## 3.6 GEOLOGY AND SOILS

This section describes the exiting geologic and soil conditions and analyzes the potential for impacts related to geological hazards that could result from the proposed Ocean Avenue Project (Project). Potential issues of concern related to geology and soils include fault rupture, ground shaking, liquefaction, dynamic dry settlement, expansive soils, and landform/landslide. Additionally, this section also describes and evaluates the potential impacts of the proposed Project related to paleontological resources and unique geological features.

### 3.6.1 Environmental Setting

Regional Geology

*The Project site is located on Ocean Avenue at the corner of Santa Monica Boulevard, approximately 200 feet inland from the Santa Monica Palisades Bluff on top of an uplifted marine terrace. The topography of the Project site is relatively level, with an elevation of approximately 65 feet above mean sea level.*

The City of Santa Monica (City) is located within the northwestern Coastal Plain of the Los Angeles Basin and the Peninsular Ranges Geomorphic Province in Los Angeles County. The Los Angeles Coastal Plain is a deep, sediment-filled basin that generally drains to the southwest. Erosion of the Santa Monica Mountains – located approximately 3.5 miles north of the Project site – has resulted in the accumulation of a few hundred feet of alluvium to form this broad alluvial fan. This portion of the Los Angeles Basin has been uplifted to form the existing gently rolling topography towards the southeast. The slope of the Los Angeles Coastal Plain within the vicinity of the Project site rises from sea level at the coast to approximately 375 feet above mean sea level in the northeastern portion of the City. The City is geologically bounded to the north by the Santa Monica Mountains, Elysian Hills, and Repetto Hills; to the east by the Merced Hills, Puente Hills, and Santa Ana Mountains; and to the south and west by the Pacific Ocean. Along the coastline west of the City's Downtown, vertical cliffs and bluffs below Palisades Park average approximately 100 feet in height.

Geologic deposits underlying the Downtown and the Project site consist predominantly of older surficial sediments of Pleistocene age (Qoa) (2.6 million years ago to 11,700 years before present) and surficial sediments of Holocene age (within the past 11,700 years). The older surficial sediments are composed of moderately to well consolidated, slightly to well cemented gray to light

brown, pebble-gravel, sand, silt, and clay. As previously described, these sediments are derived from the nearby Santa Monica Mountains. The more recently deposited surficial sediments, located in the eastern portion of the Downtown, are composed of unconsolidated and uncemented alluvial gravel, sand, and silt-clay also derived largely from the Santa Monica Mountains (Yerkes 1997; Dibblee 1991).

Southern California is seismically active with a range of faults present in the region. Faults are characterized by the California Geological Survey (CGS) as active, potentially active, or inactive according to the last seismic activity of the fault (CGS 2010). Active faults are faults that show evidence of surface displacement within the past 11,700 years (i.e., during the Holocene age). Potentially active faults are those that show evidence of fault rupture between 11,700 and 2.6 million years ago (i.e., during the Pleistocene age).[1] Inactive faults are those without recognized activity within the past 2.6 million years. Buried (i.e., blind) thrust faults are faults that do not have a surface expression but are still a potentially significant source of seismic activity. They are typically defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the Southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake, such as the Northridge Earthquake in 1994, which was produced by the Northridge blind thrust fault (Geotechnologies, Inc. 2019). No known active or potentially active faults are located within the Downtown; however, as discussed below, there are numerous faults in the Los Angeles area that are categorized as active or potentially active (CGS 2010).

The dominant geologic structural features in the region are northwest trending fault zones. Regional faulting and seismicity in Southern California is largely determined by the San Andreas Fault Zone, which extends from Baja California to the Oregon Coast. The San Andreas Fault Zone separates two of the major tectonic plates that comprise the earth's crust. The Pacific Plate is located west of the San Andreas Fault Zone and moves in a northwesterly direction relative to the North American Plate, which is located east of the San Andreas Fault Zone. This relative movement between the two plates is the driving force of fault ruptures (i.e., earthquakes) in western California. The San Andreas Fault generally trends northwest-southeast. However, north of the Transverse Ranges Province, the fault trends more in an east-west direction – generally known as the Big Bend – causing the fault's right-lateral strike-slip movement, which produces north-south compression between the two plates. This compression has produced rapid uplift of many of the

[1]Note: Quaternary was previously recognized to extent to 1.6 million years. Recent studies have extended the Quaternary system to 2.588 million years (California Geological Survey 2016).

mountain ranges in Southern California. North-south compression in Southern California has been estimated from 5 to 20 millimeters per year (mm/year) (City of Santa Monica 2017).

Regional Groundwater Basin

The Los Angeles Coastal Plain is divided into several distinct basins, which are formed by geologic features such as non-water bearing bedrock, faults, and other features that impede the flow of groundwater (City of Santa Monica 2010b). The City is located within the Santa Monica Groundwater Basin, a sub-basin of the Los Angles Groundwater Basin. The Santa Monica Groundwater Basin is further divided into five sub-basins, including the Coastal and Olympic sub-basins underlying the Downtown and the Charnock, Crestal, and Arcadia sub-basins, which are further removed (i.e., inland) from the Downtown. Groundwater occurs in all deposits of the sub-basin from the recent alluvium down to the fractured Tertiary sediments. Groundwater movement in the basin trends toward the south with some minor subsurface flow toward the west.

Project Site Geology

A site-specific Geology and Soils Investigation was prepared for the proposed Project by Geotechnologies, Inc. in April 2019 (see Appendix F). Additionally, Geotechnologies, Inc. conducted a previous geotechnical investigation at 1318-1324 2nd Street, located adjacent to the northwest of the Project site. This previous geotechnical investigation was most recently reviewed and revised in 2013; due to the existing data on geologic features and soil characteristics in close proximity to the Project site, this investigation was utilized by Geotechnologies, Inc. for inferred soil and groundwater data at the Project site.

*The Project site is generally flat covering approximately 1.89 acres in the Downtown. Soils underlying the Project site are classified as Site Class D, stiff soils that are relatively stable.*

The Project site is highly developed, resulting in a relatively level surface and at an elevation of 70 to 80 feet (Geotechnologies, Inc. 2019). The City identifies the soil underlying the Project site as Ramona Loam soil (City of Santa Monica 2018a). These sandy, gravelly, and silty soils are typically well-drained and stable with slow to medium runoff and moderate permeability.

During the previous geotechnical investigation at the adjacent site, two soil borings were drilled to depths of 40 and 70 feet below ground surface (bgs) (see Table 3.6-1). The first 4 inches of the soil

profiles from these borings included asphalt from previous development. Fill was found from 0.5 to 2.5 feet bgs and consisted of sandy and silty clay. Subsurface soil consisted of asphalt, artificial fill, and a range of sandy, silty, and clay soils. The soil 2.5 to 5 feet bgs consisted of sandy to clayey silt. The soil from 5 to 12.5 feet bgs ranged from sandy silt to clayey silt. The soil from 12.5 to 20 feet bgs was stiff sandy silt with gravel. Soils from 20 to 30 feet bgs were categorized as a range of sandy silt and silty. Slate fragments were identified from 20 to 22.5 feet bgs and minor amounts of gravel were discovered between 22.5 and 27.5 feet bgs. The soils from 30 to 35 feet bgs consisted of sandy to clayey silt. Subsurface soils were moist from 0.5 inches until groundwater, which was identified at 62.5 feet bgs.

**Table 3.6-1. Soil Profiles of Each Boring at the Adjacent 1318-1324 2nd Street**

| | Boring 1 | Boring 2 |
|---|---|---|
| Asphalt | Top 4 inches | Top 4 inches |
| Artificial Fill | 0.5 to 2.5 feet | 0.5 to 2 feet |
| Terrace Deposits | 2.5 to 70 feet | 2 to 40 feet |
| Total Depth | 70 feet | 40 feet |
| Groundwater | 62.5 feet | No Water |

Source: Geotechnologies, Inc. 2019; see Appendix F.

Project Site Groundwater

Based on the findings of the adjacent subsurface soil investigations, groundwater was identified at a depth of 62.5 feet bgs. Additionally, a site-specific Phase I Environmental Site Assessment (ESA) prepared for a nearby property located to the southeast at 402 Colorado Avenue identified groundwater at 47 feet bgs (see Appendix F). Therefore, the depth to groundwater at the Project site is likely between 47 and 62.5 feet bgs. The Project site is located within the City's "Downtown Drainage and Infiltration Device Prohibition Zone," which prohibits the onsite percolation of surface water into the ground to minimize the risk of bluff instability at the adjacent Santa Monica Palisades Bluffs and associated Palisades Park (see Section 3.8, *Hydrology and Water Quality*).

Geologic Hazards

*Fault Rupture*

Fault rupture involves the displacement and cracking of the ground surface along a fault trace. Fault ruptures are visible instances of horizontal or vertical displacement, or a combination of the two typically confined to a narrow zone along the fault (City of Santa Monica 2017). Fault rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (i.e., earthquake hypocenter) is shallow.

As discussed in Section 3.6.2, *Regulatory Framework*, the Alquist-Priolo Earthquake Fault Zoning Act of 1971 (Act) regulates development near active faults to mitigate the hazard of surface fault rupture. The Act requires the State Geologist to establish regulatory zones, also known as Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones, as appropriate. Before a project can be permitted, local agencies must require a geologic investigation to demonstrate proposed buildings would not be constructed across active faults. An evaluation and written report of the specific project site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back – generally 50 feet – from the fault (CGS 2013).

There are no Alquist-Priolo Earthquake Zones within the Downtown and the Project site does not fall within the City's Fault Hazard Management Program (Geotechnologies, Inc. 2019). Per the Earthquake Fault Zone Map for the Beverly Hills Quadrangle Map, the closest Earthquake Fault Zone is associated with the Santa Monica Fault which is located approximately 1 mile north of the Project site (California Department of Conservation 2019b). The Santa Monica Fault is identified as an active fault. This fault zone was recommended and adopted as an Alquist-Priolo Earthquake Fault Zone in 2018 (California Department of Conservation 2018). Since the City's incorporation, there have been no recorded fault ruptures within the City as a result of an earthquake.

*Seismicity and Earthquakes*

Historically, the City has experienced seismic activity from various regional faults. The strongest, most recent regional seismic event was the Northridge Earthquake generated from the Northridge Fault in January 1994. The epicenter of this event was approximately 12 miles northeast of the City in Northridge, California. Santa Monica experienced extensive damage from the Northridge Earthquake resulting in eventual demolition of many damaged buildings, particularly in the Downtown where older buildings were not seismically fitted to withstand ground-shaking of significant magnitudes. Additionally, the *October* 1987 Whittier Narrows earthquake was centered on the City of Rosemead beneath the Elysian Park/Montebello Hills area of Los Angeles County. Damage was not as extensive as with the Northridge Earthquake, and no surface fault ruptures were observed (City of Santa Monica 2010b).

The fault passing closest to the Project site is the Santa Monica Fault, located approximately 1.14 miles (refer to Figure 3.6-1; refer also to Table 3.6-1). The Santa Monica Fault is subdivided into 5 segments (Olson 2018). Segment 1 is the westernmost segment beginning as the Santa Monica Fault starts onshore at the Pacific Palisades and extends to the northeast towards the Santa Monica Canyon. Segment 2 consists of several strands trending to the east through the City and south of Brentwood Knoll. Segment 3 and Segment 4 trend northeasterly and are expressed as semi-continuous series of linear scarps in the older alluvial fan deposits. Segment 4 additionally runs parallel of Santa Monica Boulevard. Segment 5 is a single trace in the Benedict Canyon Wash alluvial plain trending northeast.

*The Santa Monica Fault is the nearest active fault to the Project site, located approximately 1.14 miles to the north. Though the frequency of larger seismic events is very low, earthquakes in the magnitude range 6.9 to 7.2 are plausible scenarios for the Santa Monica Fault (see Appendix F).*

The Santa Monica Fault system is characterized with an oblique left-lateral strike-slip movement with an estimated a total slip rate of 1.0 to 1.5 mm/year and causing earthquakes with magnitudes ranging from 6.9 to 7.2 (Metro 2011). Segments of the Santa Monica Fault Zone run through Santa Monica but are not found within the Downtown. The location of the Santa Monica Fault is not precisely known because nearly the entire onshore portion of the fault is covered by development, and the age of the last earthquake on the fault is unknown. The precise location of the segments is interpreted differently by different investigators but is characterized in the most recently available studies as occurring within a 300-foot band running east-west from Pacific Palisades to Century City. To address hazards associated with this fault, the Safety Element of the City's General Plan established a Fault Hazard Management Zone for the Santa Monica Fault. The City does not classify any portion of the proposed Project site as part of the Fault Hazard Management Zone (Geotechnologies Inc. 2019).

In addition, there are two major, potentially active buried thrust fault structures in the Los Angeles area: the Elysian Park fold and thrust belt and the Torrance-Wilmington fold and thrust belt (see Table 3.6-2; see Appendix F).

**Table 3.6-2. Active and Potentially Active Faults in the Project Vicinity**

| Fault Name | Distance to Project site | Onshore or Offshore Fault | Estimated Maximum Magnitude |
|---|---|---|---|
| Santa Monica Fault | 1.14 miles to the north | Onshore/Offshore | 7.4 |
| Anacapa-Dume Fault | 3.16 miles to the northwest | Offshore | 7.2 |
| Palos Verdes Fault | 4.6 miles to the southwest | Onshore/Offshore | 7.7 |
| Newport-Inglewood Fault | 6.49 miles to the southeast | Onshore | 7.5 |
| Hollywood Fault | 7.09 miles to the northeast | Onshore | 6.7 |
| Verdugo Fault | 16.2 miles to the northeast | Onshore | 6.9 |
| Raymond Fault | 17.38 miles to the northeast | Onshore | 6.8 |
| Sierra Madre Fault System | 19.28 miles to the northeast | Onshore | 7.3 |
| Santa Susana Fault | 17.00 miles to the west-northwest | Onshore | 6.9 |
| San Gabriel Fault System | 24.32 miles to the northeast | Onshore | N/A |
| Whittier Fault | 25.83 miles to the southeast | Onshore | 7.8 |

Source: Geotechnologies, Inc. 2019; see Appendix F.

**Table 3.6-3. Buried Thrust Fault Related Earthquakes in the Los Angeles Area**

| Buried Thrust Fault | Earthquake | Date of Earthquake | Magnitude |
|---|---|---|---|
| Elysian Park | Whittier Narrows Earthquake | October 1, 1987 | 5.9 |
| Torrance-Wilmington | Malibu Earthquake | January 19,1989 | 5.0 |
| Unidentified Buried Thrust Fault | Northridge Earthquake | January 17, 1995 | 6.7 |

Source: Geotechnologies, Inc. 2019; see Appendix F.

In the event of an earthquake, the Downtown would be subject to high-frequency strong ground motions lasting an estimated 30 seconds with potential horizontal ground accelerations of about 0.35g[2], which could potentially result in damage, particularly to older buildings and infrastructure, liquefaction, and risk to human health (City of Santa Monica 1995). The Downtown currently includes older buildings that do not meet current City of Santa Monica Building Code (SMBC) and California Building Code (CBC) building standards. Buildings that were constructed prior to 1996 may sustain significant damage during a seismic event and the aftershocks that follow. In cases of moderate to major earthquakes, older buildings suffer the most damage due to failures in the building's structural system. In 2014, the City's Department of Public Works began work to identify these buildings to determine the extent of seismic risk and potential effects to public safety. None of the structures on the Project site have been identified as being structurally deficient, hazardous, unsafe, or requiring retrofit as part of this effort (City of Santa Monica 2019).

[2] G-force is a unit of force equal to the force exerted by gravity and is used to indicate the force to which a body is subjected when it is accelerated, in this case from seismic ground shaking.


wood.

**Geologic Hazards**

**FIGURE 3.6-1**

### Liquefaction

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, and water-saturated soils. Liquefaction occurs when ground shaking transforms granular material from a solid state to a liquefied state due to earthquakes, which can induce an increase in pore water pressures in the soils when shaken. Liquefaction hazard may exist in areas where depth to groundwater is 40 feet or less below ground surface (CGS 2001). As previously described, groundwater at the Project site is estimated at a depth of between 47 feet bgs to 62.5 feet bgs. Unconsolidated silts, sands, and silty sands are most susceptible to liquefaction. Structures that are most vulnerable to liquefaction include buildings with shallow foundations, railways, buried structures, pipelines, retaining walls, utility poles, and towers.

Liquefaction risk in the City is limited to a linear area along the coastline stretching from the waterline inland to Ocean Avenue, a distance of approximately 1,000 feet (CGS 2001). Additional liquefaction potential within the City limits includes an area of approximately 78 acres on the northwest City boundary and an area of approximately 2.4 acres along the southern boundary of the City (refer to Figure 3.6-1) (City of Santa Monica 2014). The Project site is located inland of Ocean Avenue and is not located within a "liquefiable area" as designated in the State of California Seismic Hazards Map (Geotechnologies, Inc. 2019). The potential for liquefaction at the Project site is categorized as low by the City Geologic Hazards Map (City of Santa Monica 2014). Further, the depth of groundwater at the Project site – between approximately 47 and 62.5 feet bgs – make it highly unlikely that liquefaction would occur (Geotechnologies, Inc. 2019).

### Landslides and Slope Instability

The stability of slopes is affected by a number of factors including gravity, rock and soil type, and amount of water and vegetation present. Events that can cause a slope to fail include but are not limited to sudden movements, such as those during a seismic event, modification of the slope by nature or human activities, undercutting caused by erosion, and changes in hydrologic characteristics (Caltrans 2001).

The Project site is located immediately east of the Santa Monica Palisades Bluffs and Palisades Park. The Project site is not located in an area designated by the CGS Seismic Hazard Maps for Earthquake-Induced Landslides (California Department of Conservation 2019b). Although the Project site is setback more than 200 feet from the edge of the Santa Monica Palisades Bluffs, the City's Geologic Hazards Map shows the southern portion of the Project site seaward of 1st Court is located in a "High Risk" area for landslide susceptibility (City of Santa Monica 2014). However, according to the City's *Guidelines for Geotechnical Reports*, zones delineated on the State Seismic

Hazard Maps supersede those shown on the City Geologic Hazards Map (City of Santa Monica 2010a). The State of California Seismic Hazards Maps prepared by CGS indicate that the potential for "Earthquake-Induced Landslides" only exists on the face of the coastal bluff itself. The State of California Seismic Hazards Maps do not address other causes of landsliding such as saturated soil, traffic vibration, or excessive surface runoff.

The Seismic Hazards Maps prepared by CGS indicate the Project site is not located within an "Earthquake Induced Landslide" zone (California Department of Conservation 2019b). Further, slope stability analyses indicate the slope of Santa Monica Palisades Bluffs has gross deep-seated stability. Older alluvium soils underly the Project site, which are stiff and well consolidated (Geotechnologies, Inc. 2019). The composition and structure of underlying soils, the distance of the site to the slope face, and previous bluff analyses conducted for the adjacent site indicate there is not a significant risk of deep-seated slope instability at the Project site (Geotechnologies, Inc. 2019).

### Tsunami Risk

A tsunami is a wave or surge most commonly caused by an earthquake beneath the sea floor. The Project site is located outside of the City's tsunami identified inundation zone and would not likely be affected by a tsunami (California Department of Conservation 2009).

*Soil and Surface Hazards*

Many of the properties, including the Project site, have been previously developed and are underlain by a layer of fill soils with native soils underneath. These soils and surfaces can be subject to risk from hazards related to erosion, expansion, subsidence, settlement, consolidation, and/or collapse. These hazards can result from the nature of the soils themselves, physical site conditions, or the presence of groundwater.

### Erosion Potential

Erosion of exposed soils and rocks occurs naturally as a result of physical weathering caused by water and wind action. The potential for erosion increases with steeper slopes, hydrologic events, and exposed soils. Currently, the Project site is level with no distinguishable slopes and is developed with existing buildings and associated surface parking lots consisting of landscaping and impervious surfaces, such as concrete and asphalt. Therefore, due to the very small quantity of soil currently exposed at the surface of the Project site, and the level nature of the Downtown the potential for erosion is extremely low.

### Expansive Soils

Expansive soils tend to swell with seasonal increases in soil moisture in the winter months and shrink as soils become drier in the summer months. Repeated shrinking and swelling of the soil can lead to stress and damage of structures, foundations, fill slopes and other associated facilities (City of Santa Monica 2017).

Section 1803.2 of the 1994 Uniform Building Code (UBC) directs expansive soil tendency be categorized by Expansion Index (Table 1), while Section 1803.5.3 of the CBC define expansive soils by Plasticity Index and soil particulate size, or by Expansion Index. The UBC mandates that "special [foundation] design consideration" be employed if the Expansion Index is 20, or greater, as recorded in UBC Table 18-1-B. The CBC mandates that "special design and construction provisions for foundations of structures" be employed if structures are to be founded on expansive soils.

The Project site is underlain by Ramona Loam soils, which have a low to moderate expansion potential. During the 2013 geotechnical investigation conducted at 1318-1324 2nd Street, located adjacent to the northwest of the Project site, the bulk samples of the underlaying soils were tested and determined to be in the moderate expansion range with an Expansion Index values of 50 (Geotechnologies, Inc. 2019).

### Subsidence

Subsidence is the downward shift of the ground surface and is most frequently caused by subsurface withdrawal of water (i.e., groundwater drawdown), oil, or natural gas earth extraction (e.g., subsurface mining), faulting, or seasonal changes in soil moisture. Compaction of soils in some aquifer systems can accompany excessive groundwater pumping and is the largest cause of subsidence (City of Santa Monica 2017).

The City has areas of potential subsidence associated with past withdrawal of groundwater, oil production, and former clay mining activities groundwater overdraft has not been a concern since 1942, when years of substantial pumping lowered the groundwater table (City of Santa Monica 1995). No drop in groundwater levels have been noted in association with the recent drought years. The Santa Monica Groundwater Basin has been identified as a medium-priority groundwater basin by the Department of Water Resources, although it has not been identified as being in overdraft conditions (City of Santa Monica 2018b).

The proposed Project site is not located within a zone of known subsidence due to oil or any other fluid withdrawal **(**Geotechnologies, Inc. 2019). Based on the substantial depth to groundwater

between approximately 47 and 62.5 feet bgs, the risk of subsidence onsite is considered very low (Geotechnologies, Inc. 2019).

**Differential Settlement**

Differential settlement is the process whereby soils settle non-uniformly, potentially resulting in stress and damage to utility pipelines, building foundations, or other overlying structures (City of Santa Monica 2017). While strong ground-shaking often greatly exacerbates soil conditions already prone to differential settlement, such movement can also occur in the absence of seismically-induced ground failure. Differential settlement results in distress and displacement for overlying structures. Elongated structures, such as pipelines, are especially susceptible to damage as a result of differential settlement.

The risk of differential settlement is considered low in the Downtown. Some seismically induced settlement of the Project site should be expected as a result of strong ground-shaking; however, excessive differential settlement is not anticipated due to the uniform nature of the underlying soils. (Geotechnologies, Inc. 2019). Ramona Loam soils, which underlay the proposed Project site are considered to have a low potential for differential settlement.

**Hydroconsolidation**

Hydroconsolidation (i.e., soil collapse/settlement) typically occurs where recent soil materials have been deposited into arid or semi-arid environments, such as Southern California. When saturated collapsible soils lose volume, settlement of overlying structures may occur. This results in rapid compaction and settlement. Hydroconsolidation potential of the adjacent sites soils was considered through five consolidation tests. Two tests indicated evidence of minimal collapse upon saturation of the sample, and the remaining three showed less than a 0.5 percent of collapse. Ramona Loam soils, which were determined to underlie the existing proposed and adjacent site do not exhibit hydroconsolidation characteristics, and the Project site is not considered to be prone to hydroconsolidation (Geotechnologies, Inc. 2019).

Paleontological Resources and Unique Geological Features

Paleontological resources are the evidence of once-living organisms as preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). In general, fossils are considered to be older than recorded human history, or greater than 5,000 years old, and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010).

The geologic setting is key to understanding potentially important paleontological resources in the Project site. As described in above, the Project site is located in the Los Angeles Coastal Plain and is underlain by older alluvium consisting of gray to light brown pebble gravel, sand, and silt-clay (Geotechnologies, Inc. 2019).

A search of Natural History Museum of Los Angeles County's (LACM's) paleontological locality database was conducted to identify information on paleontological localities within, and in the vicinity of, the Project site and to determine if fossil resources have previously been recovered from geologic units that could be encountered by subsurface excavations associated with the proposed Project. The search of the LACM's paleontological locality database found no known paleontological localities recorded within the Project site (McLeod 2019). However, two paleontological localities have been recorded in the vicinity of the Project site and from within similar geologic units that would be encountered by subsurface excavations at the Project site. Paleontological resources recovered from the two neighboring localities include a skull of the extinct American lion (*Felis atrox*) recovered at approximately 6 feet bgs and material from an extinct horse (*Equus* sp.) and ground sloth (*Paramylodon* sp.) recovered at approximately 11 feet bgs.

### 3.6.2 Regulatory Framework

State Policies and Regulations

***Geology and Soils***

State policies and regulations have been developed in California concerning types of development, building standards and locations of seismic hazards. These regulations include:

*Alquist-Priolo Earthquake Fault Zoning Act* (1972). The purpose of this Act is to regulate types of development near active faults to mitigate the hazard of surface rupture. Under this Act, the State Geologist is required to delineate earthquake fault zones, or Alquist-Priolo Fault Zones along known active faults in California and requires that geologic studies be conducted to locate and assess any active fault traces in and around known active fault areas prior to development of buildings for human occupancy. The Alquist-Priolo Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. Local cities and counties must regulate certain development projects within the Earthquake Fault Zones, generally by issuing building permits only after geologic investigations demonstrate that development sites are not threatened by future surface displacement. A buffer prohibiting the construction of structures for human occupancy may be established. Typically, structures for human occupancy are not allowed within

50 feet of the trace of an active fault. Projects subject to these regulations include all land divisions and most buildings intended for human occupancy.

*California Building Code (CBC)* (2019). The State of California provides minimum standards for building design through the CBC, which is based on the International Building Code (IBC), but has been modified to account for California's unique geologic conditions, including the State's heightened seismicity risk. The CBC (Title 24 of the California Code of Regulations) is updated triennially, and the most recent 2019 code became fully effective on January 1, 2020. The CBC applies statewide and is selectively adopted by local jurisdictions based on local conditions. The City through the Santa Monica Municipal Code (SMMC) Chapter 8.12, *Building Code*, has adopted the CBC, 2019 Edition, as part of its building regulations.

Section 1803.5.3 of the CBC states that in areas likely to have expansive soil, the building official shall require soil tests to determine where such soils do exist. Soils meeting all four of the following provisions shall be considered expansive, except that tests to show compliance with Items 1, 2, and 3 shall not be required if the test prescribed in Item 4 is conducted:

1. Plasticity index (PI) of 15 or greater, determined in accordance with American Society for Testing and Materials (ASTM) D 4318.
2. More than 10 percent of the soil particles pass a No. 200 sieve (75 micrometers), determined in accordance with ASTM D 422.
3. More than 10 percent of the soil particles are less than 5 micrometers in size, determined in accordance with ASTM D 422.
4. Expansion index greater than 20, determined in accordance with ASTM D 4829.

*Seismic Hazards Mapping Act*. In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the Downtown are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The City is mapped as part of the Beverly Hills Quadrangle Seismic Hazard Zone Map.

The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health

and safety. Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

***Paleontological Resources***

*Public Resources Code Sections 5097.5 and 30244*. Other state requirements for paleontological resources are included in Public Resources Code Section 5097.5 and Public Resources Code Section 30244. Section 5097.5 states that "a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." Section 5097.5 also states that "a violation of this section is a misdemeanor, punishable by a fine not exceeding ten thousand dollars ($10,000), or by imprisonment in a county jail not to exceed one year, or by both that fine and imprisonment." This section defines public lands as "lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof."

Section 30244 states that "where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required."

*Society for Vertebrate Paleontology Guidelines*. The SVP has established standard guidelines that outline professional qualifications, protocols, and practices for paleontological resources assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, specimen preparation, identification, analysis, and curation (SVP 2010). Most practicing professional vertebrate paleontologists adhere closely to the assessment, mitigation, and monitoring requirements as specifically provided in the SVP Guidelines. Most state regulatory agencies with paleontological resource-specific Laws, Ordinances, Regulations, and Standards (LORS) accept and use the professional standards set forth by the SVP.

<u>Local Policies and Regulations</u>

***Geology and Soils***

*Santa Monica General Plan Safety Element*. The Safety Element (1995) contains goals and policies aimed at reducing the risk of natural disasters and man-made hazards. With the basic

objective of the Safety Element is to reduce death, injuries, property damage, and economic and social impact from hazards. The Safety Element provides the following goals and policies addressing issues of protecting the public from earthquake and landslide hazards and minimizing the impact of strong ground motion, liquefaction, and fault rupture:

**Goal 1:** Minimize the economic impact of strong ground motion, liquefaction and fault rupture on public and private property, and protect the public from earthquake hazards.

Policy 1.1 The City shall promote strengthening of planned utilities (when feasible), the retrofit and rehabilitation of existing potentially hazardous structures and lifeline utilities, and the relocation of certain Critical Facilities to increase public safety and minimize potential damage from seismic and geologic hazards.

Policy 1.2 The City shall strengthen the project permit and review process to ensure that proper actions are taken to mitigate the impact of seismic hazards, to encourage structural and nonstructural seismic design and construction practices that minimize earthquake damage in critical facilities, and to prevent the total collapse of any structure designed for human occupancy.

Policy 1.2.3 Through the environmental review process, the City shall encourage special development standards, designs, and construction practices to reduce seismic risks to acceptable levels for projects involving critical facilities, large-scale residential developments, and major commercial or industrial developments.

Policy 1.3 The City shall require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process.

Policy 1.4 The City shall encourage alternative project designs or low intensity land uses during environmental and developmental review process in areas determined to have significant seismic or geologic constraints.

**Goal 2:** Protect public safety and minimize the social and economic impacts of geologic hazards on the private and public sector, as those hazards pertain to unstable slopes in the Palisades Park region, and differential settlement.

Policy 2.1 The City shall continue to use the environmental and development review process to ensure prudent development and redevelopment within areas of high landslide potential.

Policy 2.2.2 The City should identify and encourage mitigation during permit review of onsite and offsite slope instability, debris flow, and erosion of lots undergoing substantial improvements.

In order to implement the goals and policies of the Safety Element, the City primarily relies upon code compliance, such as the City Building Code, Fire Code and SMMC, with oversight by the City Building and Safety Division and the Fire Prevention Bureau of the City Fire Department.

*City of Santa Monica Natural Hazards Mitigation Plan (2013).* The City of Santa Monica Natural Hazards Mitigation Action Plan (NHMAP) includes resources and information to assist City residents, public and private sector organizations, and others interested in participating in planning for natural hazards. The NHMAP provides a list of activities that may assist City of Santa Monica in reducing risk and preventing loss from future natural hazard events. The action items address multi-hazard issues, as well as activities for earthquakes, landslides, flooding, tsunamis, wildfires and severe windstorms/thunderstorms.

*City of Santa Monica Building Code (Chapter 8.12 of the SMMC).* The SMBC sets the minimum design and construction standards for construction within Santa Monica. Grading and construction associated with a project in the City would be required to comply with the SMBC. The SMBC adopts by reference the CBC, 2019 Edition, and the IBC, 2018 Edition, with local amendments. The SMBC and the associated codes listed above contain provisions relating to geologic and soils hazards, including construction standards related to seismic hazards. The SMBC sets minimum design and construction standards, and establishes certain portions of the City as seismic and geologic hazard zones that require special design requirements for construction. Applicable sections include:

- *Section 8.12.010 – Adoption of California Building Code*. That certain document entitled "California Building Code, 2019 Edition," which adopts by reference the International Building Code, 2018 Edition, as published by the California Building Standards Commission and the International Code Council including "Seismic Hazard Maps," as published by the United States Geological Survey.
- *Section 8.12.050 – Supplemental Land Hazard Zone Regulations*. In addition to those areas recognized under the State Seismic Hazards Mapping Act, certain portions of the City are hereby established as Seismic Hazard Zones and Geologic Hazard Zones. Said zones shall

be known as outlined, illustrated and designated in the Safety Element of the General Plan on the Districting Maps. Said maps together with all legends, indices and explanatory notes thereon are hereby made a part of these codes…For the purposes of these codes, all construction within the scope of these codes that is within a Land Hazard Zone shall be subject to special design requirements, which are necessary to effect the stated purpose of these codes. Special design requirements shall conform to the guidelines of the California Department of Conservation, Division of Mines and Geology.

*City of Santa Monica Guidelines for Geotechnical Reports (2010)*. The City's *Guidelines for Geotechnical Reports* establishes standards for data and analysis for geotechnical investigations, peer review of that data, and demonstration of compliance with applicable CBC regulations and standards for review set forth by the CGS Special Publication 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California (City of Santa Monica 2010). The City's *Guidelines for Geotechnical Reports* require a site-specific assessment of seismic hazards in the geotechnical report for each project. The geotechnical investigation must be submitted to the City for review and approval before a grading or building permit can be issued by the City for a project.

### 3.6.3 Impact Assessment and Methodology

<u>Thresholds for Determining Significance</u>

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not mandatory, it is routinely sanctioned by the courts. For purposes of this Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse geological impact if:

a) The project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;

    ii. Strong seismic ground shaking;

iii. Seismic-related ground failure, including liquefaction; and/or

iv. Landslides;

b) The project would result in substantial soil erosion or the loss of topsoil;

c) The project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse;

d) The project would be located on expansive soil, as defined in Table 18-1-B of the UBC (1994), creating substantial direct or indirect risks to life or property;

e) The project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; and/or

f) The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

*Non-Applicable Threshold(s):*

e) (Septic Systems): The proposed Project would not involve the use or development of onsite wastewater treatment systems, such as septic tanks or alternative wastewater disposal systems, because sewers are available for the disposal of wastewater at the Project site. The proposed Project would not result in impacts related to the capability of soils for supporting septic systems or alternative wastewater disposal systems. Therefore, this issue will not be analyzed further in this EIR.

Methodology

*Geology/Soils*

In terms of geology and soils, the proposed Project is primarily evaluated to determine its effects on causing or increasing geological risk including but not limited to seismicity, soil stability, and paleontology resources. The evaluation is based on the site-specific geotechnical engineering investigation conducted for the Project site in 2019 with additional information provided by the previous Geotechnologies, Inc. prepared for an adjacent site and revised in 2013. Sources of regional and local information include, but are not limited to: the Safety Element of the City of Santa Monica General Plan; the City of Santa Monica Downtown Community Plan 2017; the City of Santa Monica GIS Application; the California Geological Survey; and the National Cooperative Soil Survey. Full reference list entries for all cited materials are provided in Section 7, *References*.

Due to the developed nature of the Project site, recent subsurface soil investigations have not been completed. However, as described in Appendix F, subsurface soil investigations were completed by Geotechnologies, Inc. at the adjacent 1318-1324 2nd Street in 2013. These investigations include two soil borings, collected at depths of 40 and 70 feet below grade, respectively. Though no site-specific soil borings were conducted due to the site being almost entirely paved and occupied by existing development, the borings collected for the adjacent site are considered acceptable proxies to characterize the Project site due to similar soils, site geology, topography, and surface elevation (Geotechnologies, Inc. 2019).

*Paleontological Resources*

The analysis of paleontological resources is based on a review of the LACM paleontological records search results as well as geologic map and literature reviews. The objective of the analysis was to determine the geological formations underlying the Project site, whether any paleontological localities have previously been identified within the Project site or in the same or similar formations near the Project site, and the potential for excavations associated with the Project to encounter paleontological resources. These methods are consistent with the SVP guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

Although no known paleontological resources were identified within the Project site from the LACM search, this does not preclude the existence of previously unknown buried paleontological resources within the Project site that may be impacted during construction of the proposed Project.

### 3.6.4 Applicable Mitigation Measures from the DCP

The DCP Program EIR does not include any applicable mitigation measures for potential impacts to geology and soils. However, implementation of the following DCP Program EIR Mitigation Measures (MMs) would reduce potential impacts to paleontological resources to a less than significant level:

*MM CR-4a:* ***Paleontological Monitoring.*** *Construction activities involving excavation or other soil disturbance to a depth greater than 6 feet within Downtown shall be required to retain a qualified Paleontological Monitor as defined by the SVP (2010) equipped with necessary tools and supplies to monitor all excavation, trenching, or other ground disturbance in excess of 6 feet deep. Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. In the event that a paleontological resource is discovered, the monitor will have the authority to*

*temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected if necessary.*

*The Paleontological Monitor will periodically assess monitoring results in consultation with the Principal Paleontologist. If no (or few) significant fossils have been exposed, the Principal Paleontologist may determine that full-time monitoring is no longer necessary, and periodic spot checks or no further monitoring may be recommended. The City shall review and approve all such recommendations prior to their adoption and implementation.*

*MM CR-4b:* ***Inadvertent Discovery of Fossils****. If fossils are discovered during excavation, the Paleontological Monitor will make a preliminary taxonomic identification using comparative manuals. The Principal Paleontologist or his/her designated representative then will inspect the discovery, determine whether further action is required, and recommend measures for further evaluation, fossil collection, or protection of the resource in place, as appropriate. Any subsequent work will be completed as quickly as possible to avoid damage to the fossils and delays in construction schedules. If the fossils are determined to be significant under CEQA, but can be avoided and no further impacts will occur, the fossils and locality will be documented in the appropriate paleontological resource records and no further effort will be required. At a minimum, the paleontological staff will assign a unique field number to each specimen identified; photograph the specimen and its geographic and stratigraphic context along with a scale near the specimen and its field number clearly visible in close-ups; record the location using a GPS with accuracy greater than 1 foot horizontally and vertically (if such equipment is not available at the site, use horizontal measurements and bearing[s] to nearby permanent features or accurately surveyed benchmarks, and vertical measurements by sighting level to point[s] of known elevation); record the field number and associated specimen data (identification by taxon and element, etc.) and corresponding geologic and geographic site data (location, elevation, etc.) in the field notes and in a daily monitoring report; stabilize and prepare all fossils for identification, and identify to lowest taxonomic level possible by paleontologists, qualified and experienced in the identification of that group of fossils; record on the outside of the container or bag the specimen number and taxonomic identification, if known. Breathable fabric bags will be used in packaging to avoid black mold.*

*Upon completion of fieldwork, all significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Project proponent.*

*At the conclusion of laboratory work and museum curation, a final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the Project. The report will include a summary of the field and laboratory methods, an overview of the Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.*

### 3.6.5 Project Impacts and Mitigation Measures

*Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

*i) Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

*ii) Strong seismic ground shaking?*

*iii) Seismic-related ground failure including liquefaction?*

*iv) Landslides?*

**GEO-1** **The proposed Project would not cause adverse effects to people or structures due to a fault rupture as there are no known active faults that cross the Project site. Additionally, compliance with applicable State and City regulations and the recommendations of a Design-Level Geotechnical Report would ensure that the proposed Project would not directly or indirectly cause potential**

**substantial adverse effects involving seismic shaking, seismic related ground failure, or landslides. Potential impacts would be *less than significant*.**

Impact Description (GEO-1)

*Fault Rupture*

Based on the Beverly Hills Quadrangle Seismic Hazard Zone Map, no known faults cross beneath the Project site or its immediate vicinity; therefore, the Project site is not mapped within an Alquist-Priolo Fault Zone (California Department of Conservation 2019a). The fault located nearest the Project site is the Santa Monica Fault, located approximately 1.14 miles to the north of the Project site. Therefore, the risk of fault rupture on or in the immediate vicinity is very low, and development of the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault rupture. Fault rupture related impacts would be *less than significant*.

*Seismic Shaking*

The Project site is located within the seismically active region of Southern California. During an earthquake on any of the nearby faults, strong seismic ground-shaking has the potential to affect the structural stability of the proposed buildings and would have the potential to damage buildings and structures, with associated human health risks. However, State and City standards for building construction, operation, and maintenance are in place and would be required for the proposed Project to reduce seismic risks. Proper engineering and compliance with Title 24 of the CBC and the SMMC would ensure the maximum feasible protection of the proposed Project buildings and occupants during an earthquake from local and regional faults, including the Santa Monica Fault. In addition, the Applicant has prepared a detailed geotechnical investigation for the proposed Project (Geotechnologies, Inc. 2019), which evaluates site-specific geologic hazards, including ground-shaking hazards. The report indicated that development of the proposed Project is feasible from a geotechnical perspective, including withstanding lateral ground movement from seismic ground shaking, provided that the applicable State and City regulations are met and construction and design recommendations are implemented. Finally, during the City's plan check process, a Design-Level Geotechnical Report for the Project would be required in accordance with the requirements of the City's *Guidelines for Geotechnical Reports*. All recommendations and design features in the geotechnical investigation would be required to be incorporated into the proposed building design. Therefore, compliance with State and City standards would reduce potentially significant impacts from strong seismic ground-shaking to *less than significant*.

*Liquefaction*

The Project site is not located within the State of California Seismic Hazards Map designated liquefiable area (California Department of Conservation 2019c). Liquefaction risk in the City is limited to a linear area along the coastline stretching from the waterline inland to Ocean Avenue, a distance of approximately 1,000 feet. The Project site is not located within this zone and is therefore not subject to substantial potential for liquefaction (CGS 2001). The City's Geologic Hazards Map identifies the Project site's risk for liquefaction as low (City of Santa Monica 2014). Additionally, underlying site soils are categorized as Ramona Loam with low risk of liquefaction, and impacts would be *less than significant*.

*Landslides*

The Project site is not located in a designated area by the CGS Seismic Hazard Maps for Earthquake-Induced Landslides (California Department of Conservation 2019c). However, the City Geologic Hazards Map shows the southern portion of the site is located in a "High Risk" area for landslide susceptibility, as the Project site is located east of Santa Monica Palisades Bluffs (City of Santa Monica 2014). The Santa Monica Palisades Bluffs extend for 1.6 miles along the western coastal edge of the City. The height of the bluffs ranges from 50 to 150 feet and Santa Monica Palisades Park lies atop the steep escarpment. The bluffs consist of relatively fragile alluvial soils with near-vertical slopes and peninsular soil columns. In 2004, the City of Santa Monica commissioned a geotechnical study to assess bluff stability and to provide design recommendations for enhancing bluff stability. As noted in the study, while localized erosion and bluff recession is expected due to ongoing erosion/weathering, periodic ground-shaking, and hydrology, large-scale deep-seated failures (i.e., landslides) of the bluffs are unlikely, given the stability of soils underlying bluff-top properties. Rather, issues of bluff stability are attributable only to localized failures of the bluff face in the form of shallow sloughing or toppling of exposed peninsular columns. Further, surface runoff, groundwater seepage, animal burrows, earthquake shaking, and erosion/weathering pockets on the face of the bluffs have contributed to the sloughing or toppling. Most recorded failures in the past involved breaking off of small blocks of soil from the bluff face.

To ensure the long-term stability of the bluffs, the City implemented the Bluffs Improvement Project in 2009, which included the installation of rodent controls to prevent animal burrows from weakening the bluffs, soil nails, and micro piles for further support, and various methods of subsurface drainage control, and grouting applications. As part of the reconstruction of the California Incline, the City installed stabilizing soil nails to the upper bluffs adjacent to the California Incline to strengthen the hillside and reduce erosion and landslide concerns. In

conjunction with the California Incline reconstruction efforts, the City is installed new and upgraded drainage improvements at Palisades Park to address existing drainage issues, including ponding and runoff onto the bluffs. Additionally, to ensure that runoff infiltration does not compromise the stability of the Palisades Bluffs, the City's Department of Public Works prohibits the infiltration of urban runoff for properties located west of 4th Street.

The City Geologic Hazards Map indicates the area designated as a "High Risk" for landslide susceptibility extends eastward from the coastal bluff to 1st Court. However, according to the City's Guidelines for Geotechnical Reports, zones delineated on the State Seismic Hazard Maps supersede those shown on the City Geologic Hazards Map. The State of California Seismic Hazards Maps prepared by CGS indicate the potential for "Earthquake-Induced Landslides" only exists on the face of the coastal bluff itself. The State of California Seismic Hazards Maps do not address other causes of landslides, such as saturated soil, traffic vibration, or excessive surface runoff. Similarly, the City's Online Santa Monica Mapping Application Platform (SM MAP) indicates that in the vicinity of the Downtown, only the face of the coastal bluff and the western edge of Palisades Park are subject to landslide risk.

At the nearest point, the Project site is located approximately 200 feet away from the edge of the bluff. While coastal bluff instability has the potential for catastrophic failure, the Project site is set back from the bluff with Palisades Park and across Ocean Avenue and would not involve any offsite modifications to soils or bluff structures. The Project site itself is not located on geologically unstable material or material that would become unstable as a result of the proposed Project. Further, the proposed Project would comply with all State and City building and safety regulations to ensure site alterations do not exacerbate local risk of landslides (e.g., IBC, CBC, SMMC, etc.). Therefore, impacts would be *less than significant.*

*Would the Project result in substantial soil erosion or the loss of topsoil?*

**GEO-2 The proposed Project's redevelopment of an existing paved site would not result in substantial soil erosion or the loss of topsoil. While the construction of the proposed Project would involve ground disturbance and excavation of soils, compliance with applicable State and City regulations and requirements would ensure potential impacts would be *less than significant.***

Impact Description (GEO-2)

The Project site is an existing developed area on the western edge of the Downtown consisting primarily of impervious surfaces. Topsoil is not present as the area is paved or developed with

residential, office, or commercial structures and uses. Development of the proposed Project would replace impervious surfaces with new buildings, hardscapes, and landscaped areas; therefore, soil erosion or loss of topsoil would not occur after buildout.

Construction of the proposed Project would involve the excavation of substantial amounts of soil, estimated at approximately 108,000 cubic yards (cy), and up to a depth of 35 feet bgs. Such excavation – necessary to facilitate construction of the proposed subterranean parking garage – could create the potential for soil erosion to occur as a result of stormwater runoff or by wind. These activities would expose constructed slopes and/or stockpiled soils to wind and water-driven soil erosion. Because construction would occur for a limited period of time (i.e., up to 3 years), any potential impacts involving erosion would be short-term and temporary. Nevertheless, because the Project site is greater than 1 acre in size, the Applicant would be required to prepare and implement a Project-specific Stormwater Pollution Prevention Plan (SWPPP) in order to meet the requirements of the Statewide General Permit for Construction in accordance with the National Pollution Discharge Elimination System (NPDES) program (see Section 3.8, *Hydrology and Water Quality*). The SWPPP would contain best management practices (BMPs) designed to reduce the potential for erosion (e.g., sand/gravel bags, silt fences, dust control, etc.). Additionally, the proposed Project would be required to comply with the City's Runoff Conservation and Sustainable Management Ordinance (Chapter 7.10) to address soil erosion and urban runoff. Under this ordinance, construction projects in the City must follow additional specific BMPs. These BMPs must be put into practice at the time of demolition of an existing structure, or at the start of new construction, and must remain in place until a certificate of occupancy has been issued. In accordance with the City's Runoff Conservation and Sustainable Management Ordinance, the following BMPs must be implemented during construction activities:

- A copy of the SWPPP required to be submitted to the Los Angeles Regional Water Quality Control Board (RWQCB) shall be submitted to the City at the same time.
- Polluted runoff – including runoff containing sediments and/or construction wastes – from a construction parcel shall not leave the parcel. No wash water from any type of cement and concrete machinery or concrete mix truck shall be allowed to leave the construction parcel. Any washing of equipment in the right-of-way must be contained and properly disposed.
- Any sediment or other materials that are tracked off the parcel by vehicles and equipment shall be removed the same day as they are tracked off the parcel. Where determined to be necessary by the Director of the Department of Public Works or designated representative, a temporary sediment control BMP shall be installed.

- Plastic covering shall be utilized to prevent erosion of an otherwise unprotected area, e.g., exposed or open to elements, along with treatment control BMPs to intercept and safely convey the runoff to the municipal separate storm sewer system ("MS4").
- Erosion drainage controls shall be utilized depending on the extent of proposed grading and topography of the parcel to prevent runoff, including, but not limited to, the following: (1) detention ponds, sediment ponds or infiltration pits; (2) dikes, filter berms or ditches; and/or (3) down drains, chutes or flumes.

With the implementation of BMPs in accordance with the SWPPP and the City's Runoff Conservation and Sustainable Management Ordinance, construction activities would not result in substantial erosion or loss of topsoil. With adherence to existing State and local regulations that address soil erosion, impacts potentially resulting from erosion or loss of topsoil would be less than significant.

*Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

*Would the Project be located on expansive soil, as defined in Table 18-1-B of the uniform Building Code (1194), creating substantial direct or indirect risks to life or property?*

**GEO-3 The proposed Project would not be located on an unstable geologic unit or soil that is unstable as a result of the Project. The proposed Project would require soil excavation and installation of building foundations. Adherence with applicable recommendations in a Design-Level Geotechnical Report and compliance with applicable State and City regulations and requirements would ensure potential impacts would be *less than significant.***

Impact Description (GEO-3)

Construction of the proposed Project would involve the excavation of substantial amounts of soil, estimated at approximately 108,000 cy, and up to a depth of 35 feet bgs. Without the implementation of engineering solutions during construction, such excavation could create the potential for collapse of unsupported soil walls. As such, shoring would be required to provide adequate structural support to the subterranean parking garage walls as well as the neighboring properties and buildings. Shoring involves providing supports to hold the soil walls in place and maintain overall soil strength. The shoring system recommended by Geotechnologies, Inc. (2019) is summarized in Section 2.7.6, *Excavation* and described in detail in Appendix F. Shoring would

ensure that soils would not collapse or become unstable resulting in structural damage. Shoring involves providing supports to hold the soil in place and maintain soil strength. Typical shoring systems would include soldier piles with rakes and/or tiebacks. The use of heavy equipment (e.g., pile drivers, excavators, etc.) in these phases would produce ground-borne vibration (see Section 3.12, *Noise*); however, based on analysis in the geotechnical investigation, excavation activities including shoring are not anticipated to affect coastal bluff stability (Geotechnologies, Inc. 2019). The Project site's structures at their closest point would be situated approximately 200 feet from the top of the approximately 65-foot-high Santa Monica Palisades Bluff. Additionally, the proposed Project would be designed to direct site drainage to storm drains and the Project site utilities would be maintained regularly, protecting the coastal bluffs from accelerated runoff and associated erosion. The geotechnical investigation concluded that the proposed Project would not impact coastal bluff stability, and associated impacts would be *less than significant*.

All excavation activities for the proposed Project would be required to adhere to mandatory regulations set forth by the California Occupational Safety and Hazard Administration (CalOSHA), which specify excavation requirements to protect life and safety of construction workers during excavation, as well as all requirements of Section 1541 (General Requirements) of Title 8 of the California Code of Regulations. All excavation activities would also be required to adhere with all provisions of the SMMC and CBC, including Section 3304 of Chapter 33 of the CBC (refer to Section 3.6.2, *Regulatory Framework*), which includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes. Excavation and shoring requirements are enforced through the City's plan check process, which would require that the Applicant prepare and submit excavation and shoring plans to the City's Building and Safety Division prior to the issuance of a building permit. Conformance with all applicable State and City regulations would ensure that impacts associated with soil stability would be *less than significant*.

The Project site's relatively level topography, depth to groundwater, and soil type result in limited potential for hydroconsolidation and differential settlement. Ramona Loam soils, which underlie the Project site do not exhibit hydroconsolidation or differential settlement characteristics. Additionally, the Downtown is considered at low risk of differential settlement.

During the 2013 geotechnical investigation conducted at 1318-1324 2nd Street, located immediately adjacent to the northwest of the Project site, the bulk samples of the underlying soils were tested and conservatively determined to be in the moderate expansion range with an Expansion Index values of 50 (Geotechnologies, Inc. 2019). The UBC mandates that special foundation design consideration be employed if the Expansion Index is 20, or greater, as recorded in UBC Table 18-1-B. Further, the CBC mandates that special design and construction provisions for foundations of

structures be employed if structures are to be founded on expansive soils. For the proposed Project, mandatory design features may include, but not be limited to, foundations which resist differential volume changes or prevent uplift, use of slab-on-ground foundations, removal of expansive soils, or implementation of expansive soil stabilizing techniques (see Appendix F). Mandatory compliance with applicable regulations of the CBC and implementation of standards would reduce impacts associated with soil stability to *less than significant.*

*Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

**GEO-4 Excavation activities associated with construction of the proposed Project's subterranean parking garage have the potential to encounter unique paleontological resources in the subsurface. With implementation of the DCP MM CR-4a and CR-4b, impacts would be *less than significant with mitigation*.**

Impact Description (GEO-4)

The proposed Project involves excavation of soil and earth materials up to a depth of 35 feet bgs to facilitate construction of the underground parking garage. As described in the geotechnical investigation, surficial geological units (Qa) are composed of recent alluvium deposited during the Holocene age (within the past 11,700 years) whereas older sediments deposited during the Pleistocene age (Qoa) (2.6 million years ago to 11,700 years before present) occur below the surface units to the maximum depth of expected Project-related disturbance. Given their age and sedimentary nature, these rocks have the potential to contain paleontological resources. However, the surficial sediments (Qa) are young enough that they are unlikely to contain fossil resources and are assigned a low paleontological sensitivity for containing fossil resources. Based on the age of the older alluvium (Qoa) underlying surficial sediments, which would likely to be impacted by subsurface excavations, this geologic unit is assigned high paleontological sensitivity. Further, this sensitivity assignment is confirmed by the recovery of scientifically significant vertebrate fossils from neighboring sites at depths of only 6 to 11 feet bgs that included subsurface excavations as recorded at the LACM.

Construction activities including grading and excavation could potentially uncover significant paleontological resources in undisturbed sediments. If improperly handled, such buried paleontological resources could be damaged or destroyed resulting in potentially significant, adverse impacts to these resources. Implementation of the paleontology mitigation measures identified in the DCP Program EIR (DCP MM CR-4a and DCP MM CR-4b) would ensure that any potential impacts to fossil resources would be *less than significant*.

### 3.6.6 Cumulative Impacts

*Geology and Soils*

A cumulative impact related to geology and soils would result if the proposed Project's impacts, when combined with other past, present, and future projects, would cumulatively increase the potential for the number of residents and visitors to be exposed to geologic hazards, such as ground-shaking. The occurrence frequency probability of a larger-than-expected earthquake with corresponding high ground acceleration is low. However, any structure built in the seismically active region of Southern California is inherently at risk to damage during major seismic events.

A number of approved, pending, and proposed developments (see Section 3.0, *Environmental Impact Analysis and Mitigation Measures*) are located in the Downtown. The proposed Project in combination with cumulative projects would contribute to increasing the density of the City's urban environment. Cumulative development in the area would, as such, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards

Mixed-use infill development, including but not limited to the adjacent property at 1318 2nd Street, are anticipated to include multi-story development with subterranean structures similar to the proposed Project. These types of ongoing development are expected to remove native soils on site during excavation for subterranean structures. Potential soil impacts from development within the City and the vicinity of the Project site are generally site-specific, resulting from the underlying geology or soil conditions that could adversely affect the individual structure or property. All development within the City, as listed in Table 3.0-1 in Section 3.0, *Environmental Impact Analysis and Mitigation Measures* would be required to prepare and submit site-specific Final Geotechnical Reports for review and approval by the City's Building and Safety Division prior to the issuance of grading or building permits. The Final Geotechnical Reports would include analysis of each site's geological and soil conditions prior to construction per existing State and City regulations. This analysis would include investigations of native soils on-site and the structural stability of any proposed subterranean structures to ensure each individual project is designed and engineered to withstand reasonably foreseeable seismic activity or unstable soil conditions. Final Geotechnical Reports would be prepared in accordance with the requirements of the City's *Guidelines for Geotechnical Reports*. The City's Building and Safety Division requires the approval of the Final Geotechnical Report that specifically addresses the conditions at a project site and the proposed building design at the time of final building plan check.

Additionally, the CBC includes provisions such that when a building or other structure is constructed adjacent to or adjoining an existing building/structure, it must not increase loading on other building foundations/basement walls or show that any increase is within the permitted design capacity of the other building/structure. Cumulatively, as new structures are designed and built to code, any potential detrimental effects for adjacent structures would be mitigated. Implementation of the CBC and SMMC's applicable restrictions on development would be required in the event that geological or soil conditions posed a risk to safety. Therefore, since all development would be held to the individual analysis and safety restrictions, the cumulative impacts from development on soils subject to instability, subsidence, collapse, and/or expansive soil would be *less than significant*.

*Paleontological Resources*

A cumulative impact related to paleontological resources would result if the impacts associated with the proposed Project impacts, when combined with other past, present, and future projects, would cumulatively increase the potential for loss of paleontological resources. Cumulative development such as that anticipated under the projects listed in Table 3.0-1 may uncover previously undisturbed paleontological resources and could potentially result in damage or loss of such resources. However, in most cases project-specific impacts would be addressed on a project-by-project basis.

The proposed Project would be required to comply with DCP MM CR-4a and CR-4b, requiring monitoring of construction activities, ensuring proper identification, and treatment and preservation of any paleontological resources. Implementation of these measures would reduce site-specific impacts of the proposed Project on paleontological resources to less than significant levels. Other cumulative projects in the Downtown would also be subject to the same mitigation measures. To the extent impacts on paleontological resources from cumulative projects may occur, the proposed Project's impacts would not be cumulatively considerable, and the cumulative impacts of the proposed Project would be *less than significant*.

### 3.6.7 Residual Impacts

The CBC and SMMC include comprehensive requirements and standards to ensure that all development is constructed to provide the maximum level of protection feasible and minimize the risk to life and property. Accordingly, compliance with existing SMBC and CBC standards and implementation of identified mitigation measures would reduce the risk of excavation failure and site instability. Further, DCP MM CR-4a and DCP MM CR-4b requiring the monitoring of construction activities and proper management procedures in the event of inadvertent discovery of

paleontological resources would reduce impacts associated with the proposed Project to *less than significant*.

## 3.7 GREENHOUSE GAS EMISSIONS

This section of the Environmental Impact Report (EIR) analyzes the potential environmental impacts of the proposed Ocean Avenue Project (Project) from greenhouse gas (GHG) emissions. GHG emissions would be generated during construction and operation of the proposed Project, including construction of new buildings, utilities, pavement, and other infrastructure; energy demands for building heating, cooling, and power; and generation of Project-related vehicle trips. As described further in Section 3.7.3, *Impact Assessment and Methodology*, Project-related GHG emissions have been estimated using the California Emission Estimator Model (CalEEMod) Version 2016.3.2.

There are several challenges to analyzing GHG emissions and global climate change under the California Environmental Quality Act (CEQA). Impact analyses typically address local development projects or long-term land use plans that may have local or regional impacts. In contrast, climate change presents the considerable challenge of analyzing the relationship between local projects and the potential for global environmental impacts, if any. Regarding global climate change; however, it is generally accepted that while the magnitude of global impacts is substantial, the contribution of a traditional development projects is so small that direct project-specific significant impacts – albeit not cumulatively significant impacts – are highly unlikely.

The approach to analysis of GHG emissions under CEQA is fundamentally different from the approach to analysis of criteria pollutant emissions (refer to Section 3.2, *Air Quality*). As air quality is linked to conditions in a particular air basin, it is appropriate to consider the creation of new emissions in that air basin to be an environmental impact, regardless of whether the emissions are truly "new" emissions regionally or globally. Within the global context of climate change, it is important to consider whether GHG emissions are truly "new" emissions, or are merely replacing existing emissions or being moved from one place to another. For example, the approval of a new developmental project particularly in an urban infill area such as the Downtown does not necessarily create new passenger vehicle trips – the primary source of emissions. Rather, due to the "relocation" factor, new development projects often redistribute existing mobile emissions – potentially reduce vehicles miles traveled (VMT) and associated GHG emissions. Accordingly, the use of models that measure overall emissions increases without accounting for existing emissions that will be offset will substantially overstate the impact of a development project on global climate change. This makes an accurate analysis of GHG emissions substantially different from criteria pollutant emissions, where the "addition" of redistributed emissions to a new locale have the potential to result in a substantial difference to overall air quality.

### 3.7.1 Environmental Setting

The City of Santa Monica (City) is in Los Angeles County along the coastline of the Pacific Ocean, within the South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside counties. As described in Section 3.2, *Air Quality*, the Basin is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. Climate change within the Basin is influenced by a wide range of emission sources, such as utility usage, heavy vehicular traffic, industry, and meteorology.

Land uses in the Downtown consist predominantly of retail, restaurants, and residential mixed-use buildings (City of Santa Monica 2017). Passenger vehicles, motorcycles, and trucks are the primary source of GHG emission in the Downtown. Additional sources of GHG emissions within the Downtown include the construction and maintenance of buildings, streets, and infrastructure, and building heating, cooling, and power.

<u>Overview of Global Climate Change</u>

The U.S. Environmental Protection Agency (USEPA) defines climate change as “any significant change in the measures of climate lasting for an extended period of time.” Climate change includes major changes in temperature, precipitation, or wind patterns, among other conditions, that occur over several decades or longer. These changes are caused by several natural factors, including oceanic processes, variations in solar radiation received by Earth, plate tectonics and volcanic eruptions, as well as anthropogenic (i.e., human-related) activities. The primary anthropogenic driver of climate change is the release of GHGs into the atmosphere.

The Earth’s natural warming process is known as the “greenhouse effect.” The Earth’s atmosphere consists of a variety of gases that regulate the Earth’s temperature by trapping solar energy; these gases are cumulatively referred to as GHGs because they trap heat like glass of a greenhouse. Relying on decades of research, the overwhelming majority of the scientific community agrees that human activities, which include the burning of fossil fuels to produce energy and deforestation, have contributed to elevated concentration of GHGs in the atmosphere since the Industrial Revolution (Intergovernmental Panel on Climate Change [IPCC] 2014a). The human production and release of GHGs to the atmosphere has caused an increase in the average global temperature. While the increase in global temperature is known as “global warming,” the resulting change in weather patterns is known as “global climate change.”

Potential Effects of Global Climate Change

Global climate change could result in several potential adverse physical and environmental effects, including sea level rise, flooding, increased weather variability and intensified storm events, reduced reliability of water supplies, reduced quality of water supplies, and increased stress on ecosystems that would reduce biodiversity. Climate change may have impacts to human health due to heat waves and extreme weather events, reduced air quality, and increased climate-sensitive diseases, including food-borne, water-borne, and animal-borne diseases (World Health Organization 2018). The effects of global climate change would have global consequences and adverse effects from climate change are distributed across the globe. Sensitive communities, such as low-lying communities that are more susceptible to impacts from sea level rise and flooding, may be more heavily impacted than communities in other regions.

Greenhouse Gases

GHGs consist of a variety of gases that have the potential to trap heat, mainly water vapor, carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), ozone ($O_3$), and chlorofluorocarbons (CFCs). Methodologies and regulations approved by the IPCC, USEPA, and the California Air Resources Board (CARB) focus on $CO_2$, $CH_4$, $N_2O$, and CFCs. CFCs have been banned and have no natural source, so these GHGs are not included in this analysis. The following provides a brief description of each of the relevant GHGs and their sources:

**$CO_2$** The natural production and absorption of $CO_2$ occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, trees and wood products, and as a result of other chemical reactions, such as those required to manufacture cement. $CO_2$ is constantly being exchanged among the atmosphere, ocean, and land surface as it is both produced and absorbed by many microorganisms, plants, and animals. However, emissions and removal of $CO_2$ by these natural processes tend to balance. Since the Industrial Revolution began around 1750, human-related activities have increased $CO_2$ concentrations in the atmosphere by more than 40 percent as of 2016 (USEPA 2016). Globally, the largest source of $CO_2$ emissions is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. $CO_2$ is removed from the atmosphere (or sequestered) when it is absorbed by plants as part of the carbon cycle. When in balance, total $CO_2$ emissions and removals from the entire carbon cycle are roughly equal.

**$CH_4$** $CH_4$ is emitted from a variety of both human-related and natural sources. Anthropogenic sources include the production and transport of coal, natural gas, and oil, from livestock and other agricultural practices, and from the decay of organic waste in municipal solid

waste landfills. It is estimated that up to 65 percent of global $CH_4$ emissions are related to human activities. Natural sources of $CH_4$ include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and wildfires (USEPA 2019a).

**$N_2O$** Concentrations of $N_2O$ also began to rise at the beginning of the Industrial Revolution, reaching 314 parts per billion (ppb) by 1998. Microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen, produce nitrous oxide. In addition to agricultural sources, some industrial processes (e.g., fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to the atmospheric load of $N_2O$ (USEPA 2019a).

"Global warming potential" is a simplified index – based upon radiative properties of individual GHGs – that can be used to estimate the potential future impacts of emissions of different gases upon the climate system. The common metric of carbon dioxide equivalent ($CO_2e$) is used to report a combined impact from all of the GHGs. This metric scales the global warming potential of each GHG to that of $CO_2$. GHG emissions are typically expressed in metric tons (MT $CO_2e$), millions of metric tons (Tg $CO_2e$), or billions of metric tons (Gt $CO_2e$) (USEPA 2017).

Existing GHG Emissions from Human Activity

The burning of fossil fuels (e.g., coal, oil, gasoline, diesel, etc.) especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in $CO_2$ emissions (and thus substantial increases in atmospheric concentrations). In 2019, atmospheric $CO_2$ concentrations were 412 parts per million (ppm), which represented an increase of nearly 50 percent above the pre-industrial concentrations that were present prior to 1750 (National Aeronautics and Space Administration [NASA] 2019).

*Global GHG Emissions*

The IPCC was formed by the World Meteorological Organization in 1988 to provide governments at all levels with scientific information that they can use to develop climate policies. The IPCC is the United Nation's body for assessing the science related to climate change and is responsible for tracking and reporting global emissions of GHGs. The IPCC is in the process of preparing the Sixth Assessment Report, tentatively scheduled for publication in June 2022. IPCC's Fifth Assessment Report, which was published in 2014 reported that global GHG emissions were estimated at 49 Gt $CO_2e$ per year, with $CO_2$ making up 76 percent of the total anthropogenic GHG emissions. This is an overall increase in GHG emissions of 71 percent from the 28.7 Gt $CO_2e$ of emissions in 1970 (IPCC 2014a). Annual anthropogenic GHG emissions have increased by 10 Gt $CO_2e$ between 2000 and 2010, with this increase directly coming from energy supply (47 percent),

industry (30 percent), transport (11 percent), and buildings (30 percent) sectors. About half of cumulative anthropogenic $CO_2$ emissions between 1750 and 2010 have occurred in the last 40 years. In 1970, cumulative $CO_2$ emissions from fossil fuel combustion, cement production, and flaring since 1750 were 420 Gt $CO_2e$, since 1970 to 2010, that cumulative total tripled to 1300 Gt $CO_2e$ (IPCC 2014b).

*U.S. GHG Emissions*

The U.S. emitted 6.46 billion tons of $CO_2e$ in 2017. Total U.S. emissions have increased by 1.3 percent from 1990 to 2017, but decreased by nearly 7 percent from 2010 to 2017. Fossil fuel combustion accounted for 93 percent of $CO_2$ emissions and approximately 75 percent of total U.S. GHG emissions in 2017. Of the six major sectors generating emissions through direct fossil fuel combustion – electricity generation, transportation, industrial, agricultural, residential, and commercial – electricity generation accounts for approximately 28 percent and transportation accounts for 29 percent of these emissions. Of the energy consumed in the U.S. in 2018, approximately 80 percent was produced through combustion of fossil fuels, while the remaining 20 percent came from other energy sources such as hydropower, biomass, nuclear, wind, and solar energy. In 2017, total GHG emissions by sector were 28 percent for the electric power industry, 29 percent for transportation, 22 percent for industry, 9 percent for agriculture, 6 percent for commercial, and 5 percent for residential (USEPA 2020).

*State of California GHG Emissions*

In 2017, California generated approximately 424.1 Tg $CO_2e$, or approximately 7 percent of total U.S. emissions. This is due primarily to the high population and size of California compared to other states. Despite a population increase of 6.2 percent between 2000 and 2018, the State's gross per capita emissions were reduced 24 percent from the 14.1 MT $CO_2e$ per person in 2001 to 10.7 MT $CO_2e$ per person (U.S. Census Bureau 2019; CARB 2018). This reduction indicates the contributions that energy conservation as well as energy efficiency have in reducing per capita emissions. Another factor that has reduced California's fuel use and GHG emissions is its mild climate compared to that of many other states. Reductions in 2008 and 2009 have also been attributed to the economic recession and higher fuel prices, with marked declines in on-road transportation, cement production and electricity consumption (CARB 2014c).

Transportation is the source of approximately 40 percent of the state's GHG emissions, followed by industrial sources at 21 percent, and electricity generation – both in-state and out-of-state – at 15 percent. Residential and commercial sources account for 10 percent, respectively, while agriculture accounts for 8 percent (CARB 2018).

*City of Santa Monica Emissions*

Santa Monica has been tracking local GHG emissions for over 20 years through an annual community, sector-based emissions inventory, which measures the emissions in a given region using data from energy consumption in buildings, vehicles, waste, and industry. The 2018 GHG emissions inventory for the City accounted for electricity, natural gas, gasoline, and diesel consumption, as well as solid waste generation within the City. Total existing emissions in 2018 were estimated at approximately 981,249 MT $CO_2e$, approximately 29 percent below the 1990 emission total of 1,386,642 MT $CO_2e$. The changes are largely driven by increased efficiency in vehicle fuel, reduced waste being sent to the landfill, a decline in natural gas consumption, and reduced aviation activity. The emissions reduction is also owed to increased renewable energy for electricity generation, as the City began to purchase electricity from the Clean Power Alliance (CPA) (refer to Section 3.5, *Energy*).

***Sustainable Santa Monica at a Glance***

- *In 2019, Santa Monica started to receive 100 percent renewable energy from the Clean Power Alliance.*
- *To date, the City's vehicle fleet includes over 130 electric vehicles.*
- *Despite substantial population growth, the City reduced emission levels for City operations to 6 percent below 1990 in 2018.*
- *The City aims to reduce total City emissions by 80 percent below 1990 levels by 2030.*

In addition to the sector-based inventory, the 2018 GHG emissions inventory also includes a consumption-based inventory, which focuses on the consumption of goods and services (e.g., food, clothing, electronic equipment, etc.) by residents of a city. The consumption-based method results in about 56 percent higher emissions than the traditional sector-based approach for the City, largely due to higher emissions from air travel, food, and household purchases. Vehicle transportation remains the largest source of emissions (24 percent), followed by food (17 percent), goods (18 percent), services (19 percent), air travel (7 percent), home construction (3 percent) and electricity (3 percent) (City of Santa Monica 2018a).

*Project Site*

The Project site is located within the western boundary of the Downtown at the intersection of Ocean Avenue and Santa Monica Boulevard (refer to Section 2.2.1, *Project Location* and Figure 2-1). The Project site is currently occupied with restaurant, medical spa, office, medical office, salon, and residential uses that generate operational GHG emissions associated with the building's energy and water use needs, passenger vehicle trips generated by employees and visitors to the Project site, and truck trips associated with deliveries to the Project site. As described in Section 3.7.3, *Impact Assessment and Methodology*, existing Project site operational GHG emissions were modeled using CalEEMod based on the existing land uses onsite. The Project site currently contributes 1,733.26 MT $CO_2e$ per year (see Table 3.7-1).

**Table 3.7-1. Estimated Existing Annual GHGs Emitted by Operation of the Project Site**

| Annual Emissions by Category | GHGs (MT $CO_2e$) |
|---|---|
| Area | 0.33 |
| Energy | 471.47 |
| Mobile | 1,208.48 |
| Waste | 45.78 |
| Water | 7.2 |
| **Total** | **1,733.26** |

Note: Based on existing restaurant, retail, and surface parking lot land uses onsite (see Appendix C).

### 3.7.2 Regulatory Framework

Global climate change is addressed through the efforts of various federal, state, regional, and local government agencies, as well as national and international scientific and governmental conventions and programs. These agencies work jointly and individually to understand and regulate the effects of GHG emissions and resulting climate change through legislation, regulations, planning, policymaking, education, and a variety of additional programs. The primary agencies, conventions, and programs focused on global climate change are discussed below.

International and Federal Policies and Regulations

*International Protocols.* In 1988, the United Nations established the IPCC to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In June 1992, the U.S. joined other countries in the United Nations Framework Convention on Climate Change (UNFCCC) agreement with the goal of stabilizing GHG emissions. The treaty itself set no binding limits on GHG emissions for individual countries and contains no enforcement mechanisms. In that sense, the treaty is considered legally non-binding. Instead, the treaty provides a framework for negotiating specific international treaties (i.e., “protocols”) that may set binding limits on GHGs.

The Kyoto Protocol was the first treaty made under the UNFCCC on December 1, 1997 and was the first international agreement that commits signatories to reduce GHG emissions. The Protocol sets emissions targets for developed countries which are binding under international law. The Kyoto Protocol has had two commitment periods, the first of which lasted from 2005 to 2012, and the second from 2012 to 2020. The U.S. did not ratify the Kyoto Protocol. It has been estimated that if the commitments outlined in the Kyoto Protocol were met, global GHG emissions could have been reduced by an estimated 5 percent from 1990 levels during the first commitment period of 2008 to 2012.

In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto, but no binding agreements were reached. However, countries did ratify the Copenhagen Accord, a non-binding agreement. The Copenhagen Accord, a voluntary agreement between the U.S., China, India, and Brazil, recognizes the need to keep global temperature rise to below 2 degrees Celsius (°C) or 3.6 degrees Fahrenheit (°F) and obligates signatories to establish measures to reduce GHG emissions and to prepare to provide help to poorer countries in adapting to global climate change.

Representatives from 194 United Nations member nations, including business leaders and nongovernment organizations, met in Cancun, Mexico in December 2010 to participate in the United Nations Climate Change Conference (COP-16). In all, approximately 12,000 participants met to work out the language and reduction targets of a new agreement. The result was the Cancun Agreements, a voluntary non-binding agreement similar to the Copenhagen Accord, but with broader United Nation member nation support. The Cancun Agreements set the stage for the climate conference in Durban, South Africa, where the unresolved issues – including the future of the Kyoto Protocol and a binding agreement – would be addressed. The key elements of the Cancun Agreements are as follows:

- Countries agree to keep temperature rise below 2 °C above pre-industrial levels and developed countries are urged to make more aggressive pledges on cutting emissions.
- A $30 billion package ("fast-start financing") for 2012 to aid nations taking immediate action to adapt to global warming.
- Creation of a "Global Climate Fund" that will provide financing of $100 million annually for longer-term adaptation and mitigation measures in developing countries. The World Bank was designated as its interim trustee.
- Creation of the forestry program, Reducing Emissions from Deforestation and Forest Degradation, which provides compensation for the preservation of tropical forests in developing countries.
- Specific language and a formal system for monitoring and reporting emissions. This includes a process of "international consultations and analysis" for developing countries that is "nonintrusive, nonpunitive, and respectful of national sovereignty," incorporating analysis by technical experts and resulting in a summary report.

The UNFCCC met again in December 2011 in Durban, South Africa to continue deliberating on a treaty to replace the Kyoto Protocol, which ended in 2012. The conference resulted in progress regarding the creation of a Green Climate Fund (GCF) for which a management framework was adopted.

During the second commitment period, known as the Doha Amendment to the Kyoto Protocol, participants committed to reduce GHG emissions by at least 18 percent below 1990 levels in the 8-year period from 2013 to 2020; however, the composition of participants in the second commitment period is different from the first commitment period. Of the 37 countries with binding commitments during the second commitment period, 7 have ratified. As discussed further below, rather than further amend the Kyoto Protocol, the next climate summit resulted in the Paris Agreement, which became the successor to the Kyoto Protocol.

The 2015 United Nations Climate Change Conference (COP-21) was held in Paris, from November 30 to December 11, 2015. It was the 21st annual session of the Conference of the Parties to the 1992 UNFCCC and the 11$^{th}$ session of the Meeting of the Parties to the 1997 Kyoto Protocol. The conference agreed to a legally binding deal to limit temperature rise well below 2 °C. The deal also includes a long-term emissions goal, which aims to peak global GHG emissions "as soon as possible" and to achieve "balance" between emissions and sinks in the second half of the century. Countries which have submitted targets for 2025 are then urged to come back in 2020 with a new target, while those with 2030 targets are invited to "communicate or update" them. This process will essentially be repeated every 5 years, with the first post-2020 stocktake occurring in 2023. The agreement also places a legal obligation on developed countries to continue to provide climate finance to developing countries. It also encourages other countries to provide support voluntarily – a compromise between the highly-polarized positions that have taken center stage at the negotiations. The U.S. – along with all 195 United Nations member countries present at the COP-21, committed to the Paris Agreement – and accepted it by Executive Order in September 2016. However, in June 2017, the U.S. gave notice of withdrawal from the Paris Agreement.[1]

*Federal Clean Air Act.* The USEPA is responsible for implementing federal policy to address global climate change. The federal government administers a wide array of public-private partnerships to reduce U.S. GHG emissions. These programs focus on energy efficiency, renewable energy, methane and other non-$CO_2$ gases, agricultural practices, and implementation of technologies to achieve GHG reductions.

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that $CO_2$ is an air pollutant, as defined under the Clean Air Act Amendments, and that the USEPA has the authority to regulate emissions of GHGs. The USEPA announced that GHGs – including $CO_2$, $CH_4$, $N_2O$, hydrofluorocarbons (HFCs), perfluorocarbons (PFC), and

[1] Article 28 of the Paris Agreement states a country may give notice of withdrawal from the agreement after 3 years of its start date in the country, which was on November 4, 2016 for the U.S. On November 4, 2019, the U.S. administration gave a formal notice of intention to withdraw. As the formal notice takes 12 months to take effect, the earliest possible effective withdrawal date by the U.S. is November 4, 2020, 4 years after the Paris Agreement came into effect in the U.S.

Sulfur hexafluoride ($SF_6$) – threaten the public health and welfare of the American people. This action was a prerequisite to finalizing the USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA). The standards were established on April 1, 2010 for 2012 through 2016 model year vehicles and on October 15, 2012 for 2017 through 2025 model year vehicles.

NHTSA and the USEPA issued a final action entitled the "One National Program Rule" in September 2019 to enable the federal government to provide nationwide uniform fuel economy and GHG emission standards for automobile and light duty trucks. This action finalizes critical parts of the Safer, Affordable, Fuel-Efficient (SAFE) Vehicles Rule that was first proposed in August 2018. This action makes clear that federal law preempts State and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates (USEPA 2019b). California and 22 other states filed a lawsuit in the U.S. Court of Appeals for the District of Columbia Circuit in November 2019 to block the One National Program Rule. There will not be a resolution on the merits for now, as the administration's motion is purely procedural.

On May 13, 2010, the USEPA issued a Final Rule that took effect on January 2, 2011, setting a threshold of 75,000 MT $CO_2e$ per year for GHG emissions from major industrial facilities. The USEPA has not yet adopted thresholds for other GHG sources, although carbon pollution standards have been proposed to cut carbon pollution from existing and new power plants, the largest source of GHG emissions in the U.S.

*Pavley Standards.* In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as the Pavley standards). The standards surpass the prior Corporate Average Fuel Economy standards, and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of $CO_2$ per mile by model year 2016, based on USEPA calculation methods. In 2012, standards were adopted for model year 2017 to 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of $CO_2$ per mile. According to the USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle (USEPA 2012).

State Policies and Regulations

*Executive Order S-3-05 and Assembly Bill (AB) 32.* Former Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels
- By 2020, California shall reduce GHG emissions to 1990 levels
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels

The Secretary of California Environmental Protection Agency (CalEPA) has been charged with coordination of efforts to meet these targets and formed the Climate Action Team (CAT) to implement the Order. The CAT also provided strategies and input to the CARB Scoping Plan.

In 2006, the California State Legislature adopted AB 32 (codified in Health and Safety Code Division 25.5 – California Global Warming Solutions Act of 2006), to codify the targets in Executive Order S-3-05 of reducing GHG emissions in California to 1990 levels by 2020. The California Global Warming Solutions Act of 2006 recognizes that California is a major contributor to U.S. GHG emissions. AB 32 acknowledges that such emissions cause significant adverse impacts to human health and the environment, and therefore must be identified and mitigated where appropriate. The law further requires that reduction measures be technologically feasible and cost effective. Under AB 32, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

*Executive Order B-30-15 and Senate Bill (SB) 32.* Former Governor Brown announced on April 29, 2015 through Executive Order B-30-15 a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. This order acts as an intermediate goal to achieving 80 percent reductions by 2050 as outlined in Executive Order S-3-05 above. The Executive Order aligns California's GHG reduction targets with those of leading international governments, including the 28 nation European Union. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in AB 32. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal established by Executive Order S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

SB 32, California Global Warming Solutions Act of 2006, and AB 197. SB 32 and AB 197 were both approved by former Governor Jerry Brown on September 8, 2016 and became effective on

January 1, 2017. SB 32 codified the GHG emissions target in Executive Order B-30-15 of 40 percent below 1990 levels by 2030. AB 197 is paired with SB 32, and is a measure that increases legislative oversight over the CARB, in order to ensure strategies to lower emissions favor those most impacted by climate change.

*Executive Order B-55-18.* Executive Order B-55-18 (September 2018) establishes a Statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The Executive Order demonstrates the State's continued commitment to address climate change.

*CARB: Scoping Plan.* The CARB, a part of the California EPA, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets state ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs.

On December 11, 2008, CARB adopted the first Scoping Plan (CARB 2008) as directed by Assembly Bill (AB) 32. The Scoping Plan presented a set of actions designed to reduce overall GHG emissions in California to the levels required by AB 32. The initial Scoping Plan provided an economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions target while ensuring progress in all sectors. Relative to transportation, the Scoping Plan included nine measures or recommended actions related to reducing VMT and vehicle GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project by project basis.

AB 32 requires CARB to update the scoping plan at least every 5 years. CARB released the First Update to the Climate Change Scoping Plan in May 2014 to provide information on the development of measure-specific regulations and to adjust projections in consideration of the economic recession. The 2014 Update to the Scoping Plan presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for long-term progress beyond 2020. It also identified the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In response to Executive Order B-30-15 and SB 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the

2030 target. On December 14, 2017, the 2017 Climate Change Scoping was approved by CARB on December 14, 2017 (CARB 2017). The 2017 Scoping Plan builds upon the framework established by the first Scoping Plan and 2014 Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets.

Subsequent to the 2017 Scoping Plan, CARB adopted more aggressive SB 375 targets in 2018 as one measure to support progress toward the Scoping Plan goals, which aim to get SCSs that plan to achieve, in aggregate, a 19 percent reduction in statewide per capita GHG emissions reductions relative to 2005 by 2035 from passenger vehicles. However, CARB recognized that additional state and local actions are needed to achieve the transportation system reductions necessary to meet our climate goals, which is approximately 25 percent reduction in statewide per capita GHG emissions by 2035 relative to 2005. In 2019, CARB released a 2017 Scoping Plan Update which includes a discussion of the relationship between local government actions and achievement of the State's long-term GHG emissions reduction goals, and non-binding recommendations to support local governments in their efforts to reduce GHG emissions. The 2017 Scoping Plan Update also identifies that slower growth in VMT from more efficient land use development patterns would promote achievement of the State's climate goals.

*Renewable Portfolio Standard and SB 100.* Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and expanded in 2011 under SB 2, California's Renewables Portfolio Standard is one of the most ambitious renewable energy standards in the country. The Renewables Portfolio Standard program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 (California Energy Commission [CEC] 2017b). SB 350 (Chapter 547, Statues of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030, including interim targets of 40 percent by 2024 and 45 percent by 2027. In 2018, SB 100 further increased California's Renewables Portfolio Standard and requires retail sellers and local publicly-owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by the end of 2024, 52 percent by the end of 2027, and 60 percent by the end of 2030; and requires that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

*SB 375, Sustainable Communities and Climate Protection Act of 2008.* The adoption of SB 375 on September 30, 2008 created a process whereby local governments and other stakeholders must work together within their region to achieve the GHG reductions specified in AB 32 through integrated development patterns, improved transportation planning, and other transportation measures and policies. Under SB 375, the CARB is required to set regional vehicular GHG

reduction targets for 2020 and 2035. Additionally, SB 375 required that those targets be incorporated within a Sustainable Communities Strategy (SCS), a newly required element within the Metropolitan Planning Organization's (MPO's) Regional Transportation Plan (RTP).

On September 23, 2010, CARB adopted the vehicular GHG emissions reduction targets that require a 7 percent to 8 percent reduction by 2020 and between 13 percent and 16 percent reduction by 2035 relative to emissions in 2005 for each MPO. Southern California Association of Governments (SCAG) is the MPO for the Southern California region and is required to work with local jurisdictions, including the City. CARB has determined SCAG's reduction target for per capital vehicular emissions to be 8 percent by 2020 and 13 percent by 2035.

*SB 97.* SB 97, adopted in 2007, amends CEQA to establish that GHG emissions and their effects are appropriate subjects for CEQA analysis, and directs the California Governor's Office of Planning and Research (OPR) to develop draft CEQA Guidelines for evaluating and mitigating GHG emissions and global climate change effects. In March 2010, the California Office of Administrative Law codified into law CEQA amendments that provide regulatory guidance with respect to the analysis and mitigation of the potential effects of GHG emissions, as found in CEQA Guidelines Section 15183.5. The California Resources Agency adopted the Guidelines in January 2009.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in these amendments to the CEQA Guidelines. Rather, the Guidelines require a lead agency to make a good-faith effort based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; and/or (2) rely on a quantitative analysis or performance-based standards. Further, the CEQA Guidelines identify three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

*SB 350, Clean Energy and Pollution Reduction Act.* SB 350, was adopted in 2015. SB 350 establishes California's 2030 GHG reduction target of 40 percent below 1990 levels and sets out to help the state achieve this goal by setting ambitious 2030 targets for energy efficiency and renewable electricity (CEC 2017a).

*Executive Order S-13-08, Climate Adaptation and Sea Level Rise Planning Directive.* Executive Order S-13-08 provides clear direction for how the state should plan for future climate impacts. The first result is the 2009 California Adaptation Strategy (CAS) report which summarizes the best-known science on climate change impacts in the state to assess vulnerability and outlines possible solutions that can be implemented within and across state agencies to promote resiliency.

*California Building Code (Title 24 of the California Code of Regulations [CCR]).* CCR Title 24 is known as the California Building Code (CBC). The CBC is updated triennially, and the most recent 2019 Edition of the CBC became fully effective on January 1, 2020. The 2019 Edition of the CBC includes the following:

CCR Title 24, Part 6 comprises the California's Energy Efficiency Standards for Residential and Nonresidential Buildings, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions. The 2019 standards are the most recent version, which went into effect on January 1, 2020.

*California Green Building Standard Code (CALGreen).* CCR Title 24, Part 11 comprises CALGreen, which was adopted in 2019 and went into effect January 1, 2020. CALGreen is the first statewide mandatory green building code and significantly raises the minimum environmental standards for construction of new buildings in California. CALGreen establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of Volatile Organic Compound (VOC)-emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

*Water Conservation Act of 2009 (SB X7-7).* The Water Conservation Act mandates new water conservation goals for Urban Water Management Plans (UWMPs), requiring urban water suppliers

to achieve a 20 percent per capita water consumption reduction State-wide by 2020, as described in the 20 x 2020 State Water Conservation Plan (SWRCB 2010). UWMP updates must incorporate a description of how the water supplier will achieve this reduction, in addition to SB 610 requirements (see Section 3.15, *Utilities* for further discussion of the Water Conservation Act).

*California Integrated Waste Management Act of 1989.* The California Integrated Waste Management Act of 1989 (AB 939; California Public Resources Code, Section 40000 et seq.) established waste diversion mandates, which required each city or county Integrated Waste Management Plan to include an implementation schedule which shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and, diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities. A city or county may be deemed exempt from these goals or to reduce the requirements if the city or county demonstrates that attainment of the goals is not feasible due to the small geographic size of the jurisdiction and the small quantity of waste generated. After January 1, 1995, the Act authorized the California Integrated Waste Management Board to establish an alternative goal to the 50 percent requirement, if the Board finds that the local agency is effectively implementing all source reduction, recycling, and composting measures to the maximum extent feasible.

*Assembly Bill 341.* AB 341 established a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020. Additionally, this law required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 builds on the existing AB 939 requirement that every jurisdiction divert at least 50 percent of its waste. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012. AB 341 requires any business (including schools and government facilities) that generates 4 cubic yards or more of waste per week, and multifamily buildings with five or more units, to arrange for recycling services.

*Advanced Clean Cars Program.* In 2012, the CARB adopted a set of regulations to control emissions from passenger vehicles, collectively called Advanced Clean Cars. Advanced Clean Cars, developed in coordination with the USEPA and National Highway Traffic Safety Administration (NHTSA), combined the control of smog-causing (i.e., criteria) pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle III Regulation for criteria (LEV III Criteria) and GHG (LEV III GHG) emissions, and a technology-forcing mandate for zero-emission vehicles. The goal of the program was to guide the development of environmentally advanced cars that would continue to deliver the performance, utility and safety car owners have come to expect. Advanced Clean Cars includes the following elements:

- LEV III Criteria: Reducing Smog-Forming Pollution;
- LEV III GHG: Reducing Greenhouse Gas Emissions; and
- Zero Emission Vehicle Regulation: Promoting the Cleanest Cars.

*AB 1493 (Health and Safety Code Section 42823 and 43018.5).* In response to the transportation sector accounting for a large percentage of California's $CO_2$ emissions, AB 1493, enacted in 2002, required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In setting these standards, CARB must consider cost-effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers. The Federal CAA ordinarily preempts state regulation of motor vehicle emission standards; however, California is allowed to set its own standards with a Federal CAA waiver from the USEPA, which the USEPA granted in 2009.

However, as discussed previously, the USEPA adopted Federal standards for model year 2012 through 2016 light-duty vehicles. As such, California – and States adopting the California emissions standards (referred to as the Pavley standards) – agreed to defer to the Federal standard through model year 2016. The 2016 endpoint of the Federal and State standards is similar, although the federal standard ramps up slightly more slowly than required under the state standard. The State standards require additional reductions in $CO_2$ emissions beyond model year 2016 (referred to as the Pavley Phase II standards). Also as noted above, the USEPA adopted GHG emission standards for model year 2017 through 2025 vehicles. These standards are slightly different from the Pavley Phase II standards, but the State of California has agreed not to contest these standards, in part due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally, and is stringent enough to meet state GHG emission reduction goals. In 2012, CARB adopted regulations that allow manufacturers to comply with the 2017 through 2025 national standards to meet State law.

*Low Carbon Fuel Standard (Executive Order S-01-07).* In 2007, Executive Order S-01-07 mandated the following: establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and adopt a Low Carbon Fuel Standard (LCFS) for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. In 2009, the LCFS regulations were approved by CARB and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020. beginning in 2011. In 2015, CARB approved the re-adoption of the LCFS, which became effective beginning January 2016, to address procedural deficiencies in the way the original regulation was adopted.

Regional Policies and Regulations

*South Coast Air Quality Management District (SCAQMD).* The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Los Angeles County area. To provide GHG emissions guidance to local jurisdictions within the South Coast Air Basin, the SCAQMD has organized a Working Group to develop GHG emission analysis guidance and thresholds.

As of the present date, the only regulation adopted by the SCAQMD addressing the generation of GHG emissions is the establishment of a 10,000 MT $CO_2e$ per year screening level threshold of significance for stationary/source/industrial projects for which the SCAQMD is the lead agency.

SCAQMD released a draft guidance document regarding interim CEQA GHG significance thresholds in October 2008. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary sources (i.e., industrial projects) where the SCAQMD is lead agency. SCAQMD proposed a tiered approach, whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. The tiered approach defines projects that are exempt under CEQA and projects that are within the jurisdiction of, and subject to the policies of, a GHG Reduction Plan as less than significant.

*SCAG's 2016-2040 RTP/SCS.* As required by SB 375, SCAG has adopted the RTP/SCS, which is the culmination of a multi-year effort involving stakeholders from across the SCAG region. The SCS is a newly required element of the RTP that provides a plan for meeting GHG emissions reduction targets set forth by the CARB. SCAG's 2016–2040 RTP/SCS provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RTP/SCS includes a strong commitment to reducing emissions from transportation sources and emphasizes the crucial linkages and interrelationships between the economy, the regional transportation system, and land use. Strategies for achieving goals of available, safe, sustainable, and affordable transportation include: (1) investing in bus, light rail, and heavy rail transit, passenger and high-speed rail, pedestrian and bicycle transportation corridors, infrastructure, and transportation demand management (e.g., carpooling to reduce demand for individual transport); (2) encouraging public participation in the planning processes; and (3) educating the public about available transportation methods available in the region. As discussed above, the CARB has determined SCAG's reduction target for per capita vehicular emissions to be 8 percent by 2020 and 13 percent by 2035 relative to the 2005 baseline. In June 2016, CARB determined that SCAG's 2016–2040 RTP/SCS is consistent with their GHG reduction targets (CARB 2016). Specifically, SCAG's plan is expected to help California meet

and exceed its GHG reduction goals, with estimated reductions in per capita transportation emissions of 8 percent by 2020 and 18 percent by 2035.

On November 7, 2019, SCAG's Regional Council approved the release of the Draft 2020-2045 RTP/SCS (Connect SoCal plan) for public review and comment. The comment period for the Draft Connect SoCal plan started on November 14, 2019 and ended on January 24, 2020. The Draft Connect SoCal plan includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections.

Local Policies and Regulations

*City of Santa Monica 2019 Climate Action and Adaptation Plan.* In May 2019, the City adopted the Climate Action & Adaptation Plan (CAAP) to help the City meet its goal of carbon neutrality by 2050 and its interim goal of reducing GHG emissions to 80 percent below 1990 levels by 2030. The 2019 Climate Action & Adaptation Plan identifies eight objectives that, if completed by the end of 2030, would achieve the City's interim GHG emissions reduction goal. These objectives are grouped in the following three categories: Zero Net Carbon Buildings, Zero Waste, and Sustainable Mobility. Objectives relevant to the Project include:

*Objective 1:* Achieve 100 percent renewable grid electricity.

*Objective 2*: Install 100 MW of local solar energy.

*Objective 3*: Reduce fossil fuel use 20 percent in existing buildings.

*Objective 4*: Discourage fossil fuels in new buildings.

*Objective 6*: Convert 50 percent of local trips to foot, bike, scooter & skateboard.

*Objective 7:* Convert 25 percent of commuter trips to transit.

*Objective 8:* Convert 50 percent of vehicles to electric or zero emission.

The intent of the CAAP is to provide overarching policy direction with respect to climate change through Citywide objectives and broad strategies to reduce GHG emissions. The CAAP is not a regulatory plan to be applied on a project by project basis. Rather, the City recognizes that GHG reduction goals cannot be achieved by individual projects alone, but instead requires a comprehensive Citywide approach that would include the enactment of future plans, changes to existing ordinances, and an integrated and sustainable approach to land use/transportation planning.

The following City programs and policies support or were developed to support the achievement of targeted reductions in GHG emissions listed in the CAAP.

Policy ZNC1 Implement a Community Choice Energy (CCE) Program. Implement CCE in Santa Monica, offering the highest amount of cost-competitive renewable energy. Develop programs to incentivize new local renewable-energy projects. Adopt rates to achieve 100% renewable energy by 2025.

Policy ZNC5 Adopt a Carbon Reduction Ordinance for Existing Buildings. Adopt a Carbon Reduction Ordinance to require energy benchmarking and carbon performance of existing buildings over 20,000 square feet (sf), including multifamily buildings. Require a reduction of fossil fuel use of covered buildings by 15% in five years and elimination of fossil fuel use by 2050.

Policy ZNC8 Adopt Carbon Neutral Construction Codes. Require New Construction for commercial, mixed-use and multi-family properties to achieve zero net carbon onsite or pay in-lieu carbon impact fee to offset fossil fuel use. Require electric-ready construction for future electrification of appliances and buildings systems. Ensure that affordable housing developers have additional financing or compliance alternatives available.

Policy ZNC11 Create Equitable Access to Clean Energy Programs. Partner with utilities and the Clean Power Alliance to provide free home-energy audits and upgrade incentives for low-income households and affordable housing developers and property owners.

Policy ZW1 Implement Citywide Organics Recycling. Require waste diversion stations (trash, recycling, composting) in all businesses. Develop outreach and enforcement programs to ensure commercial and residential organics recycling citywide.

Policy ZW5 Increase Construction and Demolition Debris Diversion Requirements. Explore fees and fines to create more incentives for recycling, composting and salvage, while discouraging landfill waste. Provide educational resources to promote responsible demolition and deconstruction.

Policy SM6 Complete Streets Network. Increase the extent and quality of the complete street network and greenways to ensure residents and visitors alike have safe, convenient, and affordable transportation options. Create designated bike lanes that are protected to provide greater safety and assurance for all riders. Emphasize the movement of people with greater space dedicated to space efficient and low emission modes of transportation. Lower speed limits to improve safety. Expand publicly owned spaces and work with property owners to facilitate public access.

Policy SM8 Prioritize Transit-Oriented Affordable Housing. Increase the housing-to-jobs ratio by prioritizing the expansion and investment in affordable housing located near dense transit hubs with limited parking, through local zoning and incentives.

Policy SM12 Increase Charging Infrastructure for Electric Vehicles and Electric Mobility Devices. Expand network of off- and on-street public charging stations to 1,000 ports by 2025. Provide charging stations that will accommodate a wide range of vehicle types including bicycles, scooters and other mobility devices. Provide outreach and additional incentives for renters, lower-income individuals and non-profit property owners. Implement emerging best practices in EV technology, including mobile charging, wireless charging, energy storage, and web/smartphone applications.

*Santa Monica Sustainable City Plan.* The Santa Monica Sustainable City Plan, updated in 2014, sets GHG emissions reduction targets for the City to address climate change impacts; these targets, if achieved, would result in greater GHG emissions reductions than those set by the state, at least in the short-term. The Sustainable City Plan includes targets of reducing GHG emissions by at least 30 percent below 1990 levels by 2020 for City government operations and 20 percent below 1990 levels by 2020 Citywide.

The Sustainable City Plan anticipated most reductions would come from increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of alternative transportation. The following City programs and policies support or were developed to support the achievement of targeted reductions in GHG emissions listed in the Sustainable City Plan.

- Resource Conservation Goal 1: Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable, non-recyclable and non-recycled materials, water, and energy and fuels.
- Resource Conservation Goal 2: The City should take a leadership role in encouraging sustainable procurement, extended producer responsibility and should model innovative strategies to become a zero-waste city.
- Resource Conservation Goal 3: Within renewable limits, encourage the use of local, non-polluting, renewable and recycled resources (water, energy, and material resources).
- Environment and Public Health Goal 1: Protect and enhance environmental health and public health by minimizing and where possible eliminating the levels of pollutants entering the air, soil and water.
- Transportation Goal 1: Create a multi-modal transportation system that minimizes and, where possible, eliminates pollution and motor vehicle congestion while ensuring safe mobility and access for all without compromising our ability to protect public health and safety.
- Transportation Goal 2: Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.
- Sustainable Local Economy Goal 2: Businesses, organizations and local government agencies within Santa Monica continue to increase the efficiency of their use of resources through the adoption of sustainable business practices.
- Open Space and Land Use Goal 2: Implement land use and transportation planning and policies to create compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of existing and future public transit systems.

One of the key measures included in the Sustainable City Plan increases the percent of new and substantially-rehabilitated housing that achieves Leadership in Energy and Environmental Design (LEED) certification at LEED Silver or higher. The City offers expedited plan review for buildings pursuing LEED certification. The City also adopted a policy for new municipal buildings to achieve at least a Gold rating by the U.S. Green Building Council's LEED rating system.

*Santa Monica Green Building Ordinance.* The City's Green Building Ordinance (Santa Monica Municipal Code [SMMC] Chapters 8.106 and 8.108) adopts by reference the 2019 California Green Building Standards Code with local amendments. The local amendments address electric vehicle (EV) charging capacity for electrical services and installation of dedicated multi-meter enclosures for EV charging in new multi-family buildings (see Section 3.5, *Energy*).

Additionally, Chapter 8.108 address construction and demolition (C&D) waste recycling, with a required diversion rate for C&D waste of 70 percent.

*Santa Monica Municipal Code: Chapter 8.36 Energy Code*

The City recently updated its Energy Code to provide local amendments to Title 24 Part 6 of the California Energy Code and Title 24, Part 11 of the California Green Building Standards Code. The local amendments are part of the City's efforts to achieve carbon neutrality. The revised Energy Code, which was effective on January 1, 2020, requires new buildings in Santa Monica to achieve one of two design pathways for complying with the City's Energy Code: all-electric design or mixed-fuel design. As an incentive to design all-electric buildings, a higher level of energy efficiency would be required for mixed-fuel buildings. All-electric buildings would not be subject to higher levels of energy efficiency and may be built to the State's standard design requirements. All-electric buildings powered by a combination of on-site solar and 100 percent Green Power from CPA are effectively Zero-Emission Buildings. The energy requirements for new building types are as follows:

For new single-family, duplex, and multi-family residential buildings up to three stories:

- All-Electric Building shall be designed to code established by the 2019 CEC.
- Mixed-Fuel Building shall be designed to CalGreen Tier 1 established by the 2019 CEC. CalGreen Tier 1 buildings have additional integrated efficiency and on-site renewable energy sufficient to achieve a Total Energy Design Rating of 10 or less.

For new multi-family buildings, four stories and greater, and new hotels and motels:

- All new buildings shall have a solar photovoltaic (PV) system with a minimum rating of 2 watts per square foot of the building's footprint.
- All-Electric Building shall be designed to code established by the 2019 CEC.
- Mixed-Fuel Building shall be designed to be 5 percent more efficient than the code established by the 2019 CEC. (A change from the current Energy Reach Code, which requires these buildings to be 10 percent more efficient is the result of the cost-effectiveness study.)

For all other new non-residential buildings:

- All new buildings shall have a solar PV system with a minimum rating of 2 watts per square foot of the building's footprint.
- All-Electric Building shall be designed to code established by the 2019 CEC.
- Mixed-Fuel Building shall be designed to be 10 percent more efficient than the code established by the 2019 CEC.

*Santa Monica General Plan Land Use and Circulation Element (LUCE).* The LUCE, adopted in 2010 and revised in 2017, provides a set of goals, policies, and standards to guide land use and

transportation decisions in the City through 2030. An important principle of the LUCE is to create a more sustainable Santa Monica by providing the framework to achieve the GHG reduction goals of the Sustainable City Plan. The LUCE addresses GHG emissions through its land use and transportation decisions such as focusing new land uses near transit, creating complete neighborhoods, supporting infill mixed-use projects, and affordable and diverse housing near jobs and transit. In addition, the LUCE supports a complete network of walking and bicycling, transit improvements, carpooling, car-sharing, and Transportation Demand Management (TDM) strategies to reduce vehicle trips. The following are selected LUCE policies related to GHG emissions applicable to the Project:

**Goal LU2:** Integrate Land Use and Transportation for GHG Reduction. Integrate land use and transportation, carefully focusing new development on transit-rich boulevards and in the districts, to create sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use and improving community quality of life.

Policy LU2.1 Redirect Growth. Redirect growth away from residential neighborhoods onto transit corridors, where new uses are served by convenient transportation networks.

Policy LU2.2 Transit Villages. Capitalize on the Expo Light Rail stations to create vital new complete sustainable communities with transit as a focal element, green connections and pathways, a variety of housing types and jobs, enhanced creative arts and institutions, and local-serving retail and services.

Policy LU2.5 Vehicle Trip Reduction. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle, and roadway improvements, expand transit service, manage parking, and strengthen TDM programs that support accessibility by transit, bicycle, and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle service to ensure success of the transit system.

Policy LU2.6 Active Spaces. Focus new development in defined districts to enable active places that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new

development to provide convenient and direct pedestrian and bicycle connections.

**Goal LU3:** Transition from Regional-Serving Commercial Uses to Local-Serving Uses in Areas Served by Transit. Redirect regional-serving commercial and office development potential into new housing opportunities with access to neighborhood-serving uses in transit-accessible areas as part of a citywide trip reduction strategy.

Policy LU3.2 Focus on Housing in Transit-Accessible Corridors and Districts. Focus additional housing opportunities on the transit-rich commercial boulevards.

Policy LU3.3 Focus on Local-Serving Uses. Emphasize uses which address local-serving needs and daily resources necessary to reduce vehicle trips and VMT.

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

Policy LU4.2 Uses to Meet Daily Needs. Encourage uses that meet daily needs such as grocery stores, local-serving restaurants and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips.

Policy LU4.3 Mixed-Use Associated with Transit. Encourage mixed-use development close to transit to provide housing opportunities for the community, support local businesses, and reduce reliance on automobiles.

Policy LU4.4 Pedestrian-Oriented Design. Engage pedestrians with ground floor uses, building design, site planning, massing and signage that promote vibrant street life and emphasize transit and bicycle access.

**Goal LU8:** Reduction of Vehicle Trips/Management of Congestion – Establish a complete transportation network that supports integrated land use. Ensure that transportation supports

human activity and access to land uses through a diverse multimodal transportation system that incentivizes walking, biking and transit and reduces the need for vehicle trips.

Policy LU8.1 Transportation Demand Management. Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.

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

Policy LU12.4 Sustainability. Recognize adaptive reuse as a sustainable policy, and encourage sustainable technologies, such as solar panel installation and energy retrofitting, that respect character-defining features.

**Goal T18:** Encourage a more sustainable transportation system.

Policy T18.1 Strive toward carbon neutrality by encouraging reduced VMT per capita.

Policy T18.2 Develop programs and strategies to meet $CO_2$ or VMT reduction standards established by regional, state or federal agencies.

**Goal S2:** Reduce GHG emissions from land use and transportation decisions.

Policy S2.1 Implement the VMT reducing policies of the LUCE including, but not limited to: focusing new growth in higher density, mixed-use, transit-oriented districts; focusing new growth along existing corridors and nodes; creating complete, walkable neighborhoods with goods and services within walking distance of most homes; and, implementing and supporting a wide range of pedestrian, bicycle and transit improvements in the City.

Policy S2.2 In cooperation with the state and SCAG, proactively promote the implementation of SB 375, in particular utilizing its incentives for transit-oriented development. The City will also ensure that its local plans are consistent with the SCS Plan requirement of SB 375.

Policy S2.9 Consider incorporating the "no net new P.M. peak hour vehicle trips" policy into the City's CEQA environmental analysis and require

mitigation of significant impacts for projects that will generate new net vehicle trips.

**Goal S3:** Reduce overall energy use in the City.

Policy S3.1 Actively strive to implement the City's "zero net" electricity consumption goal by 2020 through a wide variety of programs and measures, including the generation of renewable energy in the City and energy efficiency measures.

Policy S3.2 Consider a requirement for all new residential buildings to use net zero energy by 2020 and all new commercial buildings by 2030.

**Goal S4:** Increase the use of renewable energy in the City.

**Goal S5:** Improve the environmental performance of buildings.

Policy S5.1 Continue to maintain a Building Code and prescriptive compliance options that meet or exceed state requirements for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve net zero energy buildings by 2020 for low-rise residential buildings and 2030 for commercial buildings and achieve a LEED-equivalent local building code by 2020.

Policy S5.5 Encourage shade trees on south- and west-facing sides of all new buildings to reduce building energy loads.

Policy S5.6 Encourage cool roofs or green roofs on new buildings

Policy S5.8 Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks.

### 3.7.3 Impact Assessment and Methodology

Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts from GHG emissions. Specifically, the CEQA Guidelines state that a project may have a significant adverse impact related to GHG if:

a) The project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or

b) The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

According to the California Air Pollution Control Officers Association (CAPCOA), *"GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective"* (CAPCOA 2008). Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that a single project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. CEQA Guidelines Section 15064.4(b) states that *"in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonable foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions."* Due to the global context of climate change, GHG analysis is based on the cumulative impact of emissions.

Generally, the evaluation of an impact under CEQA involves comparing the project's effects against a threshold of significance. The CEQA Guidelines clarify that "*when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.*" For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon quantified threshold of significance for GHG impacts. The CEQA Guidelines do not establish a quantified threshold of significance for GHG impacts. Instead, lead agencies have the discretion to establish significance thresholds for their respective jurisdictions. A lead agency may look to thresholds developed by other public agencies or other expert entities, so long as the threshold chosen is supported by substantial evidence. SCAG, SCAQMD, and the City have not adopted a GHG significance threshold applicable to the development of mixed-use infill projects. Therefore, this analysis considers guidance documents from other agencies and CEQA to determine the appropriate approach to GHG impacts analysis.

Even in the absence of clearly defined thresholds for GHG emissions, the law requires that an agency makes a good faith effort to disclose the GHG emissions from a project and mitigate to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact. Regardless of which threshold(s) are used, the agency must

support its analysis and significance determination with substantial evidence (CEQA Guidelines Section 15064.7). The CEQA Guidelines recommends considering certain factors, among others, when determining the significance of a project's GHG emissions, including the extent to which the project may increase or reduce GHG emissions as compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Although the Project's GHG emissions have been quantified (see Table 3.7-3 and 3.7-4), neither CARB, SCAQMD, SGAG, nor the City has adopted quantitative project-level significance thresholds for assessing impacts related to GHG emissions applicable to the proposed Project. In the absence of any adopted quantitative threshold, the determination of whether the proposed Project would result in a cumulatively considerable contribution to the cumulative impacts of global climate change is based on the following:

- If the Project would conflict with (and thereby be inconsistent with) the applicable regulatory plans and policies to reduce GHG emissions, which include the City's Sustainable City Plan, CAAP, Green Building and Energy Code, and the LUCE; SCAG's 2016-2040 RTP/SCS; AB/SB 32 and SB 375; the OPR and Climate Action Team recommendations; and CARB's Climate Change Scoping Plan.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a *"water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."*

Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with programs and/or other regulatory schemes to reduce GHG emissions.

<u>Methodology</u>

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) state that lead agencies should *"make a good faith effort, to the extent possible on scientific and factual data, to describe,*

*calculate or estimate"* GHG emissions. The CEQA Guidelines note that a lead agency shall have the discretion to *"quantify the GHG emissions from a project, and/or rely on a qualitative analysis or other performance based standards."*

CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess the significance of GHG emissions quantitatively or qualitatively. Under either approach, the lead agency's analysis must demonstrate a good faith effort to disclose the amount and significance of greenhouse gas emissions resulting from a project, based to the extent possible on scientific and factual data (CEQA Guidelines Section 15064.4[a]). In its CEQA review of projects, the City has chosen to provide both a quantitative and qualitative GHG analysis for full disclosure.

The analysis of Project impacts evaluates the Project's consistencies with plans and policies that address GHG emissions in the locally and statewide as a basis for impact findings. This analysis also included quantification of estimated GHG emissions for the proposed mixed-use infill development in the interest of information disclosure. Recent research indicates that infill development reduces VMT and associated air pollutant emissions, including GHGs, as compared to previously undeveloped or "greenfield" sites. For example, a 1999 simulation study conducted for the USEPA, comparing infill development to greenfield development, found that infill development results in substantially fewer VMT per capita (39 percent compared to 52 percent) and generates fewer emissions of most air pollutants and GHGs.

*Conflict with GHG Reduction Plans*

The analysis of potential conflicts with an adopted GHG reduction plan reviews whether the Project would be aligned with implementation of applicable GHG plans at the State, regional, and local level. At the State level, the CARB's 2017 Climate Change Scoping Plan provides strategies and recommendations for achieving the meet the State's 2020, 2030 and 2050 GHG reduction targets. Additionally, the 2017 Scoping Plan Update (2019) specifically addresses transportation related GHG emissions, and provides technical information on what level of statewide VMT reduction would promote achievement of Statewide GHG emissions reduction targets and the 2017 Scoping Plan goals. Further, the California CAT Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05.

Locally, the City's GHG reduction goals are contained within the CAAP. The intent of the CAAP is to provide overarching policy direction with respect to climate change through Citywide objectives and broad strategies to reduce GHG emissions. The CAAP is not a regulatory plan to be applied directly to individual development projects. Rather, the City recognizes that GHG

reduction goals cannot be achieved by individual projects alone, but instead requires a comprehensive Citywide approach that would include the enactment of future plans, changes to existing ordinances, and an integrated and sustainable approach to land use/transportation planning. For this EIR, the analysis is focused on whether the proposed Project would support, and not hinder, the Citywide objectives and goals of the CAAP.

The City has also adopted the LUCE, Sustainable City Plan, and Green Building and Energy Code that include goals, policies and actions for the purpose of reducing local GHG emissions. Thus, if the Project is consistent with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching local and State regulations on GHG reduction.

OPR's CEQA Guidelines encourage lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. CEQA Guidelines Section 15183.5, which state that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted mitigation program, or plan for the reduction of GHG emissions that includes the following elements:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

*Project Net GHG Emissions Estimate*

For disclosure in this EIR, total GHG emissions (i.e., construction and operation) from the Project were quantified to provide information to decision makers and the public regarding the level of

the Project's annual GHG emissions. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and energy required for water pumping and treatment for end-uses.

The proposed Project would result in net GHG operational emissions directly from on-road mobile vehicles, electricity, and natural gas, and indirectly from water conveyance, wastewater generation, and solid waste handling. In addition, construction activities such as demolition, hauling, and construction worker trips would generate GHG emissions. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

GHG emissions associated with the construction and operation of the proposed Project were estimated using the CalEEMod Version 2016.3.2 software. CalEEMod is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects (CAPCOA 2017). CalEEMod was developed in collaboration with the air districts of California, and is recommended by SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts and SCAG to account for local requirements and conditions. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. CalEEMod output sheets and detailed calculations are provided in Appendix C.

The quantification of GHGs from any project involves many uncertainties. For example, it is reasonable to assume that the future employees and visitors of the Project site currently engage in similar activities (e.g., working, recreating, and driving) that generate GHG emissions. However, the implementation of the proposed Project an improved TDM program could result in changing travel behavior that results in fewer VMT. Additionally, newer construction materials and practices, future energy efficiency requirements, future mobile source emission standards, and advances in technology would likely reduce future levels of air pollutant emissions, including GHGs. However, the net effect is difficult to quantify due to the difficulty in predicting future

standards and requirements. As such, the estimated net increase in emissions resulting from implementation of the Project is likely to be an over-estimation. These same uncertainties and assumptions exist throughout the accepted analytical methodologies for quantifying GHG emissions.

*Construction GHG Emissions*

For the purposes of this EIR, construction work is assumed to begin late 2021 and would take place over approximately 36 months. Construction equipment generates GHGs such as $CO_2$, $CH_4$, and $N_2O$ through the combustion of fossil fuels. Methane may also be emitted during the fueling of heavy equipment. The raw materials used to construct the new building and the waste material from demolished buildings can sequester and release carbon, respectively. However, since the exact nature of the origin or make-up of the construction materials is unknown, only operation of construction vehicles and equipment is considered in the analysis of construction GHG emissions.

The construction GHG emissions modeling considers the anticipated Project construction schedule and construction equipment mix. CalEEMod input values are adjusted to reflect these Project-specific construction characteristics to estimate construction GHG emissions. These values were applied to the same construction phasing assumptions used in the air quality criteria pollutant analysis (refer to Section 3.2, *Air Quality*) to generate annual GHG emissions for each construction year. Construction-related GHG emissions are then amortized over 30 years per current SCAQMD methodology (SCAQMD 2008). This means that the total construction emissions are divided by the lifetime of the project, which is generally assumed to be 30 years (SCAQMD 2008).

*Operational GHG Emissions*

Operation of the proposed Project would generate GHG emissions from onsite operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. GHG emissions would also be generated by Project-generated vehicle trips.

For operational emissions of GHG emissions, CalEEMod was used to estimate GHG emissions from natural gas, solid waste, water and wastewater, and landscaping equipment. Operational impacts were assessed for the full buildout in 2024 and, as a conservative emissions estimate, assumes full occupancy in 2024. CalEEMod was used to analyze operational GHG emissions from the operation of the proposed hotel, residential, cultural, and retail/restaurant land uses:

***Vehicle trips.*** Vehicle trips generated by the proposed Project would result in GHG emissions through combustion of fossil fuels. In calculating mobile-source GHG emissions, emissions are estimated based on the predicted number of trips to and from the Project site as determined in the

Transportation Study (see Section 3.13, *Transportation* and Appendix K). Trip lengths for areas within the SCAQMD are generated based on the SCAG's Transportation Demand Model (SCAQMD 2020).

***Onsite use of natural gas and other fuels.*** The City's Energy Code requires All-Electric Building designed to code established by the 2019 CEC or Mixed-Fuel Building designed to be 5 percent more efficient than the code established by the 2019 CEC. If the Project includes the Mixed-Fuel Building option, natural gas would be used by the proposed Project to heat the residential and commercial spaces, which would result in a direct release of GHGs. As the City's Energy Code requirements were not incorporated into the Project CalEEMod, estimated emissions from the combustion of natural gas and other fuels for the Project represent a conservative analysis based on the number of dwelling units and square footage of the commercial retail and restaurant space using the consumption rates as presented in the CalEEMod modeling output (see Appendix C).

***Electricity use.*** Use of electricity for the operation of proposed Project would contribute to the indirect emissions associated with electricity production. Estimated emissions from the consumption of electricity are based on the number of dwelling units in the residential portion of the building and square footage of hotel and commercial space, using the standard electrical consumption rates from CalEEMod. Beginning in early 2019, the City has received electricity from the CPA (refer to Section 3.5, *Energy*). The CPA buys electricity from renewable sources and partners with the Southern California Edison Company (SoCal Edison) to distribute electricity to residential and commercial customers throughout the City. The City has chosen 100 percent Green Power as a step towards achieving carbon neutrality and all customers are defaulted to receive electricity from 100 percent renewable resources. However, as customers can opt out of the CPA, the analysis conservatively assumes that the renewable usage is equal to that of SoCal Edison's renewable production. City data shows that approximately 92 percent of residents and businesses receive 100 percent Green Power (Office of Sustainability and the Environment 2019).

***Water use and Wastewater generation.*** The amount of water used and wastewater generated by a project has indirect GHG emissions as a result of the energy used to supply, distribute, and treat water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both $CH_4$ and $N_2O$ depending on the treatment method. Estimated emissions from the consumption of potable water were based on the consumption factors used in Section 3.15, *Utilities*, multiplied by the number of dwelling units and the square footage of hotel and commercial space. Estimated emissions from the generation of wastewater were estimated as presented in the CalEEMod modeling output.

***Solid waste.*** Emissions calculated for solid waste reflect the indirect GHG emissions associate with waste that is disposed of at a landfill. GHG emissions from solid waste disposal are also calculated using CalEEMod Version 2016.3.2. Emissions are based on solid waste calculated for the proposed Project and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for $CH_4$, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment.

Other sources of GHG emissions from operation of the proposed Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. CalEEMod default emission rates were used in calculating GHG emissions from these additional sources.

The GHG emissions calculations incorporate GHG reductions from the sustainability features associated with the proposed Project, some of which are required by regulation, such as the City's Green Building Code (which requires new buildings to meet or exceed the Title 24 Building Standards Code). These features are described in Section 2.6.10, *Sustainability Features*.

As previously noted, existing uses on the Project site, which include residential, office, restaurant, retail uses, generate GHG emissions. For comparative purposes, existing GHG emissions (see Table 3.7-1) were compared to the proposed Project's estimated GHG emissions to determine net new emissions (see Table 3.7-3). The proposed Project's net annual emissions are calculated by subtracting the estimated GHG emissions of the existing site with the total annual GHG emissions of the proposed Project.

*Project Construction and Operational GHG Emissions*

Total annual GHG emissions for construction and operation of the proposed Project were estimated using CalEEMod (see Table 3.7-2 and Table 3.7-3; see Appendix C). It should be noted that the GHG emissions shown in Table 3.7-2 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment operates periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative, worst-case estimate. A complete listing of construction equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets provided in Appendix C of this EIR.

**Table 3.7-2. GHG Emissions from Construction of the Proposed Mixed-Use Development Project**

| Year | GHGs (MT $CO_2e$) |
|---|---|
| 2021 | 154.69 |
| 2022 | 1,231.32 |
| 2023 | 778.04 |
| 2024 | 541.89 |
| **Total** | **2,705.94** |
| **Amortized over 30 years** | **90.20 per year** |

Notes: See Appendix C.

As indicated in Table 3.7-2 above, construction activities for the proposed Project would result in temporary generation of GHG emissions totaling 2,706 MT $CO_2e$. As described above, SCAQMD recommends that construction-related GHG emissions be amortized over a project's 30-year lifetime to include these emissions as part of a project's annualized lifetime total emissions. In accordance with SCAQMD methodology, the estimated construction GHG emissions have been amortized over a 30-year lifetime period, and included in the annualized operational GHG emissions in Table 3.7-3 below.

**Table 3.7-3. Combined Annual Operational GHG Emissions for the Proposed Project**

| Annual Emissions by Category | GHGs (MT $CO_2e$) |
|---|---|
| Area | 1.74 |
| Energy | 1,798.81 |
| Mobile | 1,282.27 |
| Waste | 78.44 |
| Water | 23.35 |
| Construction (amortized) | 90.20 |
| **Total** | **3,274.81** |

Notes: see Appendix C.

Construction-related GHG emissions are further divided by year and total construction GHG emissions are amortized over an anticipated 30-year period to provide an average annual estimate of 90.2 MT $CO_2e$/year. As indicated in Table 3.7-3 above, total operational GHG emissions generated by the proposed Project would be approximately 3,185 MT $CO_2e$/year. Per current SCAQMD methodology, the combination of amortized construction GHG emissions with operational GHG emissions would result in a combined total of approximately 3,275 MT $CO_2e$/year (see Table 3.7-3). When proposed Project GHG emissions are compared to existing GHG emissions at the Project site, the net new GHG emissions result in a combined total of

approximately 1,542 MT $CO_2e$/year (refer to Table 3.7-4), which translates to 2.95 MT CO2e/year/service population.

**Table 3.7-4. GHG Annual Emissions per Service Population for the Proposed Project**

| GHG Emissions Factors | Proposed Project |
|---|---|
| Residential Population[1] | 187 |
| Jobs[1] | 186 |
| Hotel Guests[2] | 150 |
| Service Population (Population + Jobs) | 523 |
| Estimated Net New Annual Project GHG Emissions (MT $CO_2e$ /year)[3] | 1,542 |
| Annual GHG Emissions/Service Population (MT $CO_2e$ /year per service population) | 2.95 |
| SB 32 2030 GHG Emissions/Service Population Threshold | 4.8 |

Note: The service population for the proposed Project was calculated by considering the employees, residents and transient residents (i.e., hotel guests).
[1] See Section 2.0, *Project Description*, and Section 4.0, *Other CEQA*, for occupancy and population information.
[2] This analysis conservatively assumes 50 percent of maximum hotel occupancy of 300.
[3] Emissions of $CO_2e$ are estimated using the CalEEMod computer model developed for the SCAQMD for mobile source, area, and energy emissions (see Appendix C).

While no thresholds have been adopted, the SCAQMD has been evaluating GHG significance thresholds since April 2008. In September 2010, SCAQMD proposed a four-tiered approach to evaluate potential GHG impacts from various uses. Tier 4 addressed residential, commercial, or mixed-use projects with net new GHG emissions that generate more than 3,000 $CO_2e$/year, and considers whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020.

In 2010, the proposed 2020 efficiency target was 4.8 MT $CO_2e$/year per service population for project level analyses; the Project GHG emissions of 2.95 MT $CO_2e$/year per service population would be substantially less than this outdated efficiency target. These proposed targets have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the targets has not met since September 2010. Additionally, these efficiency targets are no longer applicable as they were specific to AB 32 goals and do not consider the recently adopted 2030 GHG reduction targets contained in SB 32. Instead, the 2017 Climate Change Scoping Plan was recently approved by CARB on December 14, 2017, and sets the state on a course to reduce GHG emissions an additional 40 percent below 1990 levels by 2030 under SB 32 (CARB 2017). Further, the 2017 Scoping Plan Update provides more technical information on what level of Statewide VMT reduction would promote achievement of Statewide

GHG emissions reduction targets and the 2017 Scoping Plan goals. As described above, the impact analysis is based on Project consistency with current statewide and local policies, plans, and programs rather than outdated proposed efficiency targets.

It should be noted that the operational emissions presented in Table 3.7-3 and Table 3.7-4 provide a conservative estimate of the actual GHG emissions, considering the CalEEMod does not account for the City's participation in CPA and cleaner vehicles in the future. The City's decision to purchase 100 percent Green Power as a step towards achieving carbon neutrality, would ensure all customers receive electricity from 100 percent renewable resources. Although customers can opt out of the CPA, City data shows that approximately 92 percent of residents and businesses receive 100 percent Green Power (Office of Sustainability and the Environment 2019).

Project operational-related GHG emissions would also be likely decline in future years as emissions reductions from the State's Cap-and-Trade program are fully realized. As shown, a large portion of the Project's GHG emissions would result from mobile sources. Reductions in mobile source GHGs would occur over the next decade, and beyond, ensuring that the total GHG emissions associated with the proposed Project would be further reduced. Emissions from mobile sources would decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards (refer to Section 3.7.2, *Regulatory Framework*).

### 3.7.4 Applicable Mitigation Measures from the DCP

Several mitigation measures regarding air quality were identified and adopted as part of the Mitigation Monitoring and Reporting Program (MMRP) for the Downtown Community Plan (DCP) Program EIR. Certain requirements established by these mitigation measures would be applicable to GHG emissions (e.g., MM AQ-1, which requires construction-related equipment to be turned off when not in use for more than 5 minutes). As described in the impact analyses below, the proposed Project would not result in potentially significant impacts related to GHG emissions and the identified mitigation measures from the DCP Program EIR would not be required. As described further in Section 3.6.10, *Sustainability Features* and Section 3.2, *Air Quality*, the proposed Project would incorporate sustainability measures that would be consistent with the DCP and would further reduce GHG emissions beyond the level of reduction that would be achieve through the implementation of the DCP MMs.

### 3.7.5 Project Impacts and Mitigation Measures

*Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

*Would the project be inconsistent with any of the GHG reduction strategies set forth by the City's LUCE, Downtown Community Plan, and Climate Action and Adaptation Plan, AB/SB 32 and SB 375; and the State Attorney General, California Air Resources Board, and Climate Action Team recommendations?*

**GHG-1 The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with any applicable plan, policy, or regulation that has been adopted for the purpose of reducing GHG emissions. Therefore, this impact would be *less than significant.***

Impact Description (GHG-1)

*Project Consistency with City of Santa Monica Goals and Actions*

The proposed Project would support the City's GHG reduction goals and policies established in the LUCE, Sustainable City Plan, and Climate Action and Adaptation Plan (see Table 3.7-5). The proposed Project includes several sustainable design features and characteristics, such as a rooftop solar electric PV system and energy efficient heating, ventilation, and air conditioning (HVAC) systems, intended to reduce overall GHG impacts (refer to Section 2.6.10, *Sustainability Features*). Additional sustainability features may also be included as part of the Development Agreement (refer to Section 2.6.11, *Development Agreement*).

Development of the proposed Project would help fulfill the goals of SB 375 and LUCE Goal LU2, which calls for integration of land use and transportation to reduce GHGs by focusing new development near transit to create sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases walking, bicycling, and transit use. The proposed Project is a mixed-use compact infill development in the City's Downtown, which is served by high quality transit and bicycle/pedestrian facilities and is a Transit Priority Area (TPA), as further described in Section 3.13, *Transportation*. Directing growth to existing urbanized areas is an important strategy to reduce GHG emissions, largely due to reduced building energy and automobile use.

By locating new housing in the transit-rich Downtown, the proposed Project would promote the use of existing public transit services provided by the Big Blue Bus line and Metro, including the Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line, which is located within approximately 0.5 miles of the Project site. Bus service in the vicinity (within 0.5 miles) of the Project site includes Big Blue Bus service routes 1, 2, 3, 5, 7, 8, 9, 18, Rapid (R) 3, R7, and R10 and Metro service routes 33, 534, 704, 720 and 733 (City of Santa Monica 2018b; Metro 2018). There is also a layover zone for Metro service routes 33 and 733 on the west side of 2nd Street along the southeast corner of the Project site (refer to Figure 2-3). The Project site is easily accessed by walking and bicycling, with the 2nd Street green bicycle lanes adjacent to the Project site and the expanded sidewalks associated with the proposed Project. Due to its location along the western boundary of Downtown, the proposed Project is also located within walking distance to several retail, restaurant, entertainment, office, and recreation destinations, including the Third Street Promenade, the Santa Monica Place shopping center, the beaches/oceanfront district, Santa Monica Pier, and the Civic Center. The Project's site accessibility to the various alternative modes of transportation and variety of destinations would help minimize VMT and decrease GHG emissions. The estimated VMT associated with the proposed Project would be lower than the regional average and consistent with regional plans to reduce transportation-related GHG emissions as part of the overall statewide strategy under AB 32 and SB 32 (Health and Safety Code Division 25.5).

The diverse mix of uses associated with the proposed Project (i.e., hotel, residential, retail, restaurant, cultural) located in a transit-rich environment would help promote a reduction in VMT and GHG emissions. Future and existing Downtown residents, visitors, and employees would be able to walk/bike, rather than drive, to the proposed Cultural Use Campus, restaurants, and retail stores. The design of the proposed Project would also further the City's goal of promoting a sustainable pedestrian-friendly environment and reducing reliance on automobiles. The public paseos and public courtyard associated with the proposed Project – in combination with ground floor cultural, retail, and restaurant uses – would activate the streets and support pedestrian activity.

Further, the proposed Project would minimize employee and resident VMT to and from the Project site by implementing a TDM plan that would exceed the minimum requirements established in the City's Transportation Demand Management Ordinance. The details of the TDM plan would be finalized as part of the Development Agreement (refer to Section 2.6.11, *Development Agreement*).

Based on the above, the proposed Project would be consistent with the City's GHG reduction goals and policies established in the LUCE, Sustainable City Plan, and CAAP (see Table 3.7-5). Therefore, the Project would be consistent with applicable plans, policies, and regulations and impacts would be *less than significant*.

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan

| Policy | Relationship to Project |
|---|---|
| **Santa Monica LUCE** | |
| **Policy LU2.1 Redirect Growth.** Redirect growth away from residential neighborhoods onto transit corridors, where new uses are served by convenient transportation networks. | **Consistent.** The Project site is not located in a residential neighborhood. The Project site is located in the transit-rich Downtown, which is well served by existing transit services provided by the Big Blue Bus and Metro E (Expo) LRT. As discussed in Section 3.13, *Transportation*, the Project site is adequately served by transit and transportation infrastructure. |
| **Policy LU2.2 Transit Villages.** Capitalize on the Expo Light Rail stations to create vital new complete sustainable communities with transit as a focal element, green connections and pathways, a variety of housing types and jobs, enhance creative arts and institutions, and local-serving retail and services. | **Consistent.** The proposed Project would include mixed uses at the street level including commercial retail and restaurant, open space, and cultural uses oriented to serve pedestrians – including residents, hotel guests, and passerby arriving to the Downtown at the Downtown Santa Monica Station, which is located within approximately 0.5 miles of the Project site. |
| **Policy LU2.5 Vehicle Trip Reduction.** Achieve vehicle trip reduction through comprehensive strategies that designate land uses; establish development and street design standards; implement sidewalk, bicycle and roadway improvements; expand transit service, manage parking; and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle, and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle service to ensure success of the transit system. | **Consistent.** The proposed Project would support vehicle trip reduction by virtue of its location within the transit-rich Downtown. By locating new housing and commercial uses Downtown, residents, employees, and patrons of the Project would have access to existing public transit, including the Metro E (Expo) LRT. Proximity to the various uses in the Downtown and the Third Street Promenade would also make walking a convenient mode of transportation for shopping and entertainment. Additionally, the proposed Project would provide a mix of compatible uses on the site, including restaurants, retail stores, and cultural uses which would be easily accessed via walking or bicycling, reducing vehicle trips between land uses. The proposed Project would also integrate pedestrian-friendly widened sidewalks, provide ground level shopping and open space uses, and implement a TDM plan that would promote vehicle trip reduction in the City. |
| **Policy LU2.6 Active Spaces.** Focus new development in defined districts to enable active places that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections. | **Consistent.** The Project site is located at the corner of Ocean Avenue and Santa Monica Boulevard. The proposed Project would provide active ground floor retail/restaurant uses as well as a Cultural Use Campus, along with hotel and residential uses all on one site. The mix and type of uses associated with the proposed Project would promote pedestrian activity onsite as well as the surrounding area. The proposed Project would also improve walkability with active street frontages, expanded sidewalks, two public paseos, a breezeway, and a public courtyard that would also attract pedestrian use and enliven the area. |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| **Policy LU3.2 Focus on Housing in Transit-Accessible Corridors and Districts.** Focus additional housing opportunities on the transit-rich commercial boulevards. | **Consistent.** The proposed Project is located within the transit-rich Downtown. By locating new housing and commercial uses Downtown, residents, employees, and patrons of the project would have access to existing public transit, including the Metro E (Expo) LRT. The proposed Project would also integrate pedestrian-friendly widened sidewalks and implement a TDM plan that would promote vehicle trip reduction in the City. |
| **Policy LU3.3 Focus on Local-Serving Uses.** Emphasize uses which address local-serving needs and daily resources necessary to reduce vehicle trips and VMT. | **Consistent.** The proposed Project would provide a mix of services and local-serving commercial uses within the transit-rich Downtown, such as residential, cultural, retail, and restaurant uses. By locating new housing, entertainment, shopping, and dining opportunities in the Downtown, future residents, employees, and patrons of the Project would have access to existing public transit (e.g., Metro buses, Downtown Santa Monica Station for Metro E [Expo] LRT, etc.). Additionally, this cluster of compatible uses would activate the pedestrian paseos and courtyard provided by the proposed Project, to encourage walking by future residents, employees, and patrons of the site. The proposed Project would be easily accessible by walking or bicycling, reducing vehicle trips between land uses. |
| **Policy LU4.2 Uses to Meet Daily Needs.** Encourage uses that meet daily needs such as grocery stores, local-serving restaurants and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips. | |
| **Policy LU4.3 Mixed-Use Associated with Transit.** Encourage mixed-use development close to transit to provide housing opportunities for the community, support local businesses, and reduce reliance on automobiles. | |
| **Policy LU4.4 Pedestrian-Oriented Design.** Engage pedestrians with ground floor uses, building design, site planning, massing and signage that promote vibrant street life and emphasize transit and bicycle access. | **Consistent.** As described in Section 2.6.8, *Access Circulation, and Parking*, the proposed Project would expand sidewalks along 2nd Street to provide a minimum width of 15 feet. Additionally, the proposed public paseos and public courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. The location of the Project site within the Downtown would allow future residents, employees, and patrons access to existing public transit (i.e., Metro buses, Downtown Santa Monica Station). The proposed Project would also include short-term bicycle parking stations on the ground level and long-term bicycle storage for the residential uses Level B1 to provide parking for a minimum of 231 bicycles consistent with SMMC Section 9.28.140. Bicycle facilities would also include a bicycle repair station and locks and shower facilities in accordance with SMMC Section 9.28.170. |
| **Policy LU8.1 Transportation Demand Management.** Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development | **Consistent.** The Applicant would be required to implement a TDM plan with measures to encourage walking, biking and public transit use and reduce vehicle trips. The TDM plan would meet minimum LUCE requirements and would aim to achieve a 2.2 Average Vehicle Ridership (AVR) target. Details of |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| in TDM Districts and programs to encourage reduction of existing vehicle trips. | the TDM plan would be finalized as a part of the Development Agreement. For a more detailed discussion of trip generation, traffic, and circulation refer to Section 3.13, *Transportation*. |
| **Policy LU12.4 Sustainability.** Recognize adaptive reuse as a sustainable policy, and encourage sustainable technologies, such as solar panel installation and energy retrofitting, that respect character-defining features. | **Consistent.** All buildings would conform to the City's Green Building Code and Energy Code as well as the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. Some key sustainability features that would be incorporated into the Project include PV panels; EV charging stations; harvesting of stormwater for landscape irrigation; low-flow toilet fixtures in hotel and residences; secure parking for bicycles at the ground level and in the subterranean basement; low-water drought tolerant landscape plant palette; and. In addition, during construction the Project would implement a construction waste management plan to divert 70 percent of all mixed C&D debris to a City certified C&D waste processors, consistent with the SMMC Section 8.108.010. |
| **Policy T18.1.** Strive toward carbon neutrality by encouraging reduced VMT per capita. | **Consistent.** The proposed Project is infill development within a TPA. The characteristics of the proposed Project would reduce trips and VMT due to its infill location within the Downtown that has access to public transportation and is within close proximity to multiple other destinations. The proposed Project would provide a mix of uses, including hotel, residential, restaurant, retail, and cultural uses in the City's Downtown Core. In addition, the proposed Project would implement an enhanced TDM program in order to further reduce peak hour trips as further discussed in Section 3.13, *Transportation*, of this EIR. The proposed Project would include short-term and long-term bicycle parking spaces in accordance with City's requirements. These features would reduce work trips and encourage employees, visitors, and residents to use alternative modes of transportation including walking, bicycling, and public transportation. |
| **Policy T18.2.** Develop programs and strategies to meet CO2 or VMT reduction standards established by regional, state or federal agencies. | **Consistent.** Refer to the discussion under Policy T18.1 and Policy LU12.4. |
| **Policy S2.1.** Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan including, but not limited to: focusing new growth in mixed-use, transit oriented districts; focusing new growth long existing corridors and nodes; supporting the creation of complete, walkable neighborhoods with | **Consistent.** Refer to the discussion under Policy LU4.4 and Policy T18.1. |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| goods and services within walking distance of most homes; and, promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City. | |
| **Policy S2.3 "No net new vehicle trips".** Advance the "no net new vehicle trips" goal in the Land Use and Circulation Element with transportation demand management projects such as expanded rideshare programs, parking management strategies, as well as development impact fees for public transit infrastructure. | **Consistent.** Refer to the discussion under Policy LU 8.1. |
| **Policy S2.9.** Consider incorporating the "no net new P.M. peak hour vehicle trips" policy into the City's CEQA environmental analysis and require mitigation of significant impacts for projects that will generate new net vehicle trips. | **Consistent.** Refer to the discussion under Policy LU 8.1. |
| **Policy S3.1 "Zero Net" Electricity Consumption Goal by 2020.** Actively strive to implement the City's "zero net" electricity consumption goal by 2020 through a wide variety of programs and measures, including the generation of renewable energy in the City and energy efficiency measures. | **Consistent.** The proposed Project would comply with the City's Green Building Ordinance and Energy Code, which establish development standards that ultimately help the City achieve Net Zero Energy. The proposed Project would include PV panels on the roof decks that would provide a minimum of 125 kilowatts, as well as energy efficient HVAC systems and lighting systems with occupancy sensors and dimmers. Further, the proposed Project would at a minimum comply with existing SMMC Section 8.106.080, which requires all projects to exceed Title 24 compliance by 15 percent. Additional sustainability measures intended to help the City achieve Net Zero Energy may be included as part of the Development Agreement between the City and the Applicant. |
| **Policy S3.2 Net Zero Energy by 2020 for New Residential and 2030 for New Commercial.** Consider a requirement for all new residential buildings to use net zero energy by 2020 and all new commercial buildings by 2030. | |
| **Policy S4.1 Solar Installations on New Construction.** Explore creating an ordinance to require solar installations, both photovoltaic and hot water, on new construction projects. | **Consistent.** The proposed Project would include solar electric PV panels on the roof decks that would provide a minimum of 125 kilowatts. |
| **Policy S5.1 Building Code and Prescriptive Compliance.** Continue to maintain Building Code and prescriptive compliance options that meet or exceed state requirement for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve net zero energy buildings by 2020 for low-rise residential buildings and 2030 for commercial building and achieve a LEED-equivalent local building code by 2020. | **Consistent.** The proposed Project would comply with the City's Green Building Ordinance and Energy Code. The proposed Project would include solar electric PV panels on the roof decks that would provide a minimum of 125 kilowatts, as well as energy efficient HVAC systems and lighting systems with occupancy sensors and dimmers. Additionally, the proposed Project would include water efficient equipment and plumbing infrastructure. Further, the proposed Project would comply with existing SMMC Section 8.106.080, which requires all projects to exceed Title 24 compliance by 15 percent. Additional sustainability measures intended to help the City achieve Net Zero Energy may be included as part of |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| | the Development Agreement between the City and the Applicant. |
| **Policy S5.5.** Encourage shade trees on south- and west-facing sides of all new buildings to reduce building energy loads. | **Consistent.** Existing street trees on 2nd Street, Santa Monica Boulevard, and Ocean Avenue would remain in place and be protected during construction to the extent feasible. If removal is necessary during construction, these trees would be replaced onsite. These trees would potentially provide shading on the Project site. |
| **Policy S5.6.** Encourage cool roofs or green roofs on new buildings. | **Consistent.** The proposed Project would include PV panels on the roof decks that would provide a minimum of 125 kilowatts. |
| **Policy S5.8.** Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks. | **Consistent.** It is anticipated that the proposed Project would include electrical outlets for electrical landscaping equipment. |
| **Policy H6.1.** Encourage housing to be located along transit corridors and close to transit stations. | **Consistent.** The proposed Project would locate 100 residential units in the Downtown with convenient access to the Downtown Santa Monica Station at 4th Street and Colorado Avenue. |
| **Policy H6.2.** Encourage complementary uses and local services in conjunction with or adjacent to new housing and locate housing in close proximity to existing services. | **Consistent.** The proposed Project would provide active ground floor retail/restaurant uses as well as a Cultural Use Campus, along with hotel and residential uses all on one site. This complementary mix of uses would serve local and regional Downtown residents, employees, and visitors. |
| **Policy H6.3.** Encourage or facilitate the inclusion of complementary land uses not already present within a neighborhood district such as grocery markets, daily services, and parks. | **Consistent.** The proposed Project would provide daily uses such as restaurants and retail on the ground floor. For example, the restaurants and retail uses associated with the proposed Project would help reduce trips and GHG emissions, since Downtown residents, employees, and visitors would be able to walk or bike for their food needs. |
| **Policy H6.4.** Consider separating out or reducing parking requirements for new housing near transit. | **Consistent.** The proposed Project would incorporate unbundled parking as a measure to reduce vehicle ownership, and subsequent vehicle trips and GHG emissions. The proposed Project would also provide less parking than the amount required under the SMMC. Given the proximity of the Project site to the Metro E (Expo) LRT and other transit services (i.e., Big Blue Bus and Metro Rapid) as well as the mixed-use nature of the Project, reduced parking is appropriate for the proposed Project. |
| **Policy H6.5.** Establish minimum pedestrian and bicycle facility and connectivity standards in conjunction with new housing development. | **Consistent.** The proposed Project would expand sidewalks along 2nd Street to provide a minimum width of 15 feet. Additionally, the proposed public paseos and public courtyard would connect to |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| | existing sidewalks and help expand the pedestrian network in the Downtown. The proposed Project would also include short-term bicycle parking stations on the ground level and long-term bicycle storage for the residential uses Level B1 to provide parking for a minimum of 231 bicycles consistent with SMMC Section 9.28.140. Bicycle facilities would also include a bicycle repair station and shower and locker facilities in accordance with SMMC Section 9.28.170. |
| **Downtown Community Plan** | |
| **Policy PPS3.2.** Facilitate a more sustainable streetscape and public space network. | **Consistent.** The proposed Project would provide expanded sidewalks and public paseos, with landscaping, shading, and seating areas. Additionally, the proposed Project would provide a public courtyard fronting Ocean Avenue between the Hotel Building and Cultural Use Campus. These pedestrian paseos and courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. |
| **Policy SI1.1.** Require new development to meet or exceed the City's water conservation and water neutrality requirements of the water self-sufficiency programs. | **Consistent.** The proposed Project would comply with the City's Water Neutrality Ordinance, which requires new development to offset all increases in water demand at a ratio of 1:1 using on-site water efficiency measures, except for 100 percent affordable housing projects, which must offset water demand at a ratio of 0.5:1 (see Section 3.15, *Utilities*). The proposed Project would at minimum include low flow fixtures and other water efficient equipment and plumbing infrastructure in compliance with the City's Green Building Ordinance. Additional water use efficiency measures may also be included as a part of the Development Agreement. |
| **Policy SI3.2.** Require that new development meet or exceed the City's Green Building standards for stormwater retention/infiltration, and encourage consideration of new technologies and superior practices in Tier 2 and 3 projects and on large sites with potential to incorporate such facilities. | **Consistent.** The proposed Project would comply with the City's Green Building Ordinance as well as the Urban Runoff Pollution Ordinance, which implements the requirements of MS4 NPDES permits and requires all development projects to develop an Urban Runoff Mitigation Plan (URMP) for approval by the City's Department of Public Works. The URMP is required to include mitigations to avoid runoff at the site (see Section 3.9, *Hydrology and Water Quality*). The proposed Project would also include water efficient equipment and plumbing infrastructure in compliance with the City's Green Building Ordinance. |
| **Policy AM1.1.** Expand the capacity of walking infrastructure to promote safety, encourage first/last mile | **Consistent.** The proposed Project would expand sidewalks along 2nd Street to provide a minimum |

**Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)**

| Policy | Relationship to Project |
|---|---|
| connections and create an exceptional walking experience. | width of 15 feet, to provide additional walking capacity to, from, and throughout the Project site. Additionally, the proposed public paseos and public courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. The location of the Project site, approximately 0.5 miles from the Downtown Santa Monica Station, as well as the proximity to Metro bus stops would encourage future residents, employees, and patrons to use existing public transit. Additionally, the proposed Project would provide a mix of compatible uses which would activate the pedestrian paseos and courtyard provided by the proposed Project, to encourage walking within the Project site and to other commercial areas within the Downtown, such as the Third Street Promenade. The proposed Project would be easily accessible by walking or bicycling, reducing vehicle trips between land uses. |
| **Policy AM1.3.** Encourage people to walk throughout Downtown to explore its range of uses and activities that complement the Third Street Promenade. | |
| **Policy AM2.1.** Reduce employee SOV commute trips to Downtown through the City's TDM program. | **Consistent.** The Applicant would be required to implement a TDM plan with measures to reduce vehicle trips/VMT and promote alternative transportation. The specific strategies required in the TDM Plan have not yet been determined but would be finalized as a part of the Development Agreement. The TDM plan would meet minimum LUCE requirements and would aim to achieve a 2.2 AVR target. By locating new housing, entertainment, shopping, and dining opportunities in the Downtown, future residents, employees, and patrons of the would have access to existing public transit (i.e., Metro buses, Downtown Santa Monica Station). The proposed Project would also provide enhanced pedestrian and bicycling facilities to promote alternative mobility options to and from the Project site. |
| **Policy AM2.3.** Expand TDM programs for resident access and mobility options Downtown. | |
| **Policy AM6.4.** Support the adoption and use of EVs. | **Consistent.** The proposed Project would include approximately six EV charging stations in accordance with SMMC Section 9.28.160(B)(2). |
| **Sustainable City Plan** | |
| **Resource Conservation Goal 1.** Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable, non-recyclable and non-recycled materials, water, and energy and fuels. | **Consistent.** The proposed Project would comply with the City's Green Building Ordinance and would include onsite recycling containers to support the City's recycling goal. In addition, the proposed Project would comply with SMMC Section 8.108.010 Subpart C, which requires that demolition and/or construction projects over 1,000 sf divert at least 70 percent of C&D material from landfills. Additionally, the Project would include PV panels on |
| **Resource Conservation Goal 2.** The City should take a leadership role in encouraging sustainable procurement, extended producer responsibility and should model innovative strategies to become a zero-waste city. | |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| **Resource Conservation Goal 3.** Within renewable limits, encourage the use of local, non-polluting, renewable and recycled resources (water, energy, and material resources). | the roof decks that would provide a minimum of 125 kilowatts, as well as energy efficient HVAC systems and lighting systems with occupancy sensors and dimmers. Further, the proposed Project would comply with existing SMMC Section 8.106.080, which requires all projects to exceed Title 24 compliance by 15 percent. In addition, the proposed Project would comply with the City's Water Neutrality Ordinance, which requires new development to offset all increases in water demand at a ratio of 1:1 using on-site water efficiency measures, except for 100 percent affordable housing projects, which must offset water demand at a ratio of 0.5:1 (see Section 3.15, *Utilities*). In addition, the proposed Project would at minimum include low flow fixtures and other water efficient equipment and plumbing infrastructure in compliance with the City's Green Building Ordinance. Additional water use efficiency measures may also be included as a part of the Development Agreement. |
| **Environment and Public Health Goal 1.** Protect and enhance environmental health and public health by minimizing and where possible eliminating the levels of pollutants entering the air, soil and water. | **Consistent.** The proposed Project would incorporate numerous measures, actions, and design features to reduce air pollutant emissions, including sustainability features, construction best management practices, and additional actions to reduce emissions from construction and operational activities, vehicle idling, fuel use, and other activities. Additionally, as required by MM AQ-1, the Applicant would use "super-compliant" architectural coatings to reduce VOC emissions (refer to Section 3.2, *Air Quality*). |
| **Transportation Goal 1.** Create a multi-modal transportation system that minimizes and, where possible, eliminates pollution and motor vehicle congestion while ensuring safe mobility and access for all without compromising our ability to protect public health and safety. | **Consistent.** By locating new housing, entertainment, shopping, and dining opportunities in the Downtown, future residents, employees, and patrons would have access to existing public transit (e.g., Metro buses, Downtown Santa Monica Station, etc.). Additionally, this cluster of compatible uses would activate the pedestrian paseos and courtyard provided by the proposed Project, to encourage walking by future residents, employees, and patrons. The proposed Project would expand sidewalks along 2nd Street to provide a minimum width of 15 feet. Additionally, the proposed public paseos and public courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. The proposed Project would also include short-term bicycle parking stations on the ground level and long-term bicycle storage for the residential uses Level B1 to provide parking for a minimum of 231 bicycles consistent with SMMC Section 9.28.140. Bicycle facilities would also include a bicycle repair station |
| **Transportation Goal 2.** Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel. | |

**Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)**

| Policy | Relationship to Project |
|---|---|
| | and lockers and shower facilities in accordance with SMMC Section 9.28.170. The proposed Project would be easily accessible by walking or bicycling, reducing vehicle trips between land uses.<br>In addition, the Applicant would be required to implement a TDM plan with trip reduction strategies paid for and implemented by the applicant. Details of the TDM have yet to be finalized; however, the TDM plan is anticipated to include several measures aimed at reducing vehicle trips by employees and residents. A more detailed discussion of trip generation, traffic and circulation plans regarding the project can be found in Section 3.13, *Transportation*. |
| **Open Space and Land Use Goal 2.** Implement land use and transportation planning and policies to create compact mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling, and the use of existing and future public transit systems. | **Consistent.** The proposed Project reflects integrated land use and transportation planning by virtue of its location within the transit-rich Downtown. By locating new housing, entertainment, shopping, and dining opportunities in the Downtown, future residents, employees, and patrons of the Project would have access to existing public transit (e.g., Metro buses, Downtown Santa Monica Station for the Metro E [Expo] LRT, etc.). Proximity to the various uses in the Downtown and the Third Street Promenade would also make walking a convenient mode of transportation for shopping and entertainment. Additionally, the proposed Project provides a mix of compatible uses on the site, including residential and restaurant uses, which would be easily accessible by walking or bicycling, reducing vehicle trips between land uses. The proposed Project would also provide affordable housing (refer to Section 2.6.11, *Development Agreement*). |
| **2019 Climate Action & Adaptation Plan** | |
| **Objective 1.** Achieve 100 percent renewable grid electricity. | **Consistent.** The Project would include PV panels on the roof decks that would provide a minimum of 125 kilowatts in local solar energy. Additionally, the proposed Project would automatically receive its energy from the Clean Power Alliance (which uses 100 percent renewable energy sources) unless commercial and residential tenants choose to opt out. The proposed Project would also include energy efficient HVAC systems and lighting systems with occupancy sensors and dimmers to reduce fossil fuel use in the proposed buildings. Further, the proposed Project would at minimum comply with existing the City's Energy Code, which requires the construction of all-electric buildings, or alternative if mixed fuel |
| **Objective 2.** Install 100 MW of local solar energy. | |
| **Objective 3.** Reduce fossil fuel use 20 percent in existing buildings. | |
| **Objective 4.** Discourage fossil fuels in new buildings. | |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| | buildings are constructed, the buildings would be required to exceed Title 24 compliance by 5 percent. |
| **Objective 6.** Convert 50 percent of local trips to foot, bike, scooter & skateboard. | **Consistent.** The Applicant would be required to implement a TDM plan with measures to reduce vehicle trips/VMT and promote alternative transportation. The specific strategies required in the TDM Plan have not yet been determined but would be finalized as a part of the Development Agreement. The TDM plan would meet minimum LUCE requirements and would aim to achieve a 2.2 AVR target. By locating new housing, entertainment, shopping, and dining opportunities in the Downtown, future residents, employees, and patrons of the proposed Project would have access to existing public transit (e.g., Metro buses, Downtown Santa Monica Station, etc.).<br>The proposed Project would provide a mix of compatible uses to activate the proposed expanded sidewalks, pedestrian paseos, and courtyard in order to encourage walking by future residents, employees, and patrons of the site. The proposed public paseos and courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. Additionally, bicycle amenities would include showers and lockers for commercial employees who bike to work, ground level short-term visitor bike parking, long-term parking for employees, secured parking for residents, and residential elevators to facilitate convenient transport of bicycles within the Project site. For a more detailed discussion of trip generation, traffic, and circulation refer to Section 3.13, *Transportation*. |
| **Objective 7.** Convert 25 percent of commuter trips to transit. | |
| **Objective 8.** Convert 50 percent of vehicles to electric or zero emission. | **Consistent.** The proposed Project would include approximately six EV charging stations in accordance with SMMC Section 9.28.160(B)(2). |
| **ZNC1. Implement a Community Choice Energy (CCE) Program.** Implement CCE in Santa Monica, offering the highest amount of cost-competitive renewable energy. Develop programs to incentivize new local renewable-energy projects. Adopt rates to achieve 100% renewable energy by 2025. | **Consistent.** While this action is not implemented at the project level, the proposed Project would be consistent with this action, as commercial and residential components would receive energy from the Clean Power Alliance (which uses 100 percent renewable energy sources) unless commercial and residential tenants choose to opt for lower renewable percentage or opt out completely. |
| **ZNC5. Adopt a Carbon Reduction Ordinance for Existing Buildings.** Adopt a Carbon Reduction Ordinance to require energy benchmarking and carbon performance of existing buildings over 20,000 sf, including multifamily buildings. Require a reduction of | **Consistent.** While this action is not implemented at the project level, the proposed Project would conform to the City's Zero-Net Energy Code. The Code requires new buildings to be All-Electric Building designed to code established by the 2019 CEC or |

## Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)

| Policy | Relationship to Project |
|---|---|
| fossil fuel use of covered buildings by 15% in five years and elimination of fossil fuel use by 2050. | Mixed-Fuel Building designed to be 5 percent more efficient than the code established by the 2019 CEC. Additionally, the proposed Project would install a PV system with a rating of 2 watts per square foot of the building footprint, which contributes to reducing carbon emissions. |
| **ZNC8. Adopt Carbon Neutral Construction Codes**. Require New Construction for commercial, mixed-use and multi-family properties to achieve zero net carbon onsite or pay in-lieu carbon impact fee to offset fossil fuel use. Require electric-ready construction for future electrification of appliances and buildings systems. Ensure that affordable housing developers have additional financing or compliance alternatives available. | |
| **ZNC11. Create Equitable Access to Clean Energy Programs.** Partner with utilities and the Clean Power Alliance to provide free home-energy audits and upgrade incentives for low-income households and affordable housing developers and property owners. | **Consistent.** Refer to the discussion under ZNC1. |
| **ZW1. Implement Citywide Organics Recycling.** Require waste diversion stations (trash, recycling, composting) in all businesses. Develop outreach and enforcement programs to ensure commercial and residential organics recycling citywide. | **Consistent.** The proposed Project would be consistent with this action, as the proposed Project would include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, landscaping debris (trimmings), and organic waste, consistent with the City's Zero Waste Strategic Plan. |
| **ZW5. Increase Construction and Demolition Debris Diversion Requirements.** Explore fees and fines to create more incentives for recycling, composting and salvage, while discouraging landfill waste. Provide educational resources to promote responsible demolition and deconstruction. | **Consistent.** The proposed Project would implement a construction waste management plan to divert a minimum of 70 percent of all mixed C&D debris to City certified C&D waste processors, consistent with the SMMC Section 8.108.010 Subpart C. |
| **SM6. Complete Streets Network.** Increase the extent and quality of the complete street network and greenways to ensure residents and visitors alike have safe, convenient, and affordable transportation options. Create designated bike lanes that are protected to provide greater safety and assurance for all riders. Emphasize the movement of people with greater space dedicated to space efficient and low emission modes of transportation. Lower speed limits to improve safety. Expand publicly owned spaces and work with property owners to facilitate public access. | **Consistent.** Refer to the discussion under Sustainability City Plan Transportation Goal 1 and 2. |
| **SM8. Prioritize Transit-Oriented Affordable Housing.** Increase the housing-to-jobs ratio by prioritizing the expansion and investment in affordable housing located near dense transit hubs with limited parking, through local zoning and incentives. | **Consistent.** The proposed Project is infill development within the Downtown, which is a TPA. The proposed Project would locate up to 100 residential units, including 19 replacement rent-controlled housing units and additional affordable housing units, as well as a diverse mix of uses, including hotel, restaurant, retail, cultural, and open space uses within close proximity to public transit. In addition, the proposed Project would implement an |

**Table 3.7-5. Project Consistency with LUCE, Sustainable City Plan, and Climate Action & Adaptation Plan (Continued)**

| Policy | Relationship to Project |
|---|---|
| | enhanced TDM plan as discussed in Section 3.13, *Transportation.* The proposed Project would include short-term and long-term bicycle parking spaces in accordance with the City's requirements. These features would reduce work trips and encourage employees, visitors, and residents to use alternative modes of transportation including public transportation, walking, and bicycling. |
| **SM12. Increase Charging Infrastructure for Electric Vehicles and Electric Mobility Devices.** Expand network of off- and on-street public charging stations to 1,000 ports by 2025. Provide charging stations that will accommodate a wide range of vehicle types including bicycles, scooters and other mobility devices. Provide outreach and additional incentives for renters, lower-income individuals and non-profit property owners. Implement emerging best practices in EV technology, including mobile charging, wireless charging, energy storage, and web/smartphone applications. | **Consistent.** The proposed Project would provide EV charging stations in the subterranean garages in accordance with City requirements. The proposed Project would also provide designated parking for carpools and vanpools; long-term bicycle parking; employee shower and locker facilities; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. |

Source: City of Santa Monica 2010, 2014, 2017, 2019.

*Project Consistency with Statewide and Regional Mandates, Plans, Policies, and Regulations*

The primary focus of many of the Statewide and regional mandates, plans, policies and regulations is to address worldwide climate change. Global GHG emissions, in their aggregate, contribute to climate change, not any single source of GHG emissions alone.

The significance of the GHG emissions associated with the proposed Project is also evaluated based on whether the proposed Project is consistent with the relevant Statewide and regional mandates, plans, policies and regulations to reduce GHG emissions including AB 32 and SB 32 (Health and Safety Code Division 25.5), SCAG's 2016-2040 RTP/SCS, and other Statewide and regional regulations and programs. Because the proposed Project incorporates physical and operational sustainability features that would promote a reduction in GHG emissions, the proposed Project would not cumulatively contribute to significant climate change effects and would not conflict with the GHG reduction goals of Health and Safety Code Division 25.5 and associated GHG reduction plans such as SCAG's RTP/SCS. The RTP/SCS aims to reduce or limit new trip generation and associated regional growth in traffic congestion and VMT by focusing growth, density, and land use intensity within existing urbanized areas. Additionally, the RTP/SCS strives towards enhancing the existing transportation system and integrating land use into transportation planning. The RTP/SCS recommends local jurisdictions accommodate future growth within

existing urbanized areas to reduce VMT, congestion, and GHG emissions. The RTP/SCS specifically encourages future growth to occur within existing High Quality Transit Areas, which are described as generally walkable transit districts or corridors that are within 0.5 miles of a major transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Consistent with SCAG's 2016 RTP/SCS alignment of transportation, land use, and housing strategies, the proposed Project would be located in a High Quality Transit Area and would encourage walking, biking, and transit uses within the Downtown. The proposed Project supports these goals by including a mix of hotel, restaurant and retail, residential, cultural uses, and open space in close proximity to transit services within the Downtown, including the various Big Blue Bus and Metro bus lines and the Downtown Santa Monica Station, which are within walking distance of the Project site. Additionally, the proposed Project would maximize multimodal transportation through the implementation of 22,407 sf of ground-level open space as well as widening the sidewalk along 2nd Street to provide a minimum 15-foot building-to-frontage (i.e., face of curb) line in accordance with the DCP (see Chapter 4D Building Frontage Line of the DCP). The proposed Project would also provide a minimum of 231 bicycle parking spaces for visitors, employees, and residences improving overall access to active bicycle facilitates. The density of housing, jobs, restaurants, shopping, and recreational amenities in the Project vicinity, combined with the network of bike lanes, pedestrian paths, and public transportation opportunities, supports the RTP/SCS urban land use patterns that would promote transportation efficiency. The Project would be consistent with all applicable goals of the 2016-2040 RTP/SCS intended to improve mobility and access to diverse destinations, promote smart growth, provide more transportation choices, and reduce vehicular demand and associated emissions. As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions, and impacts would be *less than significant*.

## Table 3.7-6. Project Consistency Summary with Regional GHG Emissions Reduction Strategies

| Strategy | Relationship to Project |
|---|---|
| **SCAG SCS Land Use Actions and Strategies** | |
| Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full range of shopping, entertainment, and services all within a relatively short distance. | **Consistent.** The proposed Project would establish hotel, residential, restaurant, retail, and cultural commercial uses in an urbanized area within the Downtown, which would be consistent and compatible with existing land uses in this location. The Project site would also be located immediately adjacent to recreational amenities (e.g., Santa Monica Pier, parks, and the beach) and in close proximity to multi-modal transportation options. |
| **SCAG SCS Transportation Network Actions and Strategies** | |
| Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles or other alternative fueled vehicles | **Consistent.** The proposed Project would promote walkability due to its location in the Downtown, along Ocean Avenue and Santa Monica Boulevard. Additionally, the proposed Project would include bicycle facilities encouraging both patrons and employees to use alternative modes of transportation. |
| Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers. | **Consistent.** The proposed Project site is located within approximately 0.5 miles of the Downtown Santa Monica Station and several bus stops are located at the Project site and immediate vicinity (see Section 3.13, *Transportation*). |
| Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other Zero-Emission Vehicle options. | **Consistent.** The Project site is located in an urbanized area close to existing commercial and residential development. The proposed Project would ensure connectivity of the neighborhood to existing developed and recreational areas as well as provide bicycle parking to encourage bicycling and walking rather than driving. |
| **SCAG SCS Transportation Demand Management Actions and Strategies** | |
| Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes. | **Consistent.** The proposed Project would implement transit and carpool incentives for employees as part of the TDM plan (see Section 3.13, *Transportation*). |
| **SCAG SCS Clean Vehicle Technology Actions and Strategies** | |
| Develop a Regional Plug-in Electric Vehicle Readiness Plan with a focus on charge port infrastructure plans to support and promote the introduction of electric and other alternative fuel vehicles in Southern California. | **Consistent.** The proposed Project would provide parking spaces for electrical vehicles equipped with electrical charging stations and bicycle parking spaces. |

Source: SCAG 2016.

The Project would also support the State's strategies in the 2017 Climate Change Scoping Plan to reduce GHG emissions (see Table 3.7-7). The 2017 Climate Change Scoping Plan relies on a broad array of GHG reduction strategies, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms, such as the Cap-and-Trade program. These potential strategies include increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems. The proposed Project would benefit from Statewide and City efforts towards increasing the portion of electricity provided from renewable resources. The proposed Project would also benefit from statewide efforts towards increasing the fuel economy standards of vehicles. The proposed Project would utilize energy efficiency appliances and equipment, as well as encourage the use of public transportation through its TDM plan and the use of electric-powered vehicles by providing EV vehicle spaces. Consistent with the City's Energy Code, the Project would be designed to be either: All-Electric Building designed to code established by the 2019 CEC or Mixed-Fuel Building designed to be 5 percent more efficient than the code established by the 2019 CEC. While the CARB is in the process of developing a framework for the 2030 reduction target in the Scoping Plan, the proposed Project would support or not impede implementation of these potential reduction strategies identified by the CARB.

Further, CARB's 2017 Scoping Plan Update (released in January 2019) states *"in many instances, achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an inappropriate overall objective for new development"* and also recognizes that *"achieving a net zero increase in GHG emissions may not be appropriate or feasible for every project. Indeed, there are circumstances when certain types of development projects, by virtue of their location and land use context, are likely consistent with state climate goals, when considered on a per capita VMT basis."* The 2017 Scoping Plan Update further provides that VMT is a proxy for transportation-related GHG emissions and the associated effect on the climate. Based on the 2017 Scoping Plan Update, land use development projects in areas that would produce rate of light-duty VMT per capita that are approximately 16.8 percent lower than existing conditions (either lower than regional average or other appropriate context) could be, by virtue of their location and land use context, interpreted to be consistent with the transportation assumptions embedded in the 2017 Scoping Plan and with 2050 State climate goals. As discussed in detail in Section 3.13, *Transportation*, the proposed Project's VMT per capita would be more than 16.8 percent lower than existing regional averages and further, the total VMT calculated for the proposed Project would be at least 16.8 percent lower than business as usual VMT. Therefore,

when reviewing the proposed land use characteristics and associated VMT, the proposed Project would be in support of GHG reduction goals.

Based on the above, the proposed Project would be consistent with the California Renewables Portfolio Standard, SB 350, SB 100, CCR Title 24, California Green Building Standards Code Requirements, SB 375, and recommendations of the State Attorney General, OPR and Climate Action Team (see Table 3.7-7). Therefore, the Project would be consistent with applicable plans, policies, and regulations and impacts would be *less than significant*.

## Table 3.7-7. Project Consistency Summary with State GHG Emissions Reduction Strategies

| Strategy | Relationship to Project |
|---|---|
| **California Renewables Portfolio Standard and SB 350 and SB 100** | |
| Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. SB 100 accelerates the Renewables Portfolio Standard Program goals as follows: (1) 50 percent renewable resources target by December 31, 2026; and (2) 60 percent renewable resources target by December 31, 2030. SB 100 also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. | **Consistent.** While this measure does not directly apply to the proposed Project, the proposed Project would be consistent with and would not conflict with this strategy because SoCal Edison is required to meet the State's Renewable Portfolio Standard, including SB 100. SoCal Edison would also be required to meet the 60 percent renewable target in 2030. Further, the proposed Project could receive up to 100 percent of its electricity from renewable energy sources under the City's agreement with the CPA and SoCal Edison. Additionally, the proposed Project would include the installation of PV panels as required by the SMMC Chapter 8.106 – Green Building Standards Code. |
| **CCR Title 24** | |
| Energy Efficiency Standards for Residential and Nonresidential Buildings | **Consistent.** The Project would comply with the City's most recent Energy Code requirements at the time of building permit issuance and the City's Green Building Code by incorporating PV panels, high-performance building envelopes, and energy-efficient HVAC and lighting systems, thereby reducing energy use, air pollutant emissions, and GHG emissions. The City's Energy Code makes local amendments to Title 24 Building Energy Efficiency Standards. |
| Title 24 includes water efficiency requirements for new residential and non-residential uses. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. The proposed Project would include water efficient equipment and plumbing infrastructure. With regard to operational landscaping irrigation, the proposed Project would reuse onsite water collected from stormwater runoff, recovered and treated water from onsite uses (e.g., air conditioning and hotel wash-water), and/or recycled water from the City's Santa Monica Urban Runoff Recycling Facility (SMURRF). These options would be explored as final design plans are further developed. |
| **California Green Building Standards Code Requirements** | |
| All bathroom exhaust fans shall be ENERGY STAR compliant. | **Consistent.** The proposed Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in the City's Energy Code. |

## Table 3.7-7. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| HVAC Systems will be designed to meet ASHRAE standards. | **Consistent.** The proposed Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in the City's Energy Code. |
| Energy commissioning shall be performed for buildings larger than 10,000 sf. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with SMMC Chapter 8.36 Energy Code. |
| Air filtration systems are required to meet a minimum of MERV 8 or higher. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with the City's requirements, and the CALGreen Code. |
| Refrigerants used in newly installed HVAC systems shall not contain any CFCs. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. |
| Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. |
| Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code by including parking for a minimum of 231 bicycles consistent with SMMC Section 9.28.140, with the final number determined through the Development Agreement. |
| Stormwater Pollution Prevention Plan (SWPPP) required. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's Runoff Conservation and Sustainable Management Ordinance and the CALGreen Code. |
| Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow. | **Consistent.** Refer to the discussion under CCR Title 24 requirements above. |
| All irrigation controllers must be installed with weather sensing or soil moisture sensors. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. |
| Wastewater usage shall be reduced by 20 percent compared to current California Building Standards. | **Consistent.** The proposed Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code. |
| Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris. | **Consistent.** The proposed Project would exceed this requirement as part of its compliance with SMMC Chapter 8.108. The Applicant would comply with the Construction and Demolition Ordinance (SMMC Section 8.108.010 Subpart C) by submitting a waste management plan to the City and diverting at least 70 percent of C&D debris from landfills. As described in Section 3.15, *Utilities*, the proposed Project would also be consistent with the City's Zero Waste Strategic Plan effectively achieving a diversion rate of 95 percent by 2030. |

## Table 3.7-7. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| Requires documentation of types of waste recycled, diverted or reused. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. |
| Requires use of low VOC coatings consistent with AQMD Rule 1168. | **Consistent.** The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements. Implementation of MM AQ-1 would require the use of "super-compliant" VOC coatings during the architectural coating phase of Project construction (refer to Section 3.2, *Air Quality*). |
| 100 percent of vegetation, rocks, soils from land clearing associated with new non-residential developments shall be reused or recycled. Phased projects can stockpile on-site. | **Consistent.** Construction of the proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. Usable fill material would be taken to local storage yards for later use during construction activities within the City. |
| **Mobile Source Strategy (Cleaner Technology and Fuels)** | |
| Reduce GHGs and other pollutants from the transportation sector through transition to zero emission and low-emission vehicles, cleaner transit systems and reduction of VMT. | While this action does not apply to individual projects, the proposed Project would be consistent and would not conflict with this strategy by supporting the use of zero-emission and low-emission vehicles through the onsite provision of EV parking spaces. Furthermore, the Project would reduce VMT as a result of its urban infill location, with access to public transportation within a quarter-mile of the Project site. |
| **AB 1493 (Pavley Regulations)** | |
| Reduces greenhouse gas emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model year 2017-2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020. | **Consistent.** The proposed Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards. |
| **Low Carbon Fuel Standard (Executive Order S-01-07)** | |
| Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels. | **Consistent.** The proposed Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards. |
| **Advanced Clean Cars Program** | |
| In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug- | **Consistent.** While this action does not apply to individual projects, all vehicles used by residents, employees, and visitors would not impact or conflict with implementation of the Advanced Clean Cars Program. |

## Table 3.7-7. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)

| Strategy | Relationship to Project |
|---|---|
| in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. | |
| **SB 375** | |
| SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's MPOs, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. | **Consistent.** While this measure does not directly apply to the proposed Project, the proposed Project would be consistent with and would not conflict with this strategy because the Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement infill development and reduce regional VMT. The Project site is located within walking distance of public transportation. |
| **SB X7-7** | |
| The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. | **Consistent.** Refer to discussion under CCR Title 24 requirements above. |
| **California Integrated Waste Management Act of 1989 and AB 341** | |
| The IWMA mandated that state agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020. | **Consistent.** While this action does not apply to individual projects, the proposed Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in the City, that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with and would not conflict with Citywide recycling targets. The proposed Project would incorporate sustainability waste diversion measures and performance standards to increase recycling and minimize waste disposal, consistent with the City of Santa Monica Zero Waste Strategic Plan. These include implementing a construction waste management plan to divert 70 percent of all mixed C&D debris to City certified C&D waste processors, consistent with the SMMC Section 8.108.010. During operation, the proposed Project would provide easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings). Provision of onsite recycling containers and waste reduction programs would support the City's measure to divert waste from landfills. |
| **Climate Action Team** | |
| Reduce diesel-fueled commercial motor vehicle idling. | Consistent. The proposed Project would comply with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. |

**Table 3.7-7. Project Consistency Summary with State GHG Emissions Reduction Strategies (Continued)**

| Strategy | Relationship to Project |
|---|---|
| Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction. | **Consistent.** Refer to the discussion under California Integrated Waste Management Act above. |
| Plant five million trees in urban areas by 2020 to effect climate change emission reductions. | **Consistent.** The proposed Project would provide appropriate landscaping on the Project site including vegetation and trees as required by City regulations. |
| Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions. | **Consistent.** The proposed Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. Refer to discussion under CCR Title 24 requirements above. |
| Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development. | **Consistent.** The proposed Project would utilize energy efficiency appliances and equipment and would meet or exceed the Title 24 Building Energy Efficiency Standards. |
| Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems. | **Consistent.** The proposed Project would locate hotel, residential, restaurant, retail, and cultural uses within a TPA and within walking distance to the Downtown Santa Monica Station. The Project area within the Downtown also provides an extensive network of sidewalks, pedestrian paths, and bicycle lanes. |

Source: SCAG 2016.

### 3.7.6 Cumulative Impacts

Due to the global context of climate change, the analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions. As described in Section 3.7.5, *Project Impacts and Mitigation Measures*, the proposed Project would have *less than significant* impacts related to GHG emissions. Therefore, the implementation of the proposed Project would not have a considerable contribution to a cumulatively significant impact related to GHG emissions.

### 3.7.7 Residual Impacts

With implementation of the Project's sustainable design features and applicable mitigation from the DCP Program EIR, the proposed Project would not result in a considerable contribution to cumulatively significant impacts related to GHG emissions.

## 3.8 HAZARDS AND HAZARDOUS MATERIALS

This section describes the existing conditions related to hazards and hazardous materials in the vicinity of the Project site and analyzes the potential for impacts that could result from the proposed Ocean Avenue Project (Project).

Hazardous materials are defined as substances with physical and chemical properties of flammability, corrosivity, reactivity, or toxicity, which may pose a threat to human health or the environment. The term hazardous materials is used in this section to describe chemicals such as petroleum, oils, lubricants, solvents, pesticides, herbicides, asbestos-containing materials (ACMs), lead-based paints (LBPs), and other regulated materials (e.g., polychlorinated biphenyls [PCBs]). Additionally, the term "release" is used to describe spills, leaks, illegal dumping, or other methods of hazardous materials exposure in soil, groundwater, or surface water. Areas where historical releases of hazardous materials have occurred could pose a risk to the environment and public health.

A range of other hazards are addressed in other sections of this Environmental Impact Report (EIR) including: air pollution, such as toxic air contaminants (TACs) and particulate matter (PM), are addressed in Section 3.2, *Air Quality*; geotechnical hazards, such as seismic shaking, seismic-related ground failure, or landslides are addressed in Section 3.6, *Geology and Soils*; and structural fire hazards and response/suppression systems are discussed in Section 4.0, *Other CEQA* within the *Public Services* discussion.

### 3.8.1 Environmental Setting

The Project site is located within the western portion of the urbanized Downtown of the City of Santa Monica (City). The nearest schools to the Project site are: the British American School – LA, located approximately 0.12 miles northwest; Concord Prep High School located approximately 0.49 miles northeast; Piper Preschool located 0.54 miles northeast; and Santa Monica High School located 0.65 miles east. However, no public schools are located within the

*The Project site is located in the urbanized Downtown and includes mixed-used residential, restaurants and retail, medical office, and commercial office, which have a low potential to generate hazardous materials or wastes.*

Downtown. The nearest airport is the Santa Monica Municipal Airport (SMO) located approximately 2.7 miles east of the Project site.

As described in Section 2.2.2, *Existing Setting*, the 1.89-acre Project site is fully developed (i.e., paved) with one- to three-story buildings and associated surface parking lots. Existing uses on the Project site include multi-family residential, restaurants and retail, medical office, commercial office, medical spa, and salon (refer to Table 2-2).

Potential Presence of Hazardous Materials Associated with the Existing Buildings

A Phase I Environmental Site Assessment (ESA) was prepared for the proposed Project to evaluate the current environmental conditions at the Project site (SCS Engineers 2019; see Appendix G). The Phase I ESA included a visual site inspection of the Project site and surrounding vicinity, a hazardous materials records search, and preparation of an environmental regulatory database report. Hazardous materials observed during the visual site inspection include propane gas tanks, compressed gas cylinders, and cleaning supplies located in the storage area to the rear of the restaurants. These products were observed to be stored in their original containers with no obvious evidence of spills or releases. Hazardous wastes include limited quantities of medical sharps associated with the medical spa located at 1327 Ocean Avenue and fluorescent light bulbs and cooking grease associated with the restaurants onsite (SCS Engineers 2019). With the exception of minor surficial staining observed at various locations on the asphalt-paved surface parking lot, no indications of hazardous materials releases were documented during the visual site inspection. Further, the minor releases in the surface parking lots were considered to be *de minimis* (SCS Engineers 2019).

Based on aerial photographs, Sanborn Fire Insurance Maps, and other real estate documents, it is estimated that construction of the existing buildings at the Project site occurred between 1906 and 1951 (SCS Engineers 2019; refer to Section 3.4, *Cultural Resources*). All of the buildings onsite were constructed with wood frames and the exterior walls are covered with a range of brick, stucco, wood, or brick and plaster (SCS Engineers 2019). Based on the age of the buildings, the following hazardous materials are of concern:

- **Asbestos-Containing Materials –** Asbestos is a carcinogenic mineral fiber that was widely used in a variety of building construction materials for insulation, as well as in friction and heat-resistant products. The use and manufacturing of ACMs was banned in 1977 in California. Older buildings constructed prior to 1978 may contain ACMs. When left intact and undisturbed, these materials do not pose a health risk to building occupants. Asbestos release can occur after ACMs are disturbed by cutting, sanding, or other

remodeling or demolition activities. Improper attempts to remove ACMs can release asbestos fibers into the air, increasing asbestos levels and affecting human respiratory health (City of Santa Monica 2017). A previous Phase I ESA was conducted by IVI Due Diligence Services, Inc. (2007) at 1327, 1333, and 1337 Ocean Avenue, which were utilized as commercial office space at the time. No friable ACMs were identified in readily accessible areas of the three properties during the previous Phase I ESA (destructive sampling methods were not completed for non-friable resilient floor finish assemblies, wallboard assemblies, mastics, caulking, and built-up roofing system materials). All suspect ACMs were considered to be in good condition and the potential for fiber release was considered low. No further action was recommended by the previous 2007 Phase I ESA (IVI Due Diligence Services, Inc. 2007; see Appendix G). SCS Engineers did not inspect the mixed-use building at 101 Santa Monica Boulevard for ACMs; however, given the age of the building, it is assumed that non-friable ACMs could be present (SCS Engineers 2019).

- **Lead-Based Paint –** Lead is a harmful environmental pollutant with potential exposure pathways through air, drinking water, food, contaminated soil, deteriorating paint, and dust. Before the dangers of lead were documented, it was widely used in paint. In 1978, the State of California banned the use of LBPs. Older buildings constructed prior to 1978 may contain LBPs. If LBPs are improperly removed from surfaces by dry scraping or sanding, LBP can be absorbed into the body and can pose a potential public health risk. SCS Engineers did not inspect the buildings for LBPs; however, given the age of the buildings, it is assumed that LBPs could be present (SCS Engineers 2019).
- **Mold –** The presence of visible water damage, damp materials, visible mold, or mold odor in buildings increases the potential risks of respiratory disease for occupants. Known health risks include the development of asthma, allergies, respiratory infections, increased wheeze, cough, difficulty breathing, and other symptoms (State of California 2011). SCS Engineers did not conduct mold testing; however, no signs of active mold growth were noted during the visual inspection (SCS Engineers 2019).

Disturbance of ACMs, LBPs, or mold during renovation or demolition activities may cause risk of release of these hazardous materials, which can be harmful to human health.

Records Search (Hazardous Materials Site Listing)

Historical Records Search

SCS Engineers contacted relevant State and local agencies during preparation of the Phase I ESA in order to identify previous release(s) of hazardous materials and/or known contamination at the Project site and in the surrounding vicinity. A summary of correspondence regarding the Project site is provided below:

- **City of Santa Monica Department of Building and Safety (SMDBS)**: LADBS found various permits associated with the Project site, including: electrical (1936), plumbing (1954), and construction (2010) permits for 101 Santa Monica Boulevard; a plumbing (1955) permit for 113 Santa Monica Boulevard; and plumbing (1969) and commercial office (2005) permits for 1337 Ocean Avenue
- **South Coast Air Quality Management District (SCAQMD**): SCAQMD identified an equipment list for a natural gas charbroiler (1989) and an application for a charbroiler (2004) at 101 Santa Monica Boulevard.
- **California Department of Conservation, Division of Oil, Gas, and Geothermal Resources:** No oil and gas wells were identified within a 1-mile radius of the Project site.
- **The County of Los Angeles Fire Department, Health Hazardous Materials Division:** No records for the Project site.
- **Los Angeles County Sanitation District (LACSD):** No records for the Project site.
- **Regional Water Quality Control Board (RWQCB):** No records for the Project site.
- **Los Angeles County Sanitation District:** No records for the Project site.

In addition to these correspondences, an environmental regulatory database report was prepared by Environmental Data Resources, Inc. (EDR). Various Federal, State, and local regulatory databases were reviewed for the Project site and properties within up to 1 mile (see Table 3.8-1).

## Table 3.8-1. Summary of Radius Map Database Search for Offsite Facilities

| Federal or State Government Database | Search Radius | Number of Reported Facilities | Onsite | Adjacent to the Project Site |
|---|---|---|---|---|
| National Priorities List (NPL) | 1.00 mile | 0 | No | No |
| NPL Delisted | 1.00 mile | 0 | No | No |
| Superfund Enterprise Management System (SEMS) | 0.50 mile | 0 | No | No |
| No Further Remedial Action Planned (NFRAP) | 0.50 mile | 0 | No | No |
| Resource Conservation and Recovery Act- Corrective Action (RCRA COR ACT) | 1.00 mile | 0 | No | No |
| RCRA Treatment and Disposal Facilities (RCRA TSD) | 0.50 mile | 0 | No | No |
| RCRA Generators (RCRA GEN) | 0.25 mile | 8 | No | No |
| Federal Engineering and Institutional Controls (IC/EC) | 0.50 mile | 0 | No | No |
| Emergency Response Notification System (ERNS) | 0.12 mile | 0 | No | No |
| State/ Tribal-Equivalent NPL | 1.00 mile | 0 | No | No |
| State/Tribal-Equivalent CERCLIS (ENVIROSTOR) | 1.00 mile | 6 | No | No |
| State/Tribal Solid Waste List (SWL) | 0.50 mile | 0 | No | No |
| State/ Tribal Leaking Underground Storage Tanks (LUST) | 0.50 mile | 20 | No | No |
| State/Tribal Underground/ Aboveground Storage Tanks (USTs/ ASTs) | 0.25 mile | 2 | No | No |
| State/ Tribal Voluntary Cleanup Program (VCP) | 0.50 mile | 1 | No | No |
| Federal Brownfields | 0.50 mile | 0 | No | No |
| Local Lists of Registered Storage Tanks (Statewide Environmental Evaluation and Planning System [SWEEPS UST], Historic UST, CA Facility Inventory Database [FID] UST) | 0.25 mile | 5 | No | No |
| Local Land Records (DEED) | 0.50 mile | 0 | No | No |
| Other (RCRA NonGen, Unexploded Ordinance Sites [UXO], HAZNET, CA Historical Cortese, MN Manifest) | 0.12 mile | 17 | **Yes** | No |
| EDR High Risk Historical Records (Historic auto, historic cleaner, Manufactured Gas Plant [MGP]) | 0.125 mile | 56 | No | **Yes** |

Source: SCS Engineers 2019; see Appendix G.

The Project site was listed on the following databases:

- HAZNET Database: 1333 Ocean Avenue, Santa Monica, California, 90401. This property was listed for disposal of 0.16 tons of ACMs in 2003. However, no violations were listed, and the disposal of ACMs is not considered to represent a recognized environmental condition (REC).
- EDR Historical Cleaner Database: 133 Santa Monica Boulevard, Santa Monica, California, 90401. This property was operated as a dry cleaning facility in 1928.
- EDR Historical Cleaner Database: 135 Santa Monica Boulevard, Santa Monica, California, 90401. This property was operated as a dry cleaning facility from 1936 to 1982.

Historic Land Uses with Potential for Hazardous Materials Impacts

A review of existing resources – including Nationwide Environmental Title Research, LLC (NETR) aerial photographs, Sanborn Fire Insurance Maps, topographic maps, City directories, and City of Los Angeles Building and Safety Department records – indicate that the Project site was historically developed with single- and multi-family residences, commercial restaurants and retail businesses, office buildings, and dry cleaning facilities.

**Table 3.8-2. Previous Development on the Project Site**

| Year | Previous Development |
|---|---|
| 1887-1924 | Single-family residences, boarding house, Bennett and Cannon Real estate offices |
| 1928-1982 | Multi-family residential, retail, chamber of commerce<br>135 Santa Monica Boulevard (1936-1982)<br>Towne Cleaners, E.T. Gorman cleaners, and W. N. Craig cleaners<br>133 Santa Monica Boulevard (1928)<br>A.D. Miller cleaners |
| 1985-2018 | Multi-family residential, restaurants, and retail |

Notes: The dates associated with previous development are considered approximations only based on inferences from historical resources. Please refer to Section 3.4, *Cultural Resources* for issues involving historic architecture.
Source: SCS Engineers 2019; see Appendix G.

Identified Historical Site-Specific Hazardous Conditions

Based on a review of existing resources, the following site-specific hazards were identified:

- **Dry Cleaning Facilities:** The EDR Historical Cleaners Database lists 133 and 135 Santa Monica Boulevard – located on the northeastern portion of the Project site – as historical dry cleaning facilities in operation from 1928 to 1982. It is likely that these facilities used petroleum hydrocarbon-solvents (e.g., Stoddard solvent). Given that the dry cleaning

facilities at 135 Santa Monica Boulevard remained in operation until 1982, it is possible these facilities switched to the use and storage of tetrachloroethylene (PCE). The use of these solvents may have resulted in the release of hazardous materials to the soil, soil vapor, and/or groundwater. Petroleum hydrocarbon-based solvents and PCE liquid and vapor have the ability to permeate flooring and building foundations, entering the subsurface soils and potentially groundwater, and potentially volatizing and migrating into buildings. This is considered a potential risk to human health. Short-term, high-level inhalation exposure can result in irritation of the upper respiratory tracts and eyes, kidney dysfunction, and neurological effects. Long-term exposure can result in neurological impacts including impaired cognitive and motor neurobehavioral performance as well as adverse effects in the kidney, liver, immune system and hematologic system, and on development and reproduction (U.S. Environmental Protection Agency [USEPA] 2018). The Phase I ESA concluded that there is a moderate to high likelihood that the 52-year operation of the historical dry cleaning facility resulted in a hazardous condition at the Project site as a result of the potential use of hazardous solvents commonly associated with historic dry cleaning facilities (SCS Engineers 2019; see Appendix G).

- **Burned Ash and Refuse Dumps:** Historical resources indicate single- and multi-family residential uses at the Project site as early as 1887. As such, is a potential for burned or incinerated ash from backyard burn pits and/or metal-bearing fill material to be present or mixed with the soil. Burn ash has the potential to contain high concentrations of contaminants of concern including certain metals such as lead, zinc, and cadmium. No obvious indications of burned ash or metal-bearing fill material were documented during the visual site inspection (SCS Engineers 2019; see Appendix G).

<u>Potential Migration of Contaminants onto the Project site from an Offsite Source</u>

Offsite hazardous materials releases adjacent to or hydraulically upgradient of the Project site may result in a REC if contaminants migrate to the Project site. The Project site slopes gently down to the south and southwest. The measured groundwater gradient based on hydrogeological data is to the southwest toward the Pacific Ocean, with groundwater occurring between 47 to 62.5 feet below the ground surface (bgs) (refer to Section 3.6, *Geology and Soils*). Hazardous sites located hydraulically down-gradient or cross-gradient are unlikely to impact the Project site since the predominate movement of the contaminated groundwater plume is away from the Project site along the hydraulic gradient of the area.

With the exception of the following sites, the Phase I ESA determined that there is a low likelihood for offsite facilities listed to cause RECs that may impact the Project site (SCS Engineers 2019; see Appendix G).

- **122 and 134 Santa Monica Boulevard** are located adjacent to the east of the Project site. According to the environmental regulatory database report prepared by EDR, both of these properties were previously operated as dry cleaning facilities. No releases were reported, and data is not available on the types or quantities of hazardous materials stored at either of these locations. Due to the absence of violations, lack of reported or known releases, and cross-gradient groundwater flow, the potential for this property to affect the Project site is low.
- **1347 2nd Street**, which is located adjacent to the north of the Project site, was also operated as a dry cleaning facility from 1933 to 1948. No releases were reported, and data is not available on the types or quantities of hazardous materials stored at this location. However, the facility is hydraulically upgradient in terms of groundwater flow direction to the Project site; therefore, in the event that a hazardous materials release did occur at this property (e.g., PCEs), the Project site could be affected.
- **1401 Ocean Avenue**, located immediately the south of the Project site, was operated as gasoline service station from 1928 to 1987. No releases were reported, and data is not available on the types or quantities of hazardous materials stored at this location. The facility is not included in the State Water Resources Control Board's (SWRCB's) Geotracker database. Due to the absence of violations, lack of reported or known releases, and the interpreted downgradient groundwater flow direction, this property has a low to moderate potential to affect the Project site.

### 3.8.2 Regulatory Framework

Several Federal, State, and local regulations limit the risk of upset during the use, transport, handling, storage, and disposal of hazardous materials. Hazardous materials management is subject to a range of laws, policies, and regulations at all levels of government. The Federal enforcement agency is the USEPA. Enforcement agencies at the State level include two branches of the California Environmental Protection Agency (CalEPA): Department of Toxic Substances Control (DTSC) and the RWQCB. The Santa Monica Fire Department (SMFD) is the Certified Unified Program Agency (CUPA) at the local level for the City. The enforcing agency is the CUPA.

Federal Regulations

Federal agencies that regulate hazardous materials include the USEPA, Occupational Safety and Health Administration (OSHA), and U.S. Department of Transportation (USDOT). Applicable Federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the Code of Federal Regulations (CFR). Some of the major Federal laws include the following:

- Resources Conservation and Recovery Act of 1976 (RCRA);
- Toxic Substances Control Act of 1976 (TSCA);
- Hazardous and Solid Waste Act of 1984 (HSWA);
- Federal Insecticide, Fungicide, and Rodenticide Act of 1947;
- Asbestos Hazard Emergency Response Act of 1986;
- OSHA – Process Safety Management Standard (29 CFR §1910.119);
- Clean Water Act of 1977 (CWA);
- National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR 61 Subpart M; and
- Residential Lead-Based Paint Hazard Reduction Act of 1992.

*U.S. EPA Pacific Southwest Region 9*. The Downtown is located within USEPA Pacific Southwest Region 9 (Region 9), which administers programs for Arizona, California, Hawai`i, Nevada, Pacific Territories, and 148 Native American tribes.

- Superfund is USEPA's program to identify, investigate, and clean up uncontrolled or abandoned hazardous waste sites throughout the U.S.
- Region 9's Brownfields Program works to clean up and redevelop potentially contaminated lands in the Pacific Southwest region, making it easier for such lands to become vital, functioning parts of their communities. It is also Region 9's program to prevent, prepare, and respond to environmental emergencies.
- Region 9's PCB Program regulates the processing, distribution, use, cleanup, storage, and disposal of PCBs under the TSCA and also provides support for TSCA compliance to limit the manufacture, processing, and distribution of PCBs.

*Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).* CERCLA, commonly known as the Superfund Act, was developed to protect the nation's water, air, and land resources from the risks created by past chemical disposal practices. Under CERCLA,

the USEPA is authorized to undertake short- or long-term actions for the cleanup of abandoned contaminated sites in the nation, known as Superfund sites, which pose a risk to human health or the environment. The USEPA maintains the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database, which contains information on current Superfund sites, former Superfund sites, and remediation activities. CERCLIS includes Superfund sites that are on the National Priorities List (NPL) or are being considered for the NPL.

State Policies and Regulations

Primary State agencies with jurisdiction over hazardous chemical materials management include CalEPA, DTSC and RWQCB. Other State agencies involved in hazardous materials management are the Department of Industrial Relations, State Office of Emergency Services, California Department of Fish and Wildlife (CDFW), California Air Resources Board (CARB), California Department of Transportation (Caltrans), State Office of Environmental Health Hazard Assessment, and the California Integrated Waste Management Board. The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol (CHP) and Caltrans. Hazardous materials waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.

Hazardous chemical and biohazardous materials management laws include the following:

- Hazardous Waste Control Act;
- California Hazardous Materials Release Response Plans and Inventory Law (Business Plan Act);
- Safe Drinking Water and Toxic Enforcement Act (Proposition 65);
- Hazardous Substances Act;
- Hazardous Waste Management Planning and Facility Siting (Tanner Act); and
- Hazardous Materials Storage and Emergency Response.

*DTSC EnviroStor Database*. DTSC maintains a database that contains information on properties in California where hazardous substances have been released, or where the potential for a release exists. This database is known as EnviroStor (formerly CalSites) and is one of a number of databases that comprise the Cortese List and Spills, Leaks, Investigations, and Cleanups (SLIC) List. EnviroStor provides a brief history of cleanup activities, contaminants of concern, and

scheduled future cleanup activities. The EnviroStor database also includes properties that have been remediated and certified by DTSC.

*SWRCB GeoTracker Database*. GeoTracker is the SWRCB's online database that: (1) provides access to statewide environmental data; and (2) tracks regulatory data for the following types of sites:

- Leaking Underground Storage Tank (LUST) cleanup sites;
- Cleanup program sites (also known as site cleanups and formerly known as SLIC sites);
- Military sites including: military Underground Storage Tank (UST) sites; military privatized sites; and military cleanup sites;
- Land disposal sites (i.e., landfills);
- Permitted UST facilities;
- Waste discharge requirement sites; and
- Agricultural waivers program sites (also known as Irrigated Lands Regulatory Program [ILRP]).

*2018 State of California Multi-Hazard Mitigation Plan (SHMP)*. The SHMP is the official statement of the State's hazard identification, vulnerability analysis, and hazard mitigation strategy. The goal of the SHMP is to guide implementation activities to achieve the greatest reduction of vulnerability, which results in saved lives, reduced injuries, reduced property damages, and protection for the environment. In particular, the SHMP helps administer the Local Hazard Mitigation Plan (LHMP) program for the state. The California Emergency Management Agency supports and assists local governments in the development of LHMPs and tracks the progress and effectiveness of plan updates and projects. It provides local governments with information on integrating hazard identification, risk assessment, risk management, and loss prevention into a comprehensive approach to hazard mitigation and helps them identify cost-effective mitigation measures and projects.

*South Coast Air Quality Management District (SCAQMD).* The SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 defines asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites. The SCAQMD also regulates volatile organic compound (VOC) emissions from

contaminated soil through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 sets requirements to control the emission of VOCs from excavating, grading, handling, and treating soil contaminated with volatile organic compounds as a result of leakage from storage or transfer operations, accidental spillage, or other deposition, including hydrocarbons.

*Government Code (GC) Section 51175-51189*. Section 51175-51189 of California Government Code designates responsibility to local agencies, including but not limited to charter cities, charter counties, and cities and counties, to identify areas in the state as very high fire hazard severity zones falling under local protection. Classification should be consistent with statewide criteria. Designation of very high fire hazard severity zones should be based on fuel loading, slope, fire weather, and other relevant factors including winds identified as causing wildfire spread. Once identified, information on very high fire hazard severity zones should be made available to the public. This section also outlines brush clearance and defensible space maintenance for buildings in the zones as well as the necessary permit process for building construction and reconstruction.

Local Policies and Regulations

The primary local agency, known as the CUPA, with responsibility for implementing Federal and State laws and regulations pertaining to hazardous materials management is the SMFD. The CUPA is certified by CalEPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code pursuant to Senate Bill (SB) 1082. The six consolidated programs include:

- Hazardous Materials Reporting and Response Planning;
- Uniform Fire Code Business Plan;
- Hazardous Waste Generation and Onsite Treatment;
- Accidental Release Prevention;
- Aboveground Storage Tank; and
- Underground Storage Tank.

As the CUPA for the City, SMFD maintains the records regarding location and status of hazardous materials sites in the City and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. The SMFD contracts with the Los Angeles County Fire Department for hazardous waste inspection and enforcement components of the Unified Program.

*City of Santa Monica 2014 All Hazard Mitigation Plan.* This plan serves as a re-evaluation of the City's 2004 Hazard Mitigation Plan. This document provides potential actions to reduce the effects of natural hazards on the City and population. The plan includes risk assessments and mitigation goals and actions for identified hazards within the City (e.g., earthquakes). This plan is re-evaluated every 5 years to ensure consistency with existing hazards to the community.

*City of Santa Monica General Plan Safety Element.* The Safety Element of the General Plan contains several policies regarding fire hazards and emergency management. Specifically, it provides assessment of natural and manmade hazards associated with fires, as well as providing a framework and guiding policies to guide future development and strengthen existing regulations within the City. The policies that are applicable to the proposed Project and hazardous materials are listed below:

Policy 5.1. The use, storage, and transportation of toxic, explosive, and other hazardous and extremely hazardous materials shall be strictly controlled to prevent unauthorized discharges.

Policy 5.1.2. The City shall continue to manage the Hazardous Materials Disclosure Program to identify and regulate business handling types and quantities of extremely hazardous materials, or hazardous materials in greater than consumer types and quantities.

Policy 5.1.3. The City shall continue to require annual reporting by businesses to the Environmental Programs Division of the use, storage or manufacture of hazardous or extremely hazardous materials in any quantity. The City shall continue to require annual submission or verification of business emergency plans by businesses that use, store or manufacture any hazardous or extremely hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds or 200 cubic feet.

*City of Santa Monica Office of Emergency Management.* The City of Santa Monica Office of Emergency Management (OEM) has the responsibility of organizing and directing the preparedness efforts during large scale events, emergencies, or disasters in the City. The mission of the OEM is to protect the City from the loss of life and property in the event of a natural or manmade disaster. The OEM also has primary responsibility for preparing and updating the City's Multi-Hazard Functional Emergency Plan. The plan includes resources and information to assist City residents, public and private sector organizations, and others interested in participating in planning for natural hazards. The mitigation plan provides a list of activities that may assist the

City in reducing risk and preventing loss from future natural hazard events. The action items address multi-hazard issues, as well as activities for earthquakes, landslides, flooding, tsunamis, wildfires and severe windstorms/thunderstorms.

*City of Santa Monica Municipal Code (SMMC).* SMMC Section 5.24 establishes Hazardous Materials Reporting and Response Planning and Hazardous Materials Management Plans requirements. SMMC Section 5.24.010 requires all businesses to declare to the City if they use, store, or manufacture any quantity of a hazardous or extremely hazardous material. An annual business plan must be submitted if the business uses, stores, or manufactures hazardous materials exceeding 55-gallons or more of liquid, 500-pounds or more of solid, and/or 200-cubic feet or more of a gas, at stand temperature and pressure. In addition to inventorying the materials in question, the business plan must describe emergency response plans and procedures to be used in the event of an accident. The requirements are established to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment. SMMC Section 8.104 requires that the installation, operation and removal of USTs be conducted under the authority of City issued permits. Additionally, the investigation, assessment and cleanup of a release from a UST are overseen by SMFD. The SMFD was certified by the CalEPA as the CUPA for the City in 1997.

### 3.8.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not mandatory, it is routinely sanctioned by the courts. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact related to hazards or hazardous materials if:

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

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

c) The project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school;

d) The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 6592.5, and as a result, it would create a significant hazard to the public or the environment;

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, the Project would result in a safety hazard or excessive noise for people residing or working in the Project area;

f) The project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or

g) The project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Non-Applicable Issue(s):

c) (Emit or Handle Hazardous Materials Near a School): There are no public schools within the Downtown of the City (City of Santa Monica 2017). The British American School – LA is a private school located within 0.25 miles of the Project site; however, the school is not located adjacent to or along a construction haul route accessing the Project site. Demolition of existing structures and other construction-related activities would adhere to all applicable regulatory standards to avoid release of contaminants, such as ACMs or LBPs, if present. Accordingly, there would be no potentially significant adverse impact to schools within 0.25 miles of the Project site and therefore, this issue will not be analyzed further in this EIR.

d) (Hazardous Materials Sites): The Project site is not identified on either the proposed or final NPL or California DTSC list of sites that require clean-up of toxic or hazardous contamination. Accordingly, there would be no potentially significant adverse impact to hazardous materials sites. Therefore, this issue will not be analyzed further in this EIR.

e and f) (Private Air Strip and Public Airport): As previously described, the Project site is located approximately 2.7 miles northwest of SMO and is not located within an aviation hazard area or any private airstrips. Accordingly, the proposed Project would not result in a safety hazard for people residing or working in the proposed buildings. Therefore, this issue will not be analyzed further in this EIR.

f) (Interfere with Emergency Response or Evacuation Plan): The Project site is located within the service area of SMFD and would be developed in accordance with all applicable building and fire codes to meet current fire protection standards. Ocean Avenue is a designated Disaster Route by the City (County of Los Angeles Department of Public Works 2013). The proposed Project does not propose changes, obstructions, or reconfigurations to public evacuation routes or emergency access along this route. The proposed Project would not result in physical interference with or impairment to implementation of the City's All Hazards Mitigation Plan or Multi-Hazard Plan. Therefore, this issue will not be analyzed further in the EIR.

g) (Wildfire): The Project site is located in a highly urbanized area within the Downtown and entirely within an LRA, approximately 1.58 miles from the nearest designated High or Very High Fire Hazard Severity Zone (FHSZ). As described further in Section 4.0, *Other CEQA* within the *Wildfire* discussion, redevelopment of the Project site would not exacerbate wildfire risks. The Project site would not involve the additional installation of any infrastructure that would exacerbate wildfire risk and would not increase public exposure to wildfires. The Project site is not located on a significant slope and would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations. Therefore, issues involving wildfires will not be analyzed further in this EIR.

Methodology

This assessment includes review of existing adopted plans, public databases, recent studies, and EIRs, to assess the potential presence of hazards and hazardous materials sites within the Project site and vicinity. A Phase I ESA was prepared for the proposed Project to evaluate the current environmental conditions at the Project site (SCS Engineers 2019; see Appendix G). The Phase I ESA included a visual site inspection of the Project site and surrounding vicinity, records search, and preparation of an environmental regulatory database report.

### 3.8.4 Applicable Mitigation Measures from the DCP

Implementation of the following mitigation measures from the DCP Program EIR would reduce potential impacts involving ACMs, LBPs, and mold to a less than significant level. DCP MM HAZ-2a: Phase I ESA requires the preparation of a Phase I ESA prior to demolition activities within the Downtown. The Applicant has implemented this mitigation through the preparation of the Phase I ESA provided as Appendix G of this EIR. DCP MM HAZ-2a.a and MM HAZ-2b.b requires additional testing of the building materials and soils located on the Project site to identify

any potential hazardous materials. If necessary, DCP MM HAZ-2c and MM HAZ-2d would guide steps for identification, management, transport, and/or disposal of contamination.

*MM HAZ-2a:* ***a. Asbestos-Containing Materials (ACM), Lead-Based Paints (LBP), polychlorinated biphenyls (PCBs), and Molds.*** *Prior to any the issuance of a demolition permit, the Applicant shall conduct a comprehensive survey of ACM, LBP, PCBs, and molds. If such hazardous materials are found to be present, the applicant shall follow all applicable local, state and federal codes and regulations, as well as applicable best management practices, related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety.*

***b. Potential Onsite Hazardous Materials or Conditions.*** *A visual survey and reconnaissance-level investigation of the existing site shall be conducted to determine if there are any structures or features within or near the buildings that are used to store, contain, or dispose of hazardous materials. For any development within the Downtown area that has not been subject to a Phase I ESA or successful remediation efforts in the past, a Phase I ESA shall be performed to determine the likelihood of contaminants in areas beyond what has already been assessed in accordance with ASTM E 1527-05 as may be amended. If the Phase I ESA finds that contaminated soil is suspected to be present within any building excavation footprint or open space area, the Applicant shall perform soil sampling and analysis to determine the extent of contamination. If contaminants are detected in soil at or above regulatory levels, then the results of the soil sampling shall be reviewed and acted upon by the SMFD or the Planning Department and other regional or state regulatory agencies as needed.*

*MM HAZ-2c* ***Discovery of Contamination****: In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist [PG], a licensed Professional Engineer [PE] or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-*

*development; and (2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., SMFD). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration requirements shall be prepared and in place prior to commencement of work in any contaminated area.*

*MM HAZ-2d* ***Soils Management Plan:*** *For project sites with onsite soil contamination, prior to approval of the first grading plan or issuance of the first demolition permit, whichever occurs first, the project Applicant shall submit a soils management plan and a transportation plan to the appropriate cleanup agency (e.g., Los Angeles RWQCB, DTSC, SMFD) for review and approval. The soils management plan and transportation plan shall include the following tasks.*

*Soils Management Plan*

*Affected soils shall be either directly loaded into awaiting trucks for immediate offsite disposal or temporarily stockpiled on plastic sheeting prior to load-out and offsite disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came.*

*Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following.*

*Soil and Material Segregation*

*Overburden soils shall be screened with an organic vapor analyzer (OVA) in accordance with SCAQMD Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with federal, state, and local regulations. Soil cuttings during the installation of soldier piles shall be disposed of offsite with any affected soils from the deep excavation.*

*Stockpile Management*

*The stockpiled soils for load-out shall be segregated by waste classification:*

- *Nonhazardous waste.*
- *VOC-contaminated nonhazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm.*
- *VOC-contaminated nonhazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll-off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a tarp for offsite transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan.*

*The temporary stockpiles containing affected soils shall be managed as follows:*

- *The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust.*
- *The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.*
- *Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made.*
- *If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations.*
- *During stockpile generation and removal, only the working face of the stockpile shall be uncovered.*

*Decontamination Methods and Procedures*

*Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket.*

*Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable*

*circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the onsite and offsite distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.*

*Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.*

*Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated, but shall be packaged for appropriate offsite disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures:*

- *Nonphosphate detergent and tap-water wash, using a brush if necessary.*
- *Tap-water rinse.*
- *Initial deionized/distilled water rinse.*
- *Final deionized/distilled water rinse.*

*Truck Loading*

*Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:*

- *Materials shall be transported to an approved treatment/disposal facility.*
- *No excavated material shall extend above the sides or rear of the truck/trailer.*

- *Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.*
- *The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material offsite.*

*Storm Water Management*

*The good housekeeping practices prescribed in the City's Urban Runoff Mitigation Plan (SMMC Section 7.10.060) shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with federal, state, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include:*

- *Pumping the standing water into temporary above-ground storage tanks for reuse onsite for dust suppression.*
- *Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain, subject to approval by the City of Santa Monica Water Resources Protection Programs Division.*
- *Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility.*

*Transportation Plan*

*All affected soils shall be transported offsite for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment.*

### 3.8.5 Project Impacts and Mitigation Measures

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

**HAZ-1 Construction of the proposed Project would require the demolition all onsite structures that may contain hazardous materials, (e.g., ACMs, LBP, and mold). Project operations would involve cleaning and maintenance activities using limited quantities of common hazardous materials, such as cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and pesticides/herbicides. However, compliance with Federal, State, and local regulations and mitigation measures from the DCP Program EIR would ensure that the proposed Project would not create a hazard to the public or the environment through the routine transport, use, or, disposal of hazardous materials. This impact would be *less than significant with mitigation*.**

Impact Description (HAZ-1)

*Construction*

As described in Section 2.0, *Project Description*, the proposed Project would include the development of hotel, residential, restaurant and retail, and cultural uses and a three-level subterranean parking garage. The 3-year construction period (refer to Section 2.7, *Construction Activities*) would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, such materials would be in limited quantities (i.e., not commercially reportable) and would be handled in compliance with all applicable Federal, State, and local regulations (refer to Section 3.8.2, *Regulatory Framework*). Construction workers in contact with potentially hazardous materials would be required to wear appropriate protective equipment and safety equipment would be provided onsite pursuant to OSHA standards.

Project construction would require the demolition of all onsite structures, with the exception of the two existing City-designated Landmarks currently located at 1333 and 1337 Ocean Avenue, which would be rehabilitated and relocated on the northern portion of the Project site along Ocean Avenue. Due to the age of the existing buildings, hazardous materials, (e.g., ACMs, LBP, and mold) may be present within the buildings at Project site. As such, construction workers and/or members of the public could be exposed to these materials during demolition of the existing buildings and hauling of construction debris. Implementation of DCP MM HAZ-2a.a would require construction material testing to identify the potential presence of ACMs, LBPs, or mold in existing buildings at the Project site prior to demolition. This mitigation measure would also require construction material testing for PCBs, which were not addressed within the Phase I ESA.

If previously unidentified ACM is detected during demolition activities, mandatory compliance with SCAQMD Rule 1403 would require the abatement and control of ACMs prior to demolition.

Similarly, Title 8, Industrial Relations, of the California Code of Regulations (CCR) would require the removal and control of LBPs prior to demolition. Standard construction best management practices (BMPs) would be applied, as necessary (e.g., development of a health and safety plan, fugitive dust controls, protective equipment, including but not limited to respirators, googles, protective clothing, gloves, etc.).

Mold could also potentially occur within existing buildings on the Project site. Specifically, mold growth within interior or inaccessible areas of buildings may be released during demolition or renovation activities and result in exposure to construction workers posing a potential hazard to public health and the environment. As with ACM and LBP, the Phase I ESA did not conduct destructive mold testing, so it cannot be conclusively stated whether active mold growth is present within existing structures at the Project site. However, implementation of DCP MM HAZ-2a.a would require construction material testing to identify the presence of mold onsite prior to demolition. If encountered during demolition and/or construction, the construction contractor would remove using safe and appropriate methods to minimize potential exposure to high concentrations of spores. Some situations will require extra precautions – similar to those used for handling ACMs or LBPs – to limit the distribution of airborne mold spores.

Compliance with existing mandatory regulations and BMPs related to the treatment, handling, and disposal of ACM, LBP, and mold, combined with DCP MM HAZ-2a.a, would ensure impacts of the proposed Project from construction would be *less than significant with mitigation*.

*Operation*

Following the completion of construction activities operations and maintenance associated with the proposed Project – including the proposed residential units, hotel guestrooms, retail, restaurant, and cultural use campus – would include routine cleaning and maintenance activities using common hazardous materials, such as cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and pesticides/herbicides. Applications of such materials would likely be in limited quantities (i.e., not commercially reportable). The proposed Project would not use, store, or manufacture hazardous materials requiring a Hazardous Materials Business Plan under the SMMC (i.e. hazardous materials exceeding 55-gallons or more of liquid, 500-pounds or more of solid, and/or 200-cubic feet or more of a gas, at a standard pressure and temperature). All hazardous materials used onsite would be subject to all appropriate regulation and documentation for the handling, use, and disposal of such materials consistent with all appropriate Federal, State, and local regulations. If necessary, appropriate permits, worker training, and agency inspections would be obtained and provided. Implementation of standard good housekeeping measures, standard BMPs, site maintenance, and security precautions, and compliance with applicable

standards and regulations would reduce potential impacts related to the routine transport, use, or disposal of hazardous materials. Therefore, the risk of public or environmental exposure through the routine transport, use, or disposal of hazardous materials during operation of the Project would be *less than significant*.

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

**HAZ-2 Construction of the proposed Project could create a hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials during excavation, trenching, and grading. Impacts would be *less than significant with mitigation*.**

Impact Description (HAZ-2)

*Construction*

Soil disturbance during excavation, trenching, and grading on the Project site may result in the release of hazardous materials through disturbance of potentially contaminated soil. Current land uses at the Project site do not pose a risk of potential hazard through soil exposure; however, historical onsite and offsite uses may have released hazardous materials, resulting in contamination of underlying soils. Historical records indicate 133 and 135 Santa Monica Boulevard, which occupy the northeastern portion of the Project site, were previously operated as a dry cleaning facility from 1928 to 1980. Based on the results of the Phase I ESA, it is likely that these facilities used petroleum hydrocarbon-based and PCE solvents, which have the potential to release into the underlying soil, soil vapor, and groundwater. Additionally, residential uses were located on the Project site as early as 1887, which may have resulted in burned or incinerated ash from backyard burn pits as well as metal-bearing fill material in the soil. Burn ash and metal-bearing fill material may contain unsafe concentrations copper, lead, zinc, or other metals.

In addition, 1347 2nd Street and 1401 Ocean Avenue were previously operated as a dry cleaning facility and a gasoline and automobile service station, respectively. No violations or known releases were reported for these sites; however, the property at 1347 2nd Street is located hydrologically upgradient of the Project site. Therefore, in the event that a hazardous materials release did occur at this property (e.g., PCEs), the Project site could be affected. As such, the potential remains for an environmental condition at the Project site associated with contaminant migration from the previous dry cleaning facility. 1401 Ocean Avenue is downgradient of the

Project site in terms of groundwater flow direction, so it is unlikely an environmental condition exists at the Project site due to contaminant migration from the historical gas station.

As soil testing was not possible during the Phase I ESA due to the developed nature (i.e., paved) of the Project site, DCP MM HAZ-2a.b would require soil, soil vapor, and groundwater testing, consistent with the recommendations of SCS Engineers (2019) for all areas of proposed soil disturbance prior to demolition. This assessment would involve soil borings and soil vapor probes for PCEs as well as trenching and sampling of the shallow subsurface soil for common burned ash constituents. If contaminated soils are identified during this Phase II testing, additional abatement activities would be required including preparation of a Soil Management and Transportation Plan under DCP MM HAZ-2d. If previously unknown contamination is discovered during construction (e.g., discolored or stained soils and/or odors from a localized release of petroleum, oils, and lubricants) the construction contractor would be required to follow the procedures described in DCP MM HAZ-2c. Further, all construction activities associated with the proposed Project would be required to comply with all Federal, State, and local policies and regulations relating to discovery, disturbance, and/or disposal of potentially contaminated soils. The implementation of these mitigation measures and mandatory compliance with Federal, State, and local policies and regulations would ensure impacts would be *less than significant with mitigation.*

*Operation*

As discussed in Impact HAZ-1, the types and amounts of chemicals used and stored for daily operation of the proposed Project would be limited and below reportable quantities. Users would follow manufacturer instructions and excess solutions and empty containers would be disposed of in accordance with all Federal, State, and local regulations. Operational impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be *less than significant.*

### 3.8.6 Cumulative Impacts

Cumulative development within the Downtown would have the potential to expose residents, employees, and visitors to hazardous materials through redevelopment of sites and structures that may be contaminated from either historic or current uses. A number of approved, pending, and proposed developments are located in the Downtown (refer to Table 3.0-1). The proposed Project in combination with these cumulative projects would contribute to increasing the density of the City's urban environment. Approved and pending projects in the vicinity are expected to transport, use, and store hazardous materials within the site vicinity. For example, the mixed-use development project at 1318 2nd Street, adjacent to the Project site, would involve the export of

demolition debris and the delivery of construction materials. The construction schedule associated with this cumulative project may overlap with the construction schedule described for the proposed Project. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Therefore, specific projects proposed in the City or within the Downtown would be required to undergo individual environmental review, including review of potential impacts related to hazards and hazardous materials that are applicable to that particular development site and proposed use.

Nevertheless, cumulative projects within the Project site vicinity would also be required to implement the previously adopted mitigation measures in the DCP Program EIR regarding hazards and hazardous materials. Restrictions on development or remediation requirements would be applied in the event that hazardous materials posed a risk to safety. In addition, as with the proposed Project, all cumulative projects would be required to comply with Federal, State, and local regulations regarding the handling, use, transport, and disposal of potentially hazardous materials, as applicable. Further, because restrictions on development or remediation requirements would be applied in the event that hazardous materials posed a risk to safety, it is anticipated that cumulative impacts from exposure to hazards or hazardous materials would be *less than significant*.

### 3.8.7 Residual Impacts

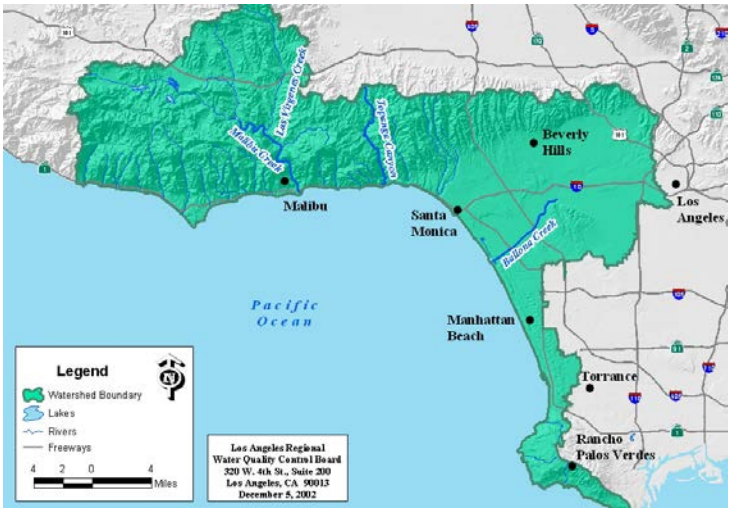
Demolition associated with the proposed Project could potentially disturbed ACMs, LBPs, and/or mold on the Project site. Additionally, excavation activities could disturb soils contaminated with PCEs and/or burned ash. Compliance with DCP MM HAZ-2a and MM HAZ-2d, would require further investigation and appropriate management, transport, and disposal of all contaminated demolition debris and soils, if necessary. Implementation of these mitigation measures and compliance with Federal, State, and local regulations related to the transport, use, storage, and cleanup of hazardous materials would reduce the risk of hazardous impacts to *less than significant*.

## 3.9 HYDROLOGY AND WATER QUALITY

This section describes the existing hydrology and water quality issues and analyzes the potential impacts related to construction and operation of the Ocean Avenue Project (Project). The primary issues of concern related to hydrology include drainage and surface water quality, and groundwater levels and groundwater quality. Related issues that are addressed in other sections of this Environmental Impact Report (EIR) include: water infrastructure and supply in Section 3.15, *Utilities*; groundwater basin geology and groundwater-related geotechnical hazards in Section 3.6 *Geology and Soils*; and the potential for groundwater contamination from hazardous materials in Section 3.8, *Hazards and Hazardous Materials.*

### 3.9.1 Environmental Setting

Watershed and Regional Setting




*The Downtown is located with the coastal area of the Santa Monica Bay WMA, between Topanga Canyon Creek and Ballona Creek sub-watersheds, where the existing topography causes runoff to flow to the Santa Monica Bay.*

The City of Santa Monica (City) is located within the Santa Monica Bay Watershed Management Area (WMA), which encompasses approximately 414 square miles. The boundaries of the Santa Monica Bay WMA reach from the crest of the Santa Monica Mountains in the north and from the Ventura-Los Angeles County line in the east to Downtown Los Angeles. From there, the boundaries extend to the south and west including the area east of Ballona Creek and north of the Baldwin Hills. South of Ballona Creek the natural drainage area is a narrow strip of wetlands between Playa del Rey and Palos Verdes (State Water Resources Control Board [SWRCB] 2014, 2018). The Santa Monica WMA drains the Santa Monica Mountains and coastal portions of the cities located along the Santa Monica Bay, including the cities of Malibu, Santa Monica, Los Angeles, El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Palos Verdes Estates, and Rancho Palos Verdes. The Santa Monica WMA drains directly to the Santa Monica Bay and Pacific Ocean (SWRCB 2014, 2018). The Santa Monica Bay is located adjacent to one of the most populated and urbanized coastal metropolitan areas in the U.S. and discharge of treated municipal,

commercial, and industrial runoff, cooling water, and wastewater have impacts on regional water resources, including inland surface waters, estuarine waters, and marine waters, such as wetlands, lakes, rivers, estuaries, lagoons, harbors, bays, and beaches.

Local Hydrology and Drainage

The City's Downtown is located midway between the Topanga Canyon Creek and Ballona Creek sub-watersheds. The Downtown contains no water bodies, streams, or creeks. Except for plazas, courtyards, landscaping, and active construction sites with exposed soils, the Downtown is completely developed with buildings, roadways, and paved surface parking lots that prevent natural infiltration. Surface water within the Downtown is generally limited to sheet flow (i.e., overland flow or downslope movement of water taking the form of a thin, continuous film) to curbed gutters, which empty into the municipal storm drain system (City of Santa Monica 2017).

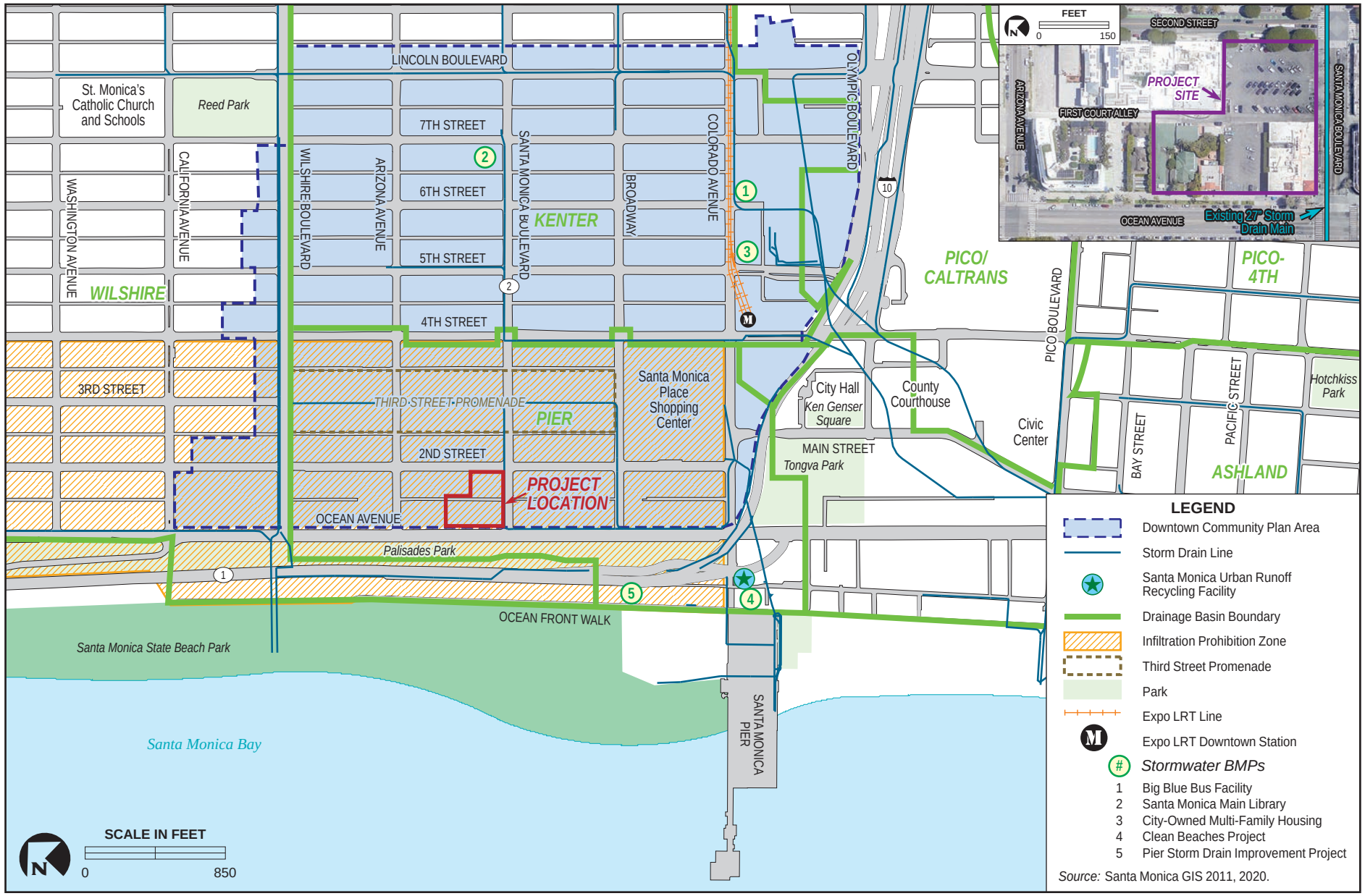
*Stormwater Drainage and Infrastructure*

In an urban setting like Downtown Santa Monica, drainage infrastructure is designed and constructed with an alignment and capacity intended to protect life and property from flooding caused by storm events. The design and capacity of stormwater drains, culverts, channels, and pumping stations are optimized to provide flood control for an area in a cost-effective way after accounting for all reasonable scenarios. The drainage infrastructure divides the City's runoff flows into 13 drainage basins, which all drain to the Santa Monica Bay (City of Santa Monica 2010, 2017). Most of the Downtown flows to one of three drainage basins: Kenter Basin, Pier Basin, or Wilshire Basin (see Table 3.9-1 and Figure 3.9-1).

**Table 3.9-1. Downtown Drainage Basins**

| Basin | Description |
|---|---|
| Kenter Basin | The Kenter Basin is a 3,968-acre urban watershed collecting regional runoff. The 1,424-acre portion of the Kenter Basin within Santa Monica is developed with predominantly residential, commercial, transportation and industrial land uses. |
| Pier Basin | The Pier Basin is an 84-acre urban watershed located adjacent to Santa Monica Beach just west of the Kenter Basin. The Pier Basin is densely commercial – including the Third Street Promenade – with residential development along the waterfront. |
| Wilshire Basin | The 587-acre Wilshire Basin is in the west-central portion of the City and drains to Santa Monica Beach. It is bordered by the Montana Basin to the north and the Kenter Basin to the east and south. Land uses within the Wilshire Basin consist primarily of multi-family residences with commercial development along Wilshire Boulevard. The Wilshire Basin also includes Reed Park and Douglas Park. |

Source: City of Santa Monica 2010.




wood.

**Downtown Drainage and Infiltration Device Prohibition Zone**

**FIGURE 3.9-1**

The capacities of the Kenter Basin, Pier Basin, and Wilshire Basin were analyzed in the Santa Monica Watershed Management Plan (City of Santa Monica 2006, 2017). Based on the Los Angeles County Public Works Department Hydrology Manual (2006), the capacities of the three drainage basins were assessed based on a 10-year frequency storm event over a 24-hour period. These three drainage basins have varying degrees of excess capacity for stormwater runoff as described in Table 3.9-2 and Table 3.9-3 (City of Santa Monica 2006, 2017).

**Table 3.9-2. Storm Drain Theoretical Capacity Summary – 10-year Storm Event**

| Basin | Total Basin Drainage Area (acres) | Length of Storm Drain Under Theoretical Capacity (miles) | Runoff Volume during 0.75-inch Rain Event (AF) | Peak Flow During 0.75-inch Rain Event (cfs) | Average Excess Flow (cfs) |
|---|---|---|---|---|---|
| Kenter Basin | 3,968 | 3.4 | 61 | 1,162 | 55 |
| Pier Basin | 81.6 | 0.7 | 4 | 33 | 21 |
| Wilshire Basin | 578.8 | 2.9 | 23 | 266 | 48 |

Source: City of Santa Monica 2006, 2017.

During a storm event, stormwater runoff from the three drainage basins is conveyed by the existing network of storm drains to the Wilshire, Pico-Kenter, and Pier Storm Drains and ultimately to the Santa Monica Bay. The Wilshire Storm Drain runs along Wilshire Boulevard and has a 5.5-foot and 4-foot outfall along the sand (Personal Communication Joshua Carvalho, Civil Engineer, Department of Public Works). The Pico-Kenter Storm Drain, a 10-foot diameter storm drain, runs through the City and outfalls to the Santa Monica Bay at the western end of Pico Boulevard. The Pico-Kenter runoff drainage area includes parts of the City of Los Angeles and the Santa Monica Mountains. The Pier Storm Drain, a 60-inch diameter storm drain, is located immediately south of the Downtown and outfalls to the Santa Monica Bay at the Santa Monica Pier extension off Colorado Boulevard (City of Santa Monica 2006, 2017).

**Table 3.9-3. Storm Drain Theoretical Capacity for Drain Segments within the Downtown – 10-year Storm Event**

| Storm Drain Alignment with Roadway | From | To | Pipe Diameter (inches) | Total Pipe Length (feet) | Excess Drain Capacity (cfs) |
|---|---|---|---|---|---|
| **Kenter Basin** | | | | | |
| **Santa Monica Boulevard** | 5th Street | 7th Street | 24 | 800 | 48 |
| **4th Street** | Santa Monica Boulevard | I-10 | 36 | 1,840 | 293 |
| **Lincoln Boulevard** | Arizona Avenue | Santa Monica Boulevard | 66 | 680 | 55 |
| **Pier Basin** | | | | | |
| **Santa Monica Boulevard** | 3rd Street | Ocean Avenue | 21 - 27 | 770 | 24 |
| **Ocean Avenue** | Santa Monica Boulevard | Colorado Avenue | 24 - 30 | 1,390 | 64 |
| **3rd Street** | Santa Monica Boulevard | Broadway Avenue | 24 | 650 | 41 |
| **Broadway Avenue** | 2nd Street | Ocean Avenue | 27 | 380 | 2 |
| **Colorado Avenue** | Ocean Avenue | 2nd Street | 42 | 250 | 15 |
| **Wilshire Basin** | | | | | |
| **Wilshire Boulevard** | Ocean Avenue | Lincoln Boulevard | 24 - 90 | 4,070 | 407 |
| | | | Total | **10,830** | **949** |

Sources: City of Santa Monica 2006, 2017.

As shown in Table 3.9-3, the three drainage basins serving the Downtown have adequate capacity to convey flows from a 10-year storm event (City of Santa Monica 2006, 2017). Additionally, following the completion of the Santa Monica Watershed Management Plan, several Best Management Practices (BMPs) were constructed in the Downtown, further reducing stormwater flows in the storm drain system described in Table 3.9-4.

## Table 3.9-4. Stormwater BMPs in the Downtown

| Address | Primary Land Use | BMP Description |
|---|---|---|
| 612 Colorado Avenue | Big Blue Bus Facility | Three separate, large infiltration zones were developed in two phases to capture runoff from rooftops and surface parking areas. Phase I consisted of an infiltration zone made up of concave plastic chambers, called Infiltrators®, backfilled with rock. This system holds up to 25,000 gallons of rainwater runoff for infiltration. The second phase consisted of two identical systems intended to capture runoff from the bus parking and nearby rooftops areas. These systems were designed to hold up to 160,000 gallons of the projected runoff from a 0.75- to 1-inch storm event. |
| 601 Santa Monica Boulevard | Santa Monica Main Library | Runoff from rooftops, decks, and surface parking lots is collected and piped through 17 downspout filters before entering a 200,000-gallon concrete cistern, which is located beneath the underground parking structure. Stored water is pumped to the library's sub-surface irrigation system. |
| 502 Colorado Avenue | City-owned Multi-Family Housing | Instead of using rock as infill for the underground storage area for runoff, plastic chambers, called Infiltrators® or StormTech® chambers, line the percolation zone. The estimated capacity is 500 cubic feet. An overflow pipe from the chambers spills when full onto the 1st Court surface, which is composed of two permeable paving types – porous concrete and Invisible Structures GravelPave2. Runoff from areas upstream of this site sheet flows to this permeable surface and infiltrates into the ground. Excess runoff flows to a catch basin |

Source: City of Santa Monica 2018a.

In 2018, the City completed the Clean Beaches Project to prevent pollutants from flowing into Santa Monica Bay (City of Santa Monica 2020). This project involved the construction of a diversion structure and pipeline under the Pier and Lot 1 North surface parking lot to convey stormwater and dry weather (non-stormwater) runoff from Downtown to a new 1,600,000-gallon underground storage tank at the Deauville surface parking lot, located at 1543 Ocean Front Walk near the beach. Runoff from this underground storage tank is ultimately conveyed to the Santa Monica Urban Runoff Recycling Facility (SMURRF).

*The Clean Beach Project includes a diversion structure, pipeline, and 1,600,000-gallon underground storage tank, that captures stormwater from 106 acres of the Downtown.*

*Dry Weather (Non-Stormwater) Runoff*

Dry weather runoff occurs from excess irrigation, accidental spills, construction sites (e.g., vehicle washing, soil watering and dewatering during excavation), pool draining, car washing, pavement washing, etc. Dry weather runoff generated within the City is entirely diverted to sanitary sewers and the Wilshire, Pico-Kenter, and Pier Storm Drains. As described in Section 3.15, *Utilities*, dry weather runoff from the City's Pico-Kenter and Pier Storm Drains is ultimately treated at the SMURRF. The SMURRF is designed to effectively treat up to 0.5 million gallons per day (MGD) of urban runoff. The treated water is pumped through a reclaimed water distribution system – commonly referred to as purple pipe – to serve the City's non-potable water needs (e.g., park landscaping, street sweeping, etc.) (City of Santa Monica 2018b).

In 2009, the City completed the Pier Storm Drain Improvement Project which provided for the replacement of the deteriorated pipe, installation of a diversion structure, and upgrades to storm drain connections from 1550 Parking Lot and dry weather runoff diversions. The project diverts all dry weather runoff to the sanitary sewer, eliminating that source of contamination to the Santa Monica Bay (City of Santa Monica 2009).

Another water quality improvement project that has improved dry weather runoff from the Downtown is the City's Wilshire Boulevard Watershed Water Quality Project, a dual-stage, subterranean water quality treatment system located at Palisades Park (City of Santa Monica 2017). This first stage of this water treatment system is a Continuous Deflective Separation (CDS) unit, which screens and settles out pollutants (e.g., floatables, sediment, and oil and grease) from the 90-inch storm drain within Wilshire Boulevard. After being processed through the CDS unit, dry weather runoff, which still contains soluble pollutants (i.e., heavy metals and organic chemicals), flows into a second stage vault that drains into the sanitary sewer for advanced treatment at the City of Los Angeles Hyperion Treatment Plant (see Section 3.15, *Utilities*). During storm events, the first 0.75 inches of rainfall is treated by the CDS unit only and then drains through a vault to the Santa Monica Bay, where runoff outfalls on Santa Monica State Beach approximately 480 feet from the high tide line and approximately 900 feet southwest of the western terminus of Wilshire Boulevard.

*Water Quality*

Urban runoff – including stormwater and dry weather runoff – contain a wide range of debris and pollutants. Impervious surfaces increase the volume and rate of urban runoff and can result in degraded surface water quality. Stormwater and dry weather runoff carrying increased

concentrations of surface water pollutants can have harmful effects on drinking water, recreational water, and wildlife (City of Santa Monica 2006).

Surface water pollutants originate from two types of sources:

- **Point Sources** refer to discrete discharges of surface water pollutants from specific generators into receiving waters, including pipes or man-made ditches. Point sources are regulated in accordance with the National Pollutant Discharge Elimination System (NPDES) program (see Section 3.9.2, *Regulatory Setting*).
- **Non-Point Sources** refer to stormwater and dry weather runoff that washes, scours, and intercepts pollutants from the air and ground, including solid waste, leaked motor oil, or heavy metals or chemicals deposited on pavements or vegetation. Urban runoff includes all surface water draining from streets, parking lots, driveways, and landscaping that flows through the storm drain system to treatment facilities and ultimately to Santa Monica Bay.

Two principal water quality plans are applicable to the Santa Monica Bay: the California Ocean Plan (Ocean Plan) (2019) and the Water Quality Control Plan for the Los Angeles Basin (Basin Plan) (2014). For coastal sites, the Ocean Plan includes water quality objectives for the protection of oceanic water quality. Under the Basin Plan, urban runoff must meet guidelines set by the Los Angeles Regional Water Quality Control Board (RWQCB) to retain the beneficial use of the receiving water bodies. The Basin Plan defines beneficial uses of Santa Monica Beach and Santa Monica Bay as industrial service supply; navigation; contact and noncontact water recreation; commercial and sport fishing; estuarine habitat; marine and wildlife habitat; preservation of biological habitats; migration of aquatic organisms; rare, threatened or endangered species; shellfish harvesting, spawning, reproduction, and/or early development of fish (City of Santa Monica 2017).

The location of Santa Monica Beach and Santa Monica Bay downstream of the Los Angeles metropolitan area has resulted in impacts to water quality (City of Santa Monica 2017). In response to these conditions and subsequent lawsuits, a consent decree was issued in 1999 between the U.S. Environmental Protection Agency (USEPA), Heal the Bay, Inc., and BayKeeper, Inc. to establish Total Maximum Daily Loads (TMDLs) for pollutants in the Santa Monica Bay, necessary to meet Federal water quality standards. The consent decree also mandated the establishment of BMPs to address water quality concerns in the Santa Monica Bay.

To improve the condition of the Santa Monica Bay and meet TMDLs, dischargers are required to achieve pollutant load reduction targets through various means, including implementation of projects identified in the Watershed Management Plans (WMPs) and Enhanced Watershed

Management Plans (EWMPs) under the stormwater discharge permits. There are also collaborative and integrated watershed-wide planning and implementation efforts, such as the Storm Water Strategy, an effort led by SWRCB to sustainably manage and utilize stormwater in California to support water quality and water availability, and Integrated Water Resource Management Plan (IRWMP) for the Los Angeles metropolitan area, including the availability and allocation of bond funding to facilitate and contribute to water quality improvement planning and implementation efforts in the region.

*Dry weather runoff from the City's Pico-Kenter and Pier Storm Drains is ultimately treated at the SMURRF. The SMURRF is designed to treat and recycle up to 0.5 million gallons per day (MGD) of urban runoff.*

The City has made considerable contributions to the improvement of water quality of the Santa Monica Bay, beginning with the construction of the SMURFF in 1999 and followed by various other stormwater improvement projects (refer to Table 3.9-4). Further, the City of Los Angeles has installed approximately 40 low-flow diversions (LFDs) or runoff treatment facilities at storm drains leading to Santa Monica Bay in order to reduce coliform levels and beach closures. Some of the LFDs have become full-time diversions (City of Santa Monica 2017). Of the 27 high priority storm drains listed in the Santa Monica Beach dry weather bacteria TMDL, all have been diverted. While LFDs or runoff treatment facilities are in operation at many of the storm drains in the Santa Monica Bay, approximately 12 of the outlets still discharge dry weather flow into the Santa Monica Bay. On a rainy day, the ability of LFDs and runoff treatment facilities to accommodate flows is overwhelmed and approximately 10 billion gallons of stormwater can flow into the Santa Monica Bay (City of Santa Monica 2017). The City's Wilshire Basin, which is served by the 90-inch storm drain in Wilshire Boulevard, does not contribute dry weather flows to Santa Monica Bay. During storm events, the Wilshire Boulevard outfall treats wet weather flows from the Wilshire sub-watershed for trash and debris in the system's CDS prior to discharging them to the Santa Monica Bay.

The Santa Monica Bay Restoration Commission's (SMBRC) 2018 Update of the Bay Restoration Plan notes that substantial progress had been made in the last 30 years in improving water quality in the Santa Monica Bay. However, the Santa Monica Bay is still affected by water quality issues

due to its location downstream of the Los Angeles metropolitan area and the presence of past contamination. As a result of these factors, both Santa Monica Beach and Santa Monica Bay are identified as impaired water bodies under Clean Water Act (CWA) Section 303(d) (SWRCB 2016). As listed in Table 3.9-5, the impairments for Santa Monica Beach are limited while those for Santa Monica Bay are more extensive.

**Table 3.9-5. Impaired Water Bodies within the Vicinity of the Downtown**

| Water Body Name & Type | Water Body Extent | Pollutant | Potential Source |
|---|---|---|---|
| Santa Monica Beach – Coastal and Bay Shoreline | 3 miles | Indicator Bacteria | Non-point Source |
| Santa Monica Bay Offshore/Nearshore – Bay and Harbor | 146,645 acres | Arsenic | Source Unknown |
| | | DDT | Source Unknown |
| | | Mercury | Source Unknown |
| | | PCBs | Source Unknown |
| | | Trash | Source Unknown |

Notes: DDT = Dichlorodiphenyltrichloroethane; PCBs = Polychlorinated biphenyls
Source: SWRCB 2016.

In addition, the 2018 Plan Update observed that while existing water quality improvement programs have achieved significant reduction of pollutant loading, many new contaminants are emerging and causing concern. The emerging contaminants include, but are not limited to, polybrominated diphenyl ethers (PBDEs), which are used primarily as flame retardants, perfluorinated chemicals that are used as stain repellants, and other pharmaceuticals or other personal care products that may harm aquatic life or the environment (SMBRC 2018).

*Groundwater*

As described in Section 3.6, *Geology and Soils*, the City is located within the Santa Monica Groundwater Basin (SMGB), a sub-basin of the Los Angeles Groundwater Basin. The SMGB is further divided into five sub-basins, including the Coastal and Olympic sub-basins underlying the Downtown and the Charnock, Crestal, and Arcadia sub-basins, which are further removed (i.e., inland) from the Downtown. Groundwater occurs in all deposits of the sub-basin from the recent alluvium down to the fractured Tertiary sediments. The average depth to groundwater within the City is 110 to 180 feet below ground surface (bgs) with an estimated maximum depth of 550 feet bgs further inland (Metropolitan Water District [MWD] 2010). Within the Downtown, groundwater is estimated to be encountered at 26 to 63.5 feet bgs. Groundwater movement in the SMGB trends toward the south with some minor subsurface flow toward the west.

As described in Section 3.15, *Utilities*, the SMGB is currently unadjudicated and the City is the only municipality with a history of pumping significant volumes of water from the SMGB. Sustainable yield estimates developed by Slade and ICF provide a strong level of confidence that the City can continue pumping from the SMGB in an ongoing manner into the future without negatively impacting the basin or creating overdraft conditions (City of Santa Monica 2018b).

*Groundwater Quality*

As described in Section 3.15, *Utilities*, the City has 10 active wells in the Charnock, Arcadia, and Olympic sub-basins of the SMGB:

- The Charnock Well Field, located in the Charnock Sub-Basin;
- The Arcadia Well Field, located in the Arcadia Sub-Basin; and
- The Olympic Well Field, located in the Olympic Sub-Basin.

Given the coastal location of the Downtown, seawater intrusion and increased salinity is a consideration for groundwater quality, particularly in the Coastal sub-basin of the SMGB. However, groundwater levels in each sub-basin are generally at or above mean sea level, which generally inhibits saltwater intrusion. Additionally, the City does not operate any wells in the Coastal sub-basin, which lies nearest to Santa Monica Bay. Therefore, potential saltwater intrusion does not pose a significant risk to the City's groundwater quality and no seawater intrusion barriers or desalination mechanisms are needed in the SMGB (City of Santa Monica 2010a).

Three general groundwater quality parameters in the SMGB are treated by the City to meet drinking water standards: (1) Total Dissolved Solids (TDS); (2) volatile organic compounds (VOC); and (3) methyl tertiary-butyl ether (MtBE).

- **Total Dissolved Solids (TDS)** are dissolved solids plus suspended and settleable solids in water consisting of calcium, chlorides, nitrate, phosphorus, iron, sulfur, and other ion particles that will pass through a filter. Higher concentrations of TDS can affect water clarity, diminish photosynthesis, lead water sources to retain heat, and adversely affect the taste of drinking water. Sources of TDS include industrial discharges, sewage, fertilizers, urban runoff, and soil erosion.
- **Volatile Organic Compounds (VOCs)** are emitted as gases from a variety of organic chemical solids or liquids and may have short- and long-term adverse health effects. VOCs are emitted by a wide array of products, including paints and lacquers, paint strippers, cleaning supplies, and pesticides. Groundwater contamination occurs when VOCs are stored improperly, spilled, or settle into water resources.

- **Methyl tertiary-butyl ether (MtBE)** is a chemical compound that is used in U.S. gasoline since 1979 to replace lead to help prevent engine "knocking." MtBE can leak into the environment, including groundwater and drinking water sources, wherever gasoline is stored, and can be spilled whenever fuel is transported. In 1997, the USEPA advised that MtBE concentrations above 40 parts per billion (ppb) in drinking water could cause negative health effects.

In 1996, testing revealed that MtBE had infiltrated two of the City's well fields – Charnock and Arcadia – with MtBE contamination levels as high as 610 ppb and 86 ppb, respectively. The source of the gasoline compound was leakage from underground storage tanks at gasoline service stations in the vicinity. In response, the two well fields, representing approximately 50 percent of the City's drinking water supply, were temporarily shut down and the City began purchasing replacement water while pursuing remediation options. The Arcadia Well Field was reactivated in December 2003 following success of a well head treatment system. The Charnock Well Field Restoration Project culminated in the reactivation of the well field and the launching of the Santa Monica Water Treatment Plant in December 2010 (City of Santa Monica 2017).

Existing Conditions at the Project Site

*Site Drainage*

A site-specific Hydrology Drainage Study was prepared for the proposed Project by KPFF Consulting Engineers (KPFF) in May 2020 (see Appendix H). As described in Section 2.2.2, *Existing Project Site*, the 1.89-acre Project site is bisected by 1st Court and fully developed with one- to three-story buildings and surface parking lots. No retention or treatment of stormwater runoff is currently provided on the Project site.

For the purposes of the Hydrology Study, the Project site is divided into two Drainage Areas (DAs):

- DA1, located to the east of 1st Court, with a total area of 0.69 acres and 100 percent impervious surface.
- DA2, located to the west of 1st Court, with a total area of 1.20 acres and 95 percent impervious surface.

There is an approximate 4.5-foot elevation change over approximately 350 feet on the Project site, resulting in a gradient of approximately 1.3 percent from northwest to southeast. As a result of this elevation change, urban runoff at the Project site flows toward Santa Monica Boulevard and Ocean Avenue where it is captured by curbed gutters conveyed into existing storm drain inlets, through

laterals, and into the 27-inch storm drain line beneath Santa Monica Boulevard. The Project site is located within the Pier Basin; therefore, stormwater runoff is conveyed south along Santa Monica Boulevard to the 1,600,000-gallon underground storage tank at the Deauville surface parking lot, approximately 1,600 feet south of the Project site. As previously described, stormwater from this underground storage tank is ultimately conveyed to the SMURRF, where it is treated and pumped through purple pipe to serve the City's non-potable water needs (e.g., park landscaping, street sweeping, etc.). The Los Angeles County's HydroCalc Calculator was used to determine the existing peak runoff rates at the Project site during the 10-, 25-, and 50-year storm events (see Appendix H). HydroCalc is a software based on the Modified Rational Method (MODRAT), as outlined by the Los Angeles County Public Works Department Hydrology Manual (2006).

Based on the analysis, the 50-year, 24-hour rainfall depth for the Project site is 6 inches (KPFF 2020; see Appendix H). The 10-year 24-hour rainfall depth and 25-year 24-hour rainfall depth was determined by applying a factor of 0.714 and 0.878, respectively, to the 50-year, 24-hour rainfall depth per Table 5.3.1 of the Los Angeles County Public Works Department Hydrology Manual. The 10-, 25- and 50-year peak discharges for the Project site are summarized in Table 3.9-6.

**Table 3.9-6. Existing 10-, 25-, and 50-year Peak Stormwater Discharge at the Project Site**

| Drainage Area | Area (acres) | Flow Path Length (feet) | Flow Path Slope (%) | Existing Impervious Surface (%) | Existing Flow (cfs) |
|---|---|---|---|---|---|
| **10-Year** | | | | | |
| DA-1 | 0.69 | 200 | 1.5% | 100 | 1.59 |
| DA-2 | 1.20 | 350 | 1.1% | 95 | 2.35 |
| **25-Year** | | | | | |
| DA-1 | 0.69 | 200 | 1.5% | 100 | 1.95 |
| DA-2 | 1.20 | 350 | 1.1% | 95 | 3.12 |
| **50-Year** | | | | | |
| DA-1 | 0.69 | 200 | 1.5% | 100 | 2.22 |
| DA-2 | 1.20 | 350 | 1.1% | 95 | 3.87 |

Source: KPFF 2020; see Appendix H.

*Groundwater*

The Project site overlies the Coastal sub-basin of the SMGB, which does not contain groundwater wells (due to the brackish nature of the subsurface groundwater) and does not provide water supplies to the City. Based on the findings of the subsurface soil investigations, groundwater was identified at a depth of 62.5 feet bgs (Geotechnologies Inc. 2019; see Appendix F). Additionally, a site-specific Phase I Environmental Site Assessment (ESA) prepared for a nearby property

located to the southeast at 402 Colorado Avenue identified groundwater at 47 feet bgs (SCS Engineers 2019; see Appendix F). Therefore, the depth to groundwater at the Project site is likely between 47 and 62.5 feet bgs (refer to Section 3.6, *Geology and Soils*).

The Project site is located within the City's Downtown Drainage and Infiltration Device Prohibition Zone, which delineates an area where groundwater infiltration is prohibited to minimize the risk of bluff instability at the adjacent Santa Monica Palisades Bluffs and associated Palisades Park (refer to Figure 3.9-1). The City's Downtown Drainage and Infiltration Device Prohibition Zone includes the blocks north of Colorado Avenue, south of Wilshire Boulevard, east of Ocean Avenue, and west of 4th Street (refer to Section 3.6, *Geology and Soils*).

### 3.9.2 Regulatory Framework

Several Federal, State, and local laws and regulations have been enacted to regulate hydrology and water quality as necessary to manage pollutant discharges into the surrounding environment. Regulations that are directly relevant to potential impacts associated with the proposed Project are summarized below.

Federal Regulations

*Clean Water Act*. The CWA was designed to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The CWA was created in 1972, and then amended in 1977, and again in 1987. CWA authorizes Federal, State, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of Sate waters and tributaries. Key provisions of the CWA address water quality standards and the establishment of the NPDES program for controlling the discharge of stormwater.

- Section 303(d)(1) and TMDLs

  Section 303(d)(1) of the CWA requires each State to identify the waters within its boundaries that do not meet water quality standards. Water bodies that do not meet water quality standards are considered impaired and are placed on the State's "CWA Section 303(d) List." For each listed water body, the State is required to establish a TMDL for each of the pollutants impairing the water quality standards in that water body. A TMDL is a tool for implementing water quality standards and is the maximum amount of an impairing substance or stressor (e.g., pollutant) that a water body can receive while still safely meeting water quality standards. As previously described, Santa Monica Beach and Santa Monica Bay are listed as impaired water bodies on the CWA Section 303(d) List (refer to Table 3.9-5).

- National Pollutant Discharge Elimination System

  Section 402 of the CWA prohibits certain discharges of stormwater containing pollutants except in compliance with a NPDES permit. In 1972 when the NPDES program was first established, most efforts to improve water quality focused on regulating pollutant discharges from known end-of-pipe point sources. However, the 1987 amendments to the CWA extended the NPDES program to encompass non-point source pollution found in stormwater and dry weather runoff. In 1987, the NPDES program began to regulate non-point source runoff to municipal separate storm sewer systems ("MS4"). Since that time, non-point source regulations under the NPDES program have been significantly revised and expanded. The NPDES program regulates stormwater discharges from three potential sources: MS4, construction activities, and industrial activities. To prevent harmful pollutants from being washed or dumped into an MS4, operators must obtain a NPDES permit and develop a stormwater management program. Implementing programs intended to meet TMDLs defined under the NPDES program are managed at the State and regional levels, as discussed below.

State Policies and Regulations

The California Environmental Protection Agency (CalEPA) is charged with developing, implementing, and enforcing the State's environmental protection laws. The SWRCB and nine RWQCBs – including the Los Angeles RWQCB – operate under the regulatory authority of the USEPA. The SWRCB, a branch of CalEPA, and the RWQCBs have the responsibility of granting NPDES permits for certain point source discharges. California issues NPDES permits to selected point source dischargers and issues either waste discharge requirements or conditioned water quality certification for other discharges.

*1969 Porter-Cologne Water Quality Control Act*. The Porter-Cologne Act grants ultimate authority to the SWRCB over State water rights and water quality policy and establishes nine RWQCBs to oversee water quality on a day-to-day basis at the regional and local level. The Porter-Cologne Act is the basic water quality control law for California and works in coordination with the CWA. The Porter-Cologne Act states that a RWQCB may include water discharge prohibitions applicable to conditions, areas, or types of waste within its regional plan. California Water Code Section 13170 also authorizes the SWRCB to adopt water quality control plans on its own initiative.

*NPDES Construction General Permit*. The SWRCB regulates stormwater runoff from construction activities under Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and

2012-0006-DWQ. Construction activities subject to the NPDES Construction General Permit include sites that disturb at least 1 acre, and small construction sites less than 1 acre but part of a larger common plan of at least 1 acre. The Order requires that, prior to beginning any construction activities, the permit applicant must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent (NOI) and an adequate Stormwater Pollution Prevention Plan (SWPPP). The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges. Required elements of a SWPPP include: (1) site description addressing the elements and characteristics specific to the site; (2) descriptions of BMPs for erosion and sediment controls; (3) BMPs for construction waste handling and disposal; (4) implementation of approved local plans; (5) proposed post-construction controls, including a description of local post-construction erosion and sediment control requirements; and (6) non-stormwater management. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the CWA Section 303(d) List for sediment.

All construction activities related to the proposed Project are subject to the requirements in the Construction General Permit. The current permit, as amended, establishes the following.

- Technology-based Numeric Action Levels (NALs): The Construction General Permit includes NALs for pH and turbidity. NALs are essentially numeric benchmark values for certain parameters that, if exceeded in effluent sampling, trigger the discharger to take actions. Exceedance of an NAL does not itself constitute a violation of the Construction General Permit; however, if the discharger fails to take the corrective action required by the Construction General Permit, that may constitute a violation.
- Technology-based Numeric Effluent Limitations (NELs): The Construction General Permit contains NELs for pH during any construction phase where there is a high risk of pH discharge and turbidity for all discharges.
- Risk-based Permitting Approach: The Construction General Permit establishes a four-level risk calculation. Those dischargers that are determined to be Risk Level 4 are not covered by the Construction General Permit, and thereby are required to submit a Report of Waste Discharge (ROWD) to the appropriate RWQCB and seek coverage under an individual or other applicable general permit.

- Minimum Requirements Specified: The Construction General Permit specifies more minimum BMPs and requirements that were previously only required as elements of the SWPPP or were suggested by guidance.
- Project Site Soil Characteristics Monitoring and Reporting: The Construction General Permit requires all dischargers to monitor and report soil characteristics. The primary purpose of this requirement is to provide better risk determination and eventually better program evaluation.
- Effluent Monitoring and Reporting: The Construction General Permit requires effluent monitoring and reporting for pH and turbidity in stormwater discharges. The purpose of this monitoring is to be used to determine compliance with the NELs and evaluate whether NALs included in this Construction General Permit are exceeded.
- Receiving Water Monitoring and Reporting: The Construction General Permit requires some Risk Level 2 and Risk Level 3 dischargers to monitor receiving waters.
- New Development and Redevelopment Stormwater Performance Standards: The Construction General Permit specifies runoff reduction requirements for all sites not covered by a Phase I or Phase II MS4 NPDES Permit, to avoid, minimize and/or mitigate post-construction stormwater runoff impacts.
- Rain Event Action Plan: The Construction General Permit requires sites to develop and implement a Rain Event Action Plan (REAP) that must be designed to protect all exposed portions of the site within 48 hours prior to any likely storm event.
- Site Photograph Self-Monitoring and Reporting: The Construction General Permit requires all projects to provide photographs of their sites at least once quarterly if there are storm events causing a discharge during that quarter. The purpose of this requirement is to help RWQCB staff prioritize their compliance evaluation measures (e.g., inspections). In addition, this reporting makes compliance-related information more readily available to the public.
- Annual Reporting: The Construction General Permit requires all projects that are enrolled for more than one continuous 3-month period to submit information and annually certify that their site complies with these requirements. The primary purpose of this requirement is to provide information needed for overall program evaluation and pubic information.
- Certification/Training Requirements for Key Project Personnel: The Construction General Permit requires that key personnel (e.g., SWPPP preparers, inspectors, etc.) have specific training or certifications to ensure their level of knowledge and skills are adequate to ensure their ability to design and evaluate project specifications that will comply with all applicable requirements.

*Water Quality Control Plan for Ocean Waters of California (Ocean Plan)*. California Water Code Division 7 Section 13000 includes water quality objectives for the protection of oceanic water quality. The Ocean Plan sets forth limits or levels of water quality characteristics for ocean waters of the State to ensure the reasonable protection of beneficial uses and the prevention of nuisance. Pursuant to California Water Code Section 13263(a), the requirements of the NPDES program implement the Ocean Plan.

*Sustainable Groundwater Management Act.* On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, composed of Assembly Bill (AB) 1739 (Dickinson), Senate Bill (SB) 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act (SGMA). The SGMA requires local governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the SGMA, these basins should reach sustainability within 20 years of implementing the required sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline.

SGMA empowers local agencies to form groundwater sustainability agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt groundwater sustainability plans (GSPs) for crucial groundwater basins in California. According to the SGMA, GSAs have until January 21, 2022 to develop their GSPs.

The cities of Santa Monica, Los Angeles, Beverly Hills, and Culver City as well as Los Angeles County, are all stakeholders in the SMGB. However, Santa Monica is the only entity currently pumping water from the basin (see Section 3.15, *Utilities*). As such, Santa Monica has been designated the GSA for the Santa Monica Basin, established the Santa Monica Groundwater Sustainability Agency (SMBGSA) in June 2017, and will lead the other stakeholders in preparation of the required GSP.

The SMGB is designated by the SGMA Basin Prioritization Dashboard as a medium priority basin. Therefore, the SGMA requires that this basin reach sustainability by 2042.

Regional Policies and Regulations

*Water Quality Control Plan for the Los Angeles Region (Basin Plan)*. The Basin Plan establishes beneficial uses for surface and groundwater in the region and sets forth the regulatory water quality standards set by the Los Angeles RWQCB that urban runoff must to protect those designated beneficial uses. Where multiple designated beneficial uses exist, water quality standards must protect the most sensitive use. In cases where the Basin Plan does not contain a water quality

objective for a pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under CWA Section 304(a). Permits issued to control pollution (i.e., water quality standards) while taking into consideration beneficial uses to be protected. The Basin Plan works to preserve and enhance water quality and protect the beneficial uses of Santa Monica Beach and Santa Monica Bay (e.g., preservation of biological habitats, navigation, and migration of aquatic organisms).

*Municipal Separate Storm Sewer System (MS4) NPDES Permit*. The CWA established the NPDES program to regulate the discharge of pollutants from point sources to waters of the U.S. However, pollution from non-point sources (i.e., urban runoff) was largely unabated. In response to the 1987 Amendments to the CWA, the USEPA developed the NPDES Storm Water Permitting Program in 1990, which established a framework for regulating municipal and industrial discharges of urban runoff. USEPA required NPDES permit coverage for discharges from MS4 with populations of 100,000 or more. Operators of MS4s regulated under the NPDES Storm Water Permitting Program are required to obtain permit coverage for municipal discharges of stormwater and non-stormwater to waters of the U.S.

Under SWRCB enforcement, the Los Angeles RWQCB implements the NPDES Storm Water Permitting Program in Los Angeles County. Except for those discharges originating from the City of Long Beach MS4, stormwater and non-stormwater discharges from the County of Los Angeles MS4 are regulated under NPDES Permit No. CAS004001 (Final Order No. R4-2012-0175), which went into effect in December 2012. The Los Angeles County MS4 NPDES Permit covers 86 permittees, which include the City of Santa Monica. The provisions of this MS4 NPDES Permit are intended to develop, achieve, and implement a timely, comprehensive, cost-effective stormwater pollution control program to reduce the discharge of pollutants in stormwater to the MS4 from the permitted areas in the County of Los Angeles to the waters of the State. Pursuant to CWA, the MS4 NPDES Permit includes effluent limitations and other provisions to implement the TMDLs for the water bodies that have been classified as impaired on the State's CWA Section 303(d) List. The MS4 NPDES Permit prohibits non-stormwater discharges, except for natural flows, uncontaminated groundwater infiltration, and certain exemptions including landscape irrigation, non-commercial car washing, non-emergency fire-fighting activities, and natural dewatering, provided that conditionally exempt non-stormwater discharges avoid potential sources of pollutants in the flow path to prevent the introduction of pollutants to the MS4 and receiving water.

In 2018, the Los Angeles RWQCB approved the removal of fecal coliform from the monitoring requirements contained in Attachment E of the MS4 NPDES Permit for consistency with Resolution No. R10-005, which removed the water quality objective for fecal coliform in freshwater designated for water contact recreation and limited water contact recreation.

The MS4 Permit sets forth the requirements for all permittees, which are discussed below.

Construction. For all construction sites, less than 1 acre that disturb soil, permittees must require the implementation of an effective combination of erosion and sediment control BMPs to prevent erosion and sediment loss, and the discharge of construction wastes. For all construction sites 1 acre or more that disturb soil, permittees must require the preparation or submission an Erosion and Sediment Control Plan (ECSP) prior to the disturbance of land. The Project site is approximately 1.89 acres, so the proposed Project is subject to erosion and sediment BMPs. The ESCP must contain appropriate site-specific construction site BMPs for controlling erosion during excavation and grading activities. ESCPs must include the elements of a SWPPP and must address methods to minimize footprint of disturbed area, methods to protect native vegetation and trees, sediment/erosion control, non-stormwater controls (e.g., vehicle washing, soil watering, dewatering), materials management (e.g., delivery and storage), spill prevention and control, and waste management (e.g., concrete washout/waste management, sanitary waste management, etc.). SWPPPs prepared in accordance with the requirements of the Construction General Permit can be accepted as ESCPs.

Operation. The NPDES MS4 Permit requires that permittees, including the City, implement operational stormwater runoff controls for new development and redevelopment projects. Under the NPDES MS4 Permit, these projects must be designed to minimize the footprint of the impervious area and to use low-impact development (LID) strategies to disconnect the runoff from impervious area. Projects must be designed to retain onsite the stormwater runoff resulting from either the 0.75-inch per 24-hour storm or the 85$^{th}$ percentile storm as defined in the Los Angeles County 85$^{th}$ percentile, 24-hour storm isohyetal map, whichever is greater. Stormwater runoff may be retained onsite by methods designed to intercept rainwater via infiltration, bioretention, and harvest and use. Examples of LID strategies that may be employed to meet the stormwater retention requirements include rain gardens, bioswales, pervious pavement, green roofs, and rainwater harvesting for use in landscape irrigation.

Construction Dewatering General Permit. The Los Angles RWQCB also regulates discharges of groundwater from construction activities in the coastal watershed of Los Angeles County under Order No. R4-2013-0095 (NPDES Permit No. CAG994004), which was adopted on June 6, 2013. Discharges covered by this permit include, but are not limited to, treated or untreated groundwater

generated from permanent or temporary dewatering operations. This permit applies to all construction dewatering activities conducted in the City; and includes effluent and receiving water limitations for metals and other potential contaminants in discharges from dewatering operations, as well as monitoring and reporting requirements. Similar to the Construction General Permit, the construction operator must submit a NOI to discharge groundwater generated from construction dewatering operations in accordance with the requirements of the Construction Dewatering General Permit. The NOI must include such information as the intended reuse or disposal of the wastewater, the nature of wastewater treatment, the discharge point of the wastewater, and the nature of the receiving waters.

Standard Urban Stormwater Mitigation Plan (SUSMP). The NPDES MS4 Permit defines the minimum required BMPs that must be adopted by the permittee municipalities and included by developers within plans for facility operations. To obtain coverage under this permit, a developer must obtain approval of a project-specific SUSMP from the appropriate permittee municipality.

A SUSMP addresses the discharge of pollutants within stormwater generated following new construction or redevelopment. Under recent regulations adopted by the Los Angles RWQCB, projects are required to implement a SUSMP during the operational life of a project to ensure that stormwater quantity and quality is addressed by incorporating BMPs into project design. This plan defines water quality design standards to ensure that stormwater runoff is managed for water quality concerns and to ensure that pollutants carried by stormwater are confined and not delivered to receiving waters. Applicants are required to abide by source control and treatment control BMPs from the list approved by the Los Angles RWQCB and included in the SUSMP. These measures include infiltration of stormwater as well as filtering runoff before it leaves a site. This can be accomplished through various means, including the use of infiltration pits, flow-through planter boxes, hydrodynamic separators, and catch basin filters.

In combination, these treatment control BMPs must be sufficiently designed and constructed to treat or filter the first 0.75 inches of stormwater runoff from a 24-hour storm event, and post-development peak runoff rates and volumes cannot exceed peak runoff rates and volumes of pre–development conditions. Permittees are required to adopt the requirements set forth herein in their own SUSMP. Additional BMPs may be required by ordinance or code adopted by the permittee and applied in a general way to all projects or on a case by case basis.

Local Policies and Regulations

*Santa Monica Watershed Management Plan*. The Santa Monica Watershed Management Plan, adopted in 2006, is intended to restore a healthier balance between the urban environment and

local, natural ecosystems, including the Santa Monica Bay, by reducing urban runoff pollution levels, reducing urban flooding, and increasing recreational opportunities, water conservation, and natural habitats. The plan provides an analysis of urban runoff conveyance systems (i.e., hydraulics and water quality) and recommended watershed management projects.

*Sustainable Water Master Plan.* The Sustainable Water Master Plan (SWMP) provides an up-to-date, comprehensive evaluation of the City's water system using available planning information to assess the City's water system infrastructure needs. The SWMP addresses local groundwater resources and integrates new water conservation programs and alternative water supply opportunities. Specifically, treatment feasibility study findings are included for the Olympic Wellfield and production efficiency enhancements for the Arcadia Water Treatment Plant to refine the pathway to achieve water self-sufficiency in the City. The SWMP confirms that achieving water self-sufficiency in the future is practical and cost effective by 2023. See also, Section 3.15, *Utilities* (City of Santa Monica 2018a).

*Santa Monica General Plan Land Use and Circulation Element (LUCE).* The LUCE is the land use and transportation planning document that governs existing and future land uses and establishes goals, policies and development criteria for land uses and circulation in the City. In 2017, the LUCE was amended to include a zoning update, which allows land uses policies to be translated directly into standards to implement goals and objectives of the LUCE. The following applicable policies for water resource management and use are included in the LUCE:

Policy LU19.4 Retrofit streets to meet the City's evolving infrastructure and sustainability needs including energy systems, water conveyance and stormwater retention, transportation infrastructure, utilities and high-capacity information systems.

Policy S6.2 Implement the recommendations of the 2005 Santa Monica Urban Water Management Plan, including increasing water supply and conservation measures such as the City's no waste ordinance, landscape ordinance, wastewater control ordinance, and low-flow ordinance, and complete an assessment of the viability of additional urban runoff recycling.

Policy S6.3 Implement landscape water conservation requirements for new construction projects.

Policy S6.4 Continue to remediate the City's own contaminated groundwater supply.

*Santa Monica General Plan Conservation Element*. The Conservation Element, adopted in 1975, sets forth policies and programs to ensure proper management and conservation of the City's natural resources, including water resources. The following are applicable policies and programs:

| | |
|---|---|
| Policy 4 | The City shall actively participate in the protection of water shed areas affecting Santa Monica water supplies. |
| Policy 11 | The Public Works Department shall continue to maintain adequate City owned and maintained storm drainage and runoff systems to accommodate flood control requirements. |
| Program 3 | Monitoring programs shall be maintained to ensure constant adherence to prevailing standards of water quality. |
| Program 5 | The water division shall protect the potable water system from accidental or malicious introduction of contaminants. |

*Santa Monica Municipal Code (SMMC) Chapter 7.10 Runoff Conservation and Sustainable Management Ordinance*. The Runoff Conservation and Sustainable Management Ordinance became effective July 1, 2017 and updates the City's previous Urban Runoff Mitigation Ordinance. In 2017, Chapter 7.10 was revised to comply with NPDES permits including prohibitions of all non-stormwater discharges to the City's stormwater infrastructure, implementation of good housekeeping requirements, and specific runoff requirements for all new construction. The ordinance's purpose is to permanently modify the behavioral and structural causes of urban runoff pollution by reducing runoff volume and pollution from existing properties and from future parcel developments. The goal is to maximize onsite storage of runoff and use of stormwater through a hierarchy of construction and post-construction LID requirements. This ordinance requires onsite rainwater collection and non-potable water use for properties 15,000 square feet (sf) or greater. Throughout site operation, new developments are required to implement good housekeeping practices (e.g., trash containment and BMP implementation) to minimize polluted runoff and prepare an Urban Runoff Mitigation Plan prior to obtaining a final building permit. The Urban Runoff Mitigation Plan requires that a project applicant store and use (for non-potable purposes), infiltrate, or evapo-transpire project-generated runoff during a 0.75-inch storm event, or alternatively, pay an urban runoff reduction fee. (As shown in Figure 3.9-1, the City's Department of Public Works prohibits infiltration of runoff for properties located west of 4$^{th}$ Street, ranging from the City's northern limits to I-10 to the south, including the Project site. Therefore, the Applicant would be required to pay the urban runoff reduction fee.) The Urban Runoff Mitigation Plan must also include steps for ongoing maintenance of BMPs throughout the life of the project.

*SMMC Chapter 5.20 Industrial Wastewater Control (2014)*. SMMC Chapter 5.20 sets forth uniform requirements for direct and indirect dischargers to publicly owned treatment works (POTWs), the storm drain system, and the waters of the State. Through a permit and inspection program administered under the City, the City aims to prevent any discharge into POTWs, which may interfere with its operation, treatment ability, or threaten operation or safety of the storm drain system.

### 3.9.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on hydrology and water quality if:

a) The project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

b) The project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

c) The project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    i. Result in the substantial erosion or siltation onsite or offsite;

    ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite;

    iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

    iv. Impede or redirect flood flows?

d) In flood hazard, tsunami, or seiche zones, the project would risk release of pollutants due to Project inundation?

e) The project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

*Non-Applicable Issues*

c, iv) (Impede or redirect flood flows): The Project site is currently developed and based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) No. 06037C1569F, the Project site and the surrounding vicinity are not located within a 100-year flood plain (FEMA 2008). As a result, there would be no impact related to impeding or redirecting flood flows.

d) (Flood Hazard, Tsunami, or Seiche Zones): As described in Section 3.6, *Geology and Soils*, the Project site is located outside of the State of California's Tsunami Inundation Map (California Department of Conservation 2009). Further, the Project site is not located along the City's Tsunami Evacuation Route. The closest designated tsunami evacuation road is Colorado Avenue, approximately 0.25 miles south of the Project site (City of Santa Monica Office of Emergency Management 2011). There are no enclosed bodies of water in the Downtown. Further, the County of Los Angeles Flood and Inundation Hazards Map indicates that the Project site is not located within a mapped inundation boundary due to a seiche or a breached upgradient reservoir (Leighton and Associates, Inc. 1990). The Downtown does not contain any zones that are subject to tsunami, seiche, or flood hazards; therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death from such hazards. No potentially significant adverse impacts associated with inundation by a tsunami, seiche, or flood would occur in the vicinity of the Project site; therefore, this issue is not analyzed further in this EIR.

<u>Methodology</u>

The proposed Project has been evaluated to determine its effects on hydrology and water quality. This analysis includes existing and projected data from the Santa Monica Watershed Management Plan, Urban Water Management Plan, and Integrated Water Resources Plan, as well as technical studies that were referenced in the Downtown Community Plan (DCP) Program EIR. Additionally, a site-specific Hydrology Drainage Study was prepared for the proposed Project by KPFF in May 2020 (see Appendix H). KPFF used Los Angeles County's HydroCalc Calculator to determine the existing and proposed peak runoff rates at the Project site during the 10-, 25-, and 50-year storm events (see Appendix H). Potential impacts to the storm drain system were analyzed by comparing

the calculated existing and proposed peak runoff rates (see Table 3.9-7), taking into consideration the capacity of the existing storm drain system serving the Project site and mandatory compliance with applicable State and local regulations addressing stormwater runoff.

Water quality impacts were assessed by considering the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the proposed Project, including potential pollutants and features intended to contain or treat these pollutants. Consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would ensure that the proposed Project would not significantly degrade existing water quality. The analysis of water quality impacts takes into consideration the proposed Project's mandatory compliance with applicable State and local regulations addressing stormwater runoff.

### 3.9.4 Applicable Mitigation Measures from the DCP

The DCP Program EIR does not include any applicable mitigation measures for potential impacts to hydrology and water quality associated with the proposed Project.

### 3.9.5 Project Impacts and Mitigation Measures

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

**HYD-1 Implementation of the proposed Project would not generate a substantial increase in urban runoff that would violate water quality standards or waste discharge requirements. The proposed Project would comply with existing regulations and plans to ensure the potential impacts to water quality would be *less than significant*.**

<u>Impact Description (HYD-1)</u>

*Construction*

Construction of the proposed Project would involve major earthwork, including demolition of existing pavements and structures, excavation and shoring for subterranean levels, grading, and trenching, which would disturb the underlying soils and expose them to potential erosion and mobilization from wind, rain, and onsite watering activities, necessary to reduce airborne dust (refer to Section 3.6, *Geology and Soils*). These activities could result in sediment transport into nearby storm drain inlets – particularly during storm events or during onsite watering. Additionally, construction activities have the potential to contribute to polluted stormwater runoff

due to the delivery, handling, and storage of construction materials and wastes, as well as potential leakage and spills of construction materials (e.g. oil, grease, paints, solvents, or cleaning agents) (refer to Section 3.8, *Hazards and Hazardous Materials*). During storm events, these contaminants on the Project site have the potential to be washed away by stormwater runoff and carried into existing storm drain system.

Construction of the proposed three-level subterranean parking garage would entail the excavation and export of approximately 108,00 cubic yards (cy) of soil. Winter storms and rainfall events that occur during the three-year construction period could potentially create surface runoff waters moving over exposed areas and carrying suspended sediments and other pollutants into the storm drain system. Due to the substantial amount of excavation and the potential for extended periods of exposed soils, soil erosion could result in the creation of onsite rills and gully systems, clogs in the existing storm drain system, and transport of suspended sediments into down-gradient areas of the Project site. This runoff would flow into the existing storm drain system within the Pier Basin, including the 27-inch storm drain line beneath Santa Monica Boulevard, which ultimately conveys urban runoff to the 1,600,000-gallon underground storage tank at the Deauville surface parking lot. This stormwater runoff could also contain eroded construction materials and hazardous materials that could potentially further degrade surface water quality in the Project vicinity, including Santa Monica Bay. Potential pollutant sources resulting from conditions or areas at the Project site that may cause sediment, silt, and/or turbidity in site runoff include, but are not limited to:

- Exposed soil areas with inadequate erosion control measures;
- Areas of active grading;
- Poorly stabilized slopes;
- Lack of perimeter sediment controls;
- Areas of concentrated flow on unprotected soils;
- Poorly maintained erosion and sediment control measures;
- Tracking sediment onto roads and paved surfaces;
- Unprotected soil stockpiles; and
- Failure of an erosion or sediment control measure.

Potential adverse effects on water quality associated with the proposed Project would be reduced through compliance with the requirements of the Construction General Permit (SWRCB Order

No. 2009-0006-DQA) and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10). As described in Section 3.9.2, *Regulatory Setting*, construction activities that disturb at least 1 acre are subject to the Construction General Permit. Prior to beginning any construction activities, the permit applicant must obtain coverage under the General Construction Permit by preparing and submitting a NOI and SWPPP for review and approval by the Los Angeles RWQCB. BMPs outlined in the SWPPP would be informed by the requirements of the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10) and could include, but not be limited to:

- **Erosion Control or Soil Stabilization BMPs** cover and/or bind soil particles to prevent them from detaching and becoming transported in stormwater runoff, including hydraulic mulch, geotextiles and mats, dikes, and drainage swales to direct runoff and avoid sheet flow, velocity dissipation devices at outlets, slope drains, soil preparation/roughening to break up sheet flow, and non-vegetative stabilization (e.g., decomposed granite, gravel mulch, etc.). These erosion control measures would be implemented throughout the Project site and would be installed well in advance of any storm events.
- **Sediment Control BMPs** are structural measures that would intercept and filter out soil particles that have been detached and transported by water to reduce sediment discharges from construction areas, including silt fencing, sediment traps, check dams, fiber rolls, gravel bag berms, and sandbag barriers. These structural controls would be placed along Project site perimeters or downhill boundaries where runoff is discharged, below the toe or down slope of erodible slopes, at storm drain inlets, along exposed slopes or temporary stockpiles, at culvert/pipe outlets, in channels/ditches/swales, parallel to roadways, or along mildly sloping construction roads. Another sediment control BMP that would be implemented to prevent sediment from entering storm drains and receiving waters would be street sweeping/vacuuming, particularly at points of egress prior to a precipitation event. In addition, vehicle tracking BMPs such as a rock pad, shaker rack, wheel washer, or other BMPs designed to remove soil and mud from vehicles and further reduce offsite tracking of sediment.
- **Wind Erosion Control BMPs** would prevent the transport of soil from disturbed areas of the Project site, offsite by wind and dry conditions during construction. Dust control measures would include construction watering to stabilize soil from wind erosion associated with construction vehicle traffic on unpaved roads, drilling and blasting activities, soil and debris storage, batch drops from front-end loaders, unstabilized soil, and

grading. In addition, wind screen fencing would be installed along the perimeter of the Project site.

- **Non-Stormwater and Materials Management BMPs** would reduce or eliminate non-stormwater discharges from the Project site, including implementation of water conservation practices, compliance with applicable Los Angeles RWQCB and local agency dewatering permits (Order No. R4-2013-0095) for any accumulated precipitation allowed to enter the storm drain system, proper inspection and notification of any illicit connections and discharges offsite, and implementation of proper operation, storage, training, and disposal associated with paving and grinding, vehicle maintenance, concrete, irrigation, and waste management operations.

In accordance with the Runoff Conservation and Sustainable Management Ordinance, the BMPs developed for the proposed Project would be incorporated into an Urban Runoff Mitigation Plan to be approved by the City's Department of Public Works prior to the initiation of construction-related activities. The Urban Runoff Mitigation Plan would require that BMPs minimize pollutants and reduce stormwater runoff to levels that comply with applicable water quality standards. In accordance with SMMC Chapter 7.10, the following urban runoff reduction requirements are required to be implemented during construction:

- Polluted runoff (including runoff containing sediments and/or construction wastes) shall not leave the Project site. No wash water from any type of cement and concrete machinery or concrete mix truck shall be allowed to leave the Project site. Any washing of equipment in the right-of-way shall be contained and properly disposed of.
- For any paint removal, paint preparation, or sandblasting activities that will result in particles entering the air or landing on the ground, BMP steps shall be implemented to prevent or minimize to the maximum extent practicable such particle releases into the environment.
- Plastic covering shall be utilized to prevent erosion of an otherwise unprotected area (e.g., exposed or open to elements stockpiles), along with treatment control BMPs to intercept and safely convey the runoff to the MS4.
- No washing of construction or other vehicles shall be allowed adjacent to a construction parcel. No polluted runoff from washing vehicles on a construction parcel shall be allowed to leave the parcel.

Implementation of BMPs developed in accordance with the requirements of the Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance

would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of the proposed Project. Therefore, construction-related impacts to water quality would be *less than significant.*

*Operation*

Dry weather runoff is not permitted to leave the Project site under existing conditions in accordance with NPDES MS4 Permit. The proposed Project would be required to comply with the NPDES MS4 Permit issued by the Los Angeles RWQCB, which requires implementation of various BMPs to reduce pollutant runoff from the Project site by retaining, treating, or infiltrating polluted dry weather runoff onsite. As such, the proposed Project would result in a *less than significant impact* regarding dry weather flows, and the following discussion pertains to stormwater runoff following completion of Project.

The proposed Project would redevelop an existing fully developed site. Proposed land cover and impervious surface areas are relatively similar in type and extent to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). However, the proposed Project would result in a net reduction in the total amount impervious surface area from 100 percent to 90 percent east of 1st Court and from 95 percent to 92 percent west of 1st Court (KPFF 2020; see Appendix H). Pervious surface areas would increase slightly with the addition of open space and landscaping that would retain stormwater on the Project site for longer periods (e.g., ornamental landscaping on the ground-level open space, landscaped planters on the podium deck of the Second Street Building, etc.). Additionally, the existing surface parking lots would be eliminated, and parking would be provided in a three-level subterranean parking garage. The elimination of surface parking lots on the Project site would reduce the amount of pollutants potentially exposed on the Project site during storm events (e.g., nutrients, oil and grease, metals, organics, pesticides, non-chemical pollutants such as trash, debris, and bacteria). As is currently the case, stormwater that flows offsite would be captured by the storm drain system in Downtown and would not flow to the Palisades Park or Palisades Bluffs.

The proposed Project would be subject to Federal, State, and local regulations pertaining to operational water quality. For instance, the proposed Project is subject to the City's Runoff Conservation and Sustainable Management Ordinance (City of Santa Monica 2017). Therefore, the Applicant would be required to prepare and implement Urban Runoff Mitigation Plan through the operational life of the proposed Project. Long-term operational requirements in the Urban Runoff Mitigation Plan would include one or more of the following to mitigate stormwater runoff (City of Santa Monica 2017):

1. Reducing runoff from the proposed Project through implementation of BMPs: Implementation of BMPs would reduce Project site-generated runoff from storm events (0.75-inch storm event) by properly storing and using runoff for non-potable purposes such as landscape elements as well as good housekeeping processing including litter removal. The proposed Project would not implement infiltration BMPs as the Project site is in the City's Downtown Drainage and Infiltration Device Prohibition Zone (refer to Figure 3.9-1).

2. Payment of an urban runoff reduction fee: An urban reduction fee would be paid to the City in accordance with SMMC Section 7.10.050(r) for the use of construction of LID post-construction BMPs designed to achieve at least the existing level of water quality protection as if all the runoff was contained to the Project site.

3. Mitigate runoff offsite in accordance with the Urban Runoff Offsite Treatment Guidelines: If the Applicant can provide evidence that it is technically infeasible to mitigate runoff onsite, this requirement may be satisfied offsite.

As described in Section 3.9.1, *Existing Setting*, stormwater runoff from the Project site is conveyed south along Santa Monica Boulevard to the 1,600,000-gallon underground storage tank at the Deauville surface parking lot. Stormwater from this underground storage tank is ultimately conveyed to the SMURRF, where it is treated and pumped through purple pipe to serve the City's non-potable water needs (e.g., park landscaping, street sweeping, etc.). All stormwater generated during construction of the proposed Project would continue to be directed to the existing City storm drain inlets and storm drain lines that currently serve the Project site (KPFF 2020; see Appendix H). No stormwater runoff would infiltrate to the SMGB. Therefore, following completion of the proposed Project, stormwater runoff from the Project site would not directly affect water quality in the Santa Monica Bay or local groundwater. Compliance with all applicable State and local regulations would ensure that operational impacts to water quality would be *less than significant*.

*Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

**HYD-2 Construction and operation of the proposed Project would not require dewatering activities or otherwise substantially deplete groundwater supplies or interfere with groundwater recharge. Compliance with existing regulations**

**and plans would ensure potential impacts to groundwater supplies would be *less than significant*.**

Impact Description (HYD-2)

*Construction*

Based on the findings of two subsurface soil investigations conducted in the immediate vicinity of the Project site, the depth to groundwater at the Project site is likely between 47 and 62.5 feet bgs (refer to Section 3.6 *Geology and Soils*; see Appendix F). The proposed Project would include excavation to a maximum depth of 35 feet bgs for the three-level subterranean parking garage. Therefore, dewatering activities would not be anticipated, and a Construction Dewatering General Permit would not be required (KPFF 2020; see Appendix H). Additionally, construction activities associated with the proposed Project (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal and less than the existing water demand occurring onsite.

Due to the existing developed (i.e., paved) nature of the Project site, existing groundwater recharge is negligible. Construction activities would temporarily increase the area of exposed soils up to a maximum of 1.89 acres; however, the overall impact on soil permeability and recharge of the SMGB would be nominal.

Construction activities would not substantially deplete groundwater supplies or affect groundwater recharge and, therefore, construction impacts to groundwater levels would be *less than significant.*

*Operation*

The City currently relies on groundwater for most of its water supply and aims to achieve water self-sufficiency – using local groundwater and recycled water – by 2023, consistent with the SWMP (City of Santa Monica 2018a; see Section 3.15, *Utilities*). The City has 10 active wells in the Charnock, Arcadia, and Olympic sub-basins of the SMGB; however, no groundwater wells are located within the vicinity of the Project site overlying the Coastal sub-basin.

As discussed in detail in Section 3.6, *Geology and Soils*, the Project site is located immediately east of the Santa Monica Palisades Bluffs and Palisades Park. The Project site is located within the City's Downtown Drainage and Infiltration Device Prohibition Zone (refer to Figure 3.9-1) and therefore, infiltration of surface water neither occurs under existing conditions nor is proposed with the implementation of the proposed Project.

The proposed Project would not measurably affect groundwater infiltration at the Project site. Implementation of the proposed Project would slightly decrease the total area of impervious surface from 100 percent to 90 percent in DA1 (east of 1st Court) and from 95 percent to 92 percent in DA2 (west of 1st Court). Typically, a decrease in the amount of impervious surface area would result in a corresponding increase in groundwater infiltration; however, the new pervious surface areas associated with the proposed Project would be underlain entirely by the three-level subterranean parking garage. Further, a substantial portion of the proposed pervious surfaces are associated with landscaped planters on ground and second levels, which would not flow to underlying soils for groundwater infiltration. Therefore, the Project site would continue to be impervious from a groundwater recharge perspective. Additionally, given the existing depth to groundwater at the Project site, the presence of the three-level subterranean parking garage would not contact or interfere with groundwater and, therefore, have no impact on groundwater flow in the Coastal sub-basin.

Overall the proposed Project would result in a *less than significant* impact on groundwater supplies, groundwater recharge, and overall management of the SMGB consistent with the 2018 SWMP.

*Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:*

*i) result in substantial erosion or siltation onsite or offsite;*

*ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or*

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

**HYD-3** **The proposed Project would neither alter existing drainage patterns nor create or contribute additional runoff to the City's storm drain system that would exceed existing capacity or increase sources of polluted runoff. The proposed Project would comply with existing regulations and plans to ensure the potential impacts related to drainage would be *less than significant*.**

Impact Description (HYD-3)

*Construction*

Construction of the proposed Project would involve site-preparation activities, including demolition, excavation, grading, and trenching within areas that are currently developed with impervious surfaces. Such activities would result in exposure of soils and would cause minor alterations to onsite drainage, including the potential for temporary ponding during storm events (refer to Impact HYD-1). However, all stormwater generated during construction of the proposed Project would continue to be directed to existing the City storm drain inlets and storm drain lines that currently serve the Project site (KPFF 2020; see Appendix H). The Project site is located within the Pier Basin; therefore, stormwater runoff is conveyed south along Santa Monica Boulevard to the 1,600,000-gallon underground storage tank at the Deauville surface parking lot, and ultimately to the SMURRF. As described in Impact HYD-1, during construction a SWPPP, Urban Runoff Mitigation Plan, and associated BMPs would be implemented in accordance with applicable Los Angles RWQCB and City regulations to provide for temporary stormwater management and prevent construction activities from adversely affecting the amount or direction of flow of surface water. The overall existing drainage pattern would be maintained during construction and would be controlled with required BMPs (refer to Impact HYD-1), so substantial erosion or siltation would not occur. While not expected (refer to Impact HYD-2), if dewatering of groundwater is required based on onsite groundwater depth, it would be accomplished in accordance with Los Angles RWQCB's Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Overall, construction impacts associated with the proposed Project would result be *less than significant.*

*Operation*

Implementation of the proposed Project would result in impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). Additionally, stormwater runoff would continue to follow the same discharge paths and drain to the existing storm drain system (KPFF 2020; see Appendix H). As described in Impact HYD-1, the proposed Project would result in a net reduction in the total amount impervious surface area from 100 percent to 90 percent in DA1 (east of 1st Court) and from 95 percent to 92 percent in DA2 (west of 1st Court) (KPFF 2020; see Appendix H). Pervious ground level surface areas would increase to approximately 22,407 sf with ground-level open space and landscaping elements that would retain stormwater on the Project site for longer periods (refer to Section 2.0, *Project Description*).

KPFF used Los Angeles County's HydroCalc Calculator to determine the existing proposed peak runoff rates at the Project site during the 10-, 25-, and 50-year storm events (see Appendix H). The change in peak flow rates caused by 10-year, 25-year, and 50-year storm events and stormwater runoff rates would be negligible at the Project site compared to existing conditions. Additionally, all stormwater runoff would continue to be directed to existing the City storm drain inlets and storm drain lines that currently serve the Project site (KPFF 2020; see Appendix H). These facilities – including the 27-inch storm drain line beneath Santa Monica Boulevard (refer to Table 3.9-3) – have excess capacity and would continue to adequate serve the Project site with the implementation of the proposed Project. Therefore, the proposed Project would have a *less than significant* impact on drainage capacity in the Downtown.

With regard to the potential for the Project to contribute additional polluted runoff, the proposed Project would slightly increase the amount of pervious surface areas with the addition of open space and landscaping that would retain stormwater on the Project site for longer periods (e.g., ornamental landscaping on the ground-level open space, landscaped planters on the podium deck of the Second Street Building, etc.). Additionally, the existing surface parking lots would be eliminated, and parking would be provided in a three-level subterranean parking garage. The elimination of surface parking lots on the Project site would reduce the amount of pollutants potentially exposed on the Project site during storm events (e.g., nutrients, oil and grease, metals, organics, pesticides, non-chemical pollutants such as trash, debris, and bacteria). Pervious surface areas typically retain stormwater and pollutant loads more effectively than impervious surface areas, and as such, the Project is not anticipated to include contaminants in stormwater flows leaving the Project Site. In addition, the Project would implement SUSMP and LID requirements through the operational life of the proposed Project in accordance with City and Los Angeles RWQCB requirements. Therefore, the proposed Project would have a *less than significant* impact related to polluted runoff.

**Table 3.9-7. Existing and Proposed 10-, 25-, and 50-year Peak Stormwater Discharge at the Project Site**

| Drainage Area | Area (acres) | Flow Path Length (feet) | Flow Path Slope (%) | Existing Impervious Surface (%) | Proposed Impervious Surface (%) | Existing Flow (cfs) | Proposed Flow (cfs) |
|---|---|---|---|---|---|---|---|
| **10-Year** | | | | | | | |
| DA-1 | 0.69 | 200 | 1.5% | 100 | 90 | 1.59 | 1.59 |
| DA-2 | 1.20 | 350 | 1.1% | 95 | 92 | 2.35 | 2.35 |
| **25-Year** | | | | | | | |
| DA-1 | 0.69 | 200 | 1.5% | 100 | 90 | 1.59 | 1.59 |
| DA-2 | 1.20 | 350 | 1.1% | 95 | 92 | 3.12 | 3.12 |
| **50-Year** | | | | | | | |
| DA-1 | 0.69 | 200 | 1.5% | 100 | 90 | 2.22 | 2.22 |
| DA-2 | 1.20 | 350 | 1.1% | 95 | 92 | 3.87 | 3.87 |

Source: KPFF 2020; see Appendix H.

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

**HYD-4 Implementation of the proposed Project would not result in a policy or plan inconsistency. The proposed Project would not conflict with applicable sustainable groundwater management plans and water quality control plans – including the Ocean Plan, Basin Plan, and the Sustainable Water Master Plan – and impacts would be *less than significant*.**

Impact Description (HYD-4)

Two water quality control plans are primarily applicable to the Santa Monica Bay watershed: the Ocean Plan and the Basin Plan. For coastal sites, the Ocean Plan includes water quality objectives for the protection of oceanic water quality. Under the Basin Plan, urban runoff must meet guidelines set by the Los Angeles RWQCB to retain the beneficial use of the receiving water bodies. The Basin Plan works to preserve and enhance water quality and protect the beneficial uses of Santa Monica Bay and Beach (e.g., preservation of biological habitats, navigation, and migration of aquatic organisms). As described in HYD-1 the proposed Project would be required to comply with the requirements of the Construction General Permit (SWRCB Order No. 2009-0006-DQA) and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10) to protect associated inland and coastal water quality. Therefore, through

compliance with the NPDES program, the proposed Project would be consistent with these applicable water quality control plans and impacts would be *less than significant.*

As described in Section 3.15, *Utilities*, the SWMP outlines the City's plan to achieve water self-sufficiency with the goal of meeting 100 percent of the City's water demand using local water sources (i.e., no reliance on imported water) by 2023. The SWMP includes an evaluation of expanded water demand management measures and a variety of water supply alternatives including recycled water, groundwater injection, stormwater collection and treatment, rainwater harvesting, gray-water applications, and other water rights and exchange opportunities. The SWMP also describes projected water supply and demand scenarios, and characterizes the approximate magnitude of supply deficits or unpredictability (City of Santa Monica 2018). As discussed in Impact UT-2, implementation of the proposed Project would not adversely affect the ability of the City to meet its goal for maximum self-sufficiency by 2023 or maintaining groundwater quality under the SWMP. Therefore, the impact of the proposed Project on sustainable groundwater management would be *less than significant.*

### 3.9.6 Cumulative Impacts

A cumulative hydrology and water quality impact would result if the potential impacts, associated with the proposed Project when combined with other past, present, and future projects (refer to Table 3.0-1), would result significantly alter regional drainage (e.g., flooding) or water quality within Santa Monica WMA.

The proposed Project, in combination with other new development projects, would contribute to increasing the density of the City's urban environment. Mixed-use infill development – including the adjacent property at 1318 2nd Street and other larger developments within the Downtown – would generate urban runoff that would be collected within the City's existing storm drain system. However, as with the proposed Project, some of these developments would include landscaping and open space that may reduce impervious surface. As described in the DCP Program EIR, land use changes anticipated to occur in the Downtown and the City would facilitate the creation of new pervious open spaces in accordance with City standards and requirements, thus reducing urban runoff at a particular site and within the Downtown as a whole, compared to existing conditions (City of Santa Monica 2017).

Further, the City manages and regulates drainage flows and water quality through plans, programs, and ordinances. The Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance require development and implementation of a SWPPP for all construction sites over 1 acre to address potential impacts to water quality from stormwater runoff.

The NPDES MS4 Permit requires that permittees, including the City, implement operational stormwater runoff controls for new development and redevelopment projects. Under the NPDES MS4 Permit, these projects must be designed to minimize the footprint of the impervious area and to use LID strategies to disconnect the runoff from impervious area. Projects must be designed to retain onsite the stormwater runoff resulting from either the 0.75-inch per 24-hour storm or the 85$^{th}$ percentile storm as defined in the Los Angeles County 85$^{th}$ percentile, 24-hour storm isohyetal map, whichever is greater. Further, projects throughout the City would be required to prepare an Urban Runoff Mitigation Plan – including the incorporation of BMPs, payment of an urban runoff reduction fee, or mitigating runoff offsite – to meet the requirements of the City's Runoff Conservation and Sustainable Management Ordinance.

Compliance with existing regulations would prevent violation of water quality standards and minimize increases in urban runoff and the potential for contributing additional sources of polluted runoff. Therefore, cumulative impacts to surface water hydrology and surface water quality would be *less than significant*.

Land use changes across the City also have the potential to increase the demand for City groundwater supplies. However, continued implementation of water conservation measures as part of the SWMP would ensure that the groundwater supply is managed such that the groundwater aquifer is not withdrawn beyond the safe yield. Therefore, cumulative impacts to groundwater levels would be *less than significant*. A complete discussion of City water demand and supply is included in Section 3.15, *Utilities*.

### 3.9.7 Residual Impacts

The Ocean Plan, Basin Plan, and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10) include comprehensive requirements and standards to ensure that all development within the Santa Monica WMA include features to protect the existing surface water resources, including Santa Monica Beach and the Santa Monica Bay. The proposed Project would comply with each of these requirements, as necessary (e.g., preparation of a SWPPP, Urban Runoff Mitigation Plan, etc.). With the implementation of construction related and long-term BMPs potential impacts to hydrology and water quality would be *less than significant.*

## 3.10 LAND USE AND PLANNING

This section describes the existing land uses in the Downtown District and evaluates the consistency of the Ocean Avenue Project (Project) with adopted goals, programs, and policies in the City of Santa Monica's (City's) General Plan, Downtown Community Plan (DCP), and Zoning Ordinance, as well as regional plans and related planning policy documents.

### 3.10.1 Environmental Setting

City of Santa Monica

The City is an urbanized incorporated community located in west Los Angeles County, approximately 15 miles west of Downtown Los Angeles. The City is bounded on the north, south, and east by the City of Los Angeles and on the west by the Pacific Ocean. Surrounding communities include Pacific Palisades to the north, Brentwood and West Los Angeles to the east, and Mar Vista and Venice to the south. Santa Monica is directly accessible from the Los Angeles area via the Interstate (I-) 10 (Santa Monica Freeway) and I-405 (San Diego Freeway). The I-10 terminates at its western end at of the State Highway 1 (Pacific Coast Highway [PCH]), which links Santa Monica to Malibu and the Santa Monica Mountains.

*The Project site is located at the western edge of the City's Downtown District within the Established Large Site (ELS) Overlay identified in the DCP.*

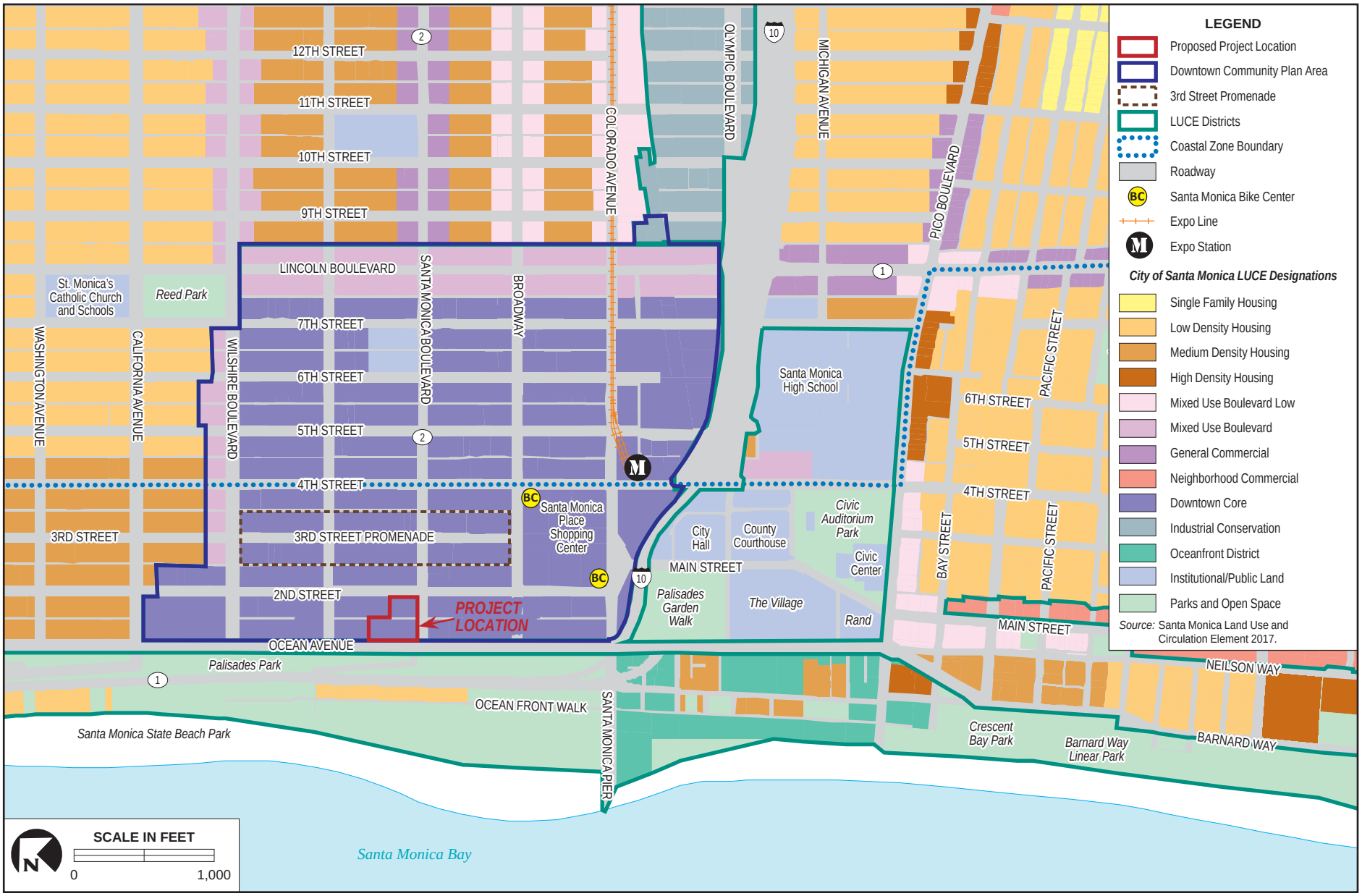
The City occupies approximately 8.25 square miles and is nearly fully developed with established residential, commercial, light industrial, and institutional uses. The City is organized on a grid system of streets providing a high level of connectivity within the City and to adjacent communities. This grid street system is interrupted by the I-10 freeway, which bisects the City from east to west adjacent to Downtown, dividing neighborhoods north and south of the freeway.

Residential neighborhoods are the predominant land use in the City with a wide range of housing types and densities. Commercial land uses include retail, restaurant, entertainment, office, and service commercial (e.g., salons), which are concentrated within the Downtown and along boulevards and avenues such as Broadway, Wilshire Boulevard, Santa Monica Boulevard, Lincoln Boulevard, and Colorado Avenue.

*The Project site is located near major local and regional destinations, including the pedestrian-only Third Street Promenade (pictured upper left) and the Downtown Santa Monica Station, located on the corner of 4th Street and Colorado Avenue (pictured upper right). The Project site is also within walking distance to the Santa Monica Place shopping area (lower left) and the Santa Monica Pier and Santa Monica State Beach (lower right).*

Downtown District and Project Vicinity

The Downtown has the greatest concentration and diversity of uses in the City and is considered the heart of the City. The Downtown District encompasses 60 City blocks located at the western edge of the City. As delineated by the City's Land Use and Circulation Element (LUCE), the Downtown District is generally defined by Ocean Avenue on the west, Lincoln Boulevard on the east, I-10 on the south, and Wilshire Boulevard on the north. The Project site is located in the western portion of the Downtown District on the northeast corner of Ocean Avenue and Santa Monica Boulevard (see Figure 3.10-1).




3.10-3

wood.

**LUCE Land Use Designations in the Downtown Community Plan Area**

**FIGURE 3.10-1**

The Downtown District comprises a diverse mix of active uses, including retail, restaurant, hotel, entertainment, office, and residential. The Project site is located on the western edge of the Downtown District within 1 mile of the Santa Monica Civic Center, Santa Monica Place shopping center, Third Street Promenade, Colorado Esplanade, Santa Monica Pier, and Palisades Park. Additionally, the Downtown District provides housing units primarily located in mixed-use buildings. Recently, several mixed-use projects have been developed in the Downtown District with the largest concentration of the projects on 5th Street, 6th Street and 7th Street in the Project vicinity. This development within the Downtown District is connected by a multi-modal street network providing access to bus, bicycle, and pedestrian facilities.

*The Project site (pictured in background) is located within the Downtown District in an area with high levels of multi-modal transportation offering access to a diverse range of commercial buildings, residences, and activities.*

The Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line is located at the intersection of Colorado Avenue and 4th Street, within approximately 0.5 miles of the Project site (see Section 3.13, *Transportation*). Additionally, several bus routes are also located in the vicinity, such as Big Blue Bus Line 7 / Rapid 7 (Pico Boulevard), which stops at the intersection of Santa Monica Boulevard and 4th Street; the Santa Monica Big Blue Bus Line 2 (Wilshire Boulevard) and Metro Line 20 (Wilshire Boulevard) which stops at the intersection Wilshire Boulevard and 4th Street; and the Metro Rapid 720 which serves all of the Downtown. With the high number of bus routes as well as the Downtown Santa Monica Station, all of the Downtown District is considered a Transit Priority Area (TPA)[1] (Southern California Association of Governments [SCAG] 2016; City of Santa Monica 2017; see Section 3.13, *Transportation*).

Project Site

The Project site (Assessor's Parcel Numbers [APN] 4291-014-016, -017, -018, -024, and -025) encompasses 11 lots and is approximately 1.89 acres in size (refer Section 2.0, *Project Description*). The Project site is located along the northeast side of Ocean Avenue and Santa Monica Boulevard (refer to Figure 2-1).

[1] "Transit priority area" is defined as an area within 0.5 mile of a major transit stop that is existing or planned if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Title 23 Code of Federal Regulations (CFR) §450.216 or §450.322.

The Project site is currently developed with one- to three-story buildings and surface parking lots (refer to Table 2-2). The site includes five addresses (discussed below) each with a different building and land use types including mixed-use commercial and residential on the corner of Ocean Avenue and Santa Monica Boulevard and three commercial buildings fronting Ocean Avenue (refer to Figure 2-3).

**101 Santa Monica Boulevard** is located on the northeast corner of the intersection of Santa Monica Boulevard and Ocean Avenue and is developed with a two-story mixed-use commercial/residential structure totaling 23,670 square feet (sf). Restaurants occupy the ground floor commercial area totaling 12,390 sf. Additionally, the building includes a 690-sf commercial storage area. The building contains 19 rent-controlled apartment units, including 18 apartments (12 studio units and 6 one-bedroom units) located on the second floor and one rooftop penthouse apartment totaling 10,590 sf. This address also includes a surface parking lot to the north of the building with approximately 43 parking spaces, including two handicapped spaces. The building at 101 Santa Monica Boulevard is identified in the City's 2017 Historic Resource Inventory (HRI) as being potentially eligible for listing as a City-designated Landmark. The significance of this building is addressed in detail in Section 3.4, *Cultural Resources.*

**1327 Ocean Avenue** is located on the north end of the Project site and totals approximately 8,080 sf. The site includes a two-story commercial structure, which is used for commercial purposes including a commercial office, hair salon, and medical spa. A surface parking lot provides eight parking spaces, seven of which are covered spaces, on the eastern edge of the Project site and an additional parallel parking space at the rear of the building.

**1333 Ocean Avenue** is located immediately south of 1327 Ocean Avenue. The site totals approximately 7,375 sf and includes a 2.5-story 4,875 sf medical office building with a separate two-story 2,500 sf commercial office structure at the rear connected by an open-air catwalk and staircase. The front building located at 1333 Ocean Avenue is a City-designated Landmark (LC-01LM-001) (refer to Section 3.4, *Cultural Resources*). Three parallel parking spaces for this address are located at the rear of the structure along 1st Court.

**1337 Ocean Avenue**, located immediately south of 1333 Ocean Avenue, consists of approximately 5,325 sf. The site includes a two-story building and a detached one-story structure located at the rear portion of the lot. The front building consists of a commercial office and salon, and the rear structure consists of a commercial office. The front building is a City-designated Landmark (LC-04-LM-005) (refer to Section 3.4, *Cultural Resources*). Three parking spaces are located on this lot, including two parallel spaces and a perpendicular space to the rear of the structure along 1st Court.

**129 Santa Monica Boulevard** is located on the northwest corner of Santa Monica Boulevard, east of 101 Santa Monica Boulevard across 1st Court and 2nd Street. The site includes a 30,000-sf surface parking lot with approximately 96 parking spaces (including four handicapped spaces).

Surrounding Land Uses

The area surrounding the Project site is fully developed and supports a mix of older, generally low-rise commercial buildings of approximately one- and two-story structures and newer, taller mixed-use buildings up to 21 stories or 300 feet in height (refer to Section 3.1, *Aesthetics and Shade/Shadow Effects).* Along Ocean Avenue, development includes commercial and residential uses in a variety of building sizes and styles. Important surrounding development includes the Gussie Moran House, which is a two-story commercial use Queen Anne-style building (City-designated Landmark); the eight-story Hotel Shangri-La (City-designated Landmark); a three-story mixed use commercial building with office and restaurant uses; the eight-story Georgian Hotel (City-designated Landmark); and the 15-story Pacific Plaza Apartments. Palisades Park (City-designated Landmark) is located west of the Project site across Ocean Avenue (refer to Section 3.4, *Cultural Resources*). PCH and Santa Monica State Beach are located at the base of the Palisades Bluffs immediately to the west of the Project site.

Along 2nd Street, adjacent to the Project site, existing development includes a two-story theater (i.e., Laemmle Monica Film Center) and restaurants (i.e., Flower Child, Elephanté); StepUp on Second, a permanent supportive housing facility; a four-story mixed-use office building with ground floor restaurant uses; a three-story office building; and a one-story church.

Across Santa Monica Boulevard, development includes a one-story commercial building; a three-story mixed use office building with ground floor retail and fitness uses; a one-story office building; a two-story creative office/media production building; and a three-story mixed use office building with ground floor fitness and restaurant uses. A six-story commercial building, a seven-story commercial building, and a nine-story City parking structure (Parking Structure #4) are located across 2nd Street from the Project site.

### 3.10.2 Regulatory Framework

This section summarizes relevant adopted regional and local land use plans and regulations applicable to the proposed Project. No Federal regulations or policies apply to the proposed Project.

State Policies and Regulations

*Senate Bill (SB) 375.* The California's Sustainable Communities and Climate Protection Act (SB 375) (Steinberg, Chapter 728, Statutes of 2008), adopted on September 30, 2008, aligns the goals of regional transportation planning efforts, regional Greenhouse Gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires metropolitan planning organizations (MPOs) such as SCAG to adopt a sustainable communities strategy (SCS) or alternative planning strategy within their Regional Transportation Plan (RTP) to demonstrate the achievement of GHG reduction targets. In compliance with SB 375, SCAG has adopted an RTP/SCS, which covers all of the City as well as other cities and counties in southern California.

*California Coastal Act.* The California Coastal Act (Coastal Act) recognizes the value of the California Coastal Zone (Coastal Zone) and is intended to protect the coast as a resource. The basic goals of the Coastal Act as stated in Public Resources Code Section 30001.5 are as follows:

a) Protect, maintain, and where feasible, enhance and restore the overall quality of the Coastal Zone environment and its natural and artificial resources.

b) Assure orderly, balanced utilization and conservation of Coastal Zone resources taking into account the social and economic needs of the people of the State.

c) Maximize public access to and along the coast and maximize public recreational opportunities in the Coastal Zone consistent with sound resource conservation principles and constitutionally protected rights of private property owners.

d) Assure priority for coastal-dependent and coastal-related development over other development on the coast.

e) Encourage State and local initiatives and cooperation in preparing procedures to implement coordinated planning.

The California Coastal Commission (Coastal Commission), in partnership with coastal cities and counties, plans and regulates the use of land and water in the Coastal Zone. The portion of the Downtown District west of 4$^{th}$ Street, which includes the Project site, is located within the Coastal Zone. For the Coastal Zone, a coastal permit is required from the Coastal Commission, or a local government that has a Commission-certified Local Coastal Program (LCP), for development activities broadly defined by the Coastal Act to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters.

The Coastal Act policies are accomplished primarily through the preparation of an LCP. Cities and counties within the Coastal Zone are required to prepare an LCP, which includes a Land Use Plan (LUP) and an Implementation Plan (IP). An LUP describes the planning area's land use and environmental conditions, identifies issues related to coastal protection and access, and establishes land use policies that are appropriate for each unique coastal community to ensure that the State's beaches, bluffs and tidelands remain as public assets. The IP is the mechanism for implementing the policies contained in the LUP. The IP is generally a part of a City's Zoning Ordinance.

An LCP becomes fully certified only after the Coastal Commission certifies that the LUP and IP are consistent with the policies of the Coastal Act. The City does not have a fully certified LCP. In 1992, the City Council approved a LUP for its portion of the Coastal Zone, but the proposed LUP received only partial certification from the Coastal Commission, excluding some subdistricts (1992 Partially Certified LUP). As a result, the City did not move forward with preparation of an IP. Until the City has a fully certified LCP, all development proposed in City's Coastal Zone requires Coastal Commission approval of a Coastal Development Permit once all discretionary City entitlements are obtained.

The City is in the process of adopting a new LCP to reflect the combined policies, goals and objectives set forth in the City's LUCE, Zoning Ordinance, and Downtown Community Plan (DCP) (all of which were adopted after the City's existing LUP was partially certified in 1992). The City Council adopted the new LUP in October 2018 (Final Draft 2018 LUP). The Final Draft 2018 LUP was submitted to the Coastal Commission for certification at the end of November 2018 and is awaiting their review and recommendation. It is anticipated that a certification hearing will be scheduled in second quarter of 2020. Upon certification, the Final Draft 2018 LUP's policies will guide issuance of future Coastal Development Permits within Santa Monica's Coastal Zone. In addition, the City is in process of preparing an IP to implement the policies in the Final Draft 2018 LUP.

Regional Policies and Regulations

*SCAGs' 2016-2040 RTP/SCS.* SCAG is a Joint Powers Authority under California law as an association of local governments and agencies to address regional issues. SCAG is a designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for regional transportation, land use and growth management, hazardous waste management, and air quality. The SCAG region encompasses 49 percent of California's population. Regional districts were created under SCAG with the intent to serve populations equitably. The City is one of many jurisdictions comprising the SCAG.

To address regional planning issues, SCAG has a number of adopted strategies and plans to implement SB 375 and recommend actions local jurisdictions can take to implement regional sustainability goals. The key principles of these strategies include: locating new employment centers and neighborhoods near major transit systems to reduce vehicle trips and peak- congestion; creating mini-communities around transit stations, with small businesses, housing and restaurants within walking distance to reduce automobile travel; focusing future growth in urban centers and existing cities to reduce vehicle miles traveled and preserve rural and other natural areas; and preserving established single-family neighborhoods and existing natural and green spaces by accommodating new development with existing urbanized areas and downtown areas.

In April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS, which includes goals to increase mobility and enhance sustainability for the region's residents and visitors. The RTP/SCS encompasses three principles to improve the region's future: mobility, economy, and sustainability. The RTP/SCS aims to minimize increases in regional traffic congestion by focusing growth, density, and land use intensity within existing urbanized areas as the general land use growth pattern for the region. At the same time, the RTP/SCS strives towards enhancing the existing transportation system and integrating land use into transportation planning. The RTP/SCS recommends local jurisdictions accommodate future growth within existing urbanized areas to reduce vehicle miles traveled (VMT), congestion, and GHG emissions. The RTP/SCS specifically encourages future growth to occur within existing high quality transit areas, which are described as generally walkable transit districts or corridors that are within 0.5 miles of a major transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The RTP/SCS designates Downtown District Santa Monica as a high-quality transit area (see Section 3.13, *Transportation*). The RTP/SCS approach to sustainably manage growth and transportation demand would reduce the distance and barriers between new housing, jobs, and services and would reduce vehicle travel and GHG emissions while improving local economies. Overall, the strategies and policies in the RTP/SCS are projected to exceed the GHG emission-reduction targets set forth by the California Air Resources Board under SB 375.

On November 7, 2019, SCAG's Regional Council approved the release of the Draft 2020-2045 RTP/SCS (Connect SoCal plan) for public review and comment. The comment period for the Draft Connect SoCal plan started on November 14, 2019 and ended on January 24, 2020. The Draft Connect SoCal plan includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections.

Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law. Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation. SCAG determines regional housing needs and what proportion of regional housing needs Los Angeles County and its constituent cities will share. RHNA quantifies the needs for housing within a jurisdiction and identified planning periods. Communities use the RHNA in land use planning, prioritization of local resource allocation, and decision making on how to address existing and future housing needs from population, employment, and household growth.

The RHNA identifies the housing needs for very low income, low income, moderate income, and above moderate income groups. The most recent RHNA allocation, the 5th Cycle RHNA Allocation Plan, was adopted by the Regional Council on October 4, 2012. This allocation identifies housing needs for the planning period between January 2014 and October 2021.

Santa Monica's allocation in the 5th Cycle (2014-2021) is for the provision of 1,674 units of which 42 percent would be above moderate rate units, and 58 percent would be affordable/moderate rate units. Of the later 283 units would be for moderate income households, 263 would be for low income households and a total of 428 would be for very low income households.

SCAG is currently developing the 6th Cycle RHNA Allocation Plan for the planning period of October 2021 to October 2029. The City is currently anticipating a large RHNA allocation – an estimated 8,897 units – in the upcoming 6th Cycle. The plan is anticipated for adoption by SCAG in October 2020.

Local Policies and Regulations

*City of Santa Monica General Plan.* The City's General Plan is the fundamental planning policy document of the City, providing a "blueprint" for the design of the City. The purpose of the General Plan is to identify the appropriate location of land uses, the basic design and function of circulation, open space, and infrastructure policies, as well as public service needs. The General Plan consists of the seven State-mandated elements: Land Use and Circulation Element (2017); Housing Element (2013); Open Space Element (2001); Scenic Corridors Element (1975); Noise Element (1992); Conservation Element (1975); and, Safety Element (1995). In addition, the Santa Monica General Plan also contains a Historic Preservation Element (2002). The City is not currently in the process of updating any General Plan elements.

*Santa Monica General Plan Land Use and Circulation Element (LUCE).* The LUCE was adopted July 6, 2010 and revised July 25, 2017. The LUCE serves as an integrated land use and transportation planning document governing existing and future land uses in the City to connect

new housing and job opportunities with expanded transportation networks. The LUCE establishes goals, policies, and development criteria for land uses and circulation in the City. The LUCE aims to conserve the City's historic resources, expands open space, and fosters opportunities for housing in areas connected directly to transit improving the multimodal transportation network. The LUCE is the fundamental planning policy for the City and includes identification of appropriate location of land uses, as well as the design and function of circulation, open space, and infrastructure policies. The LUCE's circulation policies are based on the Sustainable City Plan, updated in 2014, which describes a multimodal transportation system that minimizes congestion and pollution while ensure safe and equitable access.

The LUCE identifies the Project site as Downtown Core (refer to Section 2, *Project Description*). Under the LUCE, this designation allows the broadest mix of uses and highest intensity development in the City boundaries. The Downtown District is the City's major regional retail and employment district with pedestrian-oriented designed incorporated at the street level. The Project site is designated Downtown Core under the City's LUCE (refer to Figure 3.10-1). The Downtown Core designation allows for a broad mix of uses including retail, restaurant, hotel, entertainment, office, and residential. The City's LUCE envisions the Downtown Core as a thriving urban district serving the needs of residents and visitors to encourage high quality uses to generate activity. However, the LUCE did not establish specific development standards (e.g., maximum building heights, floor area ratios, building setbacks, etc.) for the Downtown Core and deferred such standards to the DCP per Chapter 9.10 of the Zoning Ordinance.

**Table 3.10-1. Existing Project Site Land Use Setting**

| Project Site | Existing Onsite Improvements | LU Designation | Zoning |
|---|---|---|---|
| Existing Commercial and Residential Buildings and Surface Parking Lots | Restaurant, office, spa, salon, and residential uses within one- to two-story buildings as well as surface parking lots | Downtown Core | DCP (Downtown Community Plan) District |

*Downtown Community Plan.* The DCP was approved in July 2017 and constitutes the City's policy guidance and systematic implementation plan for the Downtown District through the next 15 years. Guided by the LUCE, the DCP provides a proactive strategy for Downtown District to evolve into a more accessible, multi-modal, pedestrian-friendly urban district that serves the needs of a diverse community while integrating the Downtown Santa Monica Station. The DCP establishes permitted uses by land use categories/districts as well as project requirements for developments that exceed the City base FAR (i.e., Tier 1 development requirements); including requirements and development standards for affordable housing (including commercial linkage fees), and

requirements and fees for transportation demand management, and open space. Development under the DCP is predicated on the following six guiding principles that shape the vision for the continued evolution of the City's Downtown District:

1. Maintain the "Our Town" Character of Downtown District Santa Monica;
2. Create a New Model of Mobility;
3. Promote New Housing Opportunities;
4. Focus Public/Private Investments to Serve Residents, Visitors, and Employees;
5. Honor Downtown District's History Through Preservation and Context Sensitive Urban Design; and
6. Cultural and Economic Viability.

Recognizing the distinct character of the various areas of Downtown District, the DCP divides the Downtown District into six districts each with their own unique set of development standards and three tier options to achieve the LUCE vision. The six land-use districts are as follows:

- Mixed-Use Boulevard;
- Neighborhood Village;
- Transit Adjacent;
- Bayside Conservation;
- Wilshire Transition; and
- Ocean Transition.

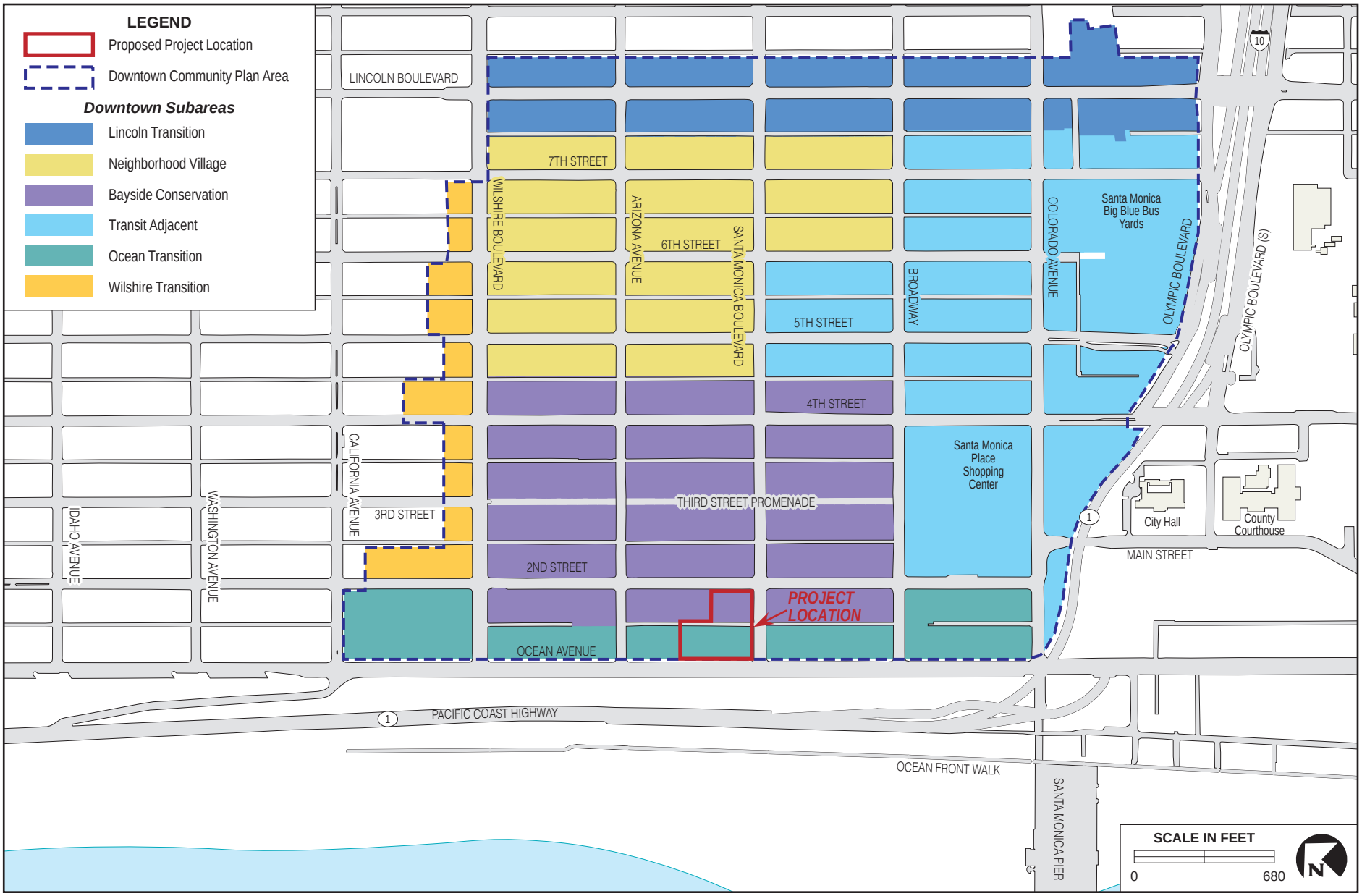
The Project site is located within two DCP land use districts: Bayside Conservation (BC) and Ocean Transition (OT). The eastern portion of the Project site (i.e., to the east of 1st Court) is located in BC District and the western portion of the Project site (i.e., to the west of 1st Court) is within OT District. The BC District is considered the pedestrian and economic heart of the City and includes the Third Street Promenade. The BC District is well served by the largest concentration of public parking in the City and includes a mix of storefronts, restaurants, and pedestrian-oriented services with opportunities for housing and office use on upper floor levels. The OT District includes a mix of dense housing developments, hotels, restaurants, and small retail. The OT District provides the Downtown's expansive views of the beach, pier, and Palisades Park. The City encourages public and private enhancements in the OT District to improve the pedestrian experience as inconsistent frontages and inactive plazas are common in this area.

The Project site is one of three sites identified in the DCP with the Established Large Site (ELS) Overlay. The ELS Overlay sites could potentially provide significant community benefits through circulation, open space, and cultural facilities that would otherwise not be anticipated from smaller projects. These significant enhancements are identified as part of an overall strategy for potential economic and functional improvements to address the City's anticipated future needs. The DCP has identified the Project site for preferred onsite community benefits including affordable housing, public open space, and historic preservation, which are incorporated into the proposed site design. The ELS Overlay sites may be developed up to the maximum height of up to 130 feet and a maximum 4.0 Floor Area Ratio (FAR) as established in the DCP with provision of significant community benefits such as affordable housing, open space, and cultural institutions subject to the following ELS requirements:

- Project would be processed through a Development Agreement;
- Additional environmental review;
- Shade and shadow analysis identifying the potential impacts of the proposed Project on adjacent uses; and
- Include in the application submittal comprehensive responses on how the proposed Project meets each of the priorities described in the DCP.

*2013-2021 Santa Monica General Plan Housing Element*. The 2013-2021 Housing Element, adopted in December 2013 and certified by the State Department of Housing and Community Development in January 2014, outlines the policies and programs the City is currently undertaking to encourage new housing to meet the needs of existing residents and accommodate anticipated population increases. These policies and programs are intended to preserve existing residential uses and allow for a range of housing opportunities at all affordability levels. The Housing Element contains goals and policies that encourage the development of housing for lower-income households, disabled persons, large families, seniors, the homeless, the City's workforce, and other persons in need of assistance. Consistent with the LUCE, the Housing Element's goals and policies encourage and create incentives for developing new market-rate and affordable housing near transit networks and along the City's major corridors.

As previously described, SCAG is currently in the process of preparing its 6$^{th}$ Cycle RHNA Allocation Plan, which is anticipated for adoption in October 2020. Following adoption of the RHNA allocation numbers, the City would embark on updating its Housing Element, but anticipates adoption of the updated Housing Element would occur in Fall 2021.




wood.

**Downtown Community Plan Subareas**

**FIGURE 3.10-2**

*Sustainable City Plan*. Santa Monica's Sustainable City Plan, adopted in September 1994 and updated in January 2014, is founded on 11 guiding principles to provide the basis for effective and sustainable decision making of future planning efforts. The guiding principles include:

1. The concept of sustainability guides City policy;
2. Protection, preservation, and restoration of the natural environment;
3. Environmental quality, economic health, and social equity;
4. All decisions have implications to the City's long-term sustainability;
5. community awareness, responsibility, participation, and education are key elements to a sustainable community;
6. The City recognizes its linkages with regional, national, and global communities;
7. Sustainability issues most important to the community will be first addressed as well as the most cost-effective programs and policies will be selected;
8. The City is committed to procurement decisions which minimize negative environmental and social impacts;
9. Cross-sector partnerships are necessary to achieve sustainable goals;
10. The precautionary principle provides a complimentary framework to help guide City decision-makers in the pursuit of sustainability; and
11. The City is committed to sustainable rights for residents, natural communities, and ecosystems.

*Land Use Plan (LUP) of the Local Coastal Program (LCP).* Implementation of the Coastal Act occurs at the local level through implementation and development of an LCP, including a LUP. LCPs determine the short- and long-term use of coastal resources in their jurisdiction within the Coastal Zone consistent with the Coastal Act goals. The City adopted an updated LUP in July 2018 and is awaiting certification by the Coastal Commission. The Final Draft 2018 LUP update includes but is not limited to policies based on a "people-focused" public access approach to ensure high quality beach visitor experience, consistency with the DCP, and identification and protection of significant coastal views and scenic corridors. The Project site is located entirely within the Coastal Zone (area west of 4$^{th}$ Street); and therefore, a Coastal Development Permit is required.

The Project site is located in Final Draft 2018 LUP's Subarea 5 (Downtown). The Final Draft 2018 LUP provides that the purpose of Subarea 5 is "to maintain a thriving, culturally-rich, mixed-use environment that is the heart of the City and its economic engine." The Final Draft 2018 LUP states that allowable uses in Subarea 5 are "pedestrian oriented, visitor-serving retail and services, commercial entertainment, cultural facilities, restaurants, lodging, offices, residential uses, social services public open spaces, [and] shared parking." The Final Draft 2018 LUP indicates that "overnight visitor accommodations and related support facilities such as shops, restaurants and cultural uses that serve visitors and the local community alike shall be priority uses" along the east side of Ocean Avenue between Colorado Avenue and California Avenue, which includes the Project site (Policy 199).

*Santa Monica Zoning Ordinance (Chapter 9.01 through Chapter 9.52 of the Santa Monica Municipal Code [SMMC]).* The City's Zoning Ordinance establishes regulations for permitted uses, project design and development, parking, loading, and transportation demand management (TDM) requirements, and other requirements regarding land use and development in the City. The Zoning Ordinance generally provides the majority of the development standards based on a site's zoning district; however, for the Downtown District, the Zoning Ordinance incorporates by reference the standards in the DCP. The Project site is located within the Downtown District, so the site is subject to development standards and regulations in the DCP. Where Zoning Ordinance provisions are not specifically addressed by the DCP, the Zoning Ordinance shall generally apply. Where there is a conflict between compliance with Chapter 4 of the DCP and the Zoning Ordinance, Chapter 4 of the DCP is controlling, except where the conflicting Zoning Ordinance provision was adopted through voter initiative in which case the initiative is controlling. Notably, key development standards that are addressed in other sections of the Zoning Ordinance include bicycle parking standards (Section 9.28.140); vehicle parking and loading (Chapter 9.28); lighting Section 9.21.080); and green building standards (Chapter 8.106).

### 3.10.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not

mandatory, it is routinely sanctioned by the courts. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on land use and planning if:

a) The project would physically divide an established community; and/or

b) The project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Methodology

*Division of an Established Community*

The evaluation of impacts regarding established communities identifies the existing land use patterns and character of neighborhood divisions in the vicinity of the Project site, the nature of proposed changes within the Project site that contribute to enhancement of the relationship between the proposed Project and its surroundings. The post-Project setting is compared to pre-Project conditions to determine whether the proposed Project would cause a division in the relationship of land uses surrounding the Project site.

*Conflict with a Land Use Plan, Policy or Regulation*

The analysis of land use consistency impacts considers whether the Project would be consistent with regional and local plans and regulations that are applicable to the Project and Project site. CEQA Guidelines Section 15125(d) requires that an EIR discuss potential inconsistencies with applicable adopted plans that the decision-makers should address. A project is considered consistent with the provisions of an identified regional and local plan if it meets the general intent of the plans and will further the objectives and policies in the plan. A project does not need to be consistent with every policy and objective in a plan. Consistent with the scope and purpose of this EIR, this discussion primarily focuses on goals and policies related to avoiding or mitigating environmental impacts, and an assessment of if any inconsistency with these standards creates a significant physical impact on the environment.

Consistency with adopted General Plan, Land Use and Development Code, LCP LUP, DCP, and 2016-2040 RTP/SCS's goals, policies, and standards are evaluated in detail (see Impact LU-2). Elements of the proposed Project that have the potential to conflict with a threshold, goal, policy, or standard are summarized in this section, along with related physical environmental consequences.

### 3.10.4 Applicable Mitigation Measures from the DCP

The DCP Program EIR does not include any applicable mitigation measures for potential impacts to land use and planning associated with the proposed Project.

### 3.10.5 Project Impacts and Mitigation Measures

*Would the project physically divide an established community?*

**LU-1** **Implementation of the proposed Project would not result in the physical division of an established community. The proposed Project would remove north-south vehicle access along the southern portion of 1st Court; however, the proposed pedestrian-only paseos and courtyards would expand ground-level open space and increase overall pedestrian connectivity through the Project site. Therefore, there would be *no impact* related to the potential division of the community.**

Impact Description (LU-1)

The Project site is located in the Downtown District and is currently developed with a mix of one- to three-story buildings with commercial and residential uses and a paved asphalt surface parking lot. The proposed Project would redevelop the existing site with five new mixed-use buildings and adaptive reuse of two existing City-designated Landmarks, providing increased commercial space, a hotel, residential units, ground floor public open spaces, and cultural uses. Project building and its uses would be consistent with the use and character of the surrounding urban environment and would be consistent with the existing land use patterns within the Downtown District. The Downtown would continue to function as it currently does with implementation of the proposed Project. Further, the addition of residential units on the Project site would provide much needed housing within the Downtown that would be compatible with the mix of uses in the vicinity of the Project site. Thus, implementation of the proposed Project would not physically divide any established communities within the City.

Additionally, the proposed Project would retain the existing layout and design of the Downtown District. The proposed Project would reconfigure 1st Court, an approximately 20-foot wide public alleyway, that provides north-south lateral connectivity between Arizona Avenue and Santa Monica Boulevard. Currently, 1st Court is used primarily for utility and service access (e.g., trash hauling) and for private access to alley driveways and garages. The alley is not heavily trafficked by pedestrians or bicyclists and does not have dedicated facilities for these travel modes (e.g., sidewalks, bike lanes). Under the proposed Project, vehicles would continue to have access to the

alley from Arizona Avenue, but would drive east to 2nd Street under the proposed Project instead of continuing to Santa Monica Boulevard (see Figure 2-15). The proposed Project would convert the southern segment of 1st Court to pedestrian access only as part of the proposed Santa Monica Boulevard Paseo. The Santa Monica Boulevard Paseo would be a north-south oriented pedestrian paseo ranging from approximately 20 to 40 feet in width that would extend along the vacated portion of 1st Court for approximately 150 feet from Santa Monica Boulevard between the Second Street Building and the Santa Monica Boulevard Building. The proposed Project would provide approximately 22,407 sf of ground-level open spaces allowing pedestrian access through the Project site and to surrounding areas to provide connectivity through the Project site, improving the overall pedestrian experience. The provision of ground-level open space would improve safe community access through the Project site and to adjacent areas in the Downtown District (refer to Section 2.0, *Project Description*). Therefore, there would be *no impact* related to the potential division of the community.

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

**LU-2 The proposed Project would be consistent with applicable land use plans, policies, and regulations, including SCAG's 2016-2040 RTP/SCS, the LUP of the LCP, the City's General Plan LUCE and Housing Element, DCP, and Zoning Ordinance. Therefore, impacts would be *less than significant*.**

Impact Description (LU-2)

Project development would be subject to the SCAG's RTP/SCS and Coastal Act as well as the City's LUP, General Plan LUCE and Housing Element, DCP, and Zoning Ordinance. The consistency of the proposed Project with the policies and goals of these land use plans and policy documents are discussed in Table 3.10-2 through Table 3.10-7 below. The analysis focuses on goals and policies related to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. The analysis identifies any feasible mitigation measures presented in this EIR to improve the consistency of the proposed Project with these policies. It is important to note that the determinations of the Project's consistency with those plans are provided for CEQA purposes to determine the potential for physical environmental effects. Final consistency determinations would be made by City decision-makers. As required by CEQA, the consistency of the proposed Project

with GHG reduction and climate change plans is addressed in Section 3.7, *Greenhouse Gas Emissions*.

*Local Coastal Program Land Use Plan*

The Project site is located within the Coastal Zone, and therefore, is subject to the Coastal Act and the City's LCP LUP. It should be noted that the Final Draft 2018 LUP has not yet been certified by the Coastal Commission.

As discussed in Table 3.10-2, the proposed Project would be consistent with the Coastal Act and the City's Final Draft 2018 LUP. Therefore, impacts related to conflicts with the Coastal Act and City's Final Draft 2018 LUP would be *less than significant*.

*2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*

The consistency of the proposed Project with the applicable goals of the 2016-2040 RTP/SCS are analyzed in Table 3.10-3. As discussed therein, the proposed Project would be consistent with all applicable RTP/SCS SCAG goals. Impacts related to consistency with the 2016-2040 RTP/SCS would be *less than significant.*

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies

| Policies | Project Consistency |
|---|---|
| **Coastal Act Section 30211.** Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation. | **Consistent.** The proposed Project would not interfere with the public's right of access to the sea as the proposed development would occur on a developed site on top of the Palisades Bluff, which does not provide direct access to the coast. The Project site is located approximately 500 feet from the landward edge of dry sand and is separated from the beach and the dry sand by PCH. |
| **Coastal Act Section 30213.** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. | **Consistent.** The proposed Project would not remove lower cost visitor accommodations, and the Applicant would be required to assess the feasibility of providing lower cost visitor accommodations as part of the proposed Project. |
| **Coastal Act Section 30222.** The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry. | **Consistent.** The proposed mixed-use development would include ground floor restaurant and retail uses along the pedestrian-only paseos as well as the courtyards and breezeway to enhance public opportunities for coastal recreation through increasing public spaces in the vicinity of the coast. |
| **Coastal Act Section 30250.** New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it would not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50% of the usable parcels in the area have been developed and created parcels would be no smaller than the average size of the surrounding parcels. | **Consistent.** The proposed Project is located in the heart of the Downtown adjacent to existing commercial and mixed-use development sites. The proposed Project would improve the vibrancy of the Downtown District by increasing public open space, retail and restaurant amenities, and providing a Cultural Use Campus, including event space. The proposed Project would not have significant adverse effects on coastal resources. |
| **Coastal Act Section 30251.** The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting. | **Consistent.** The Project site is located within the ELS Overlay as identified by the DCP, allowing a maximum height of 130 feet subject to a Development Agreement that establishes the community benefits to be provided by the proposed Project. The proposed Project would include a 5,070-sf publicly accessible rooftop observation deck, which would provide panoramic coastal views. The proposed Project would also provide improved walkability and open space through the installation of two pedestrian-only paseos as well as a courtyards and breezeway, which would enhance the public's access to coastal viewing areas. The surrounding land uses along Ocean Avenue consist of additional commercial and mixed-use buildings with various multi-story buildings along the street. The Project would not block coastal viewshed access from Palisades Park or the PCH. |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
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| **Coastal Act Section 30252.** The location and amount of new development should maintain and enhance public access to the coast by 1) facilitating the provision or extension of transit service, 2) providing commercial facilities within or adjoining residential development or in other areas that would minimize the use of coastal access roads, 3) providing non-automobile circulation within the development 4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, 5) assuring the potential for public transit high intensity uses such as high-rise office buildings, and by 6) assuring that the recreational needs of new residents would not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development. | **Consistent.** The proposed Project would include a minimum of 231 bicycle parking spaces, a repair station, and locker and shower facilities to promote overall bicycle connectivity to the Downtown Santa Monica Station for the Metro E (Expo) LRT line located within 0.5 miles of the Project site. Retail and restaurant commercial uses would be provided on the ground level of the Project site and would not impact any coastal access roads. The proposed Project would meet DCP requirements for sidewalk setbacks of 20 feet and 18 feet along Ocean Avenue and Santa Monica Boulevard, respectively. Additionally, the proposed Project would expand the sidewalk along 2nd Street's sidewalks to a minimum of 15 feet. This expansion would increase walkability of the Project site to nearby transit services.<br>The proposed Project would include a subterranean parking garage, which would provide up to 285 parking spacings including at least six designated spaces for Electric Vehicle (EV) charging stations as well as designated parking spaces for carpools and vanpools.<br>The proposed Project would provide a high-rise Hotel Building as well as two mixed-use buildings with concentrated visitor serving accommodations as well as residential units. The Project site would also include recreational areas including ground-level open space and would help avoid overloading coastal recreation areas in the site vicinity. |
| **Coastal Act Section 30253.** New development shall do all of the following:<br>• Minimize risks to life and property in areas of high geologic, flood, and fire hazard.<br>• Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.<br>• Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.<br>• Minimize energy consumption and vehicle miles traveled.<br>Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational users. | **Consistent.** The proposed Project would be in compliance with all State and local standards including California Building Code (CBC) and SMMC for building construction to reduce seismic risks to the structures to an acceptable level. A site-specific Geology and Soils Investigation was prepared for the proposed Project by Geotechnologies, Inc. in April 2019. This investigation evaluated geologic hazards and potential instability from ground-shaking hazards. All recommendations and design features of the investigation are incorporated into the proposed building design (refer to Section 3.8, *Geology and Soils*). Inclusion of bicycle parking, associated facilities (e.g. repair station, lockers, showers, etc.), and expansion of the existing sidewalks would enhance overall connectivity and minimize vehicle miles traveled (VMT) by residents, employees, and visitors (see Section 3.13, *Transportation*). The architectural design of the proposed Project would be compatible with the Downtown District's overall character and the needs of frequently visited Downtown District center. |
| **General Policy 128.** Developments of Water Quality Concern - Certain categories of development, as defined in the following subsections, have a greater | **Consistent.** The proposed Project would continue to be developed almost entirely with impervious surfaces. The proposed Project would be required to comply |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
|---|---|
| potential for adverse impacts to water quality and hydrology due to the extent of impervious surface area, type of land use, and/or proximity to coastal waters. Additional best management practices (BMPs) shall be required for a Development of Water Quality Concern, such as the use of low impact development (LID) BMPs to retain the design storm runoff on-site; Treatment Control BMPs to remove pollutants; and Runoff Control BMPs to minimize adverse changes in the runoff flow regime<br>75% or more of site would be impervious surface area. Development where 75% or more of the site's surface area would be impervious surfaces | with the City's Runoff Conservation and Sustainable Management Ordinance, requiring BMPs be developed and incorporated into an Urban Runoff Mitigation Plan to be approved by the City to minimize construction runoff. In addition, the proposed Project would continue to be required to comply with the National Pollutant Discharge Elimination System (NPDES) MS4 Permit issued by the Los Angeles Regional Water Quality Control Board (RWQCB), which requires implementation of various BMPs to reduce pollutant runoff from the Project site by retaining, treating, or infiltrating polluted dry weather runoff onsite. |
| **Final Draft 2018 LUP Policy 13.** The City would prioritize land uses and patterns associated with high transit ridership at locations near major transit stops that are in or near the coastal zone. | **Consistent.** The proposed Project would provide a high concentration of residential units (100 units) and visitor serving accommodations (120 guestrooms) in the Coastal Zone. The proposed Project is located in the transit-oriented Downtown District within approximately 0.5 miles of the Downtown Santa Monica Station for the Metro E (Expo) LRT line and along the Big Blue Bus and Metro Rapid service routes. |
| **Final Draft 2018 LUP Policy 20.** Additional automobile parking shall be required for new development or when an existing structure is enlarged or converted to a use that has a greater parking requirement. | **Consistent.** The proposed Project would include an onsite subterranean parking garage with up to 285 vehicle parking spaces including at least six spaces for EV charging stations as well as designated carpool and vanpool spaces. The proposed parking would be flexible to meet shifting commercial and residential demands onsite and potential parking demands from offsite uses. |
| **Final Draft 2018 LUP Policy 35.** Priority shall be given to the implementation of pedestrian safety improvements around community facilities and popular locations. | **Consistent.** The proposed Project would improve the walkability of the site for residents and visitors with new pathways that would support safe connectivity to the surrounding streetscape. The sidewalks along Ocean Avenue and Santa Monica Boulevard would meet DCP setback requirements of 20 feet and 18 feet, respectively. Additionally, the sidewalk along 2nd Street would be expanded to a minimum of 15 feet. Two pedestrian-only paseos as well as a public courtyard and breezeway would be available for pedestrian use on the Project site. |
| **Final Draft 2018 LUP Policy 100.** Development shall be designed to minimize light spillage and maximize light shielding to the maximum feasible extent per the following standards:<br>• Nighttime lighting shall be minimized to levels necessary to provide pedestrian security<br>• Building lighting shall be shielded and directed downward<br>• Up-lighting and use of event "searchlights" or spotlights is prohibited | **Consistent.** Unless otherwise permitted by the Development Agreement, the proposed lighting would be designed in accordance with SMMC Section 9.21.080, which requires appropriate shielding and restricts light spillover from the property to 0.5 foot-candles of light to avoid obtrusive glare onto the public right-of-way or adjacent properties. Required adherence to the SMMC combined with architectural design and materials would minimize the lighting and glare effects on public views. Lighting for the proposed Project is anticipated to be consistent with other commercial buildings in the vicinity of the Project site |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
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| • Landscape lighting shall be limited to low-intensity and low-wattage lights<br>• Red lights shall be limited to only that necessary for security and safety warning purposes<br>• Artificial night light from interior lighting shall be minimized through the utilization of automated on/off systems and motion detectors | and would not constitute a new source of substantial nighttime light pollution (refer to Section 3.1, *Aesthetics and Shade/Shadow Effects*). |
| **Final Draft 2018 LUP Policy 112.** Development shall be sited and designed to protect water quality and minimize impacts to coastal waters by incorporating measures designed to:<br>• Plan, site, and design development to minimize increases of impervious surfaces especially impervious areas directly connected to the storm drain system, and, where feasible, increase the area of pervious surfaces in re-development, to reduce runoff<br>• Minimize land disturbance activities such as clearing and grading, and cut-and-fill to reduce erosion and sediment loss<br>• Plan, site, and design development to preserve or enhance non-invasive vegetation to achieve water quality benefits such as transpiration, interception of rainfall, pollutant uptake, shading of waterways to maintain water temperature, and erosion control<br>• Collect and use rainwater and stormwater locally to replace potable water, to the maximum extent feasible | **Consistent**. The majority of the Downtown District, including the existing site is impervious to groundwater infiltration due to the highly developed nature of the area. The proposed Project would improve existing water quality through compliance with the City's Runoff Conservation and Sustainable Management Ordinance requirements to minimize the amount of impervious area and the implementation of LID strategies to disconnect the runoff from impervious area. The proposed Project would be designed to retain onsite the stormwater runoff resulting from a 0.75 inch per 24-hour storm or the 85$^{th}$ percentile of a storm as defined by Los Angeles County, whichever is greater. Stormwater measures involving infiltration would not be permitted due to the location of the Project site within the City's slope instability zone (refer to Section 3.9, *Hydrology and Water Quality*). |
| **Final Draft 2018 LUP Policy 113.** Development and construction activities shall protect and, where feasible, restore the water quality of groundwater and coastal surface waters including the ocean, coastal streams, or wetlands. Urban runoff pollutants shall not be discharged or deposited such that they adversely impact groundwater, the ocean, coastal streams, or wetlands, as stated herein and consistent with the requirements of the Los Angeles RWQCB's municipal stormwater permit and the State Water Resources Control Board's California Ocean Plan. | **Consistent.** The proposed Project would comply with the two overarching water quality control plans in the City: the California Ocean Plan (2015) and the Water Quality Control Plan for the Los Angeles Basin (Basin Plan) as well as all applicable policies and BMPs as required by the City's Runoff Conservation and Sustainable Management Ordinance (refer to Section 3.9, *Hydrology and Water Quality*). |
| **Final Draft 2018 LUP Policy 114.** All development must be designed to minimize, to the maximum extent feasible, the introduction of pollutants of concern that may result in significant impacts from site runoff from impervious areas. Development shall incorporate construction and post-construction Best Management Practices (BMPs) to reduce pollutant loading to the maximum extent feasible. | **Consistent**. The proposed Project would continue to be required to comply with the City's Runoff Conservation and Sustainable Management Ordinance, which requires implementation of various BMPs to reduce pollutant runoff from the Project site by retaining, treating, or infiltrating polluted dry weather runoff onsite. |
| **Final Draft 2018 LUP Policy 116.** Development shall be sited and designed to minimize impacts to water quality from nonpoint source pollution where feasible. All development shall use the standards set forth | |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
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| herein, and, at minimum, meet the requirements of the Los Angeles RWQCB. | |
| **Final Draft 2018 LUP Policy 120.** Development shall include construction phase sediment and erosion control and runoff control plans. These plans shall specify BMPs that would be implemented to minimize erosion and sedimentation, provide adequate sanitary and waste disposal facilities and prevent contamination of runoff by construction chemicals and materials. | **Consistent.** As required, prior to beginning any construction activities, the Applicant would obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent and Storm Water Pollution Prevention Plan (SWPPP) for review and approval by the Los Angeles RWQCB. BMPs outlined in the SWPPP would be informed by the requirements of the City's Runoff Conservation and Sustainable Management Ordinance and could include, but not be limited to erosion control and soil stabilization BMPs to prevent soil erosion and runoff during construction. |
| **Final Draft 2018 LUP Policy 121.** Development shall include post-development phase drainage and runoff control plans. These plans shall specify site design, runoff BMPs that would be implemented to minimize post- construction runoff, at a minimum reducing the runoff from the site by 0.75 inches, and shall include the maintenance plan for these BMPs, as appropriate, for the life of the development. Permits for new development and additions to existing development as appropriate shall be conditioned to require ongoing maintenance where maintenance is necessary for effective operation of required BMPs. Verification of maintenance shall include the permittee's signed statement accepting responsibility for all structural and treatment control BMP maintenance until such time as the property is transferred and another party takes responsibility. | **Consistent.** The proposed Project would be required to comply with the City's Runoff Conservation and Sustainable Management Ordinance, requiring BMPs be developed and incorporated into an Urban Runoff Mitigation Plan, which would be approved by the City to minimize construction runoff. In addition, the proposed Project would continue to be required to comply with the NPDES MS4 Permit issued by the Los Angeles RWQCB, which requires implementation of various BMPs to reduce pollutant runoff from the Project site by retaining, treating, or infiltrating polluted dry weather runoff onsite. |
| **Final Draft 2018 LUP Policy 122.** Trash storage areas shall be designed using BMPs to prevent stormwater contamination by loose trash and debris, and discharge of such polluted stormwater. | **Consistent.** Trash and recycling collection facilities would be provided within covered and enclosed refuse spaces along 1st Court, and would include appropriate stormwater drainage filters which would prevent stormwater contamination. |
| **Final Draft 2018 LUP Policy 125.** Development that requires a grading permit shall include landscaping and re-vegetation of graded or disturbed areas. Any landscaping that is required to control sediment and prevent erosion shall use native or drought-tolerant non-invasive plants to minimize the need for fertilizer, pesticides, herbicides, and excessive irrigation. Where irrigation is necessary, City – approved irrigation practices shall be required. | **Consistent.** The Project site consists of almost entirely existing impervious surfaces and does not have any exposed or graded areas. Grading activities for construction of the proposed Project would be conducted in accordance with State and local requirements to control sediment and prevent erosion. The Project site would implement 22,407 sf of ground-level open space including native vegetation landscaping to increase the attractiveness of open areas and improve site water quality. |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
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| **Final Draft 2018 LUP Policy 132.** Permitted land uses, or developments shall have no significant adverse impacts on marine and beach habitats | **Consistent.** The stormwater runoff associated with the proposed Project would be negligible as runoff would continue to follow the same existing major discharge paths and would not significantly increase runoff entering the existing stormwater system. The proposed Project would be compliant with MS4 NPDES Permits waste discharge requirements to avoid significant adverse impacts to the Santa Monica Bay and associated marine and beach habitats. |
| **Final Draft 2018 LUP Policy 133.** Development on beach or ocean bluff areas adjacent to marine and beach habitats shall be sited and designed to prevent impacts that could significantly degrade the marine habitat. All uses shall be compatible with the maintenance of the biological productivity of such areas. | **Consistent.** The Project site is located to the east approximately 180 feet from the Santa Monica Palisades Bluff. The proposed Project would not involve any offsite modifications to soils or bluff structures and would not impact bluff stability. The proposed Project would be in compliance with all applicable Federal, State, and local regulations pertaining to the protection of marine and beach habitats including geologic and hydrologic considerations. The proposed Project would not impact the biological productivity of Santa Monica Bay or Santa Monica State Beach. |
| **Final Draft 2018 LUP Policy 145 Visual Assessments.** A site specific visual assessment shall be required for all development that has the potential to impact a designated scenic corridor or vantage point to evaluate the magnitude and significance of impacts as a result of the proposed development. The visual assessment shall include an analysis of all feasible siting or design alternatives that would minimize impacts to visual resources. The alternatives analysis shall identify the least environmentally damaging alternative and shall demonstrate that the development has been designed to avoid or if avoidance is not feasible, to minimize and mitigate, adverse impacts to visual resources. The impacts to views from the proposed development and the alternatives must be adequately demonstrated through such means as visual simulations, three-dimensional massing models, perspective drawings, rendered streetscape elevations, and/or story poles and flagging. | **Consistent.** Section 3.1, *Aesthetics and Shade/Shadow Effects* provides an assessment of potential impacts to views as well as shade and shadow in the surrounding vicinity. Refer to for a detailed discussion on the setting and potential effects. Five Key Viewing Areas (KVAs) were selected to describe the changes to the visibility of the Project site. Visual simulations were rendered of the existing site's aesthetic impacts as well as a modeled representation of the proposed Project. While the proposed building height is substantially higher than the existing onsite buildings, the proposed Project would not adversely impact public scenic vistas or scenic resources. An analysis of the proposed alternatives to the proposed Project on visual resources is provided in Section 5, *Alternatives.* |
| **Final Draft 2018 LUP Policy 154 Visually Degraded Areas.** Development shall, where feasible, restore and/or enhance visual quality in visually degraded areas. Creative public and private efforts to restore the scenic beauty of visually degraded areas of the City's Costal Zone shall be encouraged and assisted as appropriate. | **Consistent**. The proposed Project would include contemporary façade design, pedestrian-oriented streetscapes, landscaping in open spaces, and context-sensitive development to improve the surrounding area's visual character. Building design would be subject to the review of the Landmarks Commission and/or the Architectural Review Board (ARB). |
| **Final Draft 2018 LUP Policy 157 Signage in Sensitive Viewsheds.** Placement of signs other than for traffic or public safety, utilities, or other accessory equipment that obstruct views to the ocean, beaches, parks, or other scenic areas from designated public | **Consistent.** The proposed Project would not include any signage other than those necessary for traffic, public safety, and utilities. The locations, sizes, materials, and colors of signage would be reviewed by the Landmarks Commission and/or the ARB. Refer to |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
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| scenic viewing areas and scenic corridors shall be prohibited. | Section 3.1, *Aesthetics and Shade/Shadow Effects*, for further discussion regarding viewsheds. |
| **Final Draft 2018 LUP Policy 158 Open Space Night Sky Preservation.** Exterior lighting (except traffic lights, navigational lights, and other similar safety lighting) shall minimize all forms of light pollution, including light trespass, glare, and sky glow. Where new development is adjacent to beaches, open space, or located where it may impact scenic resources or public viewsheds, exterior lighting shall be restricted to low-intensity features that are shielded consistent with the following standards:<br>• The minimum lighting necessary shall be used to light walkways used for entry and exit to the structures, including parking areas, on the site;<br>• Security lighting shall be attached to structures and controlled by motion detectors;<br>• The best available visor technology and shielding shall be used to minimize light spill and direct/focalize lighting downward, toward the targeted area(s) only;<br>• The development shall use the best available technology and a lighting spectrum designed to minimize lighting impacts on wildlife and habitat as well as minimize glare and sky glow;<br>• Lighting shall avoid or minimize light to trespass into native habitat or open space areas to minimize impacts on wildlife<br>• Lighting sources shall not be directly visible from public viewing areas;<br>• Lighting is prohibited around the perimeter of the parcel or for aesthetic purposes | **Consistent.** The Project site is located in the urbanized Downtown District which includes numerous sources of nighttime lighting, including streetlights, traffic signal lights, exterior building security, interior building illumination, and vehicular lights from nearby streets. Unless otherwise permitted by the Development Agreement, lighting associated with the proposed Project would be provided in accordance with SMMC Section 9.21.080, which requires appropriate shielding and restricts light spillover to avoid obtrusive glare onto the public right-of-way, adjacent properties, or the night sky. Refer to Section 3.1, *Aesthetics and Shade/Shadow Effects.* |
| **Final Draft 2018 LUP Policy 164 Avoiding Adverse Impacts to Archaeological and Paleontological Resources.** Development shall be sited and designed to avoid adverse impacts to archaeological and paleontological resources to the maximum extent feasible. If there is no feasible alternative that eliminates all impacts to these resources, then the alternative that would result in the fewest or least significant impacts to resources shall be selected. Impacts to archaeological or paleontological resources that cannot be avoided through siting and design alternatives shall be fully mitigated, consistent with Policy 170. | **Consistent with Mitigation**. The proposed Project would be sited on an existing developed site in the highly developed area of the Downtown District. A Phase I Cultural Resources Assessment was conducted and concluded there is not a significant risk of damage to an archaeological or paleontological resources on the site with the incorporation of identified mitigations in Section 3.4, *Cultural Resources*. If a previously unknown archaeological or paleontological resource is discovered during construction activities, work would cease in the vicinity of the resource(s) and all appropriate mitigation measures identified in Section 3.4, *Cultural Resources* and Section 3.6, *Geology and Soils* (e.g., DCP MM CR-3a and MM CR-3b) would be implemented prior to further development associated with the proposed Project. These measures would require the proposed Project comply with all applicable State and local regulations in construction-related activities including if a previously unknown archaeological or paleontological resource is |
| **Final Draft 2018 LUP Policy 165 Discovery of Archaeological or Paleontological Resources.** If archaeological or paleontological resources are discovered in the course of construction, including earth moving activities and/ or other ground disturbances, all activity which could damage or destroy these resources shall be immediately halted. A | |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
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| Registered Professional Paleontologist shall examine the site and provide an evaluation of the nature and significance of the resources. Mitigation measures shall be implemented to address the impacts of the development on the resources following the guidance of Policy 168 "In-situ Preservation and Avoidance Preferred" and Policy 170 "Mitigation Measures". The Planning Dept. shall determine whether the development or mitigation measures require additional environmental review and/or a new Coastal Development Permit. The City shall notify the Coastal Commission staff that paleontological resources were discovered during construction. Activities that may adversely impact these resources shall not resume without written authorization from the Planning Dept. that construction may proceed. | discovered, all activities would be halted and evaluation and appropriate recording and handling of the resources shall be conducted by certified professionals. |
| **Final Draft 2018 LUP Policy 166 Evaluating Significant Archaeological or Paleontological Resources.** Applications for Coastal Development Permits shall include an evaluation of potentially significant archaeological or paleontological resources, if applicable to the site. The City's review of the Coastal Development Permit application shall address the nature of the resource and compatibility of project siting and design with the resource. Coastal Development Permit for new development within archaeologically or paleontologically sensitive areas shall be conditioned upon the implementation of appropriate mitigation measures informed by consultations with the appropriate Native American tribe(s). | |
| **Final Draft 2018 LUP Policy 169 Prohibited Activities.** Unauthorized collecting of artifacts, or other activities that have the potential to destroy or disturb archaeological or paleontological resources shall be prohibited. | **Consistent.** The proposed Project would comply with all State and local regulations including the report of any findings of archeological or paleontological resources in earth moving activities as well as construction. No artifacts would be collected without supervision from a City-qualified Archaeologist or Native American monitor. |
| **Final Draft 2018 LUP Policy 170 Mitigation Measures.** Where, as a result of the assessment required by Policy 167, the City determines that the project may adversely affect archaeological resources and it is not feasible to avoid impacts or preserve resources in-situ as required by Policy 168, mitigation measures that are sensitive to the cultural beliefs of the affected population(s) and would result in the least significant impacts to resources shall be required and implemented as conditions of the Coastal Development Permit. An archaeological or paleontological mitigation plan for the treatment of impacted resources shall be prepared. The mitigation plan shall be prepared by a City-qualified Archaeologist (Registered Professional) and if data recovery through excavation | **Consistent with Mitigation.** Refer to discussion of consistency with Policy 164, 165, and 166. The proposed Project would implement previously identified mitigation measures necessary to ensure impacts to archaeological and paleontological resources are avoided or reduced to the maximum extent feasible. |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
|---|---|
| is the only feasible mitigation measure, shall include a Data Recovery Plan that proposes how the excavation would be carried out and a Data Recovery Report summarizing the results of the archaeological excavation(s). Excavations shall be confined to the direct area of the project's potential effects, unless otherwise indicated in a Data Recovery Plan. The Data Recovery Plan shall include but not be limited to the following: (1) the nature and purpose of the Data Recovery Plan, dates of the fieldwork, names, titles, and qualifications of personnel involved, and the nature of any permits or permission obtained; (2) the level of excavation needed; (3) the analytical protocols for the data; (4) detailed notes, photographs, and drawings of all excavations and soil samples; and (5) the location of where archaeological resources would be curated. The Data Recovery Report shall be submitted with the permit application, shall be reviewed for adequacy by a City-qualified Archaeologist (Registered Professional) and shall be subject to approval as part of the permit application for the development. A follow-up Data Recovery Report shall be submitted to the Planning Department following the archaeological excavation detailing the implementation of the Data Recovery Plan and recovery measures that were performed, including the integrity of the site deposits and any other information, as necessary. | |
| **Final Draft 2018 LUP Policy 171 Monitoring.** The following archaeological and paleontological monitoring shall occur during earth moving activities related to project construction that have the potential to uncover or otherwise disturb archaeological and paleontological resources.<br>• Onsite monitoring by a City-Qualified Archaeologist and a Native American Monitor with ties to the land in question consistent with the Native American Heritage Commission contact list, of all grading, excavation, trenching, vegetation or paving removal, ground clearance, and site preparation that involves earthmoving operations.<br>• All Contractors and construction personnel shall be alerted to the possibility of uncovering subsurface archaeological or paleontological features or artifacts associated with past human occupation of the parcel.<br>• If archaeological or paleontological resources are encountered or suspected, work shall immediately be halted or redirected to an area with no known archaeological resources and the City shall be notified. The City shall evaluate the nature, extent and significance of any discoveries or suspected | |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
|---|---|
| archaeological and paleontological resources based upon input Professional Archeologists, Native American tribal groups approved by the Native American Heritage Commission for the area, and/or professional Archeology groups as appropriate. Once identified or potential archaeological resources have been evaluated, the City shall coordinate with a Professional Archaeologist to prepare a mitigation plan (including but not limited to a Data Recovery Plan and a Data Recovery Report) and, if feasible, redirect grading and/or excavation activities to an area with no archaeological resources. The City shall determine whether the development or mitigation measures require a new Coastal Development Permit. Activities that may adversely impact these resources shall not resume without written authorization from the City's Environmental Analyst that construction may proceed.<br>• If a discovery consists of possible human remains, all work in the area shall be immediately halted and the County Coroner shall be contacted. A representative from each tribal entity on the most current List from the Native American Heritage Commission shall be retained to monitor all further subsurface disturbance in the area of the find. The City shall determine whether the development or mitigation measures require a new Coastal Development Permit. Activities that may adversely impact these resources shall not resume without written authorization from the City that construction may proceed. | |
| **Final Draft 2018 LUP Policy 172 Native American Consultation Requirement.** Native American tribal groups approved by the Native American Heritage Commission for the area shall be consulted when development may adversely impact archeological and paleontological resources and in the preparation of any mitigation plan to address impacts to these resources. | **Consistent.** The proposed Project would include oversight from the Native American Heritage Commission (NAHC) if determined necessary by the City and/or if the discovery of a previously known archeological or paleontological resource(s) occurs. If a mitigation plan is determined necessary, consultation with the NAHC would occur during the mitigation design process. |
| **Final Draft 2018 LUP Policy 176 Public Services.** Development shall be located within, contiguous within, or in close proximity to existing developed areas with adequate public services and where it would not have significant adverse effects, either individually or cumulatively, on coastal resources. | **Consistent.** The proposed Project is located in the vibrant Downtown District and is served by Big Blue Bus and is located within 0.5 miles of the Downtown Santa Monica Station. The proposed Project would provide a minimum of 231 bicycle parking spaces and supporting facilities including a repair station and locker and shower facilities. Additionally, up to 285 parking spaces would be available, which would allow for flexibility to meet shifting commercial and residential demands onsite and potential parking demands from offsite uses. |

## Table 3.10-2. Project Consistency with the Coastal Act and Final Draft 2018 LUP Policies (Continued)

| Policies | Project Consistency |
|---|---|
| **Final Draft 2018 LUP Policy 181 Development Site Drainage.** Development shall provide adequate drainage and erosion control facilities that convey site drainage in a non-erosive manner in order to minimize hazards resulting from runoff, erosion, and other hydrologic impacts to streams and shoreline areas. Drainage shall be retained on site to the maximum extent feasible and shall not be directed toward streams or the shoreline without treatment. Such drainage shall not impact adjacent properties or public areas and shall comply with all building code requirements. | **Consistent**. The proposed Project would be served by existing municipal stormwater drainage systems. The proposed Project would not adversely impact existing capacity of the stormwater drainage system and would not result in an increase in erosion, siltation, nor onsite or offsite flooding. The existing and proposed storm drain systems at the Project site ultimately discharge to the Santa Monica Bay, which are regulated by the RWQCB under MS4 NPDES Permits. |
| **Final Draft 2018 LUP Policy 183.** New public and private development shall consider Universal Design Principles and incorporate appropriate features to the extent feasible in order to improve the beach and Pier visitor experience for all. | **Consistent.** The design elements of the proposed Project are in alignment with the Universal Design Principles, such as equitable means of usage of facilities and elimination of unnecessary complexity to ensure all users are able to adequately use facilities. |
| **Final Draft 2018 LUP Policy 194.** Properties on Ocean Avenue that are currently developed with visitor accommodations and visitor-serving commercial uses shall be preserved or replaced with uses that are also visitor-serving. | **Consistent.** The existing Project site consists of visitor-serving commercial uses including restaurants and office space. The proposed Project would provide new and additional ground-level visitor-serving commercial uses including restaurants and retail spaces as well as a 5,070-sf publicly accessible rooftop open space. The proposed Project would also include a 12-story Hotel Building to expand visitor serving accommodations in the Downtown District. The proposed Project would increase the area of visitor serving accommodations at the Project including hotel space, landscaped open space, and amenities (e.g. hotel spa) to further improve the vibrancy of the Downtown District. |
| **Final Draft 2018 LUP Policy 198.** Usable terraces, balconies, viewing platforms and areas available for use by the general public shall be encouraged in new development. | **Consistent.** The proposed Project would include a 5,070-sf publicly accessible rooftop observation deck with panoramic views of Palisades Park, Santa Monica State Beach and the Pacific Ocean. The proposed Project would also provide two ground-level pedestrian-only paseos, a public courtyard, and widened sidewalks adjacent to the Project site. |
| **Final Draft 2018 LUP Policy 201.** Along the east side of Ocean Avenue, between Colorado Avenue and California Avenue, overnight visitor accommodations and related support facilities such as shops, restaurants and cultural uses that serve visitors and the local community alike shall be priority uses. Office and residential uses shall also be permitted above the ground floor or if located on the ground floor, shall not be allowed along the Ocean Avenue frontage, except for residential lobbies, which shall be allowed on the ground floor within the minimum space necessary to serve the building's residential use. | **Consistent.** The Project site would include a 12-story Hotel Building with up to 120 guestrooms including a hotel restaurant, meeting and banquet space, and pool and pool deck. Additionally, a 35,500-sf Cultural Use Campus would be incorporated into the Project site in compliance with the DCP's ELS Overlay requirements. The ground floor of the two mix-use residential buildings would consist of dedicated retail and restaurant space that serve visitors as well as the local community. All residential development would be located above the ground floor retail/restaurant uses. |

## Table 3.10-3. Project Consistency with the 2016-2040 RTP/SCS SCAG

| RTP/SCS Goal | Project Consistency |
|---|---|
| **Goal 1.** Align the plan investments and policies with improving regional economic development and competitiveness. | **Consistent.** The proposed Project would expand visitor-serving and local residential accommodations as well as services improving the Downtown District's economic competitiveness. |
| **Goal 2.** Maximize mobility and accessibility for all people and goods in the region. | **Consistent.** The proposed Project supports the RTP/SCS goal of maximizing mobility and accessibility by locating a mixed-use development within close proximity to transportation services within 0.5 miles of the Downtown District including the Downtown Santa Monica Station as well as along the Big Blue Bus and Metro Rapid service routes. The proposed Project would create a mix of hotel, residential, retail/restaurant, cultural space, and open space along the Ocean Avenue and Santa Monica Boulevard corridors. The Project site would include 22,407 sf of ground-level open space including Santa Monica Boulevard Paseo and Ocean Avenue Paseo as well as a courtyard and breezeway, each of which would provide onsite and offsite connectivity with the surrounding sidewalks. Additionally, the proposed Project would provide secure, onsite short- and long-term bicycle parking, at a minimum of 231 bicycle spaces, for residents, visitors and employees to increase multimodal transportation usage in the Downtown District. Bicycle facilities would also include a repair station, lockers, and showers. |
| **Goal 3.** Ensure travel safety and reliability or all people and goods in the region. | |
| **Goal 4.** Preserve and ensure a sustainable regional transportation system. | |
| **Goal 5.** Maximize the productivity of our transportation system. | **Consistent.** The proposed Project would maximize the productivity of the multimodal transportation system as it would develop a mix of uses on an urban infill site within the Downtown District in close proximity to public transit including the Downtown Santa Monica Station. Additionally, the Project site would complement the Downtown's pedestrian network through the provision of 22,407 sf ground-level open space as well as creation of expanded sidewalks along 2nd Street to improve pedestrian circulation through and around the site. The proposed Project would provide a minimum of 231 bicycle parking spaces for site visitors, employees, and residences to support bicycling. |
| **Goal 6**. Protect environment and health of our residents by improving air quality and encouraging active transportation (e.g. bicycling and walking). | **Consistent.** The proposed Project would contribute to improving air quality and encourage bicycling and walking in the Downtown District. The proposed Project would expand the existing sidewalks along 2nd Street and create connectivity between existing sidewalks adjacent to the Project site on Ocean Avenue, Santa Monica Boulevard, and 2nd Street through onsite pedestrian-only paseos, a courtyard, and a breezeway. Pedestrian-only open space on the ground level of the proposed Project would emphasize active transportation usage in the Downtown District to access services. Additionally, the proposed Project would expand secure bicycle parking spaces in the Downtown District by providing at least 231 parking spaces as well as a repair station, lockers, and showers to encourage multimodal transportation commuting. Providing a diversity of uses in the Downtown District and promoting safe and active transportation with Project site improvements would assist in reducing vehicle trips and VMT, improving overall air quality in the City. |

**Table 3.10-3. Project Consistency with the 2016-2040 RTP/SCS SCAG (Continued)**

| RTP/SCS Goal | Project Consistency |
|---|---|
| **Goal 7**. Actively encourage and create incentives for energy efficiency, where possible. | **Consistent.** The proposed Project would incorporate sustainable design features, including but not limited to photovoltaic solar panels, operable windows, and energy efficient heating, ventilation, and air conditioning systems. |
| **Goal 8.** Encourage land use and growth patterns that facilitate transit and active transportation. | **Consistent**. Refer to discussion of consistency with Goal 2 and Goal 6. |

*City of Santa Monica's General Plan Land Use and Circulation Element*

The Project site is located within the Downtown Core land use designation of the LUCE, which allows for a broad mix of uses and the highest intensity of development within the City. The Downtown District is the City's major regional retail and employment district, with a pedestrian-orientation at the street level. The LUCE's vision of the Downtown Core area is the heart of the City as a vibrant, mixed-use urban environment. Allowed uses include residential, commercial, retail, cultural and entertainment uses, and other visitor-serving uses, such as hotels. The LUCE refers to the DCP for the Downtown Core's development standards, such as building height.

As presented in Table 3.10-4, the proposed Project would be consistent with applicable LUCE goals and policies. Therefore, impacts related to conflicts with the LUCE would be *less than significant*.

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies

| LUCE Goals and Policies | Project Consistency |
|---|---|
| **LUCE Policies** | |
| **Policy LU2.1 Redirect Growth**. Redirect growth away from residential neighborhoods onto transit corridors, where new uses are served by convenient transportation networks. | **Consistent.** The Project site is located in the transit-rich Downtown District of the City, which is well served by existing transit provided by the Metro E (Expo) LRT line, Big Blue Bus, and Metro Rapid. The Project site is not located in a residential neighborhood. As discussed in Section 3.13, *Transportation*, the Project site is adequately served by transit and transportation infrastructure. |
| **Policy LU2.4** Affordable and Workforce Housing. Create diverse housing options along the transit corridors and in the activity centers, replacing some commercial potential with additional affordable and workforce housing, and encouraging affordable workforce housing near the transit stations. | **Consistent.** The proposed Project would provide 100 residential units, including 19 rent-controlled units within the transit-rich Downtown District. By locating new housing and commercial uses in the Downtown District, residents, employees, and patrons of the Project would have access to existing public transit, including the Metro E (Expo) LRT line, Big Blue Bus, and Metro Rapid. |
| **Policy LU2.5 Vehicle Trip Reduction.** Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system. | **Consistent.** The proposed Project would support vehicle trip reduction by virtue of its location within the transit-rich Downtown District. Ocean Avenue and Santa Monica Boulevard are highly-utilized transit corridors. By locating new housing and commercial uses Downtown, residents, employees, and patrons of the Project employees, residents, and visitors would have access to existing public transit, including the Metro E (Expo) LRT line, Big Blue Bus, and Metro Rapid. Proximity to the various uses in the Downtown District and the Third Street Promenade would also make walking a convenient mode of transportation for shopping and entertainment. Additionally, the proposed Project would provide a mix of compatible uses on the Project site, including restaurants, retail stores, and cultural uses which would be easily accessed via walking or biking, reducing vehicle trips between land uses. The proposed Project would also integrate pedestrian-friendly widened sidewalks, bicycle parking and facilities, provide ground-level shopping and open space uses, and implement a TDM plan that would promote vehicle trip reduction in the City. The subterranean parking structure would provide designated spaces for carpools and vanpools to encourage ridesharing. |
| **Policy LU2.6 Active Spaces**. Focus new development in defined districts to create active spaces that can support diverse local- serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections. | **Consistent**. The Project site is located on the corner of Ocean Avenue and Santa Monica Boulevard, in the City's vibrant Downtown District. The proposed Project would provide active ground floor retail/restaurant uses as well as a Cultural Use Campus, along with hotel and residential uses all on one site. The mix and type of proposed uses would promote pedestrian activity onsite as well as the surrounding area. The proposed Project would also improve walkability with active street frontages, expanded |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| | sidewalks, two pedestrian-only paseos, a public courtyard, and a breezeway that would also attract pedestrian use and enliven the area. As previously described, the proposed Project would include bicycle facilities and public transit access. |
| **Policy LU3.2 Focus on Housing in Transit Accessible Corridors and Districts.** Focus additional housing opportunities on the transit-rich commercial boulevards. | **Consistent**. The proposed Project would provide 100 residential units within the transit-rich Downtown District. By locating new housing and commercial uses in the Downtown District, residents, employees, and patrons of the proposed Project would have access to existing public transit, including the Metro E (Expo) LRT line, Big Blue Bus, and Metro Rapid. |
| **Policy LU3.3 Focus on Local-Serving Uses.** Emphasize uses which address local-serving needs and daily resources necessary to reduce vehicle trips and vehicle miles traveled. | **Consistent.** The proposed Project would provide a mix of services and local-serving commercial uses within the transit-rich Downtown District, such as hotel, residential, cultural, retail, and restaurant uses. By locating new housing, entertainment, shopping, and dining opportunities in the Downtown District, future residents, employees, and patrons of the proposed Project would have access to existing nearby public transit (i.e., Metro E [Expo] LRT line, Big Blue Bus, and Metro Rapid). Additionally, this cluster of compatible uses would activate the pedestrian paseos and courtyard provided by the proposed Project, to encourage walking by future residents, employees, and patrons of the site. The proposed Project would be easily accessible by walking or biking, reducing vehicle trips between land uses. Additionally, bicycle parking at the ground level and in the subterranean parking garage would encourage residents, employees, and patrons of the proposed Project to bike to the Project site. |
| **Policy LU4.1 Active Centers.** Create active neighborhood districts that cluster services, goods, and cultural and recreational uses within walking distance of residences to create a focus for community activity and an active environment that can sustain local uses. | |
| **Policy LU4.2 Users to Meet Daily Needs.** Encourage uses that meet daily needs such as grocery stores, local-serving restaurants and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips. | |
| **Policy LU4.3 Mixed-Use Associated with Transit.** Encourage mixed-use development close to transit to provide housing opportunities for the community, support local businesses, and reduce reliance on automobiles. | |
| **Policy LU4.4 Pedestrian-Oriented Design.** Engage pedestrians with ground floor uses, building design, site planning, massing and signage that promote vibrant street life and emphasize transit and bicycle access | **Consistent.** As stated in Policy LU3.3, the proposed Project would include expanded pedestrian-oriented space onsite and. Ground floor open space include several pedestrian-only spaces, including two pedestrian-only paseos, a public courtyard, and a breezeway. The hotel building would also include public open space via a 5,070-sf publicly accessible rooftop observation deck offering panoramic views of the Downtown. |
| **Policy LU4.5 Art and Amenities.** Foster creativity and the arts through programming, uses and site improvements such as the provision of community spaces, public art, and creative design of public improvements. | **Consistent.** The proposed Project includes a 35,500sf Cultural Use Campus featuring cultural uses such as art galleries, museum exhibits, or conservatories accessible to the public. A rooftop courtyard would be available to guests for special cultural use events such as Founders' dinners, artist talks, or opening events. |
| **Policy LU4.6 Open Space.** Provide open space and green connections near residences that are part of an expanding and comprehensive system of passive and active open space and complete street design emphasizing inter- connectivity, recreation, and gathering spaces. | **Consistent.** The proposed Project includes a minimum of 50 percent of the site area of open space with at least 25 percent at ground level to promote an active pedestrian environment. The ground-level open space would consist of several pedestrian-only spaces, including two pedestrian-only paseos, a public |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| | courtyard, and a breezeway. The Hotel Building would also include public open space consisting of a 4,940-sf publicly accessible rooftop observation deck offering panoramic views of the Downtown. |
| **Policy LU4.7 Pedestrian, Bicycle and Transit Access.** Emphasize pedestrian and bicycle access throughout the City, with a special focus on neighborhood gathering areas. Provide direct and convenient bicycle and pedestrian connections between destinations. Prioritize land use patterns that generate high transit ridership at major transit stops. | **Consistent.** The proposed Project is located in the Downtown District that has a high level of bicycle access. Class II (i.e., striped) bicycle lanes are provided along Ocean Avenue and 2nd Street adjacent to the site. Compared to existing conditions, the proposed Project would improve pedestrian and bicycle access with expanded sidewalks along 2nd Street as well as pedestrian pathways through the Project site. As discussed in Policy LU4.6, the proposed Project would enhance pedestrian access onsite and offsite. The provision of on-site bicycle parking facilities and associated amenities including a repair station, lockers, and showers facilities for residents, employees, and visitors would also support walking and biking. |
| **Policy LU4.8 Parking and Transportation Demand Management Districts.** Utilize parking and TDM Districts to facilitate efficient use of parking resources, shared and reduced parking opportunities, and trip reduction goals. | **Consistent.** The proposed subterranean parking garage would allow for the flexible use of parking spaces to meet shifting commercial and residential demands and potential parking demands from offsite uses with up to 285 vehicle parking spaces, including at least six EV charging stations and additional spaces for carpool and vanpools. Parking would be unbundled. All market-rate residential parking is anticipated to be valet to provide further flexibility and potential sharing of unused residential spaces with other uses. Bicycle facilities would also be provided for residents, employees, and visitors with a minimum of 231 bicycle parking spaces, a bicycle repair station, lockers, and showers in the subterranean parking garage. |
| **Policy LU6.1 Access and Circulation.** Maximize the potential of existing and future assets such as the Downtown District Light Rail Station, oceanfront vistas, and proximity to diverse neighborhoods. Pursue comprehensive parking and circulation strategies between the Downtown District and Civic Center. | **Consistent.** The Project site is located along Ocean Avenue in the transit-rich Downtown District, within approximately 0.5 miles of the Downtown Santa Monica Station. The proposed Project would provide up to 285 parking spaces including six EV charging station parking spaces as well as carpool and vanpool parking spaces. |
| **Policy LU6.2 Vital Downtown District** Support the continued transition of Downtown District to a thriving, mixed-use urban environment for people to live, work, be entertained, and be culturally enriched. | **Consistent.** The proposed Project is located in the Downtown District, characterized by high levels of pedestrian and bicycle activity. The proposed mixed-use development would expand access to visitor serving accommodations, residential apartments, retail/ restaurant uses, open space, as well as cultural amenities on-site. The diverse mix of available activities and multimodal transit access to the Project site would support the Downtown District's transition and allow for people to live, work, be entertained, and culturally enriched. |
| **Policy LU8.1 Transportation Demand Management.** Require participation in TDM programs for projects above the base to encourage walking, biking, and | **Consistent.** The proposed Project would include a TDM plan that would at a minimum comply with the City's TDM Ordinance requirements. The TDM plan |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips. | would include trip reduction strategies to reduce single-occupancy vehicle trips and achieve a 2.2 Average Vehicle Ridership (AVR) target for employees at the Project site. Specific strategies required in the TDM plan would be finalized during the Development Agreement process and would meet minimum LUCE and DCP requirements. At minimum, the proposed Project would include unbundled parking, onsite bicycle facilities (i.e., bicycle parking spaces, lockers, and showers), transit pass subsidies, and participation in a Transportation Management Association. |
| **Policy LU10.2 Benefits Tied to Community Values.** Require new development that requests height above the base to provide measurable benefits to foster complete neighborhoods and support the goals of the LUCE, including reducing vehicle trips and GHG emissions, maintaining diversity, and promoting affordable and workforce housing. | **Consistent.** The DCP identifies affordable housing, cultural institution, and historic preservation as preferred community benefits for the Project site. Of the 100 residential units proposed, the proposed Project would provide 19 rent-controlled units and a yet to be determined number of affordable housing units. A 35,500-sf Cultural Use Campus would include cultural amenity space, such as an art gallery or museum. The Cultural Use Campus would adaptively reuse the relocated and rehabilitated two City-designated Landmarks currently located at 1333 and 1337 Ocean Avenue. |
| **Policy LU10.3 Affordable and Workforce Housing.** Focus on additional affordable and workforce housing with an emphasis on employment centers close to transit facilities. | **Consistent.** Refer to discussion of consistency with Policy LU10.2 above. The Project site is located within the transit-rich Downtown District and within 0.5 miles from the Downtown Santa Monica Station. The proposed mix of uses would provide a range of employment opportunities including but not limited to hotel management, landscaping, and retail/restaurant sales. |
| **Policy LU12.3 Rehabilitation of Historic Resources.** Promote adaptive reuse of historic structures and sensitive alterations where changes are proposed. New construction or additions to historic structures shall be respectful of the existing historic resource. | **Consistent.** The proposed Project would include the relocation and adaptive reuse of two City-designated Landmarks currently located at 1333 and 1337 Ocean Avenue. Rehabilitation of these buildings would include seismic and structural retrofitting, handicap accessibility improvements, and where feasible, fire-life safety improvements and upgrades to the mechanical, electrical, and plumbing (MEP) equipment. All work will be performed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the California Historic Building Code. Refer to Section 3.4, *Cultural Resources*. |
| **Policy LU14.1 Range of Cultural Facilities.** Provide opportunities for the development and retention of cultural facilities ranging from small, flexible, and affordable performance spaces to venues serving the wider community (like the Civic Auditorium). Encourage facilities serving a wide audience to locate in transit-rich areas. | **Consistent.** Refer to the discussion of consistency with Policy 12.3. The proposed Project would include a 35,500 sf Cultural Use Campus to provide a significant community venue and gathering place of cultural amenities, such as a museum or art gallery. The Project site is located in the transit-rich center of the Downtown District and is located approximately 0.5 miles from the Downtown Santa Monica Station. |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| **Policy LU15.12 Ground Floor Gathering Spaces** Buildings should have their primary façades located at the back side of the sidewalk or on the property line. However, to encourage a well-landscaped streetscape with places for people to gather, small landscaped, people- gathering spaces are encouraged where they will attract people without interrupting the pedestrian retail experience. The intent is to have an overall ground coverage of 80% on each block. | **Consistent.** The proposed Project would comply with building frontage line requirements to provide widened sidewalks. The proposed Project would include approximately 40,920 sf of open space including 22,407 sf on the ground level, which would be available to the public. Ground-level open space would be landscaped and provide connectivity to retail, restaurant, and cultural spaces as well as serve as a gathering space for community members and visitors. Refer to Policy LU15.7 for specifics on the orientation of ground-level open space. |
| **LU15.14 Signs.** Signs should be considered an integral element of the architectural design of the façade. Signs should be primarily oriented to the pedestrian. | **Consistent.** The locations, sizes, materials, and colors of the Project's signage will be reviewed by the ARB and would be designed in accordance with the terms of the Development Agreement or the Santa Monica Sign Code (SMMC Section 9.61). The signage would be compatible with the overall design of the proposed Project. |
| **Policy LU17.2 Active Streets for Living** Utilize streets as the largest and most universally accessible public spaces in the community by improving them with landscaping (particularly shade trees) pedestrian facilities and other enhancements that promote active recreation and creates a system of green connections throughout the City. | |
| **DCP Downtown District Policies** | |
| **Policy D1.1** Create a diversity of retail opportunities including local- and regional-serving retail and dining in the Downtown District. | **Consistent.** The proposed Project would provide ground-level retail/restaurant uses. |
| **Policy D1.4** Encourage new or expanded hotel and other visitor-serving uses in the Downtown District. | **Consistent.** The proposed Project would include a 12-story Hotel Building with up to 120 guestrooms onsite for visitor-serving accommodations. The proposed hotel would include a rooftop observation deck, spa, meeting rooms, and pool and pool deck. |
| **Policy D1.5** Focus new investment in the areas of the Downtown District that are accessible to transit, accommodate mixed-use development, contribute to the pedestrian- oriented environment, and support substantial community benefits in areas such as:<br>• The area near 2nd Street and Santa Monica Boulevard | **Consistent.** The proposed Project is located on the corner of 2nd Street and Santa Monica Boulevard. The proposed Project would support vehicle trip reduction by virtue of its location within the transit-rich Downtown District. The proposed Project is also located walking distance from the Downtown Santa Monica Station and has connections in the vicinity to Big Blue Bus and Metro Rapid service routes. Additionally, onsite ground-level open space would total 22,407 sf and would provide landscaped areas that increase the safe walkability of the Project site between structures. At all site locations, patrons of the building would be able to access retail and restaurant uses on the ground floor via walking. |
| **Policy D7.1** Encourage a broad mix of uses that creates dynamic activity in both the daytime and evening hours including retail, hotels, office, high-density residential, entertainment and cultural uses in the Downtown District. | **Consistent.** The proposed Project would serve as an urban mixed-use project in the transit-rich Downtown District. The proposed Project would provide ground-level retail/restaurant uses, 100 residential units including 19-rent controlled units, hotel services, |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| | public open space, active transportation access onsite and offsite, and a Cultural Use Campus. The proposed Project would improve walkability within the Downtown District and increase local and visitor-serving accommodations. |
| **Policy D7.5** Explore options for the adaptive reuse or retention of historic resources. Require new buildings constructed in proximity to existing historic resources to respect the context and character-defining features of the historic resource. | **Consistent.** The Project site contains two existing City-designated Landmark buildings located at 1333 and 1337 Ocean Avenue. The proposed Project would relocate and adaptively reuse the Landmark structures as part of the Cultural Use Campus. Updates to the historic resources would be limited to safety features including seismic and structural retrofitting, handicap accessibility improvements where feasible, fire-life safety improvements, and upgrades to the MEP equipment. All work would be performed in accordance with the *Secretary of the Interior's Standards for the Treatment and Historic Properties* and the California Historical Building Code. |
| **Policy D7.6** Utilize the Secretary of the Interior's Standards to preserve identified character defining features of historic resources. | |
| **Policy D7.7** Encourage residential units with a diversity of types, forms, sizes, tenure, and affordability for all income levels. | **Consistent.** The proposed Project would include 100 residential units 19 of which would be rent-controlled units. The 100 residential units would include 12 studios, 55 one-bedroom, 23 two-bedroom, and 10 three-bedroom units. Of these residential units, 12 studio units and 7 one-bedroom units would be rent-controlled. |
| **Policy D8.7** Encourage mixed-use developments to have active ground floor uses that face the boulevard with residential or office uses located on the upper floors. | |
| **Policy D8.8** Discourage offices and other limited pedestrian access uses on the ground floor facing the street. Limit the length of entrances to upper-level uses, such as lobbies. | |
| **Policy D8.9** Encourage sidewalk dining where it meets established criteria. | **Consistent**. Ground-level outdoor restaurant seating is envisioned along the Ocean Avenue and Santa Monica Boulevard street frontages. |
| **Policy D8.10** Require new incentivized development to participate in shared parking and TDM strategies. | **Consistent.** The proposed Project would at a minimum meet City TDM Ordinance requirements. Refer to the discussion of consistency with Policy LU8.1. |
| **Policy D9.2** Discourage refuse containers and delivery service on the primary street frontage and encourage service from the alleys or in specially designated service areas. | **Consistent.** Trash and recycling collection facilities for commercial tenants and residents would be provided within enclosures along the 1st Court away from the primary street frontage. Trash trucks would access the Project site via the proposed commercial loading zone along 1st Court. |
| **Housing Policies** | |
| **Policy H1.3** Incentivize the creation of new affordable housing opportunities<br>• Encourage affordable housing in transit-accessible areas<br>• Create more affordable housing by transition the potential growth for regional serving office and commercial into new housing opportunities. | **Consistent.** The proposed Project would include 19 rent-controlled units. In addition, an additional portion of the 81 non-rent-controlled-residential units would be deed restricted as affordable housing. These residential units would be located in the transit-rich Downtown District located within approximately 0.5 miles of the |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| | Downtown Santa Monica Station and along Big Blue Bus and Metro Rapid service routes. |
| **Policy H1.6** Encourage the production of affordable housing on the boulevards and in the districts by requiring a percentage of affordable housing as a pre-condition for consideration of height above the base. | **Consistent.** As discussed in Policy H1.3, the proposed Project would incorporate affordable units into the mixed-use residential buildings on the proposed Project site. |
| **Policy H1.7** Incentivize additional affordable housing as a community benefit along the boulevards and in the districts. | **Consistent.** Refer to the discussion of consistency with Policy H1.6. |
| **Policy H3.1** Locate new housing opportunities near transit and within walking distance of local retail and services. | **Consistent.** The proposed Project would provide 100 residential units within the transit-rich Downtown District in the vicinity of the Downtown Santa Monica Station as well as Big Blue Bus and Metro Rapid service routes. The Project site would include ground-level mixed-use retail/restaurant use as well as a Cultural Use Campus to enhance the vibrant Downtown District. Residents at the Project site would be provided with walkability to amenities and services onsite and offsite via onsite pedestrian-only paseos and expanded sidewalks on Santa Monica Boulevard, Ocean Avenue, and 2nd Street. |
| **Policy H4.5** Prioritize new housing for households with families. | |
| **Policy H6.1** Encourage housing to be located along transit corridors and close to transit stations. | |
| **Policy H6.2** Encourage complementary uses and local services in conjunction with or adjacent to new housing and locate housing in close proximity to existing services. | **Consistent.** The proposed Project is located in the transit-rich, vibrant Downtown District with key community features including Palisades Park and the Santa Monica Pier within walking distance. The proposed Project would consist of a diverse range of mixed-uses including a Cultural Use Campus, mixed-use residential buildings with 100 residential units, and a hotel building with up to 120 guestrooms. Employees, visitors, and residents at the Project site would have access to a range of services offered onsite. |
| **Policy H7.1** Require the inclusion of usable private and common ground floor open space that promotes passive and active social interaction. | **Consistent.** The proposed Project would include 22.407 sf of ground-level open space. Ground-level publicly accessible open space would be provided across the public courtyard, the Ocean Avenue Paseo, the Santa Monica Boulevard Paseo, and the breezeway, which would be activated by the proposed restaurant, retail, and cultural uses. The open space would feature landscaping, shaded spots, and seating to create a welcoming, comfortable experience for all users encouraging social interactions. |
| **Policy H7.2** Encourage the incorporation of "quality of life" features in common areas such as seating areas, landscaping, and recreational facilities. | **Consistent.** Refer to the discussion of consistency with Policy H7.1. |
| **Policy H7.3** Encourage pedestrian and bicycle connections that support active and healthy living and increase accessibility to daily needs and services. | |
| **Policy H7.4** Encourage context-sensitive design that opens to the neighborhood with pedestrian-friendly features such as entrances, large windows, balconies, stoops and porches facing the street. | **Consistent.** The proposed buildings would decrease in floor area with each level from bottom to top, creating terraces around each building and setting back building facades to maximize outdoor area and minimize the building's impacts at a pedestrian perspective. The proposed Project is located in the highly developed |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| | Downtown District and would be compatible with surrounding buildings through the incorporation of interesting architectural element and pedestrian friendly design features such as transparent entrances, balconies, and a rooftop deck. |
| **Policy H7.5** Ensure that site and building design responds to Santa Monica's natural environment through access to natural light and air. | **Consistent.** The configuration of the buildings on the proposed Project site and their structural design would maintain access to natural light and ocean breeze as well as provide view corridors toward the ocean. |
| **Diversified and Sustainable Economy Policies** | |
| **Policy E4.6** Support Downtown District as Santa Monica's primary destination for comparison retail, including a mix of local, national and international shops and restaurants that serve residents, visitors and area employees. | **Consistent.** The proposed Project would retail/restaurant uses in each Project building. The tenants of the retail/restaurant spaces have not been identified; however, the shops would provide a diverse range of options to serve local community members, visitors, and employees. |
| **Policy E6.1** Support the growth of additional hotel facilities, as overnight visitors provide important economic and fiscal benefits in the form of retail/restaurant sales and Transient Occupancy Taxes (TOT) but do not significantly contribute to traffic congestion. | **Consistent.** The proposed Project would include up to 120 guestrooms for overnight visitor-serving accommodations. Onsite and offsite retail/restaurant uses would fiscally benefit from the increased visitor accommodations in the Downtown District. The Project site would include onsite car parking as well as bicycle parking to adequately serve visitor and residential transportation parking needs for the site. |
| **Community Enrichment Policies** | |
| **Policy CE1.1** Incentivize or require new development above the base throughout the City and particularly in activity centers along the boulevards and near the new transit stations, to include outdoor gathering places such as plazas, paseos and outdoor dining areas. | **Consistent.** The proposed Project would include 22,407 sf of landscaped pedestrian-only open space consisting of Santa Monica Boulevard Paseo, Ocean Avenue Paseo, a public courtyard, and a breezeway with seating and shady areas for the public. The open spaces would connect onsite retail/restaurant uses to sidewalk systems along Santa Monica Boulevard and Ocean Avenue. Sidewalks adjacent to the site along Ocean Avenue and Santa Monica Boulevard would meet DCP requirements of 20-foot and 18-foot widths, respectively as well as the expansion of the sidewalk along 2nd Street to a minimum of 15 feet. These widened sidewalks would also allow space for outdoor dining to help activate the streets. |
| **Policy CE2.2** Strive to make all streets pedestrian-friendly to promote increased walkability. | |
| **Policy CE4.2** Encourage land uses that provide accessibility for residents of all ages to arts and cultural programming in both existing venues and new developments. | **Consistent.** The proposed Project would provide a 35,500-sf Cultural Use Campus including the adaptively reuse of two City-designated historic landmarks currently located at 1333 and 1337 Ocean Avenue. The proposed Cultural Use Campus would provide ground floor access for visitors. |
| **Policy CE5.4** Support and enhance cultural development within and around mixed-use activity centers. | |
| **Policy CE 7.1** Promote land use patterns and transportation decisions that enable all residents to walk and bicycle to meet their daily needs.<br>• Focus new development within walking distance of transit facilities<br>• Provide a diverse mix of uses in the City. | **Consistent.** The proposed Project would provide increased visitor-serving accommodations, residences, public open space, and retail/restaurant services within approximately 0.5 miles of the Downtown Santa Monica Station and along Big Blue Bus and Metro Rapid service routes. The proposed mixed-use |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| • Encourage affordable and workforce housing in close proximity to new activity center overlays and close proximity to services, transit access and employment. | residential buildings would provide a total of 100 residential units, which would include 19 rent-controlled units and additional deed-restricted affordable housing units. |
| **Circulation Policies** | |
| **Policy T5.5** Prioritize property access from transit, walking, and bicycling over auto access. | **Consistent.** The proposed Project would be accessible to pedestrians via Ocean Avenue, Santa Monica Boulevard, and 2nd Street. The proposed Ocean Avenue Paseo and Santa Monica Boulevard Paseo, as well as the breezeway, would connect providing pedestrian access throughout the Project site with direct access to site buildings. The Project site is also located in the transit-rich area of the Downtown District in the vicinity of the Metro E (Expo) LRT line, Big Blue Bus, and Metro Rapid. The proposed Project would include a minimum of 231 bicycle parking spaces for residents, employees, and visitors as well as support facilities including a bicycle repair station, lockers, and showers. Secure, short-term bicycle parking would be available on the ground-level and long-term bicycle storage would be located on subterranean parking level B1 and B3. |
| **Policy T8.4** Design buildings to prioritize pedestrian access from the street, rather than from a parking lot. | |
| **Policy T10.2** Encourage major employers to provide covered and secure bicycle parking and shower and locker facilities for their bicycle commuters, or to assist in funding bicycle-transit centers in nearby locations. | |
| **Policy T15.7** Monitor and coordinate construction activity to minimize disruption on the transportation system. | **Consistent with Mitigation.** Per MM CE-1, a Traffic Control Plan and Construction Mitigation Plan would be prepared to include demolition, site preparation, and on-going construction activities. Components of the Traffic Control Plan would include measures to address vehicular and pedestrian safety, notification of local businesses, identification of construction parking, construction traffic and route design, and construction schedule. The Traffic Control Plan and Construction Mitigation Plan would be subject to approval by the City prior to issuance of a building permit. Refer also to Section 3.13, *Transportation*. |
| **Policy T19.2** Impose appropriate Transportation Demand Management (TDM) requirements for new development. | **Consistent.** The proposed Project would include a TDM plan that would at a minimum comply with the City's TDM Ordinance requirements. The TDM plan would include trip reduction strategies to reduce single-occupancy vehicle trips and achieve a 2.2 AVR target for employees at the Project site. Specific strategies required in the TDM plan will be finalized during the Development Agreement process and will meet minimum LUCE and DCP requirements. At minimum, the proposed Project would include unbundled parking, onsite bicycle facilities (i.e., bicycle parking, lockers, and showers), transit pass subsidies, and participation in a Transportation Management Association. |
| **Policy T19.4** Encourage a mix of land uses that meet resident's daily needs within walking distance. | **Consistent.** The Project site is located in the lively Downtown District and serve as a mixed-use |

## Table 3.10-4. Project Consistency with Applicable LUCE Goals and Policies (Continued)

| LUCE Goals and Policies | Project Consistency |
|---|---|
| **Policy 19.5** Encourage local-serving retail uses within walking distance of housing, particularly in new mixed-use neighborhoods, such as Bergamot Transit Village and Memorial Park Activity Center. | development with features including but not limited to a hotel with up to 120 guestrooms, 100 residential units, ground floor retail/restaurant uses, 20,460 sf of ground-level open space, a Cultural Use Campus, hotel amenities, and multimodal transportation parking. |
| **Policy T21.3** TDM program requirements shall be triggered for new development consistent with the LUCE performance standards. | **Consistent.** Refer to the discussion of consistency with Policy T19.2. |
| **Policy T23.1** In new multi-family and commercial buildings, encourage building owners to lease parking spaces separately from residential units and commercial space, and allow residents of nearby buildings to lease these spaces at comparable rates as building tenants. | **Consistent.** Residents of the proposed residential units would have the opportunity to rent available parking spaces rather than having parking fees included in the rent costs. |
| **Policy T23.2** In new multi-family and commercial buildings, encourage owners to make parking spaces available to qualified car-share operators, and allow public access to the car-share vehicles. | **Consistent.** The Applicant may work with the City and its designated car share operator to facilitate car share, either within the propose subterranean parking garage or adjacent to the project. |
| **Policy T23.3** In new multi-family buildings, the City should encourage developers to enroll residents in a qualified care-share program. | |
| **Policy T25.2** Require that parking be accessed only from alleys, where alley access is available. | **Consistent.** Ingress vehicular access to the Project site would be provided via 1st Court, which would be reconfigured to an "L"-shape, with vehicles exiting east onto 2nd Street. One-way traffic would circulate to the site via Arizona Avenue southbound onto 1st Court. |
| **Policy T25.3** Minimize the width and number of driveways at individual development projects. | **Consistent.** The proposed Project would reduce the number of driveways serving the Project site by eliminating the existing driveway curb cuts on Ocean Avenue and Santa Monica Boulevard and would consolidate vehicle access to the site to the realigned 1st Court. |
| **Policy T26.8** Encourage coordinated valet services to balance parking supply and demand. | **Consistent.** The proposed Project would incorporate valet parking. The Applicant would work with the City to determine the appropriate locations for valet drop off/pick up. |
| **Policy T26.9** In all new multi-family development, seek to provide the option to purchase parking separately from residential units to reduce the overall cost of housing. | **Consistency**. The parking supply for the proposed Project would be unbundled, allowing residents of the proposed Project the opportunity to purchase parking rather than having parking fees included in the rent costs. |

*City of Santa Monica's General Plan 2013-2021 Housing Element.*

As previously described, SCAG's RHNA allocated 1,674 new residential units to the City of Santa Monica. The City's 5th RHNA Cycle 2013 – 2021 Housing Element provides supportive policies for this level of residential development to occur and includes a suitable sites inventory that identifies potential locations where housing could potentially occur. Further, the Housing Element establishes the following quantified objectives to meet the City's housing needs: 1,371 total units of which 51 percent would be above moderate rate units, and 49 percent would be affordable/moderate rate units; and of the later, 111 units would be for moderate income households, 263 would be for low income households and 297 would be for very/extremely low income households. This quantified objective is based on an evaluation of available resources with consideration to the City's strong General Plan policies that encourage and promote affordable housing, as well as zoning incentives and requirements (e.g., the Affordable Housing Production Program) and the use of development agreements. The proposed Project would support the City's efforts to meet its quantifiable housing objectives and would be supportive of the objectives and policies. The proposed Project would provide 100 units, of which at least 19 would be affordable. As such, the proposed Project would support the City in meeting its quantified housing objectives, consistent with the provisions of the DCP. The increase in housing within the Downtown area would place residents within a mixed-use area that has services, retail, entertainment and employment opportunities within easy access using alternative modes of transportation. In addition, the housing would be located in a transit-rich area. Table 3.10-5 provides a discussion of the consistency with applicable 2013-2021 Housing Element's goals and policies. As presented below, the proposed Project would be consistent with the Housing Element. Therefore, impacts would be *less than significant*.

**Table 3.10-5. Project Consistency with the City's General Plan**

| Goals and Policies | Project Consistency |
|---|---|
| **2013-2021 Housing Element** | |
| **Policy 1.1** Provide adequate sites for all types of housing, particularly multi-family housing in locations near transit and services that promote walkability. | **Consistent.** The proposed Project would provide 100 residential units ranging in size from studio to three bedrooms. The proposed Project would include contemporary facade design, pedestrian-oriented streetscapes, and context-sensitive development to improve the surrounding area's urban character. Building design would be subject to the review of the Landmarks Commission and/or the ARB. The Project is located in the transit-rich Downtown District located within approximately 0.5 miles of the Downtown Santa Monica Station and along Big Blue Bus and Metro Rapid service routes. |
| **Policy 1.3** Ensure that architectural design of new housing development is compatible with the surrounding environment. | |
| **Policy 1.9** Focus housing development in the city's major activity centers near transit stations, in particular Downtown, the Bergamot Plan area, and the Memorial Park Plan area, and along corridors, consistent with the goals of the 2010 Land Use and Circulation Element. | |
| **Policy 2.1** Encourage innovative private sector and governmental programs to promote the financing and development of housing for extremely low-, very low-, and low-income persons and for moderate income families. | **Consistent.** The proposed Project would include 19 rent-controlled apartments. In addition, an additional portion of the 81 non-rent-controlled-residential units would be deed restricted as affordable housing. |
| **Policy 2.2** Focus available resources to assist for-profit and nonprofit housing providers to develop housing for extremely low-, very low-, and low-income households. | |
| **Policy 2.4** Encourage the distribution throughout the City of housing for extremely low-, very low-, low-, and moderate-income families and for the City's workforce that earn just above-moderate income. | |

*Downtown Community Plan (DCP)*

The development standards prescribed in Chapter 4 of the DCP are incorporated by reference into Section 9.10.001 et. seq. of the City's Zoning Ordinance. Accordingly, the discussion of consistency between the characteristics of the proposed Project and the development standards included within the DCP is applicable to the standards within the Zoning Ordinance as well.

The proposed Project is located on one of three ELS Overlay sites identified in the DCP due to its unique characteristics such as its large size, existing historic landmarks on-site, and potential for significant community benefits. As a proposed Project with a maximum height of 130 feet on an ELS Overlay site, the prescribed DCP standards applicable to the proposed Project are maximum height, density, and open space. Pursuant to DCP Section 9.10.110B, all other standards would be set forth in the Development Agreement between the City and the Applicant. As presented in Table 3.10-6 below, the proposed Project would be consistent with the DCP's development standards, and impacts would be *less than significant.*

## Table 3.10-6. Project Consistency with the DCP's Development Standards

| DCP Requirements and Policies | Project Consistency |
|---|---|
| **Table 2A.4 Preferred On-Site Community Benefits for 101 Santa Monica Blvd.** | |
| Affordable Housing | **Consistent**. The proposed Project would provide on-site deed-restricted affordable housing meeting, at a minimum, the DCP requirements. The exact number of the housing units that would be deed-restricted as affordable would be established in the Development Agreement for the proposed Project. |
| Cultural Institution | **Consistent**. The proposed Project includes an approximately 35,500-sf Cultural Use Campus, which would include cultural amenity space located within a new building and two City-designated Landmarks at 1333 and 1337 Ocean Avenue. |
| Historic Preservation | **Consistent**. The proposed Project includes historic preservation through the rehabilitation and relocation of the two existing City-designated Landmarks – the Queen Anne Victorian building at 1333 Ocean Avenue and the Spanish Colonial Revival building at 1337 Ocean Avenue. The proposed Project would adaptively reuse and incorporate these landmarks into the proposed Cultural Use Campus in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, the LUCE and the Landmarks Ordinance. |
| **Section 9.10.080 Established Large Sites Overlay Standards** | |
| ***Section 9.10.080.A Height Limit*** | |
| Height limit: 130 feet | **Consistent**. The maximum building height of the proposed Project would range from 53 feet is 130 feet. |
| Shall be processed through a development agreement. | **Consistent**. As described in Section 2.6.11, *Development Agreement*, the proposed Project would be processed through a Development Agreement. |
| Additional environmental review to the extent not analyzed in the DCP Final EIR. | **Consistent**. The proposed Project is analyzed for environmental impacts in this EIR. |
| Shade and Shadow analysis of the project's impacts on adjacent uses. | **Consistent**. An analysis of the potential shade/shadow impacts associated with the proposed Project is included in Section 3.1, *Aesthetics and Shade/Shadow Effects*. |
| ***Section 9.10.080 B Maximum Floor Area*** | |
| FAR: 4.0 | **Consistent**. The proposed Project would have a 2.95 FAR. |
| ***Section 9.10.080.C Open Space Requirements*** | |
| 50% of total parcel area, with at least 25% of total parcel area being open space located at the ground level. | **Consistent**. As described in Section 2.6.6, *Open Space and Public Amenities*, the proposed Project includes a minimum of 50 percent of parcel area as open space, including a minimum of 25 percent of ground-level open space. |
| **Section 9.10.060 Other Development Standards** | |
| ***Table 4.2 Parcel and Intensity Standards*** | |
| Minimum Parcel Size – 7,500 sf. | **Consistent**. The Project site has a parcel area of 82,500 sf. |
| Minimum Parcel Width – 50 feet | **Consistent**. The parcel is 350 feet wide along Ocean Avenue, 320 feet along Santa Monica Boulevard, and 200 feet side along 2nd Street. |

## Table 3.10-6. Project Consistency with the DCP's Development Standards (Continued)

| DCP Requirements and Policies | Project Consistency |
|---|---|
| Minimum Parcel Depth – 150 feet | **Consistent**. The parcel ranges from 150 feet to 320 feet deep. |
| ***Table 4.2 Building Form Regulated by Building Type*** | |
| Minimum Stepbacks (feet) Required Above Ground Floor and below 39 feet = 15% of façade<br><br>Minimum Upper Level Stepbacks Above 39 feet = 35% of façade | **Consistent**. The Project site was designated by the DCP as an ELS Overlay site due to the unique characteristics of the Project site including its substantial size and City-designated Landmarks. Consistency with maximum height, density, and open space are the only prescriptive standards for the proposed Project. The design of the proposed Project, including its minimum stepbacks, would be reviewed in the final design review process with the City. Pursuant to DCP Section 9.10.110.B, the Development Agreement for the Project may establish the Project's minimum stepbacks. |
| Section 9.10.060.C.1: Build-to-Line – 70% of linear ground floor street frontage built to the lot line. | **Consistent**. The design of the proposed Project, including its build-to-line, will be reviewed in the final design review process with the City. Pursuant to DCP Section 9.10.110.B, the Development Agreement for the proposed Project may establish the build-to-line. |
| Ground Floor Height – 11 to 16 feet | **Consistent**. Consistency with maximum height, density and open space are the only prescriptive standards for the proposed Project. The design of the proposed Project, including its ground floor heights, would be reviewed in the final design review process with the City. Pursuant to DCP Section 9.10.110.B, the Development Agreement for the proposed Project may establish the ground floor heights. |
| Section 9.10.060.C.5: Minimum Side Interior Setback – 15% of façade | **Consistent**. The Project site was designated by the DCP as an ELS Overlay site due to its unique characteristics including the large size of the site and two existing City-designated Landmarks. The Building Form regulations for the OT and BC Districts relate to the height and density in the OT and BC Districts and do not take into account the unique ELS standards or features which is why the ELS Overlay was created. Consistency with maximum height, density and open space are the only prescriptive standards for the proposed Project. The design of the proposed Project, including its minimum side interior setback, would be reviewed in the final design review process with the City. Pursuant to DCP Section 9.10.110.B, the Development Agreement for the proposed Project may establish the Project's minimum side interior setback. |
| Section 9.10.060.C.8: Maximum Unbroken Primary Façade Length | **Consistent**. Consistency with maximum height, density and open space are the only prescriptive standards for the proposed Project. The design of the proposed Project, including its maximum unbroken primary façade length, will be reviewed in the final design review process with the City. Pursuant to DCP Section 9.10.110.B, the Development Agreement for the proposed Project may establish the project's maximum unbroken primary façade length. |

**Table 3.10-6. Project Consistency with the DCP's Development Standards (Continued)**

| DCP Requirements and Policies | Project Consistency |
|---|---|
| **Section 9.10.060.D: Minimum Ground Floor Setback** | |
| Setback from face of curb to building frontage:<br>Santa Monica Boulevard: 18 feet<br>Ocean Avenue: 20 feet wide<br>2nd Street: 15 feet wide | **Consistent.** The proposed Project is setback along Santa Monica Boulevard, Ocean Avenue and 2nd Street in accordance with the building frontage setback requirements established in the DCP. |

Per the DCP, the western portion of the Project site between Ocean Avenue and 1st Court is located within the OT District. The eastern portion, between 1st Court and 2nd Street, is located within the BC District.

The OT District generally consists of a mix of dense housing developments, hotels, restaurants, and small retail. The OT District hold expansive beach views; however, the pedestrian experience needs improvements due to inconsistent building frontages and inactive plazas. The City encourages public and private enhancements in this district to enhance the public's walking experience.

The BC District is considered the pedestrian and economic heart of the City. The DCP encourages the continuation of the area as a pedestrian-oriented center with dynamic activity day and night. The land use regulations for the BC District support a diverse range of entertainment with an emphasis on cultural amenities. As presented in Table 3.10-7, the proposed Project would be consistent with the applicable goals and policies of the DCP. Therefore, impacts related to the consistency with DCP goals and policies would be *less than significant*.

Further, the proposed Project would be consistent and entirely within the growth forecasted and analyzed in the DCP EIR. As shown in Table 4.12-6, in terms of the amount of net new Project development proposed relative to the total development evaluated in the DCP EIR, the proposed Project would result in 120 hotel rooms or 1.1 percent of the 974 hotel rooms studied in the DCP Program EIR. The maximum of 100 residential units would represent 4.3 percent of the 2,326 multifamily housing units studied in the DCP Program EIR. The 248,570 sf of new above-grade hotel, restaurant, retail, and cultural space would represent approximately 14.5 percent of the commercial square footage studied in the DCP Program EIR.

## Table 3.10-7. Consistency with the DCP Goals and Policies

| DCP Goals and Policies | Project Consistency |
|---|---|
| **Policy LU1.1** Accommodate the development of public, civic and private uses that contributes to the quality of life and wellbeing of residents of all ages and abilities and the sense of a "complete neighborhood," including such uses as arts and cultural facilities, childcare facilities, parks, senior and youth facilities and meeting facilities, while adhering to the desired scale and character of development. | **Consistent.** The proposed Project would provide significant open space and community space at the ground level and throughout the Project. At least 50 percent of the parcel area would be dedicated to open space, 25 percent of which would be provided at the ground level. Ground-level open space would be accessible from Ocean Avenue and Santa Monica Boulevard and would include two pedestrian-only paseos, a public courtyard, and a breezeway. All ground-level open spaces would be compliant with the Americans with Disabilities Act of 1990 (ADA). The proposed Project would include a 5,070-sf publicly accessible rooftop open space, which would serve as a vibrant community serving space. The proposed Project also includes a cultural use campus consisting of three structures totaling 35,500 sf providing features such as art galleries and museum exhibits. |
| **Policy LU1.2** Accommodate the development of uses that support 17 hours a day/ 7 days a week environment that meets the needs of businesses and residents; such uses include retail goods and services, food stores, restaurants and cafes, hotels, health clubs, entertainment, and comparable uses. | **Consistent**. The proposed Project would include a 12-story hotel, ground floor restaurant and retail uses, and 100 residential apartments. The mix of uses would increase the vibrancy of the Downtown District and bring a range of people to the site at different times of the day based on various uses. |
| **Policy LU1.3** Promote the development of uses and facilities that enable and encourage mobility by alternative modes to the automobile; these include businesses for sale, service, rental and sharing of bicycles, as well as rideshare, flex vehicle leasing and rental services. | **Consistent.** The City's Bike Center is located at 2nd Street and Colorado Avenue, and a bike station is located at 2nd Street and Wilshire Boulevard approximately 0.25 miles from the Project site. The bicycle network within 0.5 miles of the Project site includes a beach bike path and connection to prominent bicycle routes including Ocean Avenue and 2nd Street. The subterranean parking structure at the Project site would provide bicycle facilities for residents, employees, and visitors. The proposed Project would include a minimum of 231 bicycle spaces. Bicycle facilities would include a bicycle repair station as well as lockers and shower facilities, which would be accessible by residents and employees. Additionally, several shared mobility device companies (e.g. Lyft and lime) have placed dockless electric scooters and/or electric bikes in close proximity to the Project site. Bicycle parking would be available onsite and increase from the Project site's existing usage. |
| **Policy LU1.5** Promote the distribution of land uses such that the most active ground floor uses are provided in the historic core and areas served by transit, while the least active ground floor uses are provided in the transition areas adjacent to residential neighborhoods. | **Consistent.** The proposed Project would include active ground floor uses including Santa Monica Boulevard and Ocean Avenue paseos, a public courtyard, and a breezeway, which would connect to ground-level restaurant, retail, and cultural uses. Santa Monica Boulevard and Ocean Avenue are served by transit including the Metro E (Expo) LRT, Big Blue Bus, and Metro bus service. |
| **Policy LU2.1** Enhance creative and cultural uses, including space for artists, performers, writers, and musicians and consider development of a prominent museum space. | **Consistent.** The two City-Designated Landmark buildings currently located at 1333 and 1337 Ocean Avenue would be relocated and adaptively reused on the Project's Cultural Use Campus. The proposed Project would |

## Table 3.10-7. Consistency with the DCP Goals and Policies (Continued)

| DCP Goals and Policies | Project Consistency |
|---|---|
| **Policy LU2.2** Promote the retention of existing creative arts/ entertainment uses, and provide opportunities for the founding, nurture, and growth of these enterprises, including new spaces in future development projects. | include a rooftop open space and 22,407 sf of the Project's ground level would be used as open space including paseos for public walkability. The proposed Project includes a 35,500 sf Cultural Use Campus, which would provide a space for creative arts and potential entertainment uses. |
| **Policy LU3.2** Provide increased cultural and visitor-serving uses; encourage a range of accommodation types and affordability levels to provide overnight accommodations to the broadest spectrum of visitors. | **Consistent**. Refer to the discussion of consistency with Policies LU1.5 and LU2.2. |
| **Policy LU4.1** Encourage the production of new housing projects through standards and process incentives. | **Consistent.** The proposed Project includes 100 residential units including 19 rent-controlled units, as required under the ELS Overlay for the Project site under the DCP. Additionally, the 12-story hotel would provide visitor-serving accommodations. |
| **Policy LU4.2** Expand Affordable and Middle-Income Housing opportunities available for families, seniors, and others in the Downtown District area. | |
| **Policy LU5.1** Leverage the economic, environmental and social value of the Expo Line terminus by providing additional mixed-use development opportunities on nearby sites; also provide affordable housing, local employment, and robust community benefits emphasizing a walkable district through design and the application of extensive TDM measures. | **Consistent.** The proposed Project is located within approximately 0.5 miles of the Downtown District Santa Monica Station. The proposed Project includes a mix of residential, commercial, and cultural uses that maximize walking and active transportation in and around the Project site. |
| **Policy LU5.2** Promote visitor use of the Expo Line as a convenient and safe way to visit the area. | **Consistent**. The proposed Project is located within approximately 0.5 miles of the Downtown Santa Monica Station. The Project would include both short- and long-term bicycle parking stations. A minimum of 231 bicycle parking spaces would be available on ground level and in the subterranean underground parking structure. A bicycle repair station as well as locker and shower facilities would be available to increase commuter bicycle trips. These bicycle facilities would support mobility options, and support the ability of visitors, residents, and employees to access the Metro E (Expo) LRT line from the Project site. |
| **Policy LU5.3** Set Project standards requiring designers and developers to consider and integrate sustainable practices on site, infrastructure and building design beginning early in the design process, and throughout the Project's life cycle. | **Consistent**. The proposed Project would incorporate sustainable design features including but not limited to photovoltaic solar panels, energy efficient heating, ventilation, and air conditioning systems, and water efficient equipment and plumbing infrastructure. Short-term and long-term bicycle parking as well as a bicycle repair area in the Project site would provide multimodal transportation access and storage at the Project site. |
| **Policy LU7.1** Encourage developers to provide uses and facilities that benefit the business employees, residents, vitality, and quality of the Downtown District Plan area. | **Consistent**. The Project would include 22,407 sf of ground floor open space including a public courtyard and paseos with landscaping and shade for public use encourage the walkability of onsite restaurants and retail stores. The ground floor of the proposed Project would include retail and restaurants improving walkability along the paseos and breezeways. The Cultural Use Campus would serve as a vibrant community-serving resource. Employees would benefit from the onsite access to bicycle parking, a repair station, and shower as well as locker facilities. The 100 residential units including 19 |

## Table 3.10-7. Consistency with the DCP Goals and Policies (Continued)

| DCP Goals and Policies | Project Consistency |
|---|---|
| | rent-controlled units would be located in the heart of the Downtown District with access to onsite amenities. The Project's architectural design would employ a design compatible with existing development in the vicinity and highlight existing urban patterns. |
| **Policy LU7.2** Require that community benefit uses for which additional building height and density are granted are aligned with available citywide and neighborhood-level wellbeing data, are consistent with the community's priorities and exceed those that are normally required through the base standards of the Downtown Community Plan. | **Consistent.** The DCP identifies affordable housing, cultural institution, and historic preservation as preferred community benefits for the Project site. The Project is providing 19 rent-controlled units. A 35,500 sf Cultural Use Campus would include cultural amenity space for Project use such as a museum or gallery. The Cultural Use Campus would adaptively reuse through relocation and rehabilitation of two City-designated Landmarks currently located at 1333 and 1337 Ocean Avenue. |
| **Policy LU7.3** Address the community's concern about circulation and congestion management Downtown District by focusing the additional community benefits required for "Infill Opportunities" projects on improving the circulation network to enhance Downtown District connectivity, through such things as the provision of new streets and or pathways through the sites. | **Consistent with mitigation**. See Section 3.13, *Transportation*, for information on circulation and congestion management under the proposed Project. |
| **Policy CCP1.2** Encourage projects to provide a variety of housing types and sizes to serve individuals, families, seniors, and persons living with disabilities. | **Consistent.** The proposed mixed-use buildings would provide 100 residential units including 12 studios, 55 one-bedroom, 23 two-bedroom, and 10 three-bedroom units. Of these units, 12 studio units and 7 one-bedroom units would be rent-controlled. The mixed-use buildings would include ADA-accessible elevators and floors. |
| **Policy CCP2.1** Strengthen the retail experience by supporting cultural and art uses, connections to the Expo Light Rail, and attractive streets and public spaces. | **Consistent.** The Project includes a 35,500 sf Cultural Use Campus and retail and restaurant uses on the ground floor connected via paseos for public walkability. Ground floor open space would be landscaped to provide an inviting community space. The Project site is located within approximately 0.5 miles from the Downtown Santa Monica Station and includes bicycle storage and bicycle facility features to improve multimodal transportation network connectivity. |
| **Policy CCP6.1** Encourage live entertainment venues in the Downtown District if they include features that reduce/ mitigate noise and other impacts on surrounding neighbors. | **Consistent.** The proposed Project would include 5,070 sf of rooftop open space and 22,407 sf of ground-level open space, which would serve as a vibrant community-serving spaces. The proposed Project includes a Cultural Use Campus – the precise use of the campus has not been determined, but the campus could potentially serve as an event venue for special events. |
| **Policy CCP7.1** On larger sites prioritize the inclusion of a new museum as a community benefit, particularly where a partnership for its ongoing operation can be identified and achieved. | **Consistent**. The proposed Project would include a 35,500-sf Cultural Use Campus, which would include cultural amenity space (e.g., art gallery, museum, etc.). |
| **Policy CCP7.4** Encourage small and medium-sized gathering spaces in new development to be utilized for a range of art activities, including both visual and performing art. | **Consistent.** The proposed Project would include 5,070 sf of rooftop open space available to the public, 22,407 sf of ground floor open space, and a 35,500 sf Cultural Use Campus. These spaces would provide small and medium- |

## Table 3.10-7. Consistency with the DCP Goals and Policies (Continued)

| DCP Goals and Policies | Project Consistency |
|---|---|
| | sized gathering spaces for a range of activities, which would enhance the vibrancy of the surrounding area. |
| **Policy HP1.3** Projects on HRI-listed properties should be reviewed for conformance with the Secretary of the Interiors Standards for the Treatment of Historic Properties when alterations to the exterior or interior space regularly open to the general public or demolition of any historic structure is proposed. | **Consistent**. The proposed Project includes historic preservation through the rehabilitation and relocation of two City-designated Landmarks (1333 and 1337 Ocean Avenue). The proposed Project would adaptively reuse and incorporate the City-designated Landmarks into the Cultural Use Campus in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. |
| **Policy PPS2.1** Expand the inventory of publicly accessible community gathering spaces so that all residents are within a short walking distance of a park or recreational area. | **Consistent**. The proposed Project would include a 5,070 sf of rooftop open space and 22,407 sf of ground floor open space including a public courtyard, paseos, and a breezeway, which would connect retail and restaurant uses. Residents of the Project site would have access to the site's open space including landscaping and shady seating. |
| **Policy PPS2.2** Ensure that new public spaces add to the variety of public space types and are appropriate to location, use, and size, including hardscape plazas, active parks, passive space, play lots, and dog parks. | **Consistent**. The new public spaces, as described above in Policy PPS2.1, would diversify the type of public space available along Ocean Avenue and Santa Monica Boulevard. Additionally, the proposed Project would enhance the usage and attractiveness of the ground floor retail, restaurant, and Cultural Use Campus by expanding walkability and connectivity between the residential and hotel facilities on the Project site. |
| **Policy PPS3.1** Provide well-considered landscaping as part of the public space network | **Consistent.** The 22,407 sf ground-level open space would include landscaping throughout to increase the attractiveness of open space for the public. |
| **Policy PPS3.2** Facilitate a more sustainable streetscape and public space network | **Consistent.** Refer to the discussion of consistency with Policy PPS2.2. The sidewalk along 2nd Street's sidewalks would be expanded to a minimum of 15 feet. Sidewalks along Santa Monica Boulevard and Ocean Avenue would meet or exceed DCP setback requirements of 18 feet and 20 feet, respectively, improving public walkability adjacent to the Project site. |
| **Policy PPS4.1** New public spaces created as a result of these policies, should have dedicated funding sources for operation and maintenance, whether maintained by the City, another public agency or a private entity. | **Consistent.** Public spaces on the Project site would be operated and maintained solely by the Applicant. This condition would be set forth in the Development Agreement. |
| **Policy SI1.1** Require new development to meet or exceed the City's water conservation and water neutrality requirements of the water self-sufficiency programs. | **Consistent.** The proposed Project would provide sustainable design features including water efficient equipment and plumbing infrastructure; however, the expanded residential and hotel visitor usage would increase the site's water demand. Therefore, the proposed Project would comply with the City's Water Net Neutrality Ordinance through the payment of an In-Lieu Water Offset Fee to decrease new water demand Citywide (refer to Section 3.15, *Utilities*). |

## Table 3.10-7. Consistency with the DCP Goals and Policies (Continued)

| DCP Goals and Policies | Project Consistency |
|---|---|
| **Policy SI1.2** Where purple pipe is accessible to new development, require the use of recycled water for irrigation. | **Consistent.** The proposed Project would potentially include a connection to the recycled water distribution line, which runs along Ocean Avenue for landscaping uses (refer to Section 3.15, *Utilities*). |
| **Policy SI3.2** Require that new development meet or exceed the City's Green Building standards for stormwater retention/infiltration and encourage consideration of new technologies and superior practices in Tier 2 and 3 projects and on large sites with potential to incorporate such facilities. | **Consistent.** The proposed Project would comply with the City's Green Building Ordinance as well as the Urban Runoff Pollution Ordinance, which implements the requirements of MS4 NPDES permits and requires all development projects to develop an Urban Runoff Mitigation Plan for approval by the City's Department of Public Works. The URMP is required to include mitigations to avoid runoff at the site (refer to Section 3.9, *Hydrology and Water Quality*). The proposed Project would also include water efficient equipment and plumbing infrastructure in compliance with the City's Green Building Ordinance. |
| **Policy SI3.3** Ensure that all development complies with the requirements of the City's Urban Runoff Pollution Ordinance. | **Consistent.** The proposed Project would comply with the Urban Runoff Pollution Ordinance, which implements requirements of MS4 NPDES permits and requires all development projects to develop an Urban Runoff Mitigation Plan for approval by the City's Department of Public Works. The Urban Runoff Mitigation Plan is required to include mitigations to avoid runoff at the site (refer to Section 3.9, *Hydrology and Water Quality*). |
| **Policy SI6.6** Require all new development to construct fiber infrastructure including vaults, primary and redundant conduit systems internal and extending to the City's outside plan fiber network infrastructure in the public right-of-way. | **Consistent.** The Project would include a fiber conduit system that connects to the City's network. |
| **Policy AM1.1** Expand the capacity of walking infrastructure to promote safety, encourage first/ last mile connections and create an exceptional walking experience. | **Consistent.** In accordance with the DCP, the proposed mixed-use buildings would be setback providing a 20 foot sidewalk along Ocean Avenue, an 18 foot sidewalk along Santa Monica Boulevard, and a widened 15 foot sidewalk along 2nd Street. On the Project site, the Ocean Avenue and Santa Monica Boulevard Paseo, as well as the breezeway, would provide pedestrian access in a car-free environment. |
| **Policy AM2.2** Increase visitors and customers using active, public, and sustainable travel modes. | **Consistent.** The proposed Project would provide a minimum of 231 bicycle parking spaces for short-term and long-term use by on-site residents, visitors, and employees. Additionally, the proposed Project would include the provision of on-site paseos and ground floor public space. Expansion of sidewalk and paseo spaces would increase walkability to and from the site. The proposed Project would also include a TDM plan to promote the use of sustainable travel modes**.** |
| **Policy AM4.1** Provide diverse and connected high-quality mobility options for all users in Downtown District and maximize the utility of the rail line beyond the half-mile radius. | **Consistent.** The Project site is located within approximately 0.5 miles of the Downtown Santa Monica Station. The 2nd Street frontage currently hosts a Breeze Bike Share Hub (see Section 3.13, *Transportation*), which would provide for first-mile last-mile opportunities between the Project site and the Downtown Santa Monica |

**Table 3.10-7. Consistency with the DCP Goals and Policies (Continued)**

| DCP Goals and Policies | Project Consistency |
|---|---|
| | Station. Big Blue Bus lines operate between the Project site and Metro E (Expo) LRT lines. |
| **Policy AM4.5** Engage private development to contribute to mobility network options and service quality. | **Consistent.** Refer to the discussion of consistency with Policy AM1.1. The proposed Project would feature expanded sidewalk access as well as a minimum of 231 bike parking spaces with a repair station and showers/lockers available. |

### 3.10.6 Cumulative Impacts

Cumulative land use impacts could occur if other future development projects in the vicinity of the Project site would result in land use impacts in conjunction with the proposed Project. The proposed Project, combined with other planned and pending projects within the vicinity of the Project site, would cumulatively result in an overall change in land uses in the Downtown District of the City. Development of the proposed Project in conjunction with other pending/future projects within the Downtown District (refer to Table 3.0-1 in Section 3.0.2, *Cumulative Impacts*) would increase the number of mixed-use developments including housing units and commercial floor area. These land use changes in the Downtown District; however, would be required to comply with SCAG's RTP/SCS and the City's Local Coastal Program LUP, General Plan, DCP, and Zoning Ordinance, which all have goals of focusing expanding public open space and community vibrancy in the Downtown District near transit to preserve the City's existing residential neighborhoods and to achieve sustainability goals. The proposed Project, in combination with other pending/future projects, in the Downtown District, supports the DCP, LUCE and SCAG goals by locating a mix of retail/restaurant, cultural, and housing uses in the Downtown District, improving the pedestrian environment, and providing uses near the Metro E (Expo) LRT. This integrated land use-transportation approach is expected to increase the use of public transit and decrease the distance between new housing, jobs, and transportation services, thus reducing net increases in City trips, overall vehicle miles traveled, peak-hour congestion, and GHG emissions.

In addition, all pending and future projects are required to be consistent with the LUCE and or the DCP and may be required to undergo Development Review and/or Development Agreement processing and other discretionary land use actions. Therefore, the proposed Project, in combination with other pending/future projects, would not result or contribute considerably to significant cumulative land use impacts.

Further, the DCP EIR evaluates the impacts of increased housing, population and employment within the Downtown area. The proposed Project would be consistent with the growth evaluated in the DCP; therefore, the Project would not contribute to adverse cumulative land use and planning effects.

For cumulative impacts that result primarily from development outside of the City's jurisdiction (i.e., in the cities of Los Angeles, Venice, Brentwood, or Marina Del Rey), it should be noted that the City cannot control land use policies or decisions outside of its boundaries; however, regional planning guidance provided by SCAG encourages municipalities to promote growth that would limit and reduce potential cumulative impacts, particularly related to transportation and transportation-related air pollutant emissions.

## 3.11 NEIGHBORHOOD EFFECTS

"Neighborhood effects" refer to the potential construction-related or operational effects of a project that may impact the quality of life for the existing residents of adjacent single-family residential neighborhoods and/or mixed-use or multi-family residential developments in urban environments. Quality of life represents an overall perception, usually expressed in terms of overall aesthetic character, ambient noise levels, and ease of transportation. Although neighborhood effects are not an environmental issue identified in Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the City of Santa Monica (City) requires analysis of neighborhood effects as part of CEQA review process for development projects. This section of the Environmental Impact Report (EIR) summarizes the neighborhood effects of the proposed Ocean Avenue Project (Project) in the Downtown. Potential impacts on mixed-use and multi-family residential developments in the Downtown are fully analyzed in the individual sections of this EIR, as appropriate (e.g., potential air quality and noise impact on nearby sensitive receptors); however, they are also summarized here for ease of understanding.

### 3.11.1 Environmental Setting

Overview of the Downtown

The Downtown is generally bounded by Wilshire Boulevard to the north; Interstate (I-) 10 (Santa Monica Freeway) to the south; Lincoln Boulevard to the east; and Ocean Avenue to the west. The Downtown has the highest concentration of development in the City and serves as a popular destination for local residents and tourists alike. This pedestrian-oriented urban center supports a broad mix of commercial (e.g. retail, office, hotel, restaurant, entertainment) and multi-family residential units. However, the Downtown has experienced a net loss of office space due to the conversion of existing office to residential uses as well as a developer preference for constructing new residential rather than new office buildings (City of Santa Monica 2017). In particular, mixed-use residential development on 5th Street, 6th Street, and 7th Street in the Downtown, has contributed to the creation of a sizeable residential population (approximately 4,623 residents)

*The Downtown includes a variety of older single use commercial buildings of varied heights and many new multiple-story mixed-use buildings with pedestrian-oriented uses on the ground floor and residential uses on the upper floors.*

within its borders (City of Santa Monica 2017; U.S. Census Bureau 2017). Additionally, the City's Downtown Community Plan (DCP) provides for the development of up to 2,326 additional residential units, particularly in areas adjacent to existing public transit, through the 2030 planning horizon (City of Santa Monica 2017).


*The City's Downtown includes outdoor spaces that support a variety of activities, including shopping and dining at the Third Street Promenade (top left) and Santa Monica Place (top right). The Downtown is strongly linked to the City's waterfront including Santa Monica Pier (bottom left), and Palisades Park (bottom right).*

Major commercial centers of the Downtown include the Third Street Promenade and Santa Monica Place Shopping Center, while the close proximity to the Civic Center, Palisades Park, Santa Monica Pier, and Santa Monica State Beach provide public open space and recreational activities in the Downtown. The Third Street Promenade is a central pedestrian open space with active ground-level storefronts, restaurants, and services. Santa Monica Place Shopping Center is located at the southern end of the Promenade and has was remodeled in 2011 as an open-air shopping mall that connects the Promenade to the Civic Center District. The Civic Center District is located to the south of Downtown, while Palisades Park and Santa Monica State Beach are located immediately west of the Downtown. The Santa Monica Pier extends off of the western end of Colorado Avenue.

Transportation

As described in Section 3.13, *Transportation*, two major highways provide regional access to the Downtown, the I-10 and State Highway 1 (Pacific Coast Highway [PCH]). The I-10 separates the Downtown and Civic Center, with on- and off-ramps at Lincoln Boulevard, 5th Street, and 4th Street. Access to PCH is available via the California Incline off of Ocean Avenue. The regional arterial roads that provide access to Downtown include Wilshire Boulevard, Santa Monica Boulevard, Lincoln Boulevard, and 4th Street. These major streets carry high volumes of traffic through and into Downtown as well as adjacent neighborhoods to the north and east, contributing to generally high levels of ambient traffic-related noise in the Downtown neighborhood (see Section 3.11, *Noise*), especially along the boulevards where there is dense commercial use.

The Downtown generally experiences moderate to high traffic volumes; however, certain intersections experience higher levels of weekend traffic volumes including California Avenue & Ocean Avenue and 2nd Street & Santa Monica Boulevard (see Section 3.13, *Transportation*, for further discussion of average traffic volumes within the Downtown). Of the 40 intersections that Fehr & Peers (2019) studied in the Downtown as a part of the Transportation Study for the proposed Project, 35 operate at "excellent" or "fair" level of service (LOS) (LOS A-D) while 7 have LOS that are currently ranked as "poor" or "failure" (LOS E or F) during at least one of the peak hours (see Section 3.13, *Transportation*; see Appendix K).

Most public parking in the Downtown is provided in public parking structures and metered on-street street parking. For example, within the vicinity of the Project site, Parking Structure # 4 is located off 2nd Street and metered parallel on-street parking is provided along both sides of Ocean Avenue, Santa Monica Boulevard, and 2nd Street. Additional parking demand is met with private parking garages and limited surface parking lots that exist throughout the Downtown.

Downtown is the focal point of public transportation for the City. As described in the DCP Program EIR, the Downtown is considered a Transit Priority Area (TPA) due to high quality transit service and accessibility, including several bus routes operating along 4th Street, Santa Monica Avenue, and Ocean Avenue, and regional light rail transit services from the Exposition Light Rail Transit (Expo LRT) Downtown Santa Monica Station located at 4th Street and Colorado Avenue (Southern California Association of Governments [SCAG] 2016; City of Santa Monica 2017). For example, the Project site is located within walking distance to bus transit service provided by the Big Blue Bus and Los Angeles County Metropolitan Transportation Authority (Metro), including the Metro bus layover zone located adjacent to the Project site along the west side of 2nd Street and within walking distance of various other bus stops. Additionally, the Project site is located within approximately 0.5 miles northwest of the Downtown Santa Monica Station (see Section 3.13, *Transportation*).

*The Downtown supports outdoor uses that activate the pedestrian environment for both visitors and residents, including shopping and outdoor dining.*

The design of the Downtown successfully promotes pedestrian activity, with many residents walking or riding bicycles as a primary mode of transportation. Access to local-serving restaurants and retail combined with a pedestrian-friendly design, including wide sidewalks and tree-lined streets, supports a pedestrian-oriented lifestyle in the Downtown. The sidewalks average 8 to 12 feet in width, accommodating pedestrians, street trees, and areas of street furniture, such as benches, bicycle racks, and newspaper racks. The City's urban forest program supports the preservation and enhancement of mature street trees, with mature Canary Island date palms (*Phoenix canariensis*) and Mexican fan palm (*Washingtonia robusta*) lining Ocean Avenue, Chinese flame trees (*Koelreuteria bipinnata*), carrotwood (*Cupaniopsis anacardioides*), and Indian laurel figs lining Santa Monica Boulevard, and Indian laurel figs and Canary Island date palms trees lining 2nd Street, adjacent to the Project site (see Section 4.0, *Other CEQA*).

Additionally, the Downtown includes a comprehensive network of bicycle lanes and other bicycle facilities, including the City's Bike Center located at 2nd Street and Colorado Avenue and a bicycle

*The Project site is well served by bus transit, especially on Santa Monica Boulevard and Second Street (left). It is also one block away from the recently completed Downtown Santa Monica Station (right).*

station located at 2nd Street and Wilshire Boulevard, which are used by visitors and residents to park and maintain bicycles while visiting or working at commercial restaurants, retail or other destinations within the Downtown. The bicycle network within 0.5 miles of the Project site includes connections to prominent bicycle routes on Ocean Avenue, 2nd Street, Arizona Avenue, Broadway, and Colorado Avenue. Additionally, numerous Bike Share Hubs are located within 0.5 miles of the Project site, including at Wilshire Boulevard and 2nd Street, Ocean Avenue and Arizona Avenue, at 4th Street and Arizona Avenue, along 2nd Street between Arizona Avenue and Santa Monica Boulevard, and along 4th Street between Santa Monica Boulevard and Broadway. Several shared mobility device companies (e.g., Uber, Lyft, Bird, and Lime) have also placed dockless electric scooters and/or electric bikes throughout the Downtown, including areas in close proximity to the Project site.

Neighborhood Description

As described in Section 2.2.1, *Project Location*, the Project site is located at the corner of Ocean Avenue and Santa Monica Boulevard along the western boundary of the Downtown (refer to Figure 2-1). The western portion of the Project site, between Ocean Avenue and 1st Court, is located within the Ocean Transition (OT) District designated by the DCP (refer to Section 2.3.2, *Downtown Community Plan*). The OT District generally consists of a mix of dense high-rise housing developments, hotels, restaurants, and small retail. The eastern portion of the Project site, between 1st Court and 2nd Street, is located within the Bayside Conservation (BC) District designated by the DCP (refer to Section 2.3.2, *Downtown Community Plan*). Several hotels, bars, and restaurants line the streets of this neighborhood, contributing to the active night life in the Downtown.

As previously described, the Downtown has experienced an increase in a recent rise in the number of mixed-use and multi-family residential projects in the Downtown, which is expected to occur into the future under the DCP (City of Santa Monica 2017). For example, proposed and pending mixed-used and multi-family residential development within the vicinity of the Project site includes:

- Pending mixed-use development at 1318 2nd Street including include 53 residential units and nearly 12,000 square feet (sf) of retail;
- Pending residential development at 1012 2nd Street with 4 residential units; and

- Several proposed/pending 3- to 5- unit residential buildings along 3rd Street, 4th Street, and 5th Streets as well (refer to Table 3.0-1 in Section 3.0.2, *Cumulative Impacts*).


*Residential buildings in the Downtown area often have mixed uses with commercial and retail on the ground floor that supports varied public and private frontages, contributing to the overall pedestrian-oriented design of the neighborhood.*

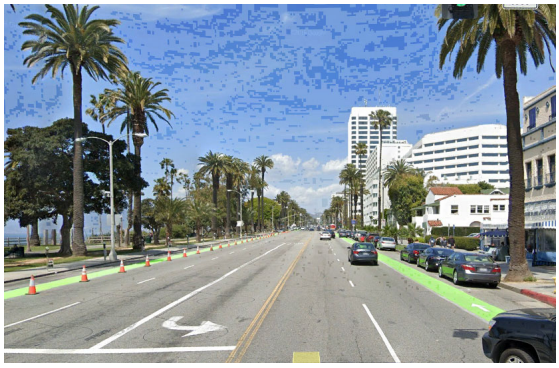
New mixed-use and residential developments within the Downtown – including near the Project site – have transformed nearby streets into mixed-use neighborhoods featuring multi-story buildings with diverse architectural styles, landscaping, areas of ground floor retail, and varied public and private frontages.

*Immediate Project Vicinity*

The area within the immediate vicinity of the Project site is fully developed and supports a mix of older, generally low-rise commercial buildings of approximately one- and two-story structures and newer, taller mixed-use buildings up to 21 stories or 300 feet in height (refer to Section 3.1, *Aesthetics and Shade/Shadow Effects*).

Ocean Avenue supports a broad mix of residential and commercial uses, including hotel, retail, and restaurant uses and upper-floor residential uses within mixed-use buildings. Palisades Park is located west of the Project site across Ocean Avenue.

Across Santa Monica Boulevard, development includes a one-story commercial building; three-story mixed use office building with ground floor retail and fitness uses; one-story office building; two-story creative office/media production building; and three-story mixed use office building with ground floor fitness and restaurant uses. A six-story commercial building, seven-story commercial building, and nine-story City parking structure (Parking Structure #4) are located across 2nd Street from the Project site.



*Ocean Avenue (left) supports a range of commercial uses and residential uses. 2nd Street (right) is a tree-lined roadway that supports a mix of residential and commercial uses.*

Along 2nd Street adjacent to the Project site, existing development includes a two-story theater (i.e., Laemmle Monica Film Center) and restaurants (i.e., Flower Child/Elephanté); StepUp on Second, a permanent supportive housing facility; four-story mixed-use office building with ground floor restaurant uses; three-story office building; and one-story church.

The neighborhood design, with mixed uses, dense development, and pedestrian-friendly elements, supports a vibrant mixed-use urban lifestyle. Downtown residents have local access to businesses that support daily living, such as grocery stores, drug stores, restaurants etc., as well as access to numerous entertainment and recreational activities. The availability of these services, as well as wide inviting sidewalks lined with trees, promotes pedestrian activity and lifestyles.

### 3.11.2 Regulatory Framework

Local

*City of Santa Monica General Plan Land Use and Circulation Element (LUCE)*. The LUCE includes a comprehensive range of goals, policies, and standards designed to preserve neighborhoods and promote a high quality of life for residents. A core principal of the LUCE is to integrate land use and transportation to manage growth sustainably while minimizing the negative impacts of new development on existing neighborhoods. By tying land use changes to transit, the LUCE relieves development pressures on established neighborhoods and locates new development in areas of the City that can accommodate sustainable mixed-use development near transit, such as the Downtown. The LUCE includes both citywide policies and neighborhood- and district-specific policies; policies that are applicable to the proposed project are listed below.

Citywide LUCE goals and policies relevant to neighborhood effects include:

*Goal LU1 Neighborhood Conservation.* Protect, conserve and enhance the City's diverse residential neighborhoods to promote and maintain a high quality of life for all residents. Establish a program of incentives and restraints to redirect intensive residential investment pressure away from existing neighborhoods and control residential investment pressure within neighborhoods.

*Policy LU1.1 Neighborhood Protection.* Establish land use policy designations and incentives which redirect intensive residential investment pressure away from existing neighborhoods to boulevards and districts served by transit.

*Policy LU1.2 Neighborhood Conservation.* Establish effective neighborhood conservation strategies to manage and control the type, rate and pace of change within existing neighborhoods to conserve their character, design and pattern of development and the high quality living environment they provide for a diversity of households, by establishing Neighborhood Conservation Overlay Districts, measures for retention of courtyard housing, modification of demolition regulations and of development standards, and coordinated parking management programs.

*Policy LU1.3 Quality of Life.* Preserve neighborhood quality of life and protect neighborhoods against potential impacts related to development, traffic, noise, air quality and encroachment of commercial activities and establish standards that transition down the building envelope of commercial buildings adjacent to residential properties.

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

*Policy LU1.5 Design Compatibility.* Require that new infill development be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.

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

Policy LU4.3 Mixed use Associated with Transit. Encourage mixed use development close to transit to provide housing opportunities for the community, support local businesses, and reduce reliance on automobiles.

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

Policy N1.4 Preserve and protect existing neighborhoods against potential impacts related to development, traffic, noise, air quality and encroachment of commercial activities.

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

**Goal N2:** Promote and maintain distinctive existing neighborhoods that are defined by their character, design, and pattern of development and the high-quality living environment they provide for a diversity of households through the establishment of a Neighborhood conservation program.

Policy N2.1 Maintain the distinguishing features and diversity of existing residential neighborhoods by protecting character-defining buildings and older smaller scale multi-family and single-family structures.

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

Policy N4.1 Design new development to be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.

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

Policy LU13.1 Maintain Character. Reinforce the City's distinctive natural, social, and environmental characteristics including its beachfront and connections to the water, its civic and cultural institutions, terrain and climate, and the geographic fabric of neighborhoods and boulevards.

LUCE goals and policies specific to the Downtown District include:

**Goal D1:** Maintain Downtown's competitive advantage as a premier local and regional shopping, dining, and entertainment destination, and support its evolution in order to respond to changing market conditions.

Policy D1.1 Create a diversity of retail opportunities including local- and regional serving retail and dining in the Downtown.

Policy D1.4 Encourage new or expanded hotel and other visitor-serving uses in the Downtown.

**Goal D8:** Ensure that new and remodeled buildings in the Downtown District contribute to the pedestrian character of Downtown and are compatible in scale with existing buildings and the surrounding residential neighborhoods.

Policy D8.1 Locate the primary façades of buildings fronting the street at the property line or back side of the sidewalk. However, to create a lively streetscape with places for people to socialize, small landscaped gathering spaces and plazas should be encouraged.

Policy D8.9 Encourage sidewalk dining where it meets established criteria.

*Downtown Community Plan (DCP).* The DCP was approved in July 2017 and constitutes the City's policy guidance and systematic implementation plan for the Downtown District through the 2030 planning horizon. The DCP provides a proactive strategy for Downtown District to evolve into a more accessible, multi-modal, pedestrian-friendly urban district that serves the needs of a diverse community while integrating the Expo LRT Downtown Santa Monica Station.

The western portion of the Project site between Ocean Avenue and 1st Court, is located within the OT District. The eastern portion of the Project site, between 1st Court and 2nd Street, is located within the BC District. The DCP allows a Tier II maximum height of 50 feet and 2.75 FAR for the OT District and a maximum height of 60 feet and 3.5 FAR for the BC District. However, the Project site is one of three sites within the DCP identified with an Established Large Site (ELS) Overlay, The ELS designation has been applied to sites that, given parcel size and development standards, could potentially provide significant community benefits that would otherwise not be anticipated from smaller projects. Under the ELS Overlay designation, an Applicant can request approval of a maximum height of 130 feet and a maximum 4.0 FAR subject to requirements for environmental review and inclusion of community benefits.

Citywide DCP goals and policies relevant to neighborhood effects include:

Policy LU1.1 Accommodate the development of public, civic and private uses that contributes to the quality of life and wellbeing of residents of all ages and abilities and the sense of a "complete neighborhood," including such uses as arts and cultural facilities, childcare facilities, parks, senior and youth facilities and meeting facilities, while adhering to the desired scale and character of development.

Policy LU1.5 Promote the distribution of land uses such that the most active ground floor uses are provided in the historic core and areas served by transit, while the least active ground floor uses are provided in the transition areas adjacent to residential neighborhoods.

**Goal LU4:** Downtown is an attractive residential neighborhood with a range of housing opportunities, that emphasizes on affordable and family housing.

**Goal LU7:** New development, infrastructure and land use changes contribute to the enhancement of the social, cultural, physical and environmental quality of Downtown.

Policy LU7.2 Require that community benefit uses for which additional building height and density are granted are aligned with available citywide and neighborhood-level wellbeing data, are consistent with the community's priorities and exceed those that are normally required through the base standards of the Downtown Community Plan.

### 3.11.3 Impact Assessment and Methodology

Thresholds of Significance

Neighborhood effects are not an environmental issue category identified in CEQA. However, the City's Initial Study Checklist includes the following question to assess neighborhood effects. Would the project:

a) Have considerable effects on the project neighborhood?

Methodology

This impact analysis summarizes the potential neighborhood effects of the proposed Project. The environmental issues analyzed in this section – including aesthetics and shade/shadow effects, air quality, land use and planning, noise, and transportation – contribute to the overall perception of and quality of life within the Downtown. Some of the analyses refers to Project-specific modeling prepared for air quality, noise, and transportation (see Appendix C, Appendix I, and Appendix K). Applicable federal, state, and local regulations were also considered. The methodologies and significance criteria for each of these specific environmental issues are discussed in their respective sections in this EIR: Section 3.1, *Aesthetics and Shade/Shadow Effects*; Section 3.2, *Air Quality*, Section 3.10, *Land Use and Planning,* Section 3.12, *Noise*, and Section 3.13, *Transportation*.

### 3.11.4 Applicable Mitigation Measures from the DCP Program EIR

The DCP Program EIR does not include any applicable mitigation measures for potential neighborhood effects associated with the proposed Project.

### 3.11.5 Project Impacts and Mitigation Measures

Implementation of the proposed Project could create temporary, but prolonged, adverse effects on the surrounding neighborhood over the estimated 34- to 36-month construction phase. Construction effects are briefly summarized below as they relate to neighborhood effects; however, a complete summary level description of construction effects is provided in Section 3.3, *Construction Effects*. Following the completion of construction activities, operation of the proposed Project could result in long-term neighborhood effects (e.g., changes to aesthetics and shadows/shadows, increase in traffic congestion associated with additional trip generation). While implementation of the proposed Project has the potential for limited long-term neighborhood effects on the Downtown as summarized below, the proposed Project is consistent with direction provided in the DCP to create an economically vibrant visitor- and pedestrian-oriented mixed use neighborhood in the Downtown (refer to Section 3.10, *Land Use and Planning*).

<u>Impact Description (NE-1)</u>

**NE-1** **Operational impacts to aesthetics and shade/shadows, air quality, land use, and noise would be less than significant. However, the proposed Project would result in significant and unavoidable transportation impacts at four intersections under Approval Year (2020) Plus Project conditions and six intersections under Future Year (2025) Plus Project conditions. Although the implementation of the proposed Project would be consistent with the DCP, and would locate uses within close proximity to transit, these traffic impacts would result in significant and unavoidable neighborhood effects.**

*Aesthetics and Shade/Shadow Effects*

With regard to visual character, the height and design of the proposed Project's would be consistent with the existing development along Ocean Avenue (refer to Section 3.1.1.1, *Existing Setting – Aesthetics* and Table 3.1-1). The proposed Project would be designed in accordance with DCP policies for façade design, pedestrian-oriented streetscapes, and context-sensitive development to support the Downtown urban character. The design of the proposed Project would incorporate modern and contemporary architectural styling that would not compete or contrast with surrounding development styles in the Downtown. Further, discretionary review of the proposed Project by

Planning Commission and City Council, as well as final design review by the Architectural Review Board (ARB) and/or Landmarks Commission, would ensure that the City's policies addressing aesthetics would be met prior to final approval of the proposed Project. As required by Santa Monica Municipal Code (SMMC) Chapter 9.55, ARB approval is required for new construction, additions or remodel of an existing building in all zones except R1. As required by the ARB, projects within the City would be required to meet the City's standards regarding site design and architecture. As stated, the mission of the ARB is to "preserve existing areas of natural beauty, cultural importance and assure that buildings, structures, signs or other developments are in good taste, good design, harmonious with surrounding developments, and in general contribute to the preservation of Santa Monica's reputation as a place of beauty, spaciousness and quality." The design review process is intended to prevent or minimize degradation of the visual character or quality of the Downtown.

Given the proposed building heights, the proposed Project would be visible from various public viewpoints in the surrounding Downtown neighborhood (refer to the Key Viewing Ares [KVAs] discussed in Impact VIS-3). However, as discussed in Section 3.1, *Aesthetics and Shade/Shadow Effects*, the proposed Project would not diminish, degrade, eliminate, or otherwise adversely alter public scenic vistas of the Santa Monica Pier, Pacific Ocean, and Santa Monica Mountains. The proposed rooftop observation deck would provide publicly accessible panoramic views of the Downtown, Santa Monica Pier, Pacific Ocean, and Santa Monica Mountains. Additionally, the proposed Project would be designed in accordance with DCP policies for façade design, pedestrian-oriented streetscapes, and context-sensitive development to support the Downtown urban character. The proposed public courtyard and ground floor pedestrian paseos would provide mass relief and allow for passage of natural sunlight and air through the Project site. The wide sidewalks, landscaping, outdoor seating areas, and tall transparent ground floor uses are designed to activate existing streetscapes and enhance the frontages along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. The building design and use of materials would add visual interest to the Project site.

As discussed in Section 3.1, *Aesthetics and Shade/Shadow Effects*, the proposed Project would result in shade and shadow and loss of solar access impacts on shade-sensitive uses, including residential uses on 2nd Street such as Luxury Apartments and StepUp on Second. Shadows casted on these buildings would be greater than 3 hours and more extensive in the winter. However, in accordance to CEQA Section 21099 (amended by Senate Bill [SB] 743), aesthetics impacts of infill mixed-use projects located within TPAs – including the Downtown – shall not be considered significant, therefore, the aesthetic and shade/shadow impacts and related neighborhood effects associated with the proposed Project would be *less than significant*.

*Air Quality*

The proposed Project would result in the generation of criteria pollutant emissions during construction and operation. However, as described in Section 3.2, *Air Quality*, the proposed Project would incorporate low-emitting materials to control Volatile Organic Compounds (VOCs) as required by South Coast Air Quality Management District (SCAQMD) Rule 1113, and incorporate U.S. Environmental Protection Agency (USEPA) Tier 4 standards for diesel emissions of emergency generators, that would reduce criteria pollutant emissions associated with the proposed Project. Additionally, the results of the construction Health Risk Assessment (HRA) indicate that unmitigated emissions of Toxic Air Contaminants (TACs) associated with the proposed Project would not increase chronic health hazards or maximum cancer risk in exceedance of South Coast Air Quality Management District's (SCAQMD's) thresholds. (Refer to Section 3.3, *Construction Effects* for a discussion regarding construction-related impacts.) As described in Section 2.6.10, *Sustainability Features* the proposed Project would incorporate varies sustainability features that ensure compliance with CALGreen and City Green Building Code standards, including photovoltaic solar panels, energy efficient heating, ventilation, and air conditioning (HVAC) systems, water efficient equipment and plumbing infrastructure, etc. No carbon monoxide (CO) hotspots would be created from increased vehicle trips. Further, as the proposed urban infill development would not generate substantial TACs (as would be the case for an industrial use) and is not located in proximity to TAC emitters, operational TACs are expected to be minor. Therefore, with the incorporation of sustainability features and compliance with all applicable Federal, State, and local air quality regulations, the air quality impacts, and related neighborhood effects associated with proposed Project would be *less than significant*.

*Land Use and Planning*

As described in Section 3.10, *Land Use and Planning* the proposed Project would be consistent with applicable land use plans, policies, and regulations for the Project site, including the Southern California Association of Government's (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the LUCE, the DCP, the Housing Element, and the City's Local Coastal Plan (LCP) Land Use Plan (LUP). The proposed Project would be consistent with and supportive of applicable goals through the provision of overnight accommodations (i.e., hotel use), the provision of residential units (including rent-controlled and affordable units) in the Downtown, the preservation of historic architectural resources on Ocean Avenue, the addition of ground floor commercial floor area, and the provision of publicly accessible open space including a publicly-accessible observation deck. In addition, the proposed Project would locate visitors and residents within walking distance to a variety of uses and regional

destination points as well as within close proximity to the Downtown Santa Monica Station and other public transit services. The proposed Project would create pedestrian and visual connections through the provision of pedestrian-only paseos and a pedestrian breezeway through the Project site. Therefore, the proposed Project would be consistent with existing City policies and impacts *would be than significant*.

*Noise*

The proposed Project would generate new noise sources at the Project site and on local roadways that would result in noise and vibration during construction and operation. (Refer to Section 3.3, *Construction Effects*, for a discussion regarding impacts during construction.) As described in Section 3.12, *Noise*, traffic-related noise impacts would not exceed the City's significant thresholds for operational noise impacts (City of Santa Monica 2017). Additionally, the proposed Project would comply with all applicable noise regulations formulated to avoid significant operational noise and vibration impacts. For example, future events at the Cultural Use Campus would be limited to the hours between 6:00 AM and 11:00 PM, in accordance with Santa Monica Municipal Code (SMMC) Section 4.12.150 (Business Support Operations). Noise levels from events would constitute an incremental increase that would not be discernable from the existing urban noise environment of the Downtown. Since the proposed Project would not result in operational noise and vibration that exceeds applicable thresholds at sensitive receptors in the surrounding neighborhood, noise and vibration impacts related to neighborhood effects would be *less than significant*.

*Transportation*

As discussed in Section 3.13, *Transportation,* the proposed Project would result in an increase of vehicle trips in the Downtown. Based on the City's adopted thresholds for determining impacts based on automobile delay (LOS), the proposed Project would result in significant and unavoidable intersection impacts at four study intersections under the Approval (Year 2020) traffic scenario:

- Palisades Beach Road & California Incline (weekend midday hours);
- Ocean Avenue & California Avenue (PM and weekend midday peak hour);
- 2nd Street & Wilshire Boulevard (PM and weekend midday peak hour); and
- Main Street & Olympic Drive (AM and weekend midday peak hours).

In addition, the proposed Project would result in significant and unavoidable intersection impacts at the following six study intersections under the Future (Year 2025) traffic scenario:

- Palisades Beach Road & the California Incline (AM peak hour);

- Ocean Avenue & California Avenue (all peak hours);
- 2nd Street & Arizona Avenue (weekend midday peak hour);
- 2nd Street & Santa Monica Boulevard (PM and weekend midday peak hours);
- Main Street & Olympic Drive (AM and weekend midday peak hours); and
- 4th Street & Santa Monica Boulevard (all peak hours).

Although the proposed Project would result in significant and unavoidable impacts to intersections using the City's adopted LOS thresholds, the proposed Project would provide residential units and would increase the range of housing opportunities in the area thereby locating visitors and residents within close proximity to transit routes. Additionally, the proposed Project would be consistent with relevant alternative transportation plans and policies (refer to Section 3.10, *Land Use and Planning*) and would provide secure bicycle racks and storage facilities to encourage the use of bicycle transportation. In addition, the proposed Project would create pedestrian connections through the pedestrian-only paseos and a breezeway through the Project site, thus breaking up the super-block that currently exists. The proposed Project would also provide ground floor restaurant and retail space oriented towards Ocean Avenue, Santa Monica Boulevard, and 2nd Street that would serve to activate the pedestrian environmental at the intersection and would facilitate a pedestrian linkage to the Third Street Promenade. The provision of publicly accessible open space at the fronting Ocean Avenue would also provide a connection with Palisades Park. The proposed Project would represent the intensification of urban density on an infill site in proximity to mass transit consistent with the DCP. Nevertheless, the proposed Project would still result in significant impacts at ~~seven study intersections, all of which would occur within the Downtown~~ four intersections under the Approval Year (2020) Plus Project traffic conditions and at six intersections under Future Year (2025) Plus Project traffic conditions. As such, the proposed Project would result in *significant and unavoidable* traffic-related neighborhood effects (e.g., increased local traffic congestion).

### 3.11.6 Cumulative Impacts

Generally, the proposed Project would transform the existing traditional commercial character of the Project site to a mixed-use development supporting hotel, residential, restaurant, retail, and cultural uses, consistent with the planning goals and policies of the DCP, and compatible with other recent development in this neighborhood. A project can result in cumulative neighborhood effects when other nearby projects are located within the same neighborhood and contribute to combined effects associated with aesthetics, air quality, land use, noise and traffic conditions within a given neighborhood. As described in Chapter 3.0.2, *Cumulative Impacts*, there are

approximately 205 pending, approved, and recently constructed projects (refer to Table 3.0-1), 12 of which are located within two blocks of the Project site (refer to Figure 3.0-1).

*Aesthetics and Shade/Shadow Effects*

As previously described above, the proposed Project would result in less than significant impacts for all of the aesthetics issues analyzed (e.g., visual character, light and glare, etc.). While the proposed Project, in combination with cumulative projects, would add to the intensification of development within an already highly urbanized area, as indicated in the DCP Program EIR most development would be redevelopment of existing properties. The building height and density associated with the proposed Project was anticipated and accounted for in the DCP as an ELS that would offer community benefits, including publicly accessible open space. The DCP Program EIR evaluated the impacts of anticipated development within the Downtown and concluded that development in accordance with the DCP would not result in significant impacts related to aesthetics, including scenic vistas and resources, view corridors, light and glare, and shade/shadow. Because cumulative development in the Downtown would occur in a manner consistent with the requirements of the DCP and because the proposed Project would not contribute to adverse aesthetic conditions, associated cumulative neighborhood effects related to aesthetics would be *less than significant*. As previously indicated, since the Project site meets the exemption criteria set forth under CEQA Section 21099(d)(1) and is an urban infill site within a TPA, the impacts related to aesthetics is provided in this EIR for informational purposes only.

*Air Quality*

As previously described, the proposed Project would result in less than significant operational air quality impacts. No CO hotspots would be created from vehicle trips associated with the proposed Project. Therefore, the proposed Project would not contribute to cumulatively substantial air quality impacts or related neighborhood effects.

*Land Use and Planning*

The Project would be consistent with applicable land use plans, policies, and regulations for the Project site, including SCAG's 2016-2040 RTP/SCS, the LUCE, the DCP, the Housing Element, and the LCP LUP. In addition, like the proposed Project, the cumulative projects would be consistent with applicable land use designations or zoning, or made consistent through amendments and rezones, and would be required by the City to be consistent with the majority of the goals, objectives and policies of applicable land use plans. Further, as with the proposed Project, cumulative development under the DCP would represent infill development within the proximity of transit and would comply with the DCP. Therefore, the proposed Project would not

contribute to cumulatively substantial land use and planning impacts or related neighborhood effects.

*Noise*

As previously described in Section 3.12, *Noise*, cumulative operational noise and vibration impacts would be less than significant. As with the proposed Project, all of the cumulative projects would be required to comply with applicable noise regulations including the City's Noise Ordinance that have been formulated to avoid significant noise and vibration impacts. Therefore, cumulative noise and vibration impacts, and associated neighborhood effects, would be *less than significant*.

*Transportation*

The intersection LOS analysis in Section 3.13, *Transportation* takes into account increases in regional traffic from cumulative growth (e.g., the future and future with project scenarios analyzed that take into account the traffic from cumulative projects). Therefore, traffic impacts, and associated cumulative neighborhood effects, would not be greater those previously identified for the Approval Year (2020) Plus Project conditions and the Future Year (2025) Plus Project conditions. than those identified above. The proposed Project would contribute to significant and unavoidable impacts at four study intersections under the Approval Year (2020) Plus Project conditions and at six study intersections under the Future Year (2025) Plus Project conditions. Therefore, based on the City's adopted LOS thresholds, the proposed Project would contribute to *significant and unavoidable* transportation-related neighborhood effects.

### 3.11.7 Residual Impacts

The proposed Project would result in *less than significant* neighborhood effects in the Downtown for aesthetics and shade/shadow effects, air quality, land use and planning, and noise. However, the operation of the proposed Project would result in long-term significant and unavoidable operational impacts associated with intersection operations during Approval Year (2020) Plus Project conditions and Future Year (2025) Plus Project conditions. Therefore, transportation and related neighborhood effects would remain *significant and unavoidable*.

## 3.12 NOISE

This section of the Environmental Impact Report (EIR) describes the existing noise environment and evaluates the potential noise and vibration impacts that could result from the implementation of the proposed Ocean Avenue Project (Project). Potential direct and indirect impacts resulting from construction and operational activities associated with the proposed Project are identified herein, and potential mitigation measures that could avoid or reduce impacts are recommended, where feasible.

### 3.12.1 Fundamentals of Sound and Environmental Noise

Noise

Noise is typically defined as unwanted sound that interferes with normal activities or otherwise diminishes the quality of the human or natural environment. Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance (Federal Interagency Committee on Urban Noise [FICUN] 1980). The ambient noise environment typically includes background noise generated from both near and distant noise sources. These can vary from an occasional aircraft overhead or an occasional train passing by to continuous noise from sources such as consistent vehicle traffic along a major road and/or pedestrian activity within open space recreational areas or other places where people congregate.

*Palisades Park is located to the west of the Project site across Ocean Avenue. This park provides trails, seating areas, grassy areas, and sweeping views of the coastline, including Santa Monica Pier. As such, this recreation area is heavily trafficked by residents and visitors.*

Sound is technically described in terms of the loudness (i.e., amplitude) and frequency (i.e., pitch) of the sound. The standard unit of measurement of the loudness of sound is the Decibel (dB). Sound frequency is measured in terms of hertz (hz), and the normal human ear can detect sounds ranging from about 20 to 15,000 hz. All sounds in the wide range of frequencies are not heard equally well by the human ear, which is most sensitive to frequencies in the 1,000 to 4,000 hz range. Since the human ear is not equally sensitive to sound at all frequencies (i.e., between 1,000 and 8,000 cycles per second), a special frequency-dependent rating scale has been devised to relate

noise to human sensitivity. The A-weighted decibel scale (dBA) adjusts very high and very low frequencies to approximate the human ear's lower sensitivity to those frequencies since. Decibels are based on a logarithmic scale, which compresses the wide range in sound pressure levels to a more useable range of numbers. This is called "A-weighting" and is commonly used in the measurement of ambient community environmental noise. Unless otherwise noted, all decibel measurements presented in the following noise analysis are dBA.

In terms of human response to noise, a noise level increase of 3 dBA is barely perceptible to most people, a 5-dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness (100 percent increase) (FICUN 1980; Harris Miller Miller & Hanson Inc. 2006).

According to the Noise Element of the City's General Plan, everyday sounds within the City normally range from 30 dBA to 100 dBA (City of Santa Monica 1992). Examples of various sound levels in different environments are shown in Table 3.12-1.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates, these scales consider the effect of noise upon people largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Each noise rating scale applicable to this analysis is defined as follows:

- *Equivalent Continuous Noise Level* ($L_{eq}$) is the average acoustic energy of noise for a given period. Thus, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. This rating scale does not "weight" or "penalize" noise, depending on whether it occurs during the day or the night.
- *Community Noise Equivalent Level* (CNEL) is a 24-hour average $L_{eq}$ with a 5-dBA "weighting" or "penalty" during the hours of 7:00 P.M. to 10:00 P.M. and a 10-dBA "weighting" or "penalty" a during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.7 dBA CNEL. CNEL is often used due to its utility in identifying noise related sleep disturbance effects, often a key community concern for increases in noise levels. This metric is typically used by State and local agencies for noise analyses and CEQA-compliant documents.
- *Day-Night Average Noise Level* ($L_{dn}$) is a 24-hour average $L_{eq}$ with a 10 dBA "weighting" or "penalty" during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour $L_{eq}$ would result in a measurement of 66.4 dBA $L_{dn}$. This metric is typically used by Federal agencies (e.g., Federal Aviation Administration [FAA]) for noise analyses and National Environmental Policy Act (NEPA) compliant documents.
- *Minimum Instantaneous Noise Level* ($L_{min}$) is the minimum instantaneous noise level experienced during a given period.

- *Maximum Instantaneous Noise Level* ($L_{max}$) is the maximum instantaneous noise level experienced during a given period.

**Table 3.12-1. Representative Noise Levels**

| Common Outdoor Activities | Noise Level (dBA) | Common Indoor Activities |
|---|---|---|
| Power saw | —110— | Rock band |
| Jet fly-over at 100 feet | | Crying baby |
| Subway | —100— | |
| Gas lawnmower at 3 feet | | |
| Rail transit horn / tractor | —90— | |
| Jack hammer | | Food blender at 3 feet |
| Rail transit at-grade (50 miles per hour [mph]) | —80— | Garbage disposal at 3 feet |
| Noisy urban area during daytime | | |
| Gas lawnmower at 100 feet | —70— | Vacuum cleaner at 10 feet |
| Rail transit in station / commercial area | | Normal speech at 3 feet |
| Heavy traffic at 300 feet | —60— | Sewing machine |
| Air conditioner | | Large business office |
| Quiet urban area during daytime | —50— | Dishwasher in next room |
| | | Refrigerator |
| Quiet urban area during nighttime | —40— | Theater, large conference room (background) |
| Quiet suburban area during nighttime | | |
| | —30— | Library |
| Quiet rural area during nighttime | | Bedroom at night, concert hall (background) |
| | —20— | |
| | | Broadcast / recording studio |
| | —10— | |
| Lowest threshold of human hearing | —0— | Lowest threshold of human hearing |

Source: California Department of Transportation (Caltrans) 1998.

Noise levels from a source decline (i.e., attenuate) as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding by buildings or other structures, may intensify or reduce the noise level at a location. A common method for estimating roadway noise is that for every doubling of distance from the source, the noise level is reduced by approximately 3 dBA at acoustically "hard" locations (i.e., mostly asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., exposed soil or landscaping, such as grass).

Noise from stationary sources – including construction noise – is reduced by approximately 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by approximately 5 dBA, while a solid wall or berm can reduce noise levels by up to 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior noise reduction of newer residential units is generally 30 dBA or more (Harris Miller Miller & Hanson Inc. 2006).

Vibration

Vibration is sound radiated through the ground. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a road is smooth (e.g., newly constructed or newly re-paved), the ground-borne vibration from traffic is rarely perceptible. The vibration of floors and walls may cause perceptible vibration, rattling of items such as windows or dishes on shelves, or a rumble noise. The rumble is the noise radiated from the motion of the room surfaces. In essence, the room surfaces act like a giant loudspeaker causing what is called ground-borne noise. Ground-borne vibration rarely disturbs people in outdoor settings. Although the motion of the ground may be perceived, without the effects associated with the shaking of a building, the motion does not provoke the same adverse human reaction. In addition, the rumble noise that usually accompanies the building vibration is perceptible only inside buildings. Typically, ground-borne vibration generated by manmade activities attenuates rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances from the source.


*1st Court, which bisects the Project site in an east-west direction, is primarily used by service vehicles, delivery trucks, and garbage trucks.*

The ground motion caused by vibration can be measured as particle velocity in inches per second (in/sec) (Harris Miller Miller & Hanson Inc. 2006; Caltrans 2013). The vibration level at which

continuous vibration is strongly perceptible is 0.1 in/sec. For incidental ground-borne vibration, 0.035 in/sec is barely perceptible while 2.0 in/sec is felt severely (Caltrans 2013). General human response to different levels of ground-borne vibration velocity levels are described in Table 3.12-2 and guidelines for the effect of vibration levels in structures are summarized in Table 3.12-3.

**Table 3.12-2. Human Response to Different Levels of Ground-borne Vibration**

| Human Response | Transient (in/sec) | Continuous (in/sec) |
|---|---|---|
| Barely perceptible | 0.035 | 0.012 |
| Distinctly perceptible | 0.24 | 0.035 |
| Strongly perceptible | 0.9 | 0.1 |
| Severe/Disturbing | 2 | 0.4 |

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: Caltrans 2013.

**Table 3.12-3. Vibration Thresholds for Potential Structural Damage**

| Structure and Condition | Transient (in/sec) | Continuous (in/sec) |
|---|---|---|
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some old buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1 | 0.5 |
| Modern industrial/commercial buildings | 2 | 0.5 |

Source: Caltrans 2013.

### 3.12.2 Existing Setting

Land uses within the City include a range of residential, commercial, institutional, and recreational open space areas that are common to urbanized coastal areas in Southern California (refer to Section 3.10, *Land Use and Planning*). The Project site is located along the western boundary of the Downtown, which includes a variety of mixed-use commercial and residential development, including various commercial retail and restaurants. Noise sources associated with these uses include, but are not limited to the following: exposed mechanical equipment (e.g., heating, ventilation, and cooling [HVAC] equipment, elevator shafts, etc.); delivery, loading, and garbage truck operations; and other minor noise sources associated with restaurant, retail, and residential uses (e.g., amplified music, talking, etc.).

*The primary noise sources in the vicinity of the Project site include roadway noise on Ocean Avenue (left), Big Blue Bus and Metro buses (right), delivery trucks, and other typical urban roadway noise sources.*

However, the primary source of noise in the vicinity of the Project site is vehicle traffic, including passenger vehicles, buses, motorcycles, and trucks. Traffic noise is primarily generated on nearby major streets such as Ocean Avenue, Santa Monica Boulevard, and 2nd Street. The Interstate (I-) 10 (Santa Monica Freeway) and State Highway 1 (Pacific Coast Highway) are additional sources of vehicle noise and are located to the west and south respectively of the Project site. The high volume of daily vehicle trips along I-10 are a large source of vehicle noise; however, this freeway is located within a deep road cut adjacent to Downtown, placing the vehicles approximately 30 to 50 feet below grade, which contains the noise generated and limits the area affected by this noise source.

Similarly, PCH runs parallel to Ocean Avenue throughout the Downtown to the west; however, this roadway lies approximately 100 feet below the adjacent Palisades Bluffs, so the vehicle noise generated along this highway is generally blocked from the Downtown.

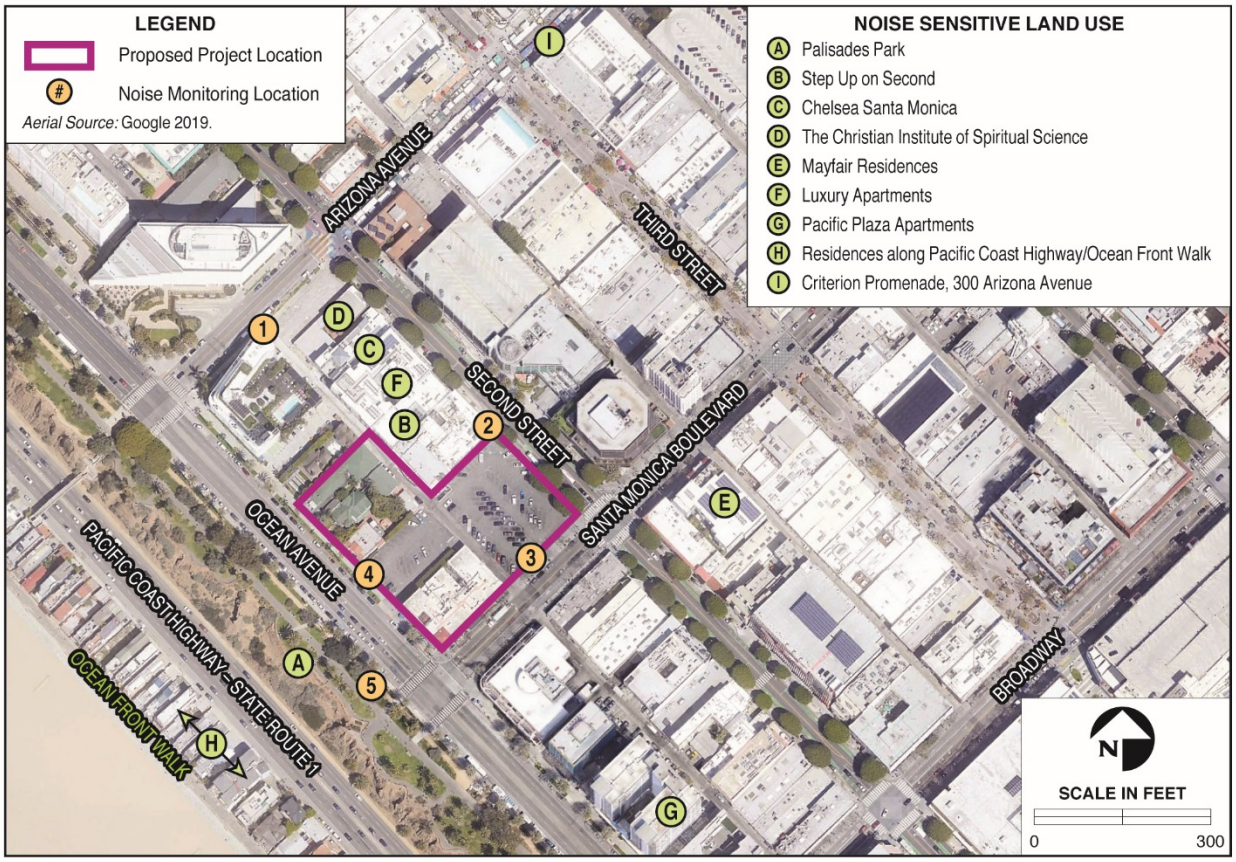
The Downtown is a popular and vibrant nightlife destination with several bars, nightclubs, and restaurants that can generate noise associated with live music, amplified music, and large gatherings. On the Third Street Promenade, noise is primarily attributable to visitors, amplified music from commercial retail and restaurants, and street performers. On summer evenings, the City's outdoor concerts on Thursday nights (Twilight Dance Series) at the nearby Santa Monica Pier can also be heard in the Downtown. Within the immediate vicinity of the Project site, local sources of noise can be attributed to the weekly public Farmer's Market hosted on Arizona Avenue, as well as informal exercise classes held within Palisades Park. The Project site generates noise from the multiple restaurant uses and their associated outdoor dining areas located adjacent to the public sidewalk.

*The Downtown Santa Monica Farmer's Market is a local source of noise from refrigerated trucks, people, amplified music, and vehicles, (left). Daytime noise measurements were taken near the Project site to quantify existing ambient noise, including in Palisades Park.*

Additionally, construction projects in the Downtown also generate construction noise, particularly during weekdays between the standard construction hours identified in City's Noise Ordinance (Santa Monic Municipal Code [SMMC] Chapter 4.12, Section 4.12.110). For example, ongoing construction at the corner of 2nd Street and Arizona Avenue to the northeast of the Project site currently contributes to the existing noise setting in the immediately Project vicinity. (A complete list of cumulative projects in the Downtown, refer to Table 3.0-1.).

The Project site is located within approximately one half of a City block in the Downtown and is bounded by Ocean Avenue to the west, Santa Monica Boulevard to the south, 2nd Street to the east, and existing development to the north. The Project site fronts three busy streets in the Downtown, Ocean Avenue, Santa Monica Boulevard, and 2nd Street. All three of these streets were identified in the Downtown Community Plan (DCP) Program Environmental Impact Report (EIR) as major streets that carry high traffic volumes and are primary contributors to the ambient noise environment generate a majority of the traffic noise within the Downtown. Bus service in the vicinity (within 0.5 miles) of the Project site includes Big Blue Bus service routes 1, 2, 3, 5, 7, 8, 9, 18, Rapid I 3, R7, and R10 and Metro service routes 33, 534, 704, 720 and 733 (City of Santa Monica 2018; Metro 2018). Additionally, there is a layover zone for Metro service routes 33 and 733 on the west side of 2nd Street along the southeast corner of the Project site, creating additional traffic noise.

To identify representative noise levels around the Project site, daytime noise measurements were taken at five locations including the streets on all sides of the Project site (i.e., Ocean Avenue, Santa Monica Boulevard, 2nd Street, and Arizona Avenue), as well as from Palisades Park west of the Project site (see Figure 3.12-1). The noise measurements were taken on Wednesday, August 28, 2019 to capture summer activity levels in the Downtown and represent typical ambient noise levels (i.e., high levels of visitors and associated vehicles trips). Noise levels were measured using a Quest Technologies SoundPro SP DL-1 precision sound level meter, which satisfies the American National Standards Institute (ANSI) for general environmental noise measurement instrumentation. Measurements were taken during 10-minute intervals between 7:30 A.M. and 9:00 A.M. (A.M. Peak), between 11:30 A.M. and 1:30 P.M. (Mid-day), and between 4:30 P.M. and 6:00 P.M. (P.M. Peak) (see Table 3.12-4).




wood.

**Noise Monitoring Locations and Noise Sensitive Receptors**

**FIGURE 3.12-1**

**Table 3.12-4. Existing Noise Levels Measured in the Project Vicinity (in dBA)**

| | | Ocean Ave | Santa Monica Blvd | 2nd St | Arizona Ave[1] | Palisades Park |
|---|---|---|---|---|---|---|
| | | Site 1 | Site 2 | Site 3 | Site 4 | Site 5 |
| A.M. Peak | $L_{eq}$ | 63.9 | 62.1 | 65.8 | 68.1 | 61.6 |
| | $L_{max}$ | 73.3 | 70.2 | 78.8 | 83.8 | 68.5 |
| | $L_{min}$ | 53.6 | 57.0 | 59.4 | 64.7 | 54.6 |
| Mid-day | $L_{eq}$ | 62.4 | 61.0 | 65.7 | 69.9 | 60.9 |
| | $L_{max}$ | 72.6 | 73.4 | 77.6 | 86.2 | 69.8 |
| | $L_{min}$ | 55.7 | 55.6 | 58.7 | 64.0 | 56.1 |
| P.M. Peak | $L_{eq}$ | 62.1 | 62.5 | 62.0 | 63.7 | 63.0 |
| | $L_{max}$ | 75.0 | 79.3 | 72.0 | 81.3 | 83.3 |
| | $L_{min}$ | 56.2 | 56.1 | 55.9 | 54.5 | 55.5 |

Notes: [1] Measurements were taken during the weekly farmer's market on Arizona Avenue. Altered traffic conditions were observed while monitoring. Therefore, noise measurements from this location include noise from pedestrian activities and amplified music.

The highest measured noise levels were recorded along the east-west thoroughfares of Santa Monica Boulevard and Arizona Avenue (Sites 2 and 4), with maximum sound levels over the three periods of 79.3 dBA and 86.2 dBA, respectively. Ocean Avenue and 2nd Street generally have lower noise levels, with maximum sound levels over the three periods of 75.0 dBA and 78.8 dBA (Sites 1 and 3). These daytime noise levels are characteristic of a high activity urban area. Existing daytime noise levels were calculated using the data collected during noise monitoring as well as the highest recorded traffic volumes on the surrounding roadways to provide the most conservative value for $L_{eq}$ noise. Thus, ambient noise levels are also reflective of roadway traffic noise.

Noise and Vibration Sensitive Land Uses

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Land uses identified by the City's Noise Ordinance (SMMC Chapter 4.12) as noise sensitive land uses include schools, hospitals, and institutional uses such as churches, museums, and libraries within 500 feet. The City also considers residential units to be noise sensitive land uses. The noise sensitive land uses nearest to the Project site are shown in Figure 3.12-1 and are listed in Table 3.12-5.

Vibration senstive land uses are affected by existing construction activity in the Downtown as well as traffic and transportation vehicles, especially heavy-duty vehicles (e.g. delivery trucks) on local roadways. Vibration sensitive land uses, including historic buildings, are typically more structurally fragile, due to older building materials and techniques. The vibration sensitive land uses nearest to the Project site are shown in include the noise sensitive land uses in Table 3.12-5 as well as the City-designated Landmarks described in Table 3.12-6.

*Noise sensitive land uses in the Project vicinity include the residential buildings adjacent to the Project site across 1st Court, including many units with windows and balconies facing directly toward the Project site (left). Palisades Park (right) is a public park located across Ocean Avenue to the west of the Project site.*

## Table 3.12-5. Noise Sensitive Land Uses within 1,000 Feet of the Project Site

| Sensitive Receptor | Address | Distance and Direction | Use |
|---|---|---|---|
| Luxury Apartments | 1322 2nd Street | 25 feet North and East | Four-story luxury apartment building with ground floor commercial uses |
| Palisades/Ocean Park | Ocean Avenue | 100 feet West | Public park with pedestrian and bicycle paths and views of Santa Monica State Beach and the Pacific Ocean |
| StepUp on Second | 1328 2nd Street | 120 feet North and East | Three-story permanent supportive and low-income housing |
| Chelsea Santa Monica | 1318 2nd Street | 160 feet North and East | Three-story luxury apartment building with ground floor commercial uses |
| The Christian Institute of Spiritual Science | 1308 2nd Street | 200 feet North | Church |
| Mayfair Residences | 210 Santa Monica Boulevard | 215 feet East | Five-story residential building |
| Pacific Plaza Apartments | 1431 Ocean Avenue | 350 feet South | 15-story rental apartment building with ground floor commercial uses |
| Residences along Ocean Front Walk | Ocean Front Walk | 350 feet West | Single- and multi-family residences between the Pacific Coast Highway and Ocean Front Walk |
| Westside Villas | 1299 Ocean Avenue | 360 feet North | 12-story apartment building |
| Criterion Promenade | 302 Arizona Avenue | 600 feet Northeast | Mixed-use building with ground floor commercial and upper floor residential |
| Ocean Avenue Apartments | 1221 Ocean Avenue | 620 feet Northwest | 17-story luxury rental apartment building |
| First Presbyterian Church /British American School | 1220 2nd Street | 620 feet Northwest | Complex of institutional buildings including a church, school and nursery |
| Emeritus College | 1227 2nd Street | 740 feet North | Four-story college campus building |
| Knowledge Universe Learning Group | 1250 4th Street | 860 feet Northeast | Child day care and social services |

**Table 3.12-6. Vibration Sensitive City-designated Landmarks within 1,000 Feet of the Project Site**

| Sensitive Receptor | Address | Distance and Direction | Use |
|---|---|---|---|
| 1906 Queen Anne Landmark | 1333 Ocean Avenue | Project site | Commercial use (e.g. medical spa, hair salon, and office) |
| 1926 Spanish Colonial Revival Landmark | 1337 Ocean Avenue | Project site | Commercial space and residential apartments |
| Gussie Moran House | 1323 Ocean Avenue | Adjacent to the north | City-designated landmark |
| Palisades Park | 100-1500 Ocean Avenue | Adjacent across Ocean Avenue | Public park |
| The Georgian Hotel | 1415 Ocean Avenue | ~500 feet to the southeast along Ocean Avenue | Hotel |
| Hotel Shangri-La | 1301 Ocean Avenue | ~800 feet to the north along Ocean Avenue | Hotel |

### 3.12.3 Regulatory Framework

Various standards have been developed to address the compatibility of land uses and noise levels. The applicable standards are presented in the following discussion. Special emphasis is placed on land uses that are noise sensitive.

Federal Regulations

No Federal noise requirements or regulations apply to local actions of the City. However, Federal regulations influence the audible landscape where Federal funding is involved. The Federal Highway Administration (FHWA) requires abatement of highway traffic noise for highway projects through rules in 23 Code of Federal Regulations (CFR) Part 772. Further, the Federal Transit Administration (FTA) and Federal Railroad Administration (FRA) each recommend thorough noise and vibration assessments through comprehensive guidelines for mass transit or high-speed railroad projects that would pass by residential areas. For housing constructed with assistance from the U.S. Department of Housing and Urban Development, minimum noise insulation standards must be achieved (24 CFR Part 51, Subpart B).

State Policies and Regulations

*State Department of Health Services.* The California State Office of Noise Control in the Department of Health Services has established guidelines to provide a community with a noise environment that it deems to be generally acceptable. Specifically, ranges of noise exposure levels have been developed for different land uses to serve as the primary tool a city uses to assess the compatibility between land uses and outdoor noise. To achieve a clearly compatible land use/noise

zone, a noise level standard of 60 dBA $L_{dn}$ is used for the exterior living areas of new single-family, duplex and mobile home residential land uses. A 45 to 65 dBA $L_{dn}$ noise level standard is used for the interior and exterior of all new multi-family residential uses. Where a land use is denoted as "normally acceptable" for the given $L_{dn}$ noise environment, the highest noise level in that range should be considered the maximum desirable for conventional construction which does not incorporate any special acoustic treatment. The acceptability of noise environments classified as "conditionally acceptable" or "normally unacceptable" depends on the anticipated amount of time that will normally be spent outside the structure and the acoustic treatment to be incorporated in the structure's design.

*California Air Resources Board Anti-Idling Measure.* In 2004, the California Air Resource Board (CARB) adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling (Title 13 California Code of Regulations, Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at a time at a location, thereby minimizing vehicle noise from idling vehicles

*California Building Standards Code (Title 24).* Title 24 of the California Code of Regulations includes Sound Transmission Control requirements that establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family units. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new dwellings. Where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL, the standards require an acoustical analysis demonstrating how dwelling units have been designed to meet the interior standard. Dwellings are to be designed so that interior noise levels would meet this standard for at least 10 years from the time of a building permit application.

*California Department of Transportation*

The Caltrans Transportation and Construction Vibration Guidance Manual provides guidance and procedures that *"should be treated as screening tools for assessing the potential for adverse vibration effects related to human perception, structural damage, and equipment. This document is not an official policy, standard, specification, or regulation, and should not be used as such."*

The Caltrans vibration criteria for assessing structural damage and human perception are shown in Table 3.12-7 and Table 3.12-8, respectively.

### Table 3.12-7. Caltrans Vibration Structural Damage Potential Criteria

| Structure and Condition | Transient Sources (Maximum PPV [in/sec]) | Continuous/Frequent Intermittent Sources (Maximum PPV [in/sec]) |
|---|---|---|
| Extremely fragile historic buildings, ruins, and monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some old buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1.0 | 0.5 |
| Modern industrial/commercial buildings | 2.0 | 0.5 |

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: Caltrans 2013.

### Table 3.12-8. Caltrans Vibration Perception Potential Criteria

| Structure and Condition | Transient Sources (Maximum PPV [in/sec]) | Continuous/Frequent Intermittent Sources (Maximum PPV [in/sec]) |
|---|---|---|
| Barely perceptible | 0.04 | 0.01 |
| Distinctly perceptible | 0.25 | 0.04 |
| Strongly perceptible | 0.9 | 0.10 |
| Severe | 2.0 | 0.4 |

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Source: Caltrans 2013.

Local Policies and Regulations

*City of Santa Monica General Plan Land Use and Circulation Element (LUCE)*. Policies relating to noise were identified in the following goals of the LUCE:

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

Policy N1.4. Preserve and protect existing neighborhoods against potential impacts related to development, traffic, noise, air quality and encroachment of commercial activities.

*1992 City of Santa Monica General Plan Noise Element.* The Noise Element of the City's General Plan provides guidance about acceptable noise levels based on the proposed land use (Table 3.12-9). Based on these standards, which follow the State guidelines, exterior noise levels of 60 dBA

CNEL and lower are "clearly compatible" for commercial uses that include hotels, motels, and transient lodging; while exterior noise levels of up to 70 dBA CNEL are "compatible with mitigation." "Clearly compatible" is defined as the highest noise level that should be considered for the construction of new buildings that incorporate conventional construction techniques, but without any special noise insulation requirements. "Compatible with mitigation" includes the highest noise levels that should be considered only after detailed analysis of the noise reduction requirements are made and needed noise insulation features are determined. The City's noise standard for the design of commercial hotels, motel, and transient lodging requires a noise level at or below 45 dBA CNEL for interior areas and has 65 dBA CNEL for exterior areas: exterior areas include the pool and other outdoor recreational areas of the hotel.

**Table 3.12-9. Land Use/Noise Compatibility Matrix**

| Proposed Land Use Categories | | Compatible Land Use Zones (dBA CNEL) | | | | | |
|---|---|---|---|---|---|---|---|
| **Categories** | **Uses** | **<60** | **60-65** | **65-70** | **70-75** | **75-80** | **>80** |
| RESIDENTIAL | Single-Family, Duplex, Multiple-Family | A | B | B | C | D | D |
| COMMERCIAL Regional, District | Hotel, Motel, Transient Lodging | A | B | B | C | C | D |
| COMMERCIAL Regional, Village District, Special | Commercial, Retail, Bank, Restaurant, Movie Theater | A | A | A | B | B | C |

ZONE A – Clearly Compatible: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

ZONE B – Compatible with Mitigation: New construction or development (i.e., substantial remodels and additions representing 50 percent or more of existing square footage, including garage square footage), should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems on air conditioning, will normally suffice.

ZONE C – Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

ZONE D – Clearly Incompatible: New construction or development should generally not be undertaken.

Source: Santa Monica General Plan Noise Element 1992.

The Noise Element addresses the issue of noise by identifying sources of noise in the City and providing objectives and policies that ensure that noise from various sources would not create an unacceptable noise environment. The Noise Element places limitations on noise produced by equipment operation, human activities, and construction. Applicable policies and actions from the Noise Element are identified below.

**Policy 1** Provide for measures to reduce noise impacts from transportation noise sources.

Action 1.2. Provide for continued evaluation of truck movements and routes in the City to provide effective separation from residential or other noise sensitive land uses.

**Policy 2** Incorporate noise considerations into land use planning decisions (as they apply to finished projects, not construction actions).

Action 2.2. Through the Noise Ordinance, incorporate noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses. The noise referral zones identified in Exhibits 6 and 7 (areas exposed to noise levels greater than 60 dBA CNEL) can be used to identify locations of potential conflict. New developments would be permitted only if appropriate mitigation measures are included such that the standards contained in this Element are met.

Action 2.3 Continue to enforce the State of California Uniform Building Code that specifies that the indoor noise levels for residential living spaces not exceed 45 dBA CNEL due to the combined effects of all noise sources. The State requires implementation of this standard when the outdoor noise levels exceed 60 dBA CNEL. The Noise Referral Zones (60 dBA CNEL) can be used to determine when this standard needs to be addressed. The Uniform Building Code (specifically, the California Administrative Code, Title 24, Part 6, Division T25, Chapter 1, Subchapter 1, Article 4, Sections T25-28) requires that "Interior community noise levels (CNEL/$L_{dn}$) with windows closed, attributable to exterior sources shall not exceed an annual CNEL or $L_{dn}$ of 45 dBA in any habitable room." The code requires that this standard be applied to all new apartment houses, hotels, motels, and dwellings other than detached single-family dwellings. The City should also, as a matter of policy, apply this standard to single-family dwellings.

**Policy 3** Develop measures to control non-transportation noise impacts.

Action 3.3 Require that new commercial and residential projects to be built near existing residential land use demonstrate compliance with the City Noise Ordinance prior to approval of the project. This shall include a requirement that all project plans show the location of mechanical

equipment in relation to adjacent noise-sensitive (i.e., residential) uses. Require that all Building Permit applicants, including contractors, sign a form acknowledging requirements of the noise ordinance, and assuming responsibility for compliance with the noise ordinance. This is particularly important for the non-resident contractor installing mechanical equipment.

**Policy 4** The City shall develop measures to control construction noise impacts.

Action 4.1 Consider incorporating provisions into the Noise Ordinance to address the problems of construction noise:

- Clearly state the permitted hours of construction and expressly prohibit construction on Sunday.
- During the environmental review of all projects requiring extensive construction, determine the proximity of the site to the established residential areas. If the project will involve pile-driving, nighttime truck hauling, blasting, 24-hour pumping (important in coastal excavations), or any other very high noise equipment, the environmental review shall include a construction noise alternative analysis. From this analysis, specific mitigation measures shall be developed to mitigate potential noise impacts. This may include but not be limited to:
    - Requirements to use quieter albeit costlier construction techniques.
    - Notification of residents (homeowners and renters) of time, duration, and location of construction.
    - Relocation of residents to hotels during noise construction periods.
    - Developer reimbursement to City for 24-hour onsite inspection to verify compliance with required mitigation.
    - Limit hours of operation of equipment 15 dB above noise ordinance limits to the hours of 10:00 A.M. to 4:00 P.M.

*City of Santa Monica Municipal Code.* The City's Noise Ordinance (SMMC Chapter 4.12) includes limitations on unnecessary, excessive, and annoying noises within the City. SMMC Section 4.12.050 (Designated Noise Zones) defines designated noise zones in the City, which include a variety of land use types, depending on their nature. Residential districts are designated as Noise Zone I; commercial districts are designated Noise Zone II; and manufacturing or

industrial districts are designated as Noise Zone III. The Project site is located in the Downtown, which consisting of residential and commercial uses, and is characterized as Noise Zone II.

> **Noise Zone II.** All property in any commercial district established by SMMC Subchapter 9.04.04 or any revisions thereto. In addition, property zoned Beach Parking District (BPD), Civic Center (CC), Bayside Commercial District (BSCD) and the Santa Monica Pier shall be included in this noise zone.

SMMC Section 4.12.060 outlines the noise standards for Noise Zone II (see Table 3.12-10).

**Table 3.12-10. Exterior Noise Standards in the City of Santa Monica**

| Noise Zone | Time Interval | Allowable $L_{eq}$ for 15 min continuous measurement period | Allowable $L_{eq}$ for 5 min continuous measurement period |
|---|---|---|---|
| II | All days of the week | | |
| | 10:00 P.M. to 7:00 A.M. | 60 dBA | 65 dBA |
| | 7:00 A.M. to 10:00 P.M. | 65 dBA | 70 dBA |

Source: SMMC Section 4.12.060 (Exterior Noise Standards).

Subsection (b) of Section 4.12.060 (Exterior Noise Standards) also states, *"[i]f the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard."* Subsection (d) states that *"[i]f any portion of a parcel is located within 100 feet of a noise zone with higher noise standards as compared to the noise standards for the noise zone in which the parcel is located, then the maximum allowable exterior equivalent noise level for the entire parcel shall be the average of the noise standards of the two noise zones. However, any noise level measurement must be taken at least 25 feet from the parcel line of the source of the noise."*

SMMC Section 4.12.110 restricts the hours for construction activity to between 8:00 A.M. to 6:00 P.M. on Mondays through Fridays and 9:00 A.M. to 5:00 P.M. on Saturdays, with some exceptions for construction that the City deems to be in the public interest. Construction activity is prohibited on Sundays and Holidays. SMMC Section 4.12.110 also sets limits for noise from construction activities relative to the noise standards set in Section 4.12.060, with the equivalent noise level not to exceed 20 dBA above standards and the maximum instantaneous noise level not to exceed 40 dBA above standards. Any construction exceeding this limit is required to occur between 10:00 A.M. and 3:00 P.M. Monday through Friday.

With regard to noise from stationary equipment, SMMC Section 9.21.140 requires all exterior mechanical and electrical equipment to be screened on all vertical sides at least to the height of the equipment it is screening and incorporated into the design of buildings to the maximum extent

feasible. Screening materials may include landscaping or other materials that shall be consistent with the exterior colors and materials of the building. Solar energy systems are exempt from this screening requirement.

Regarding vibration, SMMC Section 4.12.070 (Vibration) prohibits any person to create, maintain or cause any ground vibration that is perceptible without instruments at any point on any property. The perception threshold shall be presumed to be more than 0.05 (in/sec) root-mean-square velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft is exempt from this section.

*Downtown Community Plan (DCP).* Policies relating to noise in the DCP include the following:

Policy CCP 6.1. Encourage live entertainment venues in the Downtown District if they include features that reduce/mitigate noise and other impacts on surrounding neighbors.

### 3.12.4 Impact Assessment and Methodology

Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts related to noise. Specifically, the Appendix G of the CEQA Guidelines state that a proposed project may have a significant adverse impact related to noise if:

a) The project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards or other agencies;

b) The project would result in generation of excessive ground-borne vibration or ground-borne noise levels; and/or

c) For a project located within an airport land use plan or, where such a plan has not been adopted within 2 miles of a public airport or public use airport, the project would expose people residing or working in the project area to excessive noise levels.

Non-Applicable Threshold(s):

c) (Airport Land Use Plan and Public Airport): The Project site is located approximately 2.3 miles west of the Santa Monica Municipal Airport (SMO). The Project site is not located within airport land use plan area for SMO or Los Angeles International Airport, nor is the Project site located in the vicinity of a private airstrip. As such, the proposed Project would

not expose people in the vicinity of the Project site to excessive noise levels from a public airport or private airstrip. Therefore, this issue will not be analyzed further in this EIR.

*Construction Noise Levels (Temporary Increase in Ambient Noise Levels in Excess of Standards)*

The timing of construction noise impacts is an important factor in determining significance. In any urban area, residents expect to periodically be exposed to construction noise during normal working hours on weekdays and for more abbreviate periods on Saturdays (and sometimes Sundays). The City's Noise Ordinance (SMMC Chapter 4.12) establishes noise standards which vary depending on the zone of the construction location and the period. As set forth in the previous discussion of the City's Noise Ordinance, construction activities are generally permissible only between 8:00 A.M. and 6:00 P.M. on weekdays, and between 9:00 A.M. and 5:00 P.M. on Saturdays. During these hours, the City permits construction noise up to 20 dBA in excess of normally acceptable levels, or up to 40 dBA above normally acceptable levels for any "maximum instantaneous" noise event (i.e., $L_{max}$). Construction noise beyond these heightened levels is only permitted between 10:00 A.M. and 3:00 P.M. on weekdays. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does not consider construction activities consistent with these timing limits to constitute significant environmental effects.

*Operational Noise Levels (Permanent Increase in Ambient Noise Levels in Excess of Standards)*

The CEQA Guidelines do not define the levels at which temporary and permanent increases in ambient noise are considered "substantial." As described in Section 3.12.1, *Fundamentals of Sound and Environmental Noise*, a noise level 3-dBA increase is barely perceptible to most people, a 5-dBA increase is readily noticeable, and a 10-dBA increase would be perceived as a doubling of loudness (FICUN 1980; Harris Miller Miller & Hanson Inc. 2006). For the purposes of this EIR and to be consistent with the thresholds used for the City's DCP Program EIR, the following noise thresholds are used to assess operational roadway noise (see Table 3.12-11).

**Table 3.12-11. Significance Thresholds for Operational Ambient Noise Impacts**

| Ambient Noise Levels Without Projects ($L_{dn}$ or CNEL) | Threshold ($L_{dn}$ or CNEL) |
|---|---|
| < 60 dBA | + 5.0 dBA or more |
| 60–65 dBA | + 3.0 dBA or more |
| > 65 dBA | + 1.5 dBA or more |

Source: City of Santa Monica 2017.

The justification for the above thresholds is that people already exposed to high noise levels would not notice and be annoyed by a small increase in the amount of noise in their community. In contrast, if the existing noise levels are already low, a greater change in community noise would be required for the equivalent level of annoyance.

*Ground-borne Vibration*

The CEQA Guidelines do not define the levels at which ground-borne vibration or ground-borne noise is considered "excessive." For the purpose of this analysis, Caltrans vibration damage potential threshold criteria, previously described above in in Table 3.12-7 are used to evaluate potential structural damage impacts related to vibration from Project construction and operation. Per Caltrans guidelines, ground-borne vibration impacts associated with human annoyance would be significant if the proposed Project exceeds the threshold of 0.1 in/sec within 25 feet of a sensitive use or a fragile building. This threshold corresponds to the level at which vibration can cause a "strongly perceptible" degree of human annoyance and has the potential to cause structural damage in fragile buildings.

Methodology

The analysis of potential noise impacts includes an assessment of existing noise conditions and the proposed Project's potential to increase noise levels in the Downtown. Information used to prepare this section was derived from the Noise Element of the City's General Plan (1992), DCP Program EIR, Project-specific noise monitoring, the FHWA Highway Noise Prediction Model (FHWA-RD-77-108; FHWA Model), and the FTA's 2006 Transit Noise and Impact Assessment. The methodology and assumptions used for the analysis are detailed below.

As defined by the City's Noise Ordinance (SMMC Chapter 4.12), noise sensitive land uses include schools, hospitals, and institutional uses such as churches, museums, and libraries. The City also considers residential uses to be noise sensitive receptors. Noise sensitive land uses in the vicinity of the Project site are listed in Table 3.12-5. Additional vibration-sensitive City-designated Landmarks are listed in Table 3.12-6.

*Construction Noise Levels (Temporary Increase in Ambient Noise Levels)*

As described in Section 2.7, *Construction Activities*, the precise construction timeline for the proposed Project depends on the timing of entitlements and permit processing. For the purposes of this EIR, construction activity for the proposed Project is assumed to begin in late 2021 with future occupancy and operation of the proposed Project commencing in late 2024. The proposed construction activities and estimated durations are as follows:

- Demolition – 2 months
- Relocation of Landmarks – 4 to 6 months
    - Pre-Excavation and Temporary Landmark Relocation
    - Boring and Trenching for Landmark Site
    - Permanent Relocation of Landmarks
- Excavation – 3 months
- Building construction – 25 months
    - Paving
    - Architectural Coating

Construction-related noise and ground-borne vibration would be generated by various types of equipment as a result of construction activities anticipated to occur on the Project site. Construction noise levels are estimated based on the Project's anticipated construction equipment inventory, estimated duration of construction, anticipated construction phasing distance, and between the construction activities at the Project site and the noise sensitive land uses (refer to Table 3.12-5).

Construction noise levels at on and offsite locations were estimated using data published by the U.S. Department of Transportation (USDOT). The USDOT has compiled data regarding the noise-generating characteristics of typical construction activities.

As described in Section 3.12.1, *Fundamentals of Sound and Environmental Noise*, these noise levels would diminish rapidly with distance from the construction site, at a rate of approximately 6 dBA per doubling of distance as equipment is generally stationary or confined to specific areas during construction. For example, a noise level of 86 dBA measured at 50 feet from the noise source to the receptor would reduce to 80 dBA at 100 feet from the source to the receptor, and reduce by another 6 dBA to 74 dBA at 200 feet from the source to the receptor. The noise levels from construction at the offsite sensitive uses can be determined with the following equation from the Harris Miller Miller & Hanson Inc. (2006) *Transit Noise and Vibration Impact Assessment, Final Report*: $L_{eq}$ = $L_{eq}$ at 50 feet – 20 Log(D/50), where $L_{eq}$ = noise level of noise source, D = distance from the noise source to the receiver, $L_{eq}$ at 50 feet = noise level of source at 50 feet.

**Table 3.12-12. Noise Ranges of Typical Construction Equipment**

| Construction Equipment | Noise Levels in dBA $L_{eq}$ at 50 Feet |
|---|---|
| Pile driver | 95-101 |
| Auger drill rig | 80-85 |
| Front loader | 73–86 |
| Trucks | 82–95 |
| Cranes (moveable) | 75–88 |
| Cranes (derrick) | 86–89 |
| Vibrator | 68–82 |
| Saws | 72–82 |
| Pneumatic impact equipment | 83–88 |
| Jackhammers | 81–98 |
| Pumps | 68–72 |
| Generators | 71–83 |
| Compressors | 75–87 |
| Concrete mixers | 75–88 |
| Concrete pumps | 81–85 |
| Back hoe | 73–95 |
| Tractor | 77–98 |
| Scraper/grader | 80–93 |
| Paver | 85–88 |

Note: Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.
Source: USDOT 2013.

*Operational Noise Levels (Permanent Increase in Ambient Noise Levels in Excess of Standards)*

Existing noise levels were measured along the streets in the vicinity of the Project site and at Palisades Park (refer to Table 3.12-4). Because traffic is the primary component of the noise environment in the Downtown, these measurements are indicative of local roadway noise. Roadway noise associated with the proposed Project was considered in terms of the increases in operational vehicle trips relative to existing conditions. Existing traffic noise was developed based on traffic counts along the roadways in the immediate Project vicinity and subsequent noise modeling (see Table 3.12-14). Changes in trip volumes associated with the proposed Project provided by Fehr & Peers in the Transportation Study (see Appendix K).

With respect to stationary sources of noise, projected noise levels generated from the proposed Project's stationary sources are estimated based on the typical dBA levels generated from urban uses, such as HVAC equipment, delivery trucks, and other common uses (refer to Table 3.12-1). Stationary source noise levels were then estimated for nearby sensitive receptor location based on

the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.

*Ground-borne Vibration Levels Associated with Construction Equipment*

Ground-borne vibration levels resulting from construction activities occurring within the City were estimated using the Caltrans (2013) *Transportation and Construction Vibration Guidance Manual*. Potential vibration levels are identified for onsite and offsite locations that are sensitive to vibration, including nearby residences. Caltrans provides thresholds of significance for vibration and methodology for calculating vibration levels at distances from generation. Vibration levels at the offsite sensitive uses were determined with the following equation:[1]

$$PPV_{Projected} = PPV_{Ref} (25/D)^n$$

Where: $PPV_{Ref}$ = reference PPV at 25 feet; D = distance from equipment to the receiver in feet; n = 1.1 (a recommended conservative value pertaining to attenuation rate of vibration through ground).

Operation of the proposed Project – including the residential, hotel, restaurant, retail, and Cultural Use Campus – would not be anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur as a result of truck travel to and from the Project site for periodic deliveries. However, such incidences would be temporary in nature and would not be expected to exceed 0.1 in/sec, which is below the level for potential damage to fragile structures. No substantial sources of ground-borne vibration would be introduced as part of the proposed Project; therefore, operation of the proposed Project would not expose sensitive receptors onsite or offsite to excessive ground-borne vibration or ground-borne noise levels. Therefore, operational sources of ground-borne noise are not discussed further in this EIR.

### 3.12.5 Applicable Mitigation Measures from the DCP Program EIR

The DCP Program EIR does not include any applicable mitigation measures for potential noise impacts associated with the proposed Project.

### 3.12.6 Project Impacts and Mitigation Measures

*Would the proposed project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

[1] Caltrans 2013, *Transportation and Construction Vibration Guidance Manual*, Equation 12.

**NOI-1 Construction of the proposed Project would result in a temporary increase in noise levels in the vicinity of the Project site. However, with compliance with the City's Noise Ordinance and the required implementation of a Construction Noise Management Plan, construction noise impacts would be *less than significant with mitigation*.**

Impact Description (NOI-1)

Construction of the proposed Project would require demolition of approximately 44,450 square feet (sf) of existing structures and surface parking lots, onsite relocation and adaptive reuse of the two City-designated landmarks located at 1333 and 1337 Ocean Avenue, excavation of approximately 108,000 cubic yards (cy) of soil for the subterranean parking garage followed by construction of the five proposed new buildings. Construction of the proposed Project would occur over approximately 3 years. All phases of construction would involve the use of heavy equipment (e.g., cranes, tractors, loaders, excavators, etc.) that would produce noise. Construction activities would also involve the use of smaller power tools, generators, and other equipment that generate noise. Haul trucks used to deliver construction materials and haul away demolition debris would generate noise along the local roadways to and from the Project site. The proposed Project would result in up to four heavy truck trips per hour and the noise generated from these trips would be generally consistent with the ambient noise existing within the busy Downtown. Additionally, these haul trucks would avoid residential areas to the maximum extent feasible, consistent with the SMMC restrictions. Construction of the subterranean parking garage would involve the use of typical "drill and pour" cast-in-place concrete piles. No pile driving would be necessary for construction. Each stage of construction would involve a different mix of operating equipment, and noise levels would vary based on the amount and types of equipment in operation and the location of the activity.

Existing noise-sensitive land uses within 500 feet of the Project site include the StepUp on Second residential building, Palisades Park, Chelsea Santa Monica, the Christian Institute of Spiritual Science, Mayfair Residences, Luxury Apartments, Pacific Plaza Apartments, the Criterion Promenade, and residences along PCH beyond the bluff (refer to Table 3.12-5). Approximate noise levels anticipated to occur at these nearby noise sensitive land uses during each phase of construction are shown in Table 3.12-13.

**Table 3.12-13. Estimated Peak Construction Outdoor Noise Levels at Sensitive Receptors**

| Construction Activity | Noise Source at 50 Feet; dBA $L_{eq}$ (refer to Table 3.12-12) | Noise Level at StepUp on Second, Chelsea Santa Monica, and Luxury Apartments (25 feet; dBA $L_{eq}$) | Noise Level (100 feet; dBA $L_{eq}$) |
|---|---|---|---|
| Demolition | 95; Heavy Haul Trucks | 101 | 89 |
| Excavation/ Grading | 93; Graders | 99 | 87 |
| Shoring (Cast Piles) | 88; Concrete Mixer | 94 | 82 |
| Foundations | 88; Concrete Mixer | 94 | 82 |
| Structural | 89; Crane (Derrick) | 95 | 83 |
| External Finishing | 88; Paver | 94 | 82 |

Note: Noise levels at offsite sensitive uses were determined with the following equation from the HMMH Transit Noise and Vibration Impact Assessment, Final Report: $L_{eq} = L_{eq}$ at 50 feet. – 20 Log(D/50), where $L_{eq}$ = noise level of noise source, D = distance from the noise source to the receiver, $L_{eq}$ at 50 feet = noise level of source at 50 feet. Noise levels have been rounded up to the nearest whole number.
Source: U.S. Environmental Protection Agency (1971) *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*.

As described in Section 3.12.1, *Fundamentals of Sound and Environmental Noise*, construction noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA for every doubling of distance at acoustically hard locations. For example, a noise level of 88 dBA measured at 50 feet from the noise source to the receptor would reduce to 82 dBA at 100 feet from the source to the receptor, and reduce by another 6 dBA to 76 dBA at 200 feet from the source to the receptor.

Consistent with SMMC Section 4.12.110, construction activities would be restricted to the hours of 8:00 A.M. to 6:00 P.M. on weekdays and 9:00 A.M. to 5:00 P.M. on Saturdays. No construction activities would be allowed on Sundays or public holidays.

According to the SMMC Section 4.12.060 (Exterior Noise Standards), noise from construction activities shall not exceed 20 dBA over the exterior noise standards specified for the noise zone. The exterior noise standard for Noise Zone II – within which the Project site is located – is set at 65 dBA from 7:00 A.M. to 10:00 P.M., thereby allowing for a maximum noise level of 85 dBA during these hours. Maximum noise levels could reach as high as 101 dBA at the exterior of surrounding residential uses during the demolition and grading construction phases of the proposed Project. Although construction activities for the proposed Project would generate noise levels that may exceed the established exterior noise limit of 85 dBA in a commercial zone, SMMC Section 4.12.110(d) states that construction noise levels can exceed those standards so long as it occurs between the hours of 10:00 A.M. and 3:00 P.M.. As such, MM NOI-1 would be required to ensure that the noisiest activities be limited to between the hours of 10:00 A.M. and 3:00 P.M., consistent with SMMC Section 4.12.110(d). MM NOI-1 would also require the implementation of noise attenuation measures, as necessary, including the use of noise barriers (e.g., sound walls) or noise blankets (i.e., sound absorbing materials). As a general rule, a sound wall can reduce noise by 5 dBA. In addition, the requirement that construction staging areas and earthmoving equipment be located as far away as possible from noise and vibration sensitive land uses would also reduce construction-related noise levels.

*Residents of adjacent condominiums and apartments would be subject to noise and ground-borne vibration throughout the duration of the 3-year construction period.*

The proposed Project would be subject to SMMC Section 4.12.110(c), which requires applicants of construction projects located within 500 feet of any residential development, or other noise sensitive land uses, to submit a list of equipment and construction activities to the City planning staff prior to the issuance of a building permit. At a minimum, this list shall include: (1) construction equipment to be used, such as pile drivers, jackhammers, pavement breakers, or similar equipment; (2) construction activities such as 24-hour pumping, excavation or demolition; and (3) a list of measures that will be implemented to minimize noise impacts on nearby residential uses. Compliance with existing City noise regulations along with the implementation of MM NOI-1 would reduce potential noise impacts to *less than significant with mitigation*.

Mitigation Measures

To reduce the noise levels resulting from construction of the proposed Project for offsite residential uses, the following mitigation measures would be implemented:

*MM NOI-1* ***Construction Noise Management Plan****. A Construction Noise Management Plan shall be prepared by the Applicant and approved by the City. The Plan would address noise and vibration impacts and outline measures that would be used to reduce impacts. Measures would include:*

- *To the extent that they exceed the applicable construction noise limits, excavation, foundation-laying, and conditioning activities shall be restricted to between the hours of 10:00 A.M. and 3:00 P.M., Monday through Friday, in accordance with SMMC Section 4.12.110(d).*
- *The Applicant's construction contracts shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in or around the project sites to reduce construction noise levels:*
  - *The Applicant and its contractors and subcontractors shall ensure that construction equipment is properly muffled according to manufactures specifications or as required by the City's Department of Building and Safety, whichever is the more stringent.*
  - *The Applicant and its contractors and subcontractors shall place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible, to the satisfaction of the Department of Building and Safety.*
  - *The Applicant and its contractors and subcontractors shall implement noise attenuation measures which may include, but are not limited to, noise barriers or noise blankets to the satisfaction of the City's Department of Building and Safety.*
- *The Applicant's contracts with its construction contractors and subcontractors shall include the requirement that construction staging areas, construction worker parking and the operation of earthmoving equipment within the project site, are located as far away from vibration- and noise-sensitive sites as possible. Contract provisions incorporating the above requirements shall be included as part of the project's construction documents, which shall be reviewed and approved by the City.*

The Applicant shall require by contract specifications that heavily loaded trucks used during construction shall be routed away from residential streets to the extent possible. Contract specifications shall be included in the proposed project's construction documents, which shall be reviewed by the City prior to issuance of a grading permit.

**NOI-2 Operation of the proposed Project would permanently increase vehicle trips and associated noise. Additionally, the proposed Project would result in exposure of persons to new permanent sources of noise from deliveries, trash hauling, parking noise, mechanical equipment, and publicly accessible open space and cultural uses. However, operational noise levels would not exceed thresholds and, accordingly, would be *less than significant*.**

Impact Description (NOI-2)

*Offsite Traffic Noise*

The residential, commercial, and cultural uses associated with the proposed Project would generate vehicle trips in the vicinity of the Project site, contributing to the existing noise levels in the Downtown. As described in Section 3.12.4, *Impact Assessment and Methodology* 10-minute $L_{eq}$ noise levels were measured along the streets in the vicinity of the Project site and at Palisades Park (refer to Figure 3.12-1 and Table 3.12-4). The noise measurements were taken on Wednesday, August 28, 2019 to capture summer activity levels in the Downtown and represent peak ambient noise levels (i.e., high levels of visitors and associated vehicles trips). Additionally, because traffic is the primary component of the noise environment in the Downtown, the noise measurements were taken during 10-minute intervals between 7:30 A.M. and 9:00 A.M. (A.M. Peak), between 11:30 A.M. and 1:30 P.M. (Mid-day), and between 4:30 P.M. and 6:00 P.M. (P.M. Peak) (refer to Table 3.12-4). Therefore, these 10-minute $L_{eq}$ noise levels are representative of the peak noise experienced in the Downtown during different times during the day. Maximum noise levels (i.e., $L_{max}$) in the Downtown from amplified music, car horns, etc. could exceed this average, but only for brief durations.

The FWHA Model can calculated roadway noise levels in terms of $L_{eq}$ or $L_{dn}$ based on the available traffic inputs (i.e., peak hour trips versus Average Daily Trips [ADTs]). Given the available peak hour trip generation data calculated for the existing Project site and the proposed Project, existing noise levels were calculated in terms of $L_{eq}$.[2] It should be noted that 10-minute $L_{eq}$ noise levels collected during the peak hours are more conservative than $L_{dn}$ or CNEL noise levels, which are 24-hour averages that also factor in the nighttime and early morning periods (e.g., 12:00 A.M. to 6:00 A.M.) when noise levels are much lower. For example, the baseline noise level along Santa Monica Boulevard identified in the DCP Program EIR was 60.30 dBA CNEL, which is less than

[2] Fehr & Peers *did not* collect existing ADT or fleet mix data at the study intersections (see Section 3.13, *Transportation*); therefore, ambient noise levels were calculated in terms of $L_{eq}$. While CNEL could be calculated using 10-minute $L_{eq}$ noise levels collected during the peak hours; however, this would require assumptions on fleet mix and would result in an overly conservative CNEL because it would apply peak noise to a period that typically experience lower noise levels in the Downtown (e.g., 12:00 A.M. to 6:00 A.M.).

the 10-minute $L_{eq}$ noise levels of 62.1 dBA, 62.5 dBA, and 61.0 dBA levels measured along Santa Monica Boulevard during the A.M. Peak, P.M. Peak, and weekend Mid-day Peak, respectively (City of Santa Monica 2017).

For the purposes of this EIR and to be consistent with the thresholds established in the City's LUCE Program EIR and used DCP Program EIR, operational impacts would be considered significant if increases in Project-generated noise exceed amounts in Table 3.12-11. These increases are in terms of dBA based on the perceptibility of new noise added to an existing noise environment, and are independent of $L_{eq}$ or CNEL; however, the significance of the increase depends on the resulting noise level with the implementation of the proposed Project.

As described in Section 3.12.4, *Impact Assessment and Methodology,* projected noise levels with the Project operations were modeled based on traffic counts along the roadways in the immediate Project vicinity and noise modeling of changes in trip volumes associated with the proposed Project provided by the Transportation Study (see Appendix K). According to the Transportation Study, the proposed Project would generate approximately 146 net new trips in the weekday A.M. peak hour, 146 net new trips in the weekday P.M. peak hour, and 168 average daily trips in the weekend midday peak hour (see Appendix K). Intersection traffic volumes were analyzed to determine Project-related impacts on intersection operations.[3] Future noise levels at these intersections were calculated using the traffic volume projections in 2025 under "No Project Conditions," and the traffic volume projections in 2025 under "Plus Project Conditions" were reviewed to determine the increase in vehicular noise levels that would occur on nearby streets as a result of operations associated with the proposed Project. Based on the increase in traffic volumes resulting from the proposed Project, the change in traffic noise levels on nearby streets would range from 0.6 dBA to a maximum increase of 1.4 dBA as shown in Table 3.12-14.

[3] The 2025 analysis accounts for future traffic patterns due to cumulative development, operations of the Exposition Light Rail Transit (Expo LRT) Downtown Santa Monica Station at 4th Street & Colorado Avenue, circulation improvement projects, and anticipated regional growth.

**Table 3.12-14. Noise Impacts from Project-related Traffic**

| Corridor[1] | 2017 Noise Levels dBA $L_{eq}$[2] | 2020 Approval Year with Project dBA $L_{eq}$ | 2025 Without Project dBA $L_{eq}$ | 2025 With Project dBA $L_{eq}$ | Project Change dBA $L_{eq}$ | Cumulative Change dBA $L_{eq}$ (2019 – 2025) |
|---|---|---|---|---|---|---|
| Ocean Avenue | 62.2 | 62.3 | 62.9 | 63.0 | 0.10 | 0.80 |
| Santa Monica Boulevard | 60.5 | 60.9 | 61.0 | 61.1 | 0.10 | 0.60 |
| 2nd Street | 61.1 | 61.2 | 62.0 | 62.5 | 0.50 | 1.40 |
| Arizona Avenue | 59.5 | 60.3 | 60.5 | 60.8 | 0.30 | 1.30 |
| Palisades Park | 59.0 | 59.1 | 59.7 | 59.8 | 0.10 | 0.80 |

Notes: [1] Corridors representative of street segments within the Downtown; peak potential noise is estimated for each corridor.
[2] The 2017 Noise Levels were modeled using the FHWA Model and the existing peak hour traffic data from the Transportation Study (see Appendix I). The monitored noise levels presented in Table 3.12-4, which represents a 10-minute snap shot of sound levels and peak hour traffic for that location, were used to validate this modeled baseline. Because the modeled baseline was within 3 dBA of the monitored noise levels, any difference between the monitored and modeled baseline would be imperceptible (FICUN 1980; Harris Miller Miller & Hanson Inc. 2006).
Speed: 30 MPH on Ocean Avenue, 25 MPH on Arizona, Santa Monica, and 2nd streets.
Fleet Mix: 97% autos, 1% Medium Trucks, 1% Buses, 1% Motorcycles (based on observations during monitoring).
Traffic counts are equal among number of lanes of corresponding roads.
Traffic counts represent the highest peak hour count (i.e., either A.M., P.M., Midday) for that specific roadway and carried forward under each scenario.
Sound levels are at buildings closest to the named streets.
Source: see Appendix I.

The values in Table 3.12-14 represent changes to existing noise levels attributable to the proposed Project. Comparing changes attributable to the proposed Project, differences in noise would constitute an imperceptible difference in the ambient noise environment and are below the most stringent threshold of 1.5 dBA in an area with an existing ambient noise level of > 65 dBA CNEL (refer to Table 3.12-11). Further, as described in Section 3.12.1, *Fundamentals of Sound and Environmental Noise*, generally, a 3-dBA change is necessary for noise increases to be noticeable to humans (FICUN 1980; Harris Miller Miller & Hanson Inc. 2006). Therefore, noise impacts from vehicle trips generated by the proposed Project would be *less than significant*.

*Compatibility with the Existing Noise Environment*

Noise levels in Downtown are generally high, related to the busy urban Downtown environment, but vary throughout the day and in response to activity levels. With the proposed Project, ambient noise levels resulting from vehicle traffic (i.e., the primary noise source in the Downtown) would average between 60.8 dBA and 63.0 dBA (refer to Table 3.12-14). Based on the City's Noise Element, the Project site is located in Zone B, where residential, hotel, and commercial land uses would be compatible with the noise environment with conventional construction techniques, such as operable windows and insulations. The proposed mix of land uses associated with the proposed

Project are consistent with the Noise Element and would be compatible with Downtown noise levels with the construction techniques proposed for the Project, including operable windows, insulation, and interior climate control systems (see Section 2, *Project Description*).

The City's noise standard for the design of commercial hotels, motel, and transient lodging also requires a noise level at or below 45 dBA CNEL for interior areas and 65 dBA CNEL for exterior areas: exterior areas include the pool and other outdoor recreational areas of the hotel. SMMC Section 4.12.060 also outlines the noise standards for Noise Zone II, including standards for exterior noise levels. Typical building construction would reduce interior noise levels experienced by noise-sensitive receptors by approximately 10 dBA with windows and doors open, or by approximately 20 dBA to 25 dBA (and up to 30 dBA for more modern buildings) with windows and doors closed (Harris Miller Miller & Hanson Inc. 2006), thereby further reducing interior noise at the Project site. Further, exterior noise levels are generally below 65 dBA, including along Ocean Avenue, Santa Monica Boulevard, and 2nd Street, and proposed public open spaces, including pool decks, paseos, and courtyards, are set back from the road and/or located on upper stories and protected by intervening structures that block roadway noise.

*Deliveries and Trash Hauling*

The hotel, restaurant, retail, and cultural uses associated with the proposed Project would generate an incremental increase in ambient noise within the vicinity of the Project site due to the routine delivery of goods and weekly trash hauling. As described in Section 3.12.2, *Existing Setting* delivery trucks and garbage trucks operations currently serve the Project site and would continue to serve the proposed residential and commercial restaurant and retail uses at the Project site, with access provided via 1st Court. Under the proposed Project delivery trucks and garbage trucks would no longer be able to reach Santa Monica Boulevard from 1st Court, as the southern portion of the alley would be vacated at ground level and converted into the proposed Santa Monica Boulevard Paseo. Rather, the vehicular alley would connect east to 2nd Street. Vehicles leaving the Project site would be restricted to right turns only onto 2nd Street. Similarly, the exit lane from the proposed subterranean garage would connect to the realigned 1st Court lane connection and exit onto 2nd Street. Loading and deliveries would occur within commercial loading zones onsite along the reconfigured alley across from the proposed Hotel Building and adjacent to the ground floor service area of the 2nd Street Building (refer to Section 2.6.8, *Access, Circulation, and Parking*). Dimensions of 1st County Alley and the exit lanes to 2nd Street would constrain the size and length of delivery and hauling trucks, similar to existing conditions.

Delivery and trash hauling operations – which would also be required as a result of the proposed residential uses – would continue to generate noise from diesel engines and the backup beeper

alarm that sounds when a truck is put in reverse, as required and regulated by the California Division of Occupational Safety and Health (Cal-OSHA). The noise generated by idling diesel engines typically ranges between 64 and 66 dBA $L_{eq}$ at 75 feet. This noise would be temporary in nature, typically lasting no more than 5 minutes.[4] Backup beepers are required by Cal-OSHA to be at least 5 dBA above ambient noise levels. These devices are highly directional in nature, and when in reverse the truck and the beeper alarm would be directed towards the loading area and driveway/garage frontages of adjacent mixed-use structures. Noise at the proposed loading dock would occur occasionally and blend with the noise environment from existing activity, including truck loading and unloading, vehicles entering and exiting parking garages, and garbage collection. Further, trash hauling and deliveries to the Project site would be subject to the SMMC Section 4.12.150 (Business Support Operations), which prohibits these activities from occurring between the hours of 11:00 P.M. and 6:00 A.M.

Given the existing noise environment, noise from hauling and deliveries would be similar to existing sources at the site and would not permanently increase ambient noise. Therefore, this impact would be *less than significant*.

*Subterranean Parking Garage*

Parking structures can be a source of annoyance to neighboring uses due to automobile engine start-ups and acceleration, and the potential activation of car alarms or periodic honking. Parking garages can generate $L_{eq}$ noise levels of between 49 dBA $L_{eq}$ (tire squeals) to 74 dBA $L_{eq}$ (car alarms) at 50 feet inside the parking structure (City of Huntington Beach 2011). However, the parking garage is proposed to be completely underground. The only associated noise at the surface would occur from trips on 1st Court to the subterranean garage entrance and exit to 2nd Street. Noise would be contained underground and blocked intervening building mass, and the relatively high level of traffic noise along streets surrounding the Project site would mask noises within the garage. As a result, normal daytime parking garage noise would be similar to surrounding ambient noise levels. Therefore, noise impacts relating to parking operations of the proposed Project would be *less than significant*.

*Mechanical Equipment*

Mechanical equipment, such as HVAC systems or ventilation fans, would be installed on the rooftops of the buildings and/or within the subterranean parking structure associated with the proposed Project. Large HVAC systems associated with the proposed Project can result in noise

[4] California State law prohibits heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than 5 minutes.

levels that average between 50 dBA and 65 dBA $L_{eq}$ at a distance of 50 feet from the equipment. Noise levels from commercial HVAC equipment can reach 100 dBA at a distance of 3 feet (USEPA 1971). Ventilation fans for removing exhaust fumes from the subterranean parking garage could also generate noise. However, noise from mechanical equipment would be subject to SMMC Section 4.12.060 (Exterior Noise Standards), which requires that all mechanical equipment comply with the City's requirements to minimize exterior noise. The proposed Project would also be subject to SMMC Section 4.12.130, which requires a noise analysis for the mechanical equipment to demonstrate compliance with SMMC Section 4.12.60 (Exterior Noise Standards) prior to the issuance of a building permit. HVAC units mounted on the rooftop of the proposed building would be enclosed with screens/fence and other building features. Therefore, mechanical equipment noise associated with Project operation would comply with the standards established in the City's Noise Ordinance (SMMC Chapter 4.12) and impacts would be *less than significant*.

*Publicly Accessible Open Space and Cultural Uses*

Proposed aesthetic and landscaping features such as the pedestrian paseos would require maintenance, which would require the use of landscaping equipment (i.e., trimmers, blowers, etc.). The noise generated from these landscaping activities would be intermittent and temporary and would result in a negligible increase in sound levels. These activities would also be generally consistent with existing landscaping activities occurring within the Downtown. Given the existing noise environment, noise impacts related to landscaping activities would be *less than significant*.

Proposed ground floor commercial and cultural uses would activate the proposed public open space (i.e., pedestrian paseos, breezeway, and public courtyard) and would draw patrons to visit and stay at the Project site. The increase in human activity at the Project site would generate an increase in noise levels as compared to the existing noise environment. Outdoor dining areas would also generate noise from Project visitors. For example, dining areas may produce noise levels of 65 dBA to 70 dBA $L_{eq}$ and maximum noise levels ($L_{max}$) of 85 to 90 dBA at a distance of 20 feet from the center of the dining area (City of Hermosa Beach 2017). These noise levels would be consistent with the existing noise levels from the commercial restaurant space at 101 Santa Monica Boulevard.

As described in Section 2.6.5, *Cultural Use Campus*, the rooftop courtyard of the Cultural Use Campus would be available to guests for special cultural use events (e.g., Founders' dinners, artist talks, or museum exhibit / art gallery opening events). As with outdoor dining, these special events could contribute to and increase noise levels in the vicinity. For example, noise levels generated by outdoor events that include live amplified music (e.g., three piece band with electric or amplified instruments), may generate maximum noise levels of over 100 dBA at 50 feet (refer to

Table 3.10-1; Caltrans 1998). Acoustic accompaniments can generate maximum noise levels of 80 dBA at 1 foot and 46 dBA at 50 feet. Without any amplified music, 200 people each talking at 60 dBA would result in noise level of 83 dBA $L_{eq}$ at 5 feet and 63 dBA $L_{eq}$ at 50 feet. However, operation of such uses would be generally consistent with the types of day-time and night-time activities in this area. Further, future events would be limited to the hours between 6:00 A.M. and 11:00 P.M., in accordance with SMMC Section 4.12.150 (Business Support Operations). Noise levels from events would constitute an incremental increase that would not be discernable from the existing urban noise environment of the Downtown. Therefore, increased noise due to patrons' use of the proposed visitor-serving uses would be *less than significant*.

*Would the proposed project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

**NOI-3** **Construction of the proposed Project could result in excessive vibration levels, potentially causing structural damage to historical structures onsite and in the vicinity. With the implementation of MM NOI-2, impacts due to potential structural damage would be reduced; however, as consent of offsite property owner, who may not provide permission, would be required to implement the vibration mitigation, it is conservatively concluded that vibration impacts would be *significant and unavoidable.* With respect to human annoyance, construction activities adjacent to or near inhabited structures would not result in excessive vibration levels and impacts would be *less than significant.***

Impact Description (NOI-3)

During construction, ground-borne vibration would be generated from the use of heavy construction equipment at the Project site, which could potentially expose existing sensitive land uses in the vicinity to excessive vibration. The duration and amplitude of vibration generated by construction equipment varies widely depending on the type of equipment and the purpose for which it is being used. The vibration levels of general construction equipment that would operate during Project construction are identified in Table 3.12-15 and range from 0.019 to 0.089 in/sec PPV at 25 feet from the source of activity.

**Table 3.12-15. Estimated Peak Construction Vibration Levels at Sensitive Receptors**

| Construction Activity | Vibration Level (25 feet; in/sec) | Vibration Level (50 Feet; in/sec) | Vibration Level (100 Feet; in/sec) |
|---|---|---|---|
| Caisson Drilling | 0.089 | 0.042 | 0.019 |
| Loaded Trucks | 0.076 | 0.035 | 0.017 |
| Jackhammer | 0.035 | 0.016 | 0.008 |
| Small Bulldozer | 0.003 | 0.001 | 0.001 |

Source: Caltrans 2013.

As discussed further below, given their proximity to the sources of ground-borne vibration (e.g., demolition, excavation, and grading) and the historic nature of the buildings, the existing onsite City-designated Landmarks located at 1333 and 1337 Ocean Avenue and the adjacent offsite City-designated Landmark at 1323 Ocean Avenue could be potentially impacted by ground-borne vibration.

**Table 3.12-16. Minimum Distances to not Exceed Vibration Criteria**

| Construction Activity | Potential Structure Damage Historic | Potential Structure Damage Fragile | Potential Structure Damage Fragile Historic |
|---|---|---|---|
| | Distance in feet to PPV of 0.25 in/sec | Distance in feet to PPV of 0.10 in/sec | Distance in feet to PPV of 0.08 in/sec |
| Caisson Drilling | 10 | 23 | 28 |
| Loaded Trucks | 9 | 20 | 24 |
| Jackhammer | 5 | 10 | 12 |
| Small Bulldozer | 1 | 2 | 2 |

Source: Caltrans 2013.

Onsite Historical Resources

As described in Section 2.7, *Construction Activities* and Section 3.4, *Cultural Resources*, the rear structure at 1327 Ocean Avenue would be demolished. And, the rear structure at 1337 Ocean Avenue would be demolished. Demolition would occur over a period of approximately 2 months. Demolition would require the use of typical construction equipment, such as backhoes, to break up and remove existing asphalt, concrete, and building materials. Heavy equipment, such as bulldozers and excavators, and heavy trucks would be used to haul away large amounts of debris. These activities would occur immediately adjacent to the existing City-designated Landmarks located at 1333 Ocean Avenue and 1337 Ocean Avenue, which would be within the minimum distances for structural damage to Fragile and Fragile Historic buildings related to the use of loaded trucks and jackhammers and potentially small bulldozers.

Following the completion of demolition activities, the City-designated Landmarks would be relocated on the Project site twice. The City-designated Landmarks would first be moved to temporary locations on the 101 Santa Monica Boulevard property while their permanent locations are prepared. Protective measures would be taken to anticipate and prevent increased dust, vibration, and fire risk to the historic structures. Sensitive fixtures would be temporarily removed from the buildings, and features that are not easily removed (i.e., ceiling medallions and cornices) would be cushioned and buttressed by padded wood supports. The Applicant would use *"Temporary Protection, Tech Note No. 3, Protecting a Historic Structure during Adjacent Construction,*" published by the Technical Preservation Services, National Park Service, as its guide to consider, document, and implement protective measures (refer to Section 2.7.4, *Pre-Excavation of 1327 Ocean Avenue, 1333 Ocean Avenue, and 1337 Ocean Avenue*). However, as depicted in Figure 2-19, these buildings would be located immediately adjacent to the propsoed excavation associated with the subterranean parking garage. As such, these City-designated Landmarks would be located within the minimum distances for structural damage to Fragile and Fragile Historic buildings related to caisson drilling and the use of loaded trucks during excavation. To address potential structural damage to City-designated Landmarks, MM NOI-2 would be implemented.

Offsite Historical Resources

The Georgian Hotel and Hotel Shangri-La are located approximately 500 and 800 feet from the Project site, respectively. As such, these City-designated Landmarks would not be affected by ground-borne vibration. Additionally, Palisades Park is located across Ocean Avenue and is not developed with vibration sensitive buildings or structures.

During construction of the proposed Project, excavation activities would potentially generate significant vibration. The Gussie Moran House is located immediately adjacent to the north of the Project site at 1323 Ocean Avenue, approximately 10 feet from the from the northern boundary of the Project site. As such, this City-designated Landmark would be located within the minimum distances for structural damage to Fragile and Fragile Historic buildings related to caisson drilling and the use of loaded trucks during excavation. The Gussie Moran House is a wood frame construction and is generally not susceptible to ground-borne vibration to the same extent as an adobe or stucco construction. However, damage to some of the property's notable features (e.g., tall, shingled conical tower, bands of plain and fish scale shingles and stringcourse at the gable face, turned stickwork kingpost and collar beam at the gable apex, shiplap siding, porch posts, brick chimney, and fenestration) may occur due to construction-related vibration effects. Additionally, ground-borne vibration may result in cracking within the buildings plaster walls.

MM NOI-2 could be implemented to reduce potential ground-borne vibration structural damage impacts to a less than significant level; however, neither the Applicant, nor the City could ensure the offsite property owner would implement such mitigation, so impacts from vibration are conservatively concluded to be *significant and unavoidable*.

Human Annoyance

Section 4.12.070 of the SMMC exempts vibration caused by construction activity from the requirements of Section 4.12.070, i.e., the vibration threshold for human perception of more than 0.05 in/sec RMS velocity established in Section 4.12.070. Further, construction activity work hours would generally occur during non-sensitive times of the day in accordance with SMMC Section 4.12.110(a)(3), Section 4.12.110(a)(4), SMMC Section 4.12.110(e). Therefore, annoyance vibration impacts during construction activities would be *less than significant*.

Mitigation Measures

Construction-related vibration has the potential to result in a significant vibration impact to onsite and offsite structures located adjacent to or near Project construction during use of heavy construction equipment. MM NOI-2 would protect nearby vibration sensitive land uses from excessive vibration impacts:

***MM NOI-2:*** *To reduce the potential for construction-related vibration effects to structures, prior to the issuance of a building permit, the Applicant shall perform an inventory of the structural condition of the onsite City-designated Landmarks at 1333 Ocean Avenue and 1337 Ocean Avenue as well as the offsite City-designated Landmark at 1323 Ocean Avenue. Based on a survey of the building's structural condition, a vibration specialist will determine the appropriate Caltrans vibration structural damage potential criteria, and for each piece of equipment, assess a standoff distance from the building. The construction contractor(s) shall restrict the use of vibration-generating equipment, within the minimum applicable standoff distances to not exceed the building's applicable structural damage criteria. If the vibration-generating construction equipment is required to be used within these minimum applicable distances, the construction contractor(s) shall implement one of the following measures:*

*a. Restrict the use of large bulldozers and other similarly large vibration-generating equipment, so that the vibration-generating portion of the equipment (i.e., the motor, engine, power plant, or similar) remains at the minimum standoff distances unless it can be demonstrated to the satisfaction of*

*the City based on in-situ measurements (prior to initiation of full-scale construction activities) that vibration levels can be kept below the applicable structural damage potential criteria, as determined by the vibration specialist, through any combination of revised setbacks, alternative equipment and methods, alternative sequencing of activities, or other vibration-reducing techniques.*

b. *Install and maintain at least one continuously operational automated vibrational monitor on the side of the building facing the construction activity and capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to 0.05 in/sec PPV less than the appropriate Caltrans vibration structural damage potential criteria and a regulatory alarm level equivalent to the Caltrans vibration structural damage potential criteria. The monitoring system must produce real-time specific alarms (via text message and/or email to onsite personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity of the affected building shall be halted and the building visually inspected for damage. Results of the inspection must be logged. In the event damage occurs, such damage shall be repaired. For the onsite City-designated Landmarks at 1333 Ocean Avenue and 1337 Ocean Avenue and the offsite City-designated Landmark at 1323 Ocean Avenue such repairs shall be conducted in consultation with a qualified preservation consultant and, if warranted, in a manner that meets the Secretary of the Interior's Standards.*

### 3.12.7 Cumulative Impacts

Development of the proposed Project in conjunction with future cumulative projects would potentially result in an increase in construction-related and traffic-related noise, as well as stationary noise sources within the Downtown District of the City. Generally, noise impacts are limited to the area directly surrounding the noise source, as noise attenuates with distance at a higher rate in proximity to the source, and only has the potential to combine with other noise sources occurring simultaneously in the immediate vicinity.

Construction

Cumulative construction noise impacts could occur if construction of the proposed Project would potentially coincide with future projects in the immediate vicinity. It should be noted that the Project has no control over the timing or sequencing of future development projects that may occur proximate of the proposed Project site. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Further, construction-period noise and ground-borne vibration for the proposed Project and each future development project (that has not yet been approved or built) would be localized.

Based on a review of Table 3.0-1 and Figure 3.0-1, there are two cumulative projects near the proposed Project site that could result in temporary cumulative increases in noise levels at the same sensitive receptors as the proposed Project. These cumulative projects include an approved retail addition project at 1437 3rd Street, approximately 500 feet to the southwest, and the Miramar Hotel Project, approximately 1,000 feet to the north. During the time that these projects are being constructed, the surrounding vicinity would experience increases in daytime noise levels. However, as with the proposed Project, it is assumed that construction of these cumulative projects would be limited to daytime hours, consistent with SMMC Section 4.12.110.

During construction, Project vehicle trips could overlap with construction-related truck and worker trips associated with the cumulative projects described in Table 3.0-1 and Figure 3.0-1. For example, construction related trips associated with the proposed Project and construction-related trips associated with the 1437 3rd Street project could exit I-10 onto 5th Street where they would overlap for several blocks within the Downtown. This could result in potential cumulative noise associated with these truck trips; however, due to the existing ambient noise from I-10 and roadway noise within the Downtown, there would not be a significant cumulative increase in the level of noise as a result of these trips. Further, construction-related haul trucks, concrete deliveries, and other materials deliveries would follow approve haul routes and avoid residential neighborhood streets where lower ambient noise levels would make loud truck trips more perceptible and incompatible. Therefore, the proposed Project would not substantially contribute to a cumulatively considerable impact related to construction noise.

Due to the rapid attenuation characteristics of ground-borne vibration and distance between construction associated with the proposed Project and cumulative projects (e.g., an approved retail addition project at 1437 3rd Street, approximately 500 feet to the southwest, and the Miramar Hotel Project, approximately 1,000 feet to the north), there is no potential for cumulative vibration impacts. For example, as shown in Table 3.12-16, heavy construction activities would no longer have the potential for structural damage to fragile historic buildings associated ground-borne

vibration at a distance of 28 feet. Therefore, cumulative ground-borne vibration impacts would be less than significant.

Operation

Project implementation would result in ambient stationary noise sources, including from onsite HVAC equipment, open space usage (e.g. human conversation, music), and dock loading operations. As development of Project's directly adjacent to the site are limited and stationary noise sources are negligible at the site, cumulative noise impacts within the vicinity of the Project site would be limited. Further, cumulative projects in the Downtown area would be also be required to comply with City regulations for noise control, such as mandatory use of mechanical equipment screening.

Stationary noise sources (e.g., mechanical equipment, parking garage noise, visitor-serving uses, etc.) would be intermittent and consistent with the existing ambient noise environment in the Downtown. Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the vicinity of the proposed Project. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing roadway noise levels and future noise levels with the proposed Project and cumulative development. The noise levels associated with existing traffic volumes and future year 2025 traffic volumes with the proposed Project are identified in Table 3.12-14. As shown, the traffic generated by the proposed Project and cumulative development would increase local noise levels by a maximum of 1.4 dBA, which is generally imperceptible and would not exceed the City's thresholds of significance (refer to Section 3.12.4, *Impact Assessment and Methodology*). Therefore, this cumulative impact would be *less than significant*.

### 3.12.8 Residual Impacts

Compliance with the City's Noise Ordinance (SMMC Chapter 4.12) in conjunction with implementation of Mitigation Measure MM NOI-1 would reduce construction noise impacts resulting from the proposed Project to *less than significant*.

Implementation of MM NOI-2 would reduce ground-borne vibration structural damage impacts associated with construction activities on the Project site. Implementation of MM NOI 2 would reduce impacts to the onsite City-designated Landmarks to less than significant. Although voluntary acceptance of MM NOI-2 by the offsite property owner at 1323 Ocean Avenue would reduce potential construction-related vibration impacts to the Gussie Moran House to less than significant, neither the Applicant nor the City has the authority or control to mandate implementation of this mitigation measure by this offsite property owners. Because the consent of

the offsite property owners cannot be guaranteed, it is conservatively concluded that unless mitigated construction of the proposed Project could have potentially *significant and unavoidable* vibration impacts on the Gussie Moran House.

## 3.13 TRANSPORTATION

This section of the Environmental Impact Report (EIR) analyzes the potential environmental effects of the proposed Project on transportation as defined by the California Environmental Quality Act (CEQA) guidelines as well as the City of Santa Monica's (City's) existing policy framework and associated regulations. This analysis was prepared based on the *Ocean Avenue Project Transportation Impact Analysis* (Transportation Study) prepared by Fehr & Peers (Fehr & Peers 2020; see Appendix K). The Transportation Study contains detailed analyses of local traffic circulation issues, with particular attention to the potential Project-related increases in vehicle trips at intersections in the Downtown, which was evaluated using the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria for CEQA. Additionally, consistent with the intent of Senate Bill (SB) 743 and the associated updates to the CEQA Guidelines, the Transportation Study provides a discussion of vehicle miles traveled (VMT) associated with the proposed Project.

The Downtown is considered a Transit Priority Area (TPA) due to high quality passenger rail service provided by the Metropolitan Transportation Authority (Metro) E (Expo) Light Rail Transit (LRT) line.[1] This transit service, which is both accessible and frequent, provides a connection between the City and regional destinations, such as Downtown Los Angeles. The Downtown Santa Monica Station for the Metro E (Expo) LRT line is located at 4th Street & Colorado Avenue within approximately 0.5 miles of the Project site. Additionally, the Project site is located within convenient walking distance to high frequency bus services provided by the Big Blue Bus and Metro, including the Metro bus layover zone located adjacent to the Project site along the west side of 2nd Street and various other bus stops. Several bus routes also operate along 4th Street, Santa Monica Boulevard, and Ocean Avenue.

**The Project site is located within a Transit Priority Area (TPA) that maximizes pedestrian access to local facilities and services**

3-10 minute walk to public transit
- 13 bus lines
- Downtown Santa Monica Station

5-10 minute walk to major employment and commercial uses
- Civic Center and City Hall
- Third Street Promenade

[1] TPA is within 0.5 mile from major transit stops, defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (Public Resource Code Section 21064.3)

### 3.13.1 Environmental Setting

Regional Highway and Street System

Regional vehicle access to the Project site is provided by Interstate (I-) 10 (Santa Monica Freeway), I-405 (San Diego Freeway), and State Highway 1 (Pacific Coast Highway [PCH]). I-10 is located approximately 0.5 miles southeast of the Project site and provides access across the City through to the City of Los Angeles to the east. Near the PCH/Lincoln Boulevard exit, I-10 carries approximately 150,000 average daily trips (ADT) (California Department of Transportation [Caltrans] 2017). I-405 is located approximately 3.5 miles to the east of the Project site and provides north-south access throughout the west Los Angeles Basin. PCH is located approximately 300 feet west of the Project site and provides access north along the coast to the Pacific Palisades community of the City of Los Angeles and further north to the City of Malibu.

*The I-10 freeway provides regional access to the Downtown, creating a physical barrier between the Downtown and the Civic Center area.*

Downtown Street Network

The Downtown is supported by a circulation system consisting of streets and sidewalks, intermixing passenger vehicles with buses and those who arrive or circulate within Downtown by bicycle or walking. This grid network of streets moves and disperses traffic through the Downtown. The exception to this grid street pattern is the Third Street Promenade, which is closed to vehicle traffic, and the Santa Monica Place shopping center, which is located at the terminus of 3rd Street. Additionally, the I-10 freeway creates a physical barrier between the Downtown and the Civic Center, reducing overall circulation and connectivity in this area.

Bicycle and pedestrian activity is high in the Downtown. The Downtown provides several striped bicycle lanes to clearly distinguish the bicycle travel lane from the vehicle travel lane, as well as the Colorado Esplanade, which is a physically separated two-way bicycle path (also called a cycle track). The City has also recently marked certain streets in the Downtown as shared vehicle/bicycle lanes where bicycle connections are important but the road width is insufficient for striped bicycled lanes, and included bicycle detection zones at signalized intersections. These lanes have been painted with “sharrow” markings indicating to motorists to expect bicyclists and directing bicyclists where to ride. Sidewalks are present on both sides of the street along all the streets in

the Downtown. Additionally, all signalized intersections (and some mid-block locations) within the Downtown have striped pedestrian crosswalks and pedestrian crossing signals. The Downtown's public parking facilities all support the "park once" approach where drivers can park at a single parking structure and walk to multiple destinations in the Downtown. As a popular destination for residents as well as international, national, and regional visitors, the major vehicle and pedestrian access points to the Downtown can become congested during peak periods including weekends, holidays, and events as drivers navigate the Downtown.

City Street Classifications

The City's Land Use and Circulation Element (LUCE) categorizes the City's street system according to its use by various modes of travel, including passenger vehicle, transit, bicycle, and pedestrian (City of Santa Monica 2010). These street categories include Boulevard, Special Streets, Downtown Commercial, Neighborhood Commercial, Major Avenue, Secondary Avenue, Minor Avenue, Industrial Avenue, Neighborhood Street, Shared Street, Parkway, Pathway, Bikeway, Highway, and Alleyway.

**Boulevard** – Boulevards are regional transportation corridors with continuous mixed-use and commercial land uses. Boulevards within the vicinity of the Project site include Wilshire Boulevard, Santa Monica Boulevard, which borders the Project site to the south (see Figure 3.13-2), Lincoln Boulevard (Olympic Boulevard to the southern City limit), Ocean Avenue (Wilshire Boulevard to Pico Boulevard), Main Street (Colorado Avenue to Pico Boulevard) and 4th Street (Wilshire Boulevard to Pico Boulevard).

**Special Streets** – Special Streets are unique and ceremonial streets requiring special consideration. Within the vicinity of the Project site, Third Street Promenade is the only Special Street. The Third Street Promenade, which serves pedestrians, is considered a key part of the Downtown's open space network.

*The Third Street Promenade is a popular Downtown pedestrian-only space lined with retail, entertainment, and restaurant uses.*

**Downtown Commercial** – Downtown Commercial streets provide access for all transportation modes in the Downtown. Within the vicinity of the Project site Downtown Commercial streets include Wilshire Boulevard (Ocean Avenue to Lincoln Boulevard), Arizona Avenue, which is located to the north of the Project site (see Figure 3.13-2) Santa Monica Boulevard (Ocean

Avenue to Lincoln Boulevard), 2nd Street (Wilshire Boulevard to Colorado Avenue), which borders the Project site to the east (see Figure 3.13-2), 5th Street (Wilshire Boulevard to Colorado Avenue), 6th Street (Wilshire Boulevard to Colorado Avenue), 7th Street (Wilshire Boulevard to Colorado Avenue), and Lincoln Boulevard (Wilshire Boulevard to Olympic Boulevard).

*The California Incline, located two blocks north of the Project site, provides access between Ocean Avenue and PCH. Following the completion of seismic upgrades in 2016, the California Incline now includes a Class I (i.e., separated) bicycle and pedestrian path.*

**Major Avenue** – Major Avenues serve regional vehicle trips and provide access for all modes of transportation. They are designed to facilitate high levels of use, discouraging regional traffic from using Secondary or Minor Avenues. The Major Avenues in the vicinity of the Project site include Olympic Boulevard (4th Street to 11th Street) and the California Incline.

**Secondary Avenue** – Secondary Avenues distribute vehicle trips onto Minor Avenues and Neighborhood Streets, often serving regional bicycle trips. Secondary Avenues within the vicinity of the Project site include Broadway, Colorado Avenue, Olympic Drive (Ocean Avenue to 4th Street), and Ocean Park Boulevard (Ocean Avenue to 16th Street).

**Minor Avenue** – Minor Avenues serve local vehicle and bicycle trips. Within the vicinity of the Project site, Minor Avenues include 4th Street (Wilshire Boulevard to the northern City limit), 7th Street (Wilshire Boulevard to the northern City limit), and 11th Street (Wilshire Boulevard to Ocean Park Boulevard).

**Neighborhood Street** – Neighborhood Streets primarily serve adjacent residential uses and mixed-use buildings. Within the vicinity of the Project site, Neighborhood Streets include California Avenue, Moomat Ahiko Way, 5th Street (Wilshire Boulevard to Montana Avenue), and Lincoln Boulevard (Wilshire Boulevard to the northern City limit).

**Alleyway** – An alleyway is a narrow street typically with walls on both sides, these often serve a set of buildings and have limited pedestrian and bicycle facilities. 1st Court, which bisects the Project site, is the only alleyway within the vicinity of the Project site that provides vehicle access to many commercial and residential buildings north of the site on Ocean Avenue and 2nd Street.

**Parkway** – Parkways serve as linear parks incorporating continuous landscaping, recreational bikeways and pedestrian paths. Within the vicinity of the Project site, Ocean Avenue, which borders the Project site to the west (see Figure 3.13-2), is the only Parkway.

*Ocean Avenue, which forms the western edge of the Downtown, is located immediately west of the Project site adjacent to Palisades Park and is characterized by wide sidewalks and large trees.*

Local Street Network in Project Vicinity

The Project site is located on the corner of Ocean Avenue and Santa Monica Boulevard, with approximately 350 feet of frontage along Ocean Avenue and approximately 330 feet of frontage along Santa Monica Boulevard. The eastern border of the Project site includes approximately 200 feet of frontage along 2nd Street. The Project site is physically bordered by existing commercial development to the north, including the Gussie Moran House and the Hotel Shangri-La. The Project site is bisected by 1st Court, which is a one-way southbound alleyway that provides through access from Arizona Avenue to Santa Monica Boulevard (refer to Figure 2-3).

Ocean Avenue is an approximately 75-foot wide, four-lane street with bicycle lanes and metered parallel on-street parking on either side of the paved width. Along the Project site's Ocean Avenue frontage, sidewalks are approximately 24 feet wide which includes a landscaped median with palm trees and lawn and a pedestrian pathway. Within the immediate vicinity of the Project site, the intersections of Ocean Avenue with Santa Monica Boulevard and Arizona Avenue are signalized with dedicated left-turn lanes and stripped pedestrian crosswalks. Additionally, there is one curb cut along Ocean Avenue providing right-turn only entrance (ingress) into the existing surface parking lot on the Project site. A valet pick up and drop off zone is provided on Ocean Avenue in front of the restaurant uses at the Project site. Ocean Avenue provides the primary blufftop connection through the Downtown, connecting the

*The Project site is located along Ocean Avenue, which provides two northbound and two southbound lanes as well as a dedicated left turn lane for east bound traffic onto Santa Monica Boulevard. Ocean Avenue includes Class II (i.e., striped) bicycle lanes and metered parallel on-street parking on either side of the paved width.*

Ocean Park and Wilshire Montana (Wilmont) neighborhoods as well as multimodal access to Palisades Park. Ocean Avenue currently carries approximately 6,900 average daily vehicle trips within the vicinity of the Project site.[2]

Santa Monica Boulevard is an approximately 45-foot-wide four-lane street, consisting of one eastbound vehicle lane and one eastbound bus lane as well as two westbound vehicle lanes. The entire southern curb of Santa Monica Boulevard bordering eastbound traffic is painted red to prohibit street parking on that side of the street. Between 1st Court and 2nd Street, there is one westbound lane and on-street metered parallel parking. Sidewalks along Santa Monica Boulevard are approximately 18 feet wide along the Project site frontage with the pedestrian pathway narrowing slight in some areas as a result of existing tree wells. Two curb cuts are provided along Santa Monica Boulevard providing a right-turn only exit (egress) from 1st Court and right-turn only entrance into the existing surface parking lot on the Project site. The intersections of Santa Monica Boulevard with Ocean Avenue and 2nd Street are both signalized with left-turn pockets and striped pedestrian crosswalks. Santa Monica Boulevard terminates at Ocean Avenue, so the westbound lane splits into right-turn only and left-turn only lanes at this intersection. Within the vicinity of the Project site, Santa Monica Boulevard supports approximately 1,990 average daily trips.

*Santa Monica Boulevard, which forms the eastern boundary of the Project site, provides four lanes, including one eastbound bus lane.*

2nd Street is a 45- to 55-foot-wide, two-lane street consisting of one northbound and one southbound vehicle lane running parallel to Ocean Avenue. Additionally, there is an on-

*2nd Street supports multi-modal transportation including two vehicle lanes, on-street parking, bicycle lanes, bicycle parking, and a bus layover zone.*

[2] Average daily trips on Ocean Avenue were calculated using the existing setting 2017 intersection LOS provided in the Transportation Study (see Appendix K). Average daily trips were approximated at 10 times the estimated P.M. peak hour trips (Personal Communication with Ms. Vivian Lee, Fehr and Peers, January 20, 2020).

street bus layover zone for Metro service Line 33 / Rapid 733 on the west side of 2nd Street along the southeast corner of the Project site. 2nd Street is a designated bicycle route connecting the Wilmont neighborhood with the Civic Center and providing striped bicycle lanes on either side of the paved width as well as on-street rental bicycle parking. On-street metered parallel parking is provided on either side of the paved width where space allows. Off-street public parking in City Parking Structure #4, located across from the Project site on the eastern side of 2nd Street. Sidewalks along 2nd Street are approximately 15 feet wide along the Project site frontage, with the pedestrian pathway narrowing to 5 feet in some locations due to existing tree wells. Diagonal signalized intersection crossings (i.e., scrambles) are provided at Santa Monica Boulevard and Arizona Avenue and a mid-block unsignalized crossing is striped between Arizona Avenue and Santa Monica Boulevard. Within the vicinity of the Project site, 2nd Street supports approximately 2,510 average daily trips.

1st Court is an approximately 20-foot-wide one-way southbound alleyway that provides access across the Project site from Arizona Avenue to Santa Monica Boulevard. This alley is primarily used by passenger vehicles associated with the existing residences as well as commercial delivery trucks and garbage trucks. The existing curb cut on 1st Court is sufficient to permit Class WB-50 trucks (i.e., 5 axles; 55 feet in length) turning left from Arizona Avenue.

*1st Court is a one-way southbound alleyway providing through access from Arizona Street to Santa Monica Boulevard.*

Public Transit Services in the Project Vicinity

Downtown serves as the focal point for public transit in the City and provides accessible, frequent, and high-capacity service to local and regional destinations to the north, south, and east. The Downtown is served by the Metro E (Expo) LRT line, which became operational in May 2016 delivering approximately 100 trains per day to the Downtown. Additionally, public transit in the vicinity of the proposed Project is provided by the Big Blue Bus and Metro.

*Metro E (Expo) LRT Line*

*The Project site is located 0.5 miles from the Downtown Santa Monica Station which provides a regional connection to Downtown Los Angeles.*

The Downtown Santa Monica Station for the Metro E (Expo) LRT line is located within approximately 0.5 miles of the Project site at 4th Street and Colorado Avenue, and is the western terminus of the Metro E (Expo) LRT line. The Metro E (Expo) LRT line began operation in May 2016, connecting the City through West Los Angeles to Culver City and continuing to Downtown Los Angeles. The Metro E (Expo) LRT line makes 19 stops including the Downtown Santa Monica Station and connects with other Metro rail services in Downtown Los Angeles. The Metro E (Expo) LRT line runs every 6 to 8 minutes during the peak hour and every 12 to 20 minutes during the off-peak hour. A new connecting line along Crenshaw Boulevard is under construction and will open in 2021, providing service south towards LAX and connecting with the Metro C Line. The introduction of the Downtown Santa Monica Station has had a transformative effect on mobility within the Downtown, and the City has recently completed infrastructure improvement projects to complement this availability to multiple modes of transportation including enhanced pedestrian and bicycle access.

The Metro E (Expo) LRT line has become an integral link in local and regional transit, and a catalyst for enhancing accessibility and mobility in the Downtown and the City as a whole. The Colorado Esplanade, from 4th Street to Ocean Avenue, is a promenade designed to connect the Downtown Santa Monica Station, Tongva Park, and the Santa Monica Pier, linking the Civic Center District and Downtown across the freeway. In conjunction with opening of the Metro E (Expo) LRT line in 2016, Big Blue Bus implemented a network-wide redesign of bus routes to increase north-south connections to the train stations within their service area. In 2019, Metro began preparation of study for systemwide revisioning of bus services, *NextGen*, which made draft recommendations available for public review in early 2020 (Metro 2020). Alterations of bus routes to attract new rail-to-bus transfers have the potential to increase ridership, make more efficient use of transit resources, and reduce overall levels of congestion.

*Bus Service*

Public bus transit in the Downtown is provided by the Big Blue Bus and Metro, which provide high frequency, easily accessible bus service within Downtown as well as between Downtown and destinations in the vicinity, including Downtown Los Angeles, University of California, Los Angeles (UCLA)/West Los Angeles, Century City, Los Angeles International Airport (LAX), Venice, and Culver City. These bus services can be accessed at multiple stops within and adjacent to the Downtown, including connecting stops adjacent to the Downtown Santa Monica Station at 4th Street and Colorado Avenue. Most bus routes converge along 4th Street in the Downtown between Santa Monica Boulevard and Colorado Avenue.

*The Big Blue Bus Transit Service Center, located four blocks from the Project site, provides services and administration for local and regional public transit.*

There are 13 fixed-route bus lines with stops located within a 0.25-mile radius of the Project site (see Figure 3.13-1). These stops provide access to Big Blue Bus Lines 1, 2, 3/Rapid 3, 5, 7/Rapid 7, 8, 9, and 18, along with express service line Rapid 10. Additionally, Metro Lines 4/Rapid 704, 20/Rapid 720, 33/Rapid 733, and 534 are also accessible by stops within a 0.25-mile radius of the Project site (see Figure 3.13-1). The majority of these lines have service frequencies or headways of 30 minutes or less, with peak hour headways of 8 to 15 minutes.[3,4]

**Big Blue Bus Line 1 (Santa Monica Boulevard)** – Line 1 runs from Venice and the Ocean Park neighborhood through the Downtown to UCLA. Weekday peak hour headways are approximately 10 minutes, while weekday off peak hour and weekend headways are approximately 15 minutes. The closest stop is located approximately two blocks from the Project site at 4th Street & Santa Monica Boulevard.

**Big Blue Bus Line 2 (Wilshire Boulevard)** – Line 2 runs from Ocean Park Boulevard and Main Street near the Civic Center through Downtown to UCLA. Headways are generally between 15

[3] Headways are defined as the time period between arrivals of buses at a stop.

[4] Since the time of this writing, the City has made changes to Big Blue Bus service due to COVID-19. This includes but not limited to suspension of Rapid 3, suspension of Rapid 7, and increases in headways for a number of service routes.

and 20 minutes. The closest stop is located approximately two blocks from the Project site at 4th Street & Santa Monica Boulevard.

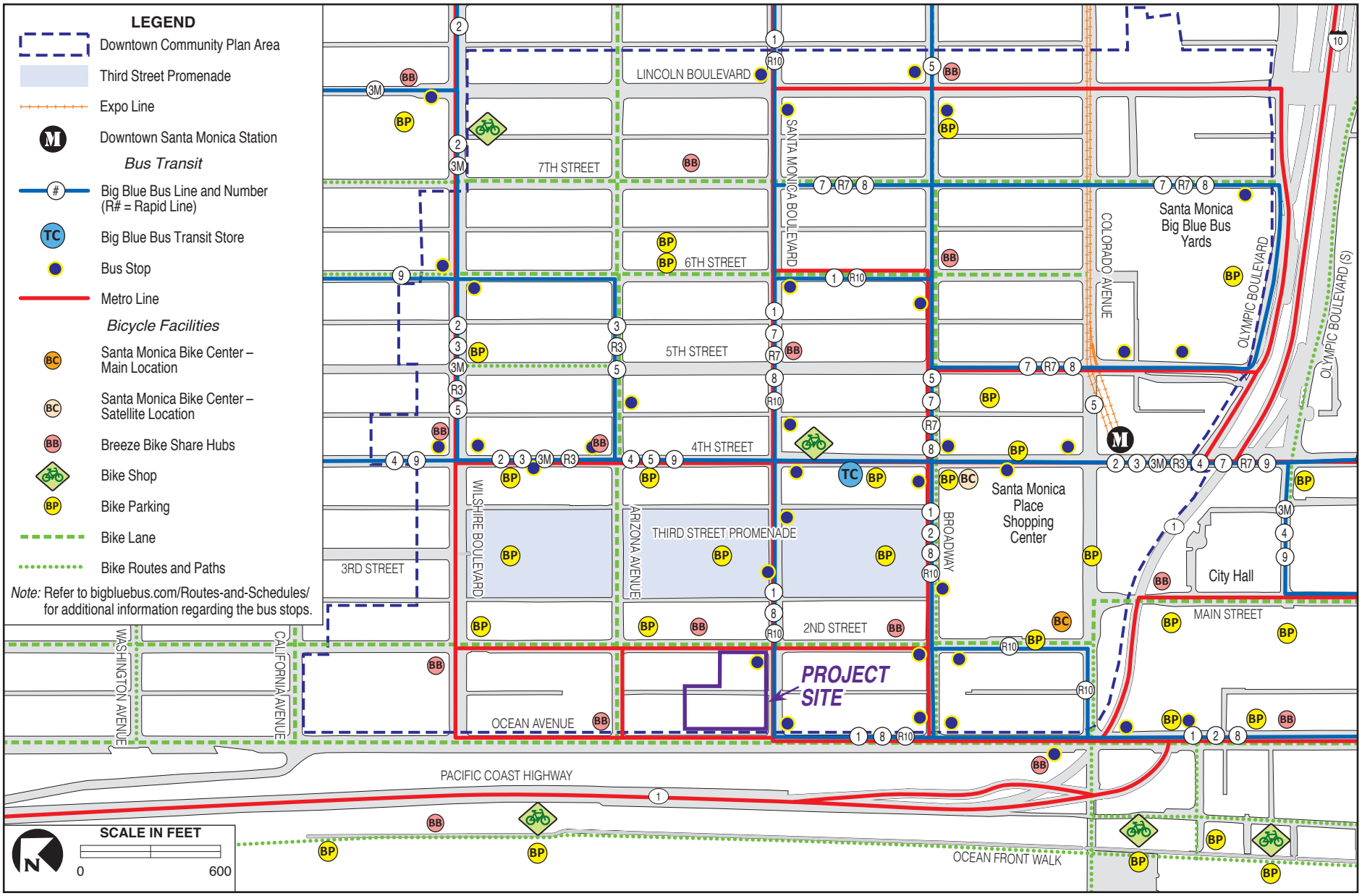
**Big Blue Bus Line 3 / Rapid 3 (Lincoln Boulevard) –** Line 3 runs from the Metro C Line / Aviation Station along Lincoln Boulevard to Downtown via Lincoln Boulevard and 4th Street. Weekday and weekend peak hour headways are approximately 10 minutes while off peak hour headways are between 15 and 20 minutes. The closest stop is located approximately two blocks from the Project site at 4th Street & Santa Monica Boulevard.

**Big Blue Bus Line 5 (Olympic Boulevard)** – Line 5 runs from 4th Street and Arizona in Downtown to Century City and the Metro E (Expo) LRT line Culver City Station via Broadway, Olympic Boulevard, Pico Boulevard, and Robertson Boulevard. Within the vicinity of the Project site, Line 5 operates along 4th Street, Broadway and Wilshire, and 6th Street. Weekday peak hour headways are approximately 20 minutes while weekday off peak hour and weekend headways are approximately 30 minutes. The closest stop is located approximately one block from the Project site at 3rd Street & Santa Monica Boulevard.

**Big Blue Bus Line 7 / Rapid 7 (Pico Boulevard)** – Line 7 runs from 6th Street and Broadway in Downtown to Rimpau Transit Center via Pico Boulevard. During the weekdays, the Rapid 7 line offers limited-stop service between Downtown and the Purple Line Wilshire/Western Station. Within the vicinity of the Project site, weekday peak hour headways are 10 minutes and weekend headways are approximately 15 minutes. The closest stop is located approximately four blocks from the Project site at 4th Street & Colorado Avenue.

**Big Blue Bus Line 8 (Ocean Park Boulevard)** – Line 8 runs from 7th Street and Olympic Boulevard through Downtown to UCLA via Main Street, Ocean Park Boulevard, National Boulevard, and Westwood Boulevard. Within the vicinity of the Project site, Line 8 operates along Santa Monica Boulevard and Broadway. During the weekday peak hours headways are approximately 15 to 30 minutes, while weekend peak hour headways are approximately 30 minutes. The closest stop is located approximately three blocks from the Project site at 4th Street & Broadway.

**Big Blue Bus Line 9 (Pacific Palisades)** – Line 9 runs from the Civic Center through Downtown to the Pacific Palisades community. Within the vicinity of the Project site, Line 9 operates along 4th Street with peak hour headways of approximately 30 minutes. The closest stop is located approximately four blocks from the Project site at 4th Street & Wilshire Boulevard.




wood.

**Existing Bus and Bike Routes and Bike Facilities**

**FIGURE 3.13-1**

**Big Blue Bus Rapid 10 (Downtown LA Freeway Express)** – Rapid 10 provides express service via the I-10 to Downtown Los Angeles. Within the vicinity of the Project site, Rapid 10 travels along 2nd Street, turns westbound on Colorado Avenue, then turning to Ocean Avenue, Santa Monica Boulevard, Bundy Drive, and the I-10. During the weekday and weekend peak hours headways are approximately 15 minutes. The closet stop is located approximately two blocks from the Project site at Santa Monica Boulevard & 4th Street.

**Big Blue Bus Line 18 –** Line 18 runs from Marina del Rey to UCLA through Downtown on 4th Street. This line serves Venice neighborhoods, Montana Avenue in Santa Monica, Brentwood, and the Veterans Affairs (VA) Hospital. Weekday and weekend headways are approximately 30 minutes. The closest stop is located approximately two blocks from the Project site at Santa Monica Boulevard & 4th Street.

**Metro Line 4 / Rapid 704 (Santa Monica Boulevard)** – Line 4 runs from Downtown Santa Monica to Downtown Los Angeles via Santa Monica Boulevard and Sunset Boulevard. Within the vicinity of the Project site, off peak hour headways are between 15 and 30 minutes. Rapid Line 704 offers limited service on Santa Monica Boulevard between Downtown Santa Monica and Downtown Los Angeles. Weekday headways are between 10 and 15 minutes. The stop closest is located approximately two blocks from the Project site along Santa Monica Boulevard & 4th Street.

**Metro Line 20 / Rapid 720 (Wilshire Boulevard) –** Line 20 / Rapid 720 operates on Wilshire Boulevard between Downtown Santa Monica and Downtown Los Angeles. Rapid 720 service is limited stop operating throughout the day. Peak hour headways are approximately 10 minutes and off-peak hour headways are between 15 and 20 minutes. Overnight, local service on Line 20 has headways between 20 and 30 minutes after Big Blue Bus Line 2 ceases operation. The closest stop is located approximately two blocks from the Project site at 2nd Street & Wilshire Boulevard.

**Metro Line 33 / Rapid 733 (Venice Boulevard)** – Line 33 / Rapid 733 provides service on Venice Boulevard and Main Street between Santa Monica and Downtown Los Angeles. The Rapid 733 has peak hour headways between 15 and 20 minutes. Line 33 extends local service along Main Street to Santa Monica from Venice during the late evening and overnight periods. The closest stop is located adjacent to the Project site at 2nd Street & Santa Monica Boulevard.

**Metro Rapid Line 534 (Malibu)** – Line 534 operates local service between Downtown Santa Monica and the City of Malibu along PCH. Headways are generally between approximately 20 to 40 minutes. The closest stop is located adjacent to the Project site on Santa Monica Boulevard at Ocean Avenue.

Public Parking in the Project Vicinity

*City Parking Structure #4 is located across 2nd Street and provides approximately 652 spaces. Metered on-street parallel parking is also provided along 2nd Street.*

Shared parking plays an important role in supporting the Downtown, allowing drivers to "park once" and walk to multiple destinations. Public shared parking includes nine City-owned parking structures and the Library parking facility, providing approximately 6,023 parking spaces (City of Santa Monica 2017). The vast majority of these existing parking facilities are located on 2nd Street and 4th Street, with the Library parking facility at 6th Street being the only public parking facility on the eastern edge of Downtown. The off-street spaces are available to the public on an hourly, daily, or monthly basis. In addition to off-street parking, the Downtown streets also provides approximately 827 on-street parking spaces (City of Santa Monica 2017).

Public parking supply located within approximately two blocks of the Project site include City Parking Structures #2, #4, and #6 (City of Santa Monica 2015b). Metered on-street parking in the immediate vicinity is provided along the northern side of Santa Monica Boulevard, and along both sides of 2nd Street and Ocean Avenue.

Two privately operated surface parking lots with parking available to the public are located on the Project site, with driveways off Ocean Avenue, Santa Monica Boulevard, and 1st Court. The paved surface parking lot located to the north of the 101 Santa Monica Boulevard has approximately 47 parking spaces (including 2 handicapped spaces). The paved surface parking lot located at 129 Santa Monica Boulevard has approximately 93 parking spaces (including 4 handicapped spaces), with an entrance provided off Santa Monica Boulevard and an exit onto 1st Court.

Pedestrian and Bicycle Facilities in the Project Vicinity

*Pedestrian Facilities*

As described in the DCP Program EIR, walking provides the foundation of the transportation system in Downtown. Pedestrian counts in the Downtown are among the highest in the City (City of Santa Monica 2017). A review of existing (2017 and 2018) pedestrian counts shows that hourly pedestrian volumes at Ocean Avenue and Santa Monica Boulevard range between 200 to over 800 in the A.M. and P.M. peak hours. Pedestrian activity can be even higher on peak summer tourism days at the busiest intersections, particularly those connecting the Downtown Santa Monica Station (Fehr & Peers 2020). As previously described, additional pedestrian improvements within Downtown have been completed – including the Colorado Esplanade Project – to integrate the Metro E (Expo) LRT line with the rest of the Downtown. The City has a *Pedestrian Action Plan* (2016), which was adopted in February 2016 and is being implemented to identify and construct pedestrian improvements that are needed to meet existing and future needs of pedestrians. Since the implementation of the *Pedestrian Action Plan*, the City has installed numerous pedestrian scramble crosswalks in the Downtown, including at the intersection of Santa Monica Boulevard & 2nd Street adjacent to the Project site. At many intersections, the City has implemented leading pedestrian interval timing, giving the walk signal for several seconds before vehicles receive a green light to reduce vehicle-pedestrian conflicts.

*Striped pedestrian sidewalks – like the ones pictured at Ocean Avenue & Santa Monica Boulevard above – are provided at each of the intersections within the vicinity of the Project site.*

Sidewalks are present on both sides of the street throughout the Downtown, generally ranging in width from 8 feet wide along Lincoln Boulevard to 24 feet wide along Ocean Avenue. As previously described, along the Project site's Ocean Avenue frontage, sidewalks are approximately 24 feet wide, which includes a landscaped median with palm trees and lawn and a pedestrian pathway. Sidewalks along Santa Monica Boulevard adjacent to the Project site are approximately

18 feet wide, with the pedestrian pathway narrowing in some areas as a result of existing tree wells. Sidewalks along the Project site's 2nd Street frontage are approximately 15 feet wide, with the pedestrian pathway narrowing to 5 feet in some locations due to existing tree wells. No sidewalks are provided along 1st Court; however, this alleyway is generally used for delivery trucks, garbage trucks, and resident vehicles, and only periodically used as a bicycle or pedestrian cut through by residences.

*Palisade Park is an open space area located adjacent to the Project site across Ocean Avenue. This open space area is heavily trafficked and provides a variety of pedestrian amenities.*

Each of the signalized intersections within the vicinity of the Project site including Ocean Avenue & Arizona Avenue, Ocean Avenue & Santa Monica Boulevard, and Santa Monica Boulevard and 2nd Street have striped pedestrian crosswalks and signalized pedestrian crossings. Additionally, a mid-block pedestrian crossing is located along 2nd Street between Arizona Avenue and Santa Monica Boulevard. Pedestrian crossing signals are either automatic at the intersection or actuated by pedestrians by push-button. All intersections have accessible curb ramps compliant with the American with Disability Act of 1990 (ADA) standards.

In addition to the paved sidewalks, the Project site is located immediately adjacent from Palisades Park which provides over 1.5 miles of pedestrian trails as well as seating areas, grassy areas, and sweeping views of the coastline, including Santa Monica Pier.

*Green painted bicycle lanes are along 2nd Street on either side of the paved width.*

*Bicycle Facilities*

The City has 45 miles of bicycle facilities, including designated bicycle lanes or paths and designated routes along streets (City of Santa Monica 2015a). Based on existing bicycle count data collected in 2017 and 2018, bike volumes on Ocean Avenue can number between 200 and 300

in the P.M. peak hour in the summer tourist season. On 2nd Street and Arizona Avenue near the Project site, bicycle volumes were around 100 during the P.M. peak hour (Fehr & Peers 2020).

*Class II bicycle lanes are provided along Arizona Avenue and are striped for visibility.*

Dedicated bicycle lanes are provided in the Downtown. Efforts to expand the existing network of bicycle facilities include the two-way cycle track completed as a part of the Colorado Esplanade. This improvement provides an important bicycle connection between the Downtown Santa Monica Station and Ocean Avenue. Additionally, in 2016 the 4-foot wide sidewalk along the California Incline was replaced by one pedestrian path and two bike lanes, which are physically separated from the vehicle lanes. This cycle track, which is located just outside of the Downtown, provides a connection between PCH and the Downtown. In addition to these dedicated bicycle facilities, the City has recently marked various streets in the Downtown area as shared vehicle/bicycle lanes and included bicycle detection zones at signalized intersections. These lanes have been painted with "sharrow" markings. Streets with these markings include 4th Street, 5th Street, Broadway, and Santa Monica Boulevard. Additional designated future bicycle routes with shared lane marking are proposed in the City's *Bike Master Plan*, a 20-year plan that is guided and supported by the LUCE (City of Santa Monica 2011; see Section 3.13.2, *Regulatory Framework*).

There is an extensive network of on-street bicycle facilities within the vicinity of the Project site. Existing facilities within 0.5 miles of the Project are identified below).

<u>Class II Bicycle Facilities</u> – Class II bicycle facilities are bicycle lanes that are located on the paved width of the street and have pavement markings that separate the lane from vehicle traffic. In Downtown, most Class II bicycle lanes are painted green within the vicinity of the Project site. On streets with metered on-street parking, the bicycle lane is located between the parking lane and the outermost travel lane. The following street segments have Class II bicycle facilities:

- **2nd Street –** between Colorado Avenue and Wilshire Boulevard, serving the Santa Monica Bike Center;
- **7th Street** – between Wilshire Boulevard and Olympic Boulevard;
- **6th Street** – between Wilshire Boulevard and Colorado Avenue;
- **Arizona Avenue –** between Ocean Avenue and 26th Street;

- **Broadway** – between 5th Street and Centinela Avenue (the eastern City limit);
- **California Avenue** –between Ocean Avenue and 17th Street;
- **Colorado** – between Ocean Avenue and 2nd Street;
- **Main Street** – between Colorado Avenue and the Santa Monica southern City limits; and,
- **Ocean Avenue** – between Bicknell Avenue and San Vicente Boulevard.

*The Santa Monica Bike Center located in City Parking Structure #7 (4th Street & Broadway) and #8 (2nd Street & Colorado Avenue), located a 5-minute walk from the Project site, provides bicycle parking, repair, and rental, and is intended to reduce traditional modes of transportation.*

Class III Bicycle Facilities – Class III bicycle facilities are designated on-street routes that do not have stripped separation from vehicle traffic, but may have pavement markings or signs ("sharrows") indicating a bicycle route and instructing drivers to share the road. Street segments in the study area with Class III bicycle facilities include:

- **4th Stree**t – bicycle route from Arizona to Wilshire Avenue;
- **5th Street** – shared lane markings from Montana Avenue to Colorado Avenue;
- **7th Street** – from the northern City limit to Wilshire Boulevard;
- **Broadway** – from 5th Street to Ocean Avenue;
- **Colorado Avenue –** from Ocean Avenue to Main Street, serving the Santa Monica Bike Center; and
- **Lincoln Boulevard** – from Arizona Avenue to the southern City limit.

Bicycle parking is available throughout Santa Monica, including in many of the parking structures, on-street racks, and associated with numerous public and private facilities. In the vicinity of the Project site, indoor bicycle parking and lockers are provided in City Parking Structures #2, #4, #5, #6 and #7, all of which are located within three blocks of the Project side. Sidewalk bicycle racks are also available in many locations adjacent to the Project site.

Additionally, to promote the use of nonautomotive transportation, the City operates the Santa Monica Bike Center in the Downtown with facilities in City Parking Structure #7 at 320 Broadway and City Parking Structure #8 at 215 Colorado (refer to Figure 3.13-1). The Santa Monica Bike Center provides secure bicycle parking and a variety of bicycle services, including retail, bicycle repair, bicycle rental, attended bicycle parking, showers, public information on alternative transportation, and a variety of additional related services.

The City also offers the Breeze Bike Share service, which allows residents, visitors, and employees to ride a public bicycle for their travel needs within the City. The bikeshare program makes several hundred "smart" bicycles available for on-demand short-term borrowing at more than 80 stations Citywide including Downtown and in neighboring Venice. The Breeze Bike Share Fleet uses “smart” bicycles that can be locked to any post, rather than at proprietary docking stations increasing the flexibility of where users can pick up and drop off a bike. Metro also operates a separate Bike Share service throughout Los Angeles County, including dock-based bicycle stations at three Metro E (Expo) LRT line stations as well as others in neighboring Venice.

*Private Shared Mobility Services*

The growth of privately operated Transportation Network Companies (TNCs) like Lyft and Uber has also changed the way people move in and around the City. TNC’s provide app-based platforms to connect passengers with drivers who use personal, non-commercial vehicles. Lyft and Uber have become the most recognized and ubiquitous forms of shared mobility and provide both local and to some extent regional linkages, although contributing to roadway congestion in Downtown. Additionally, since late 2017, the City has seen the emergence of dockless mobility devices on City streets. Residents and visitors can find share mobility transportation brands operating in the City, including Bird. These companies offer app-based electric scooters, Lyft and Jump also offer electric bikes as another option to get around. Dockless systems allow scooters and bikes to be left in any location. In June 2018 the City adopted new regulations to address safety concerns associated with dockless mobility devices. Now, once a ride is complete, e-scooters can be safely in one of the following areas:

*The City has designated e-scooter drop zones in an effort to avoid potential conflicts with ADA requirements.*

- Designated e-scooter drop zone;
- Bike rack area; and
- In the “furniture zone,” which is the section of the sidewalk between the curb and the pedestrian through zone where street furniture, lighting, benches, utility poles, tree pits and bicycle racks live.

No assumption of changes to mobility behavior (e.g., reduction in driving) are included in the analysis of future traffic conditions given the new and rapidly changing circumstances. Consequently, the vehicular trip generation provided below in Section 3.13.3, *Impact Assessment and Methodology* is considered conservative.

*Future Transportation Network Improvements*

As described in the Transportation Study, the City is planning for several future improvements to the existing transportation network in the Downtown. These improvements are in various stages of planning and development.

As part of the adopted DCP, the City envisioned that Wilshire Boulevard would be transformed into a more pedestrian-friendly street. The DCP identified the Wilshire Boulevard Streetscape Project, which would create widened pedestrian space along this street between Ocean Avenue and 4th Street through a reduction in vehicle lane space. This Wilshire Boulevard improvement is still in the conceptual stages and planning for this improvement has not yet begun. As part of this conceptual improvement, the sidewalk on the south side of Wilshire Boulevard in this segment would be widened to improve the pedestrian environment between the Third Street Promenade and Palisades Park on Ocean Avenue.

The City's *Bike Action Plan* (2011) includes recommended bicycle facilities improvement projects for 5-year implementation and 20-year vision plans. As of 2019, the majority of the 5-year implementation projects have been completed, including those nearest the Project site.

The pending bicycle facilities improvement projects that have yet to be completed in the Downtown include:

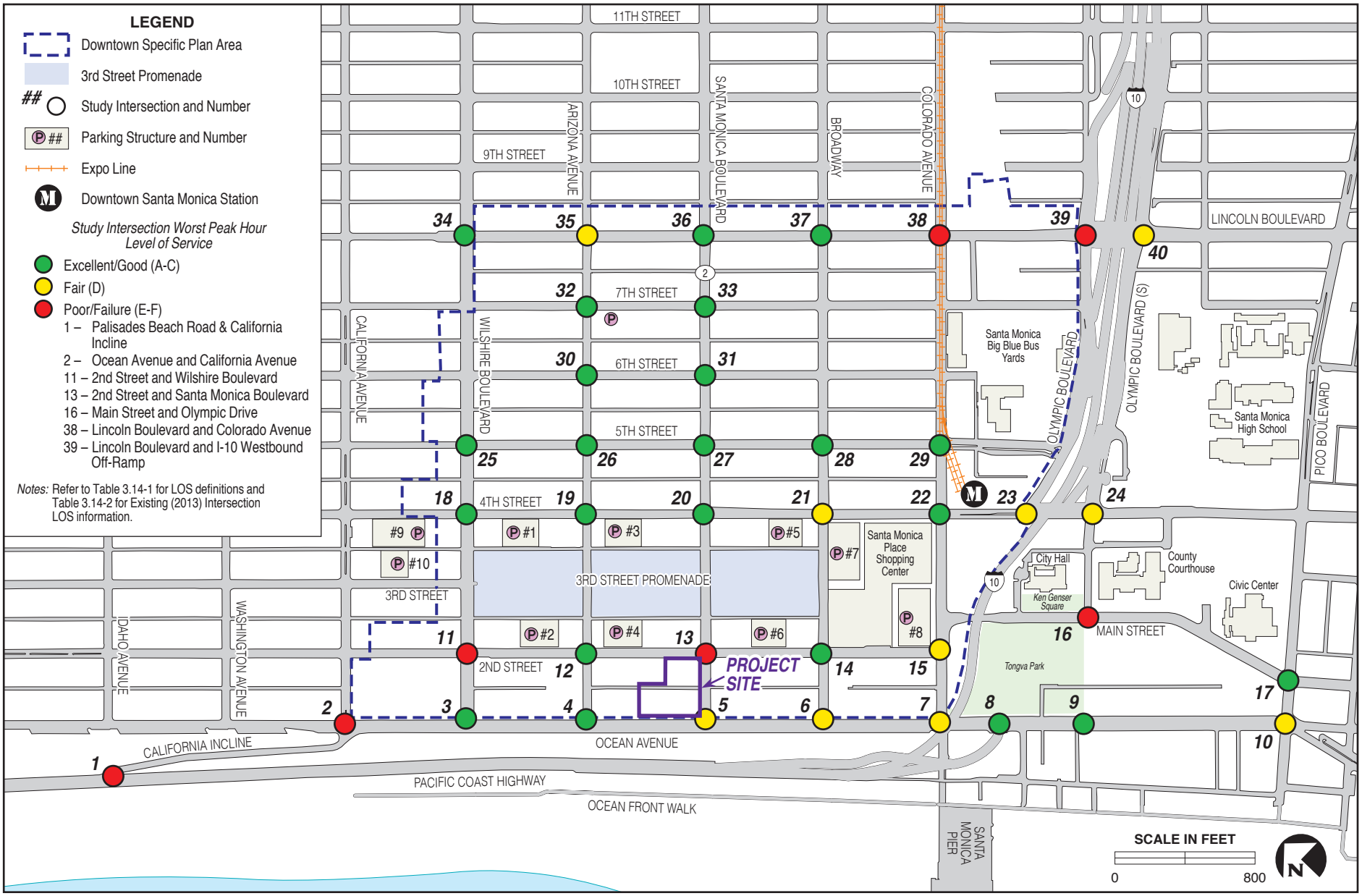
- As called for in the DCP, the City is currently exploring the potential of installing a cycle track on the west side of Ocean Avenue;
- Santa Monica Boulevard Bikeway, which includes shared lane markings (identified in the *Bike Action Plan* as a green "super-sharrow") from Ocean Avenue to 6th Street / 7th Street;
- Expo Bike and Pedestrian Path Project, which would construct a separated bicycle and pedestrian paths adjacent to the Metro E (Expo) LRT line.

<u>Intersection Operations and Level of Service</u>

The Transportation Study examined 40 intersections in the vicinity of the Project site that could be potentially affected by Project-generated trips. These intersections are identified in Table 3.13-2 and generally form the study area, which extends from Lincoln Boulevard on the east, Palisades Beach Road (PCH) on the west, Wilshire Boulevard and California Avenue on the north, and Pico Boulevard on the south.

Intersections in urban communities generally experience the highest level of congestion during the late afternoon or early evening P.M. peak hour commute. This generally holds true for the intersections within the Downtown. However, certain intersections (e.g., busy freeway on-ramps or those near larger schools) experience high level of congestion during the A.M. peak hour commute. For example, the 4th Street / I-10 on-ramp carrying commuters out of the Downtown experiences higher level of A.M. rather than P.M. peak hour congestion. Further, in communities that are regional attractions, intersections can experience higher midday weekend peak hour traffic volumes. In the Downtown, intersections, such as California Avenue & Ocean Avenue and 2nd Street & Santa Monica Boulevard experience substantially higher levels of weekend midday peak hour congestion relative to that experienced during the weekday A.M. or P.M. peak hours. The Transportation Study therefore reviews all three potential peak hours for each of the 40 study intersections (see Appendix K). All of the intersections examined in the Transportation Study are signalized and are under the jurisdiction of the City.

Because traffic flow on urban streets is most constrained at intersections, traffic flow analyses focus on operating conditions of critical intersections during the peak hour (i.e., part of the day during which traffic congestion on roads and crowding on public transport is at its highest). Intersection operation and congestion can be described by measuring the LOS of an intersection. LOS is a qualitative method for characterizing the operational conditions at an intersection generally accounting for measures such as speed, delays, travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. In rating intersection operations, LOS A through LOS F are used, with LOS A indicating free-flow operations and LOS F indicating congested operations. The City considers LOS D as the minimum desirable LOS at arterial intersections and LOS C as the minimum desirable LOS at collector street intersections.




Existing Levels of Service

FIGURE 3.13-2

**Table 3.13-1. Level of Service Criteria for Signalized Intersections**

| LOS | Interpretation | Control Delay Per Vehicle (Seconds) |
|---|---|---|
| A | Excellent; No vehicle waits longer than one red light and no approach phase is fully used. | ≤ 10 |
| B | Very Good; An occasional approach phase is fully utilized, and many drivers begin to feel somewhat restricted within groups of vehicles. | > 10 – 20 |
| C | Good; Occasionally drivers may have to wait through more than one red light and backups may develop behind turning vehicles. | > 20 – 35 |
| D | Fair; Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups. | > 35 – 55 |
| E | Poor; Represents the most vehicles intersection approaches can accommodate resulting in long lines of waiting vehicles through several signal cycles. | > 55 – 80 |
| F | Failure; Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches, result in tremendous delays with continuously increasing queue lengths. | > 80 |

Source: Transportation Research Board 2010.

To evaluate LOS at these 40 intersections, traffic volume data for both the weekday A.M. (between 7:30 A.M. and 9:30 A.M.) and P.M. (5:00 P.M. to 7:00 P.M.) peak hours as well as weekend midday peak hour (1:00 P.M. to 5:00 P.M.) were obtained from the most recent 2017 traffic counts conducted by the City and Fehr & Peers. Counts were collected in the fall (when school was in session) for weekday A.M. and P.M. peak hours and in the summer for weekend midday hours.

In accordance with the City's adopted impact analysis, the "Operational Analysis" method from *Highway Capacity Manual* (HCM) was employed to perform LOS analysis at all signalized study intersections. The operational method determines two key operating characteristics of signalized intersections. The first characteristic is the average stopped delay, experienced per vehicle. The second is the volume-to-capacity (V/C) ratio at intersections based on the amount of traffic traveling through the intersection, the lane geometries, and other factors affecting capacity such as on-street parking, bus operations near the intersection, and pedestrian volumes at the striped pedestrian crosswalks. These characterizations are used to evaluate the operation of each signalized intersection, which is described generally in terms of LOS.

## Table 3.13-2. Existing Intersection Levels of Service (2017)

| Number | Intersection | Class | Peak Hour | Existing Conditions (2017) | | |
|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS |
| **1** | **Palisades Beach Road (PCH) & California Incline** | **A** | **A.M.** | **1.347** | **77** | **E** |
| | | A | P.M. | 0.890 | 37 | D |
| | | **A** | **WKND** | **1.121** | **79** | **E** |
| **2** | **Ocean Avenue & California Avenue** | A | A.M. | 0.798 | 54 | D |
| | | **A** | **P.M.** | **1.031** | ** | **F** |
| | | **A** | **WKND** | **1.109** | ** | **F** |
| 3 | Ocean Avenue & Wilshire Boulevard | A | A.M. | 0.291 | 12 | B |
| | | A | P.M. | 0.383 | 22 | C |
| | | A | WKND | 0.388 | 27 | C |
| 4 | Ocean Avenue & Arizona Avenue | A | A.M. | 0.253 | 7 | A |
| | | A | P.M. | 0.360 | 13 | B |
| | | A | WKND | 0.345 | 13 | B |
| 5 | Ocean Avenue & Santa Monica Boulevard | A | A.M. | 0.295 | 9 | A |
| | | A | P.M. | 0.435 | 30 | C |
| | | A | WKND | 0.470 | 41 | D |
| 6 | Ocean Avenue & Broadway | A | A.M. | 0.345 | 7 | A |
| | | A | P.M. | 0.539 | 34 | C |
| | | A | WKND | 0.559 | 39 | D |
| 7 | Ocean Avenue & Colorado Avenue | A | A.M. | 0.357 | 24 | C |
| | | A | P.M. | 0.491 | 42 | D |
| | | A | WKND | 0.559 | 39 | D |
| 8 | Ocean Avenue & Moomat Ahiko Way | A | A.M. | 0.436 | 25 | C |
| | | A | P.M. | 0.520 | 24 | C |
| | | A | WKND | 0.447 | 25 | C |
| 9 | Ocean Avenue & Olympic Drive | A | A.M. | 0.400 | 11 | B |
| | | A | P.M. | 0.543 | 14 | B |
| | | A | WKND | 0.523 | 33 | C |
| 10 | Ocean Avenue & Pico Boulevard | A | A.M. | 0.489 | 20 | C |
| | | A | P.M. | 0.560 | 39 | D |
| | | A | WKND | 0.480 | 30 | C |
| **11** | **2nd Street & Wilshire Boulevard** | A | A.M. | 0.328 | 30 | C |
| | | **A** | **P.M.** | **0.379** | **64** | **E** |
| | | **A** | **WKND** | **0.617** | ** | **F** |
| 12 | 2nd Street & Arizona Avenue | C | A.M. | 0.308 | 29 | C |
| | | C | P.M. | 0.387 | 29 | C |
| | | C | WKND | 0.344 | 29 | C |

## Table 3.13-2. Existing Intersection Levels of Service (2017) (Continued)

| Number | Intersection | Class | Peak Hour | Existing Conditions (2017) | | |
|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS |
| **13** | **2nd Street & Santa Monica Boulevard** | A | A.M. | 0.360 | 29 | C |
| | | **A** | **P.M.** | **1.007** | **80** | **F** |
| | | **A** | **WKND** | **0.789** | **60** | **E** |
| 14 | 2nd Street & Broadway | C | A.M. | 0.341 | 28 | C |
| | | C | P.M. | 0.270 | 27 | C |
| | | C | WKND | 0.328 | 29 | C |
| 15 | 2nd Street & Colorado Avenue | A | A.M. | 0.437 | 35 | C |
| | | A | P.M. | 0.435 | 35 | C |
| | | A | WKND | 0.341 | 36 | D |
| **16** | **Main Street & Olympic Boulevard** | **C** | **A.M.** | **0.679** | **94** | **F** |
| | | C | P.M. | 0.362 | 22 | C |
| | | **C** | **WKND** | **0.588** | **71** | **E** |
| 17 | Main Street & Pico Boulevard | A | A.M. | 0.535 | 25 | C |
| | | A | P.M. | 0.433 | 25 | C |
| | | A | WKND | 0.512 | 29 | C |
| 18 | 4th Street & Wilshire Boulevard | A | A.M. | 0.280 | 27 | C |
| | | A | P.M. | 0.285 | 28 | C |
| | | A | WKND | 0.317 | 28 | C |
| 19 | 4th Street & Arizona Avenue | A | A.M. | 0.295 | 26 | C |
| | | A | P.M. | 0.343 | 29 | C |
| | | A | WKND | 0.352 | 29 | C |
| 20 | 4th Street & Santa Monica Boulevard | A | A.M. | 0.481 | 23 | C |
| | | A | P.M. | 0.636 | 28 | C |
| | | A | WKND | 0.593 | 29 | C |
| 21 | 4th Street & Broadway | A | A.M. | 0.377 | 34 | C |
| | | A | P.M. | 0.472 | 39 | D |
| | | A | WKND | 0.462 | 40 | D |
| 22 | 4th Street & Colorado Avenue | A | A.M. | 0.281 | 15 | B |
| | | A | P.M. | 0.400 | 21 | C |
| | | A | WKND | 0.392 | 21 | C |
| 23 | 4th Street & I-10 Westbound Off-Ramp | A | A.M. | 0.681 | 37 | D |
| | | A | P.M. | 0.557 | 29 | C |
| | | A | WKND | 0.440 | 26 | C |
| 24 | 4th Street & I-10 Eastbound On-Ramp | A | A.M. | 0.552 | 39 | D |
| | | A | P.M. | 0.542 | 24 | C |
| | | A | WKND | 0.514 | 43 | D |

## Table 3.13-2. Existing Intersection Levels of Service (2017) (Continued)

| Number | Intersection | Class | Peak Hour | Existing Conditions (2017) | | |
|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS |
| 25 | 5th Street & Wilshire Boulevard | A | A.M. | 0.275 | 16 | B |
| | | A | P.M. | 0.384 | 17 | B |
| | | A | WKND | 0.379 | 15 | B |
| 26 | 5th Street & Arizona Avenue | C | A.M. | 0.262 | 20 | B |
| | | C | P.M. | 0.291 | 21 | C |
| | | C | WKND | 0.446 | 24 | C |
| 27 | 5th Street & Santa Monica Boulevard | A | A.M. | 0.271 | 24 | C |
| | | A | P.M. | 0.356 | 22 | C |
| | | A | WKND | 0.348 | 23 | C |
| 28 | 5th Street & Broadway | C | A.M. | 0.330 | 24 | C |
| | | C | P.M. | 0.359 | 22 | C |
| | | C | WKND | 0.379 | 21 | C |
| 29 | 5th Street & Colorado Avenue | A | A.M. | 0.297 | 21 | C |
| | | A | P.M. | 0.387 | 22 | C |
| | | A | WKND | 0.378 | 23 | C |
| 30 | 6th Street & Arizona Avenue | C | A.M. | 0.234 | 17 | B |
| | | C | P.M. | 0.350 | 20 | B |
| | | C | WKND | 0.360 | 15 | B |
| 31 | 6th Street & Santa Monica Boulevard | A | A.M. | 0.298 | 14 | B |
| | | A | P.M. | 0.375 | 17 | B |
| | | A | WKND | 0.468 | 17 | B |
| 32 | 7th Street & Arizona Avenue | C | A.M. | 0.295 | 19 | B |
| | | C | P.M. | 0.323 | 20 | B |
| | | C | WKND | 0.381 | 20 | B |
| 33 | 7th Street & Santa Monica Boulevard | A | A.M. | 0.336 | 18 | B |
| | | A | P.M. | 0.352 | 18 | B |
| | | A | WKND | 0.397 | 20 | C |
| 34 | Lincoln Boulevard & Wilshire Boulevard | A | A.M. | 0.436 | 22 | C |
| | | A | P.M. | 0.435 | 22 | C |
| | | A | WKND | 0.487 | 22 | C |
| 35 | Lincoln Boulevard & Arizona Avenue | A | A.M. | 0.882 | 47 | D |
| | | A | P.M. | 0.700 | 30 | C |
| | | A | WKND | 0.635 | 28 | C |
| 36 | Lincoln Boulevard & Santa Monica Boulevard | A | A.M. | 0.474 | 24 | C |
| | | A | P.M. | 0.555 | 26 | C |
| | | A | WKND | 0.576 | 29 | C |

**Table 3.13-2. Existing Intersection Levels of Service (2017) (Continued)**

| Number | Intersection | Class | Peak Hour | Existing Conditions (2017) | | |
|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS |
| 37 | Lincoln Boulevard & Broadway | A | A.M. | 0.533 | 28 | C |
| | | A | P.M. | 0.574 | 29 | C |
| | | A | WKND | 0.622 | 32 | C |
| **38** | **Lincoln Boulevard & Colorado Avenue** | **A** | **A.M.** | **0.499** | **64** | **E** |
| | | A | P.M. | 0.483 | 49 | D |
| | | A | WKND | 0.584 | 44 | D |
| **39** | **Lincoln Boulevard & I-10 Westbound Off-Ramp** | **A** | **A.M.** | **0.941** | **88** | **F** |
| | | A | P.M. | 0.677 | 39 | D |
| | | A | WKND | 0.815 | 51 | D |
| 40 | Lincoln Boulevard & I-10 Eastbound On-Ramp | A | A.M. | 0.797 | 35 | D |
| | | A | P.M. | 0.541 | 30 | C |
| | | A | WKND | 0.750 | 36 | D |

DEFINITIONS
V/C – Volume-to-Capacity Ratio – This ratio is based on the amount of traffic traveling through the intersection, the lane geometries, and other factors affecting capacity such as one-street parking, bus operations near the intersections, and pedestrian volumes at the striped pedestrian crosswalks.
Delay – Average stopped delay per vehicle, in seconds.
* – Average stopped delay per vehicle, in seconds
** – Indicated oversaturated conditions, delay cannot be calculated
CLASS
A – Arterial Intersection – High capacity intersection which delivers traffic at the highest level of service possible.
C – Collector Intersection – Low to moderate capacity intersection which delivers traffic from local streets to arterial streets.
LEVEL OF SERVICE
Refer to definitions in Table 3.13-1.
Notes: 2017 traffic volume count data prepared by the City and Fehr & Peers. Traffic counts were collected in Fall 2017 (when school was in session) for weekday A.M. and P.M. peak hours and in the summer for weekend afternoon hours.
Source: Fehr & Peers 2020; see Appendix K.

The well-spaced grid system of streets within the Downtown tends to disperse traffic flows, minimizing intersection congestion. However, in places that carry high traffic volumes, such as primary vehicle entrances to the Downtown from the I-10 or the intersection of California Avenue & Ocean Avenue, heavy pedestrian volumes can also affect intersection operations. Of the 40 intersections studied, 35 operate at "excellent" or "fair" (LOS A, B, C or D), while seven operated at "poor" or "failure" (LOS E or F) during at least one of the peak hours (see Appendix K). Intersections within the study area that currently operate at poor LOS include:

- Study Intersection No. 1: Palisades Beach Road (PCH) & California Incline (LOS E during the A.M. and weekend midday peak hours)
- Study Intersection No. 2: Ocean Avenue & California Avenue (LOS F during the P.M. and weekend midday peak hours)
- Study Intersection No. 11: 2nd Street & Wilshire Boulevard (LOS E during the P.M. peak hour, LOS F during the weekend midday peak hour)

- Study Intersection No. 13: 2nd Street & Santa Monica Boulevard (LOS F during the P.M. peak hour; LOS E during the weekend midday peak hour)
- Study Intersection No. 16: Main Street & Olympic Drive (LOS F during the A.M. peak hour, LOS E during the weekend midday peak hour)
- Study Intersection No. 38: Lincoln Boulevard & Colorado Avenue (LOS E during the A.M. peak hour)
- Study Intersection No. 39: Lincoln Boulevard & I-10 Freeway Westbound Off-Ramp (LOS F during the A.M. peak hour)

### 3.13.2 Regulatory Framework

Federal Regulations

*Americans with Disabilities Act of 1990*

Titles I, II, III, and V of the ADA have been codified in Title 42 of the U.S. Code (USC), beginning at Section 12101. Title III prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

Examples of key guidelines include detectable warning for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

State Regulations

*Statewide Transportation Improvement Program*

The California Transportation Commission (CTC) administers transportation programming. Transportation programming is the public decision-making process, that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The State Transportation Improvement Program (STIP) is a multi-year Capital Improvement Program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. Caltrans manages the operation of State Highways, including the freeways passing through the Los Angeles Region.

*Parking Cash Out*

Parking Cash Out, Assembly Bill (AB) 2109 requires employers of 50 or more employees who lease their parking and subsidize any part of their employee parking to offer their employees the opportunity to give up their parking space and rideshare to work instead. In return for giving up their parking space, the employer pays the employee the cost of the parking space. The City was the first in the nation to implement a mandatory Parking Cash-Out Program.

*Global Warming Solutions Act of 2006*

With the passage of the Global Warming Solutions Act (AB 32), the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32. The LUCE proactively incorporates strategies for integrated land use and transportation planning that achieve per capita GHG reduce, vehicle miles traveled (VMT) reduction, and single occupancy trip reduction that would further the City's efforts to meet the Swide policy intent of this legislation.

*Senate Bill (SB) 375*

The adoption of SB 375 on September 30, 2008 recognizes the connection between poor planning and reliance on vehicles as the primary mode of transportation, with the result being emissions from vehicles accounting for 30 percent of GHG emissions in California. SB 375 aligns the goals of regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations, and requires Metropolitan Planning Organizations (MPOs) such as SCAG to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) within their regional transportation plan to demonstrate the achievement of GHG reduction targets. As discussed below, in compliance with SB 375, SCAG has adopted the 2016-2040 Regional Transportation/Sustainable Communities Strategy (RTP/SCS), which addresses land use and transportation for the region inclusive of Santa Monica.

On November 7, 2019, SCAG's Regional Council approved the release of the Draft 2020-2045 RTP/SCS (Connect SoCal plan) for public review and comment. The comment period for the Draft Connect SoCal plan started on November 14, 2019 and ended on January 24, 2020. The Draft Connect SoCal plan includes more than 3 years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections.

*Senate Bill (SB) 743*

To further the State's commitment to the goals of SB 375, AB 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7, *Modernization of Transportation Analysis for Transit-Oriented Infill Projects*, to Division 13 (Section 21099) of the Public Resources Code. Key provisions of SB 743 include reforming aesthetics and parking CEQA analysis for urban infill projects and eliminating the measurement of vehicle delay, or LOS, as a metric that can be used for measuring traffic impacts in transit priority areas. Under SB 743, the focus of transportation analysis is to shift from vehicle delay to the reduction of GHG emissions, creation of multimodal networks, and promotion of a mix of land uses. Specifically, SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit (i.e., TPAs) such as the Downtown, those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (New Public Resources Code Section 21099[b][1]) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." OPR also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

Pursuant to the mandate in SB 743, OPR adopted the revised CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. Specifically, Section 15064.3 was added to CEQA Guidelines, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts." CEQA Guideline Sections 15064.3(c) and 15007 also states that the provisions of this section shall apply prospectively (i.e. new requirements in CEQA Guidelines amendments will apply to steps in the CEQA process not yet undertaken by the date when agencies must comply with the amendments). CEQA Guideline Section 15064.3(c) further states that VMT analyses must be implemented Statewide by July 1, 2020. The Notice of Preparation (NOP) for the proposed Project was issued December 21, 2018, prior to the adoption of CEQA Guidelines Section 15064.3, and the Draft EIR was released before July 1, 2020. Therefore, a VMT analysis is not required for the proposed Project.

<u>Regional Plans</u>

*Southern California Association of Governments*

SCAG is the designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for regional

transportation, land use and growth management, hazardous waste management, and air quality. The City is one of many local and regional jurisdictions comprising the SCAG.

To address regional planning issues, SCAG has several adopted strategies and plans to implement California's Sustainable Communities and Climate Protection Act (SB 375), and recommend actions local jurisdictions can take to implement regional sustainability goals. The key principles of these strategies include: locating new employment centers and neighborhoods near major transit systems to reduce vehicle trips and peak hour congestion; creating mini-communities around transit stations, with small businesses, housing and restaurants within walking distance to reduce vehicle travel; focusing future growth in urban centers and existing cities to reduce vehicle miles traveled and preserve rural and other natural areas; and preserving established single-family neighborhoods and existing natural and green spaces by accommodating new development with existing urbanized areas and downtowns.

In April 2016, SCAG adopted the 2016-2040 RTP/SCS, which includes goals to increase mobility and enhance sustainability for the region's residents and visitors. The RTP/SCS encompasses three principles to improve the region's future: mobility, economy, and sustainability. The RTP/SCS minimizes increases in regional traffic congestion by focusing growth, density, and land use intensity within existing urbanized areas in the region while enhancing the existing transportation system and integrating land use into transportation planning. The RTP/SCS recommends local jurisdictions accommodate future growth within existing urbanized areas to reduce VMT, congestion, and GHG emissions. The RTP/SCS specifically encourages future growth to occur within existing high quality transit areas (HQTA), which are described as generally walkable transit districts or corridors that are within 0.5 miles of a major transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The RTP/SCS designates the Downtown as a HQTA. The RTP/SCS approach to sustainably manage growth and transportation demand would reduce the distance and barriers between new housing, jobs, and services and would reduce vehicle travel and GHG emissions. Overall, the strategies and policies in the RTP/SCS are projected to exceed the GHG emission-reduction targets set forth by the CARB under SB 375.

<u>Local Plans and Regulations</u>

*City of Santa Monica Municipal Code (SMMC) Article 9, Chapter 9.28, Section 140, Bicycle Parking*.

The SMMC requires all new development to provide a minimum number of bicycle parking spaces based on the primary uses of the site. Bicycle spaces must be provided for both short-term and

long-term parking needs. For example, multi-family residential uses are required to provide one space per bedroom, and 10 percent of the total would be provided as additional short-term bicycle parking spaces. This section of the SMMC also requires bicycle parking to be provided in a safe, secured, well-lit, and accessible location on the project site with adequate signage.

*SMMC Article 9, Chapter 9.53, Transportation Demand Management*

The purpose of the City's TDM Ordinance is to proactively manage traffic congestion, reduce dependence on the single occupant vehicles, and enhance transportation choices by requiring trip reduction plans. The ordinance applies to employers with 10 employees or more and developers of projects with 7,500 sf of floor area, or mixed-use project with 16 units or more. Under the City's TDM Ordinance, employers and developers shall strive to achieve the Average Vehicle Ridership (AVR) for their respective land use designation. Within the Downtown, the target AVR is 2.0 after January 1, 2016.

Under the City's TDM Ordinance, employers with 10 to 49 employees are required to provide each of their employees with information about carpooling/vanpooling, transit, air pollution, bicycle routes and facility, walking and pedestrian safety, and alternatives to driving alone to work every day. Employers of 50 or more employees are required to prepare and submit an Emission Reduction Plan, which shall include the option of: (1) purchase of mobile source emission reduction credits; or (2) preparation and implementation of Employee Trip Reduction Plan to achieve the applicable AVR target. Additionally, developers of projects are required to prepare and implement a TDM plan that would include physical and programmatic elements to reduce single occupancy vehicle trips and achieve the targeted AVR. Annual monitoring is a requirement of the developer TDM Plan.

*SMMC Article 9, Chapter 9.73, Transportation Impact Fee Program*

SMMC Article 9, Chapter 9.73 is intended to ensure that new development projected through the year 2030 to pay its fair share of the costs of providing transportation infrastructure necessary to implement the policies and achieve the no net new P.M. peak hour trips goals of the LUCE. The new development will fund transportation improvements such as new sidewalks, crosswalks, traffic signal upgrades, transit, and bicycle facilities that are necessitated by the new trips associated with land use change. The fees are based on residential units or commercial square footage. The fee is charged prior to issuance of building permits, unless State law requires the City to accept later fee payments.

*Santa Monica General Plan Land Use and Circulation Element*

The General Plan LUCE for the City of Santa Monica, adopted in 2010, provides a set of goals, policies, and standards to guide land use and transportation decisions in the City through 2030. Objectives and policies presented in the LUCE of the General Plan related to traffic that are potentially relevant to the proposed project are listed below.

*Goal LU2: Integrate Land Use and Transportation for Greenhouse Gas Emissions Reduction*

> *Policy LU2.2 Transit Villages.* Capitalize on the Expo LRT stations to create vital new complete sustainable neighborhoods with transit as a focal element, green connections and pathways, a variety of housing types and jobs, enhanced creative arts and institutions, and local-serving retail and services.
>
> *Policy LU2.5 Vehicle Trip Reduction*. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle, and roadway improvements, expand transit service, manage parking, and strengthen TDM programs that support accessibility by transit, bicycle, and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.
>
> *Policy LU2.6 Active Spaces*. Focus new development in defined districts to create active spaces that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections.

*Goal LU5: Expo Light Rail Line*

> *Policy 5.2 Integrate Transit Connections.* Integrate supporting transit linkages, as well as pedestrian and bicycle connections, at all stations. Parking developed at or near a station is shared with other uses and priced to ensure availability at all times

*Goal LU8: Reduction of Vehicle Trips/Management of Congestion*

> *Policy LU8.1 Transportation Demand Management.* Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.

*Policy LU8.2 Comprehensive Parking Management.* Comprehensively manage parking and parking policies to address housing affordability, congestion management, and air quality goals. Facilitate the creation of shared parking, particularly within activity centers, transit districts, and near Expo light-rail stations. Use pricing and other innovative strategies to manage parking availability.

*Policy LU8.3 Pedestrian, Bicycle and Transit Connections.* Ensure pedestrian, bicycle, and transit mobility by creating facilities for comfortable walking throughout the City, a complete and safe bicycle network, and convenient and frequent transit service that will make transit an attractive option for all types of trips. age parking availability.

*Goal LU15: Enhance Santa Monica's Urban Form*

*Policy LU15.5 Pedestrian and Bicycle Connectivity.* Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.

*Goal B10: Create an Enhanced Mixed-use, Pedestrian Boulevard that Provides Residents, Employees, and Visitors with an Inviting Landscaped Pedestrian Environment*

*Policy B10.2.* Scale buildings to the pedestrian to create an intimate sidewalk walking/shopping experience. Ground floor facades should include enhanced materials and detailing where they will be perceived by passing pedestrians.

*Policy B10.11.* Encourage sidewalk dining where it meets established criteria.

*Policy B10.13.* Enhance the streetscape to create an inviting pedestrian environment

*Policy S2.1* Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan including, but not limited to: focusing new growth in mixed-use, transit-oriented districts; focusing new growth along existing corridors and nodes; supporting the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and, promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the city.

*Goal T3: Ensure that Santa Monica's Streets are Pleasant for all Users*

*Policy T3.1.* Include elements that contribute to quality from the user's perspective, not just throughput for each mode.

*Goal T6: Enable Everyone to Walk Comfortably Everywhere in Santa Monica*

*Policy T6.4* Use a combination of physical improvements and programs to promote walking.

*Goal T8: Provide a beautiful and attractive pedestrian environment throughout the City of Santa Monica*

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

*Goal T9: Create a Complete Network of High-quality Bicycle Facilities*

*Policy T9.9.* Require large property development (defined as greater than one typical city block) to provide through access for bicyclists and pedestrians.

*Goal T15: Manage local and regional congestion affecting Santa Monica*

*Policy T15.1.* Reduce automobile trips starting or ending in Santa Monica, especially during congested periods, with the goal of keeping peak period trips at or below 2009 levels.

*Goal T18: Encourage a more sustainable transportation system.* An action to further this goal that relates to private development is to prohibit driveways on boulevards and major avenues where access is available from a side street or alley. Implement standards for the safe and convenient design of projects, including safe interaction between private property and the public right-of-way.

*Goal T25: Design parking to meet applicable urban design goals and minimize negative impacts on pedestrians, bicyclists and transit users*

*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.

*Policy T25.3.* Minimize the width and number of driveways at individual development projects.

*Santa Monica Downtown Community Plan (DCP)*

The DCP is a roadmap guiding the evolution of the Downtown District, a 229-acre area identified by the City's General Plan LUCE as bounded by Wilshire Boulevard and the I-10 Freeway, and

between Lincoln Boulevard and Ocean Avenue. Considering that 4 percent of the City is located within Downtown, the DCP lays out a framework that integrates mobility, housing, jobs, historic preservation, publicly-accessible open space, infrastructure, and art and culture into a comprehensive long-term plan. The DCP includes the following policies related to mobility:

*Goal A.M.1: People come first in Downtown. Streets are designed and operated so that people want to walk because it feels enjoyable, social, comfortable and safe.*

> *Policy A.M.1.1*. Expand the capacity of walking infrastructure to promote safety, encourage first/ last mile connections and create an exceptional walking experience.
>
> *Policy A.M.1.*2. Enhance the comfort and safety of sidewalks and intersections in Downtown for people of all ages and abilities

*Goal A.M.2: Downtown is renowned for mobility options and low Single Occupancy Vehicle (SOV) travel, particularly during peak periods. Downtown achieves 65% of commute trips and 50% of non -commute trips by modes other than SOV.*

> *Policy A.M.2.1.* Reduce employee SOV commute trips to Downtown through the City's TDM program.
>
> *Policy A.M.2.3.* Expand TDM programs for resident access and mobility options Downtown.

*Bike Action Plan*

The City's *Bike Action Plan* (2011) guides the City's efforts to promote an increase in safe bicycling consistent with the LUCE. The *Bike Action Plan* includes a 5-year implementation plan that will improve 75 percent of the City's bicycle network as well as a 20-year vision plan. The implementation priorities include both bikeway and programmatic investments. Recommended programs include efforts in all program areas: events, awareness, information, education, encouragement, enforcement and supporting facilities such as development of a bicycle wayfinding system and bicycle parking improvements. Recommended bikeway investments include both facility improvements that are relatively easy and low cost, so they can be applied on many streets, as well as protected bikeway facility improvements that require more outreach, design and environmental review, but are critical to the development of a high-quality continuous bikeway "backbone" and showcase leading bicycle treatments.

*Santa Monica Pedestrian Action Plan*

The City adopted a Pedestrian Action Plan in 2016. The plan provides a comprehensive approach to pedestrian policy in Santa Monica using a multi-disciplined approach to making physical, operational, and educational improvements that prioritize pedestrians. The goals, policies, and actions in the Pedestrian Action plan address the input gathered from the community, stake holders, and key professionals, such as public safety personnel, transportation planners and engineers, while aligning a vision with data analysis to develop strategies that prioritize actions for the short- and long-terms. The Plan introduces a Vision Zero program which envisions zero fatalities from pedestrian crashes. Components of the program include prioritizing and organizing community safety goals and facilitating the systematic implementation of current and future actions that support safer walkability for people of all ages and abilities. The Plan also includes a toolbox that provides guidance to best address existing and future street conditions to help all City departments recognize and respond to pedestrian priorities.

### 3.13.3 Impact Assessment and Methodology

Thresholds for Determining Significance

Appendix G of CEQA Guidelines provides a set of screening questions that address impacts with regard to transportation. Specifically, the CEQA Guidelines state that a project may have a significant impact on transportation if:

a) The project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

b) The project would conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision (b);

c) The project would substantially increase hazards due geometric to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or

d) The project would result in inadequate emergency access.

CEQA requires a lead agency to determine the significance of all environmental impacts (Public Resources Code Section 21082.2; CEQA Guidelines Section 15064). For the analysis of consistency with circulation plans, programs, ordinances, and policies; hazardous design features, and emergency access, this EIR utilizes Appendix G of the CEQA Guidelines as the thresholds. The CEQA Guidelines provide that lead agencies may use the questions set forth in the

Appendix G of the CEQA Guidelines to assess the significance of the environmental effects associated with a project.

For the analysis of vehicles miles traveled, the City utilizes OPR's Technical Advisory as a reference guide as the City has yet to adopt VMT thresholds at the time of this writing. The rationale is summarized below:

*Conflict with CEQA Guidelines Section 15064.3 (Vehicle Miles Traveled)*

OPR's Updates to Technical Advisory on Evaluating Transportation Impacts in CEQA provides guidance on VMT analysis including screening criteria and recommended significance thresholds. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular projects. OPR's Technical Advisory provides screening criteria for land use projects, transportation projects, and land use plans. For land use projects – including the proposed Project – CEQA Guidelines Section 15065.3(b)(1) and OPR's Technical Advisory state that *"generally, projects within 0.5 mile of an existing major transit stop or an existing stop along a high quality transit corridor should be presumed to have a less than significant impact on VMT."* The presumption of a less than significant impact would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

- Has a FAR of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (i.e., if the jurisdiction requires the project to supply parking); and
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the MPO)

If a project leads to a net overall increase in VMT, OPR's recommends applying the following numeric targets which vary depending on the proposed land use:

**Table 3.13-3. OPR Suggested Numeric Targets for VMT**

| Land Use | OPR Suggested Numeric Targets |
|---|---|
| Residential | Exceeds 15 percent below existing VMT per capita (regional or local) |
| Office | Exceeds 15 percent below existing regional VMT per employee |
| Retail | Any net increase in total VMT |

OPR's suggested numeric targets of 15 percent below existing VMT per capita for residential and per employee for office is based upon OPR's Technical Advisory which explains:

> "Based on OPR's extensive review of the applicable research, and in light of an assessment by the CARB quantifying the need for VMT reduction in order to meet the State's long-term climate goals, OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold. Reductions in VMT of 15 percent are achievable at the project level in a variety of place types. Moreover, a 15 percent reduction is consistent with SB 743's direction to OPR to select a threshold that will help the State achieve its climate goals. As described above, CEQA Guidelines Section 21099 states that the criteria for determining significance must "promote the reduction in greenhouse gas emissions."

Subsequent to the release of OPR's Technical Advisory, CARB release its document *California Air Resources Board 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals* (2017 Scoping Plan Update). In this document, CARB assesses VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve State climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. Applying California Department of Finance population forecasts, CARB finds per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing (regional and/or other appropriate planning context), and overall per capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario. Below these levels, a project could be considered low VMT and would, on that metric, be consistent with *2017 Scoping Plan Update* assumptions that achieve State climate goals…In summary, achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals."

The VMT thresholds in OPR's Technical Advisory and the 2017 Scoping Plan update is not binding on public agencies, and as stated in the Technical Advisory, CEQA allows lead agencies to *"consider thresholds of significance…recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence."* (CEQA Guidelines Section 15064.7[c]). The City is in the process of adopting new VMT guidance and significance thresholds. On May 13, 2020, the City's Planning Commission recommended to the City Council the adoption of draft VMT screening criteria and two sets of significance thresholds for land use projects. The proposed draft thresholds are provided in Tables 3.13-4 and 3.13-5 for informational purposes:

**Table 3.13-4. City of Santa Monica: Draft Significance Threshold 1**

| Land Use | Proposed Threshold |
|---|---|
| Residential | No greater than existing Citywide average VMT/capita |
| Commercial Employee | No greater than existing Citywide average VMT/capita |
| Retail | Any net increase in total City VMT |

**Table 3.13-5. City of Santa Monica: Draft Significance Threshold 2**

| Example Calculation | | | | | |
|---|---|---|---|---|---|
| | Project VMT | Existing City Average VMT/capita | Project Population | Business as Usual (BAU) VMT | Proposed Threshold |
| Residential | A | 9.0 | D | = (9.0 x D) | |
| Commercial Employee | B | 19.2 | E | = (19.2 x E) | |
| Total Project VMT | (A +B) | | | Total BAU VMT | Is Total Project VMT at least 16.8% lower than Total BAU VMT? |

The first significance criterion states that a project should not exceed the existing Citywide average VMT rates for residential and commercial uses. This criterion ensures that new projects would not exacerbate or worsen the City's existing VMT per capita rates. The second criterion states that a project should achieve a total VMT that is at least 16.8 percent lower than "business as usual" VMT. Business as usual VMT represents what the VMT would be if the City's existing average VMT per capita were maintained, a metric against which the City can assess how a project would support or counter progress towards reducing GHG emissions, improving mobility options and implementing the related goals of the LUCE. The second criterion is aligned with the 2017 Scoping Plan Update and the City's Climate Action and Adaptation Plan (CAAP). As previously stated, the 2017 Scoping Plan Update states that if every project reduces its VMT by at least 16.8%, the GHG reduction goals established by the State could be achieved. In addition, the City's CAAP estimates that a 16.3 percent reduction in transportation VMT is necessary to achieve carbon neutrality goals.

The City Council will be adopting the draft VMT based significance thresholds prior to July 1, 2020 in conformance with the new CEQA Guidelines. Should the City adopt new significance thresholds based on VMT, the thresholds would apply prospectively to future projects (i.e., pending projects such as the Project would not be subject to the new thresholds). Further, as previously described an analysis of VMT associated with the proposed Project has been provided for informational purposes only, and therefore, no determination of significance is provided given

that the City has neither updated its *Traffic Study Guidelines* nor adopted VMT-based significance criteria prior to publication of the Draft EIR.

*Intersection Operations and Level of Service*

In 1991, the City adopted significance criteria for assessing whether project-related traffic increases result in significant impacts on intersection operations. The significance criteria, which are summarized in Table 3.13-6, depend on the previous 1984 LUCE classification of the streets at the intersection (e.g., arterial, collector, or local streets) and the operating conditions of the intersection under the Approval Year (2020) and Future Year Plus Project (2025) traffic conditions.[5] The 2010 LUCE has adopted a different typology for streets within the City, but the LOS significance criteria have not yet been revised to reflect the new nomenclature. Based on the City's *Study Guidelines* and the City's previously adopted LOS significance criteria, the potential significance of an impact to intersection operations is measured by either the change in average vehicle delay (measured in seconds) or by a change in the intersection operating conditions to LOS D, E, or F. If the intersection would operation at LOS F; however, the potential significance of an impact to intersection operations is defined in terms of a change in V/C ratio (as calculated using the "Operational Analysis" method from the HCM), since the average vehicle delay cannot be calculated if the intersection exhibits an oversaturation in traffic.

Using the City's previously adopted significance criteria, a project would not be considered to have a significant impact at an intersection along an arterial street operating at LOS D if the addition of Project-generated vehicle trips and the incremental change in the average vehicle delay is less than 15 seconds. If the intersection is operating at LOS E after the addition of Project-generated vehicle trips and the average vehicle delay increases by any amount; however, this would be considered a significant project impact. All impacts on intersections projected to operate at LOS F are based on the V/C ratio, with project-related increases of 0.005 or greater considered significant.

[5] The City's previously adopted significance criteria are based on the previous street classifications of the 1984 LUCE. The 2010 LUCE has adopted a different typology for streets within the city, but the significance criteria have not yet been revised to reflect the new nomenclature.

**Table 3.13-6. City of Santa Monica Significant Impact Criteria for Arterial and Collector Intersections**

| Baseline Scenario | Baseline plus Project Scenario |
|---|---|
| If LOS = A, B, or C | Significant Impact If: |
| Collector street intersection | Average vehicle delay increase is ≥ 15 seconds<br>or<br>LOS becomes D, E, or F |
| Arterial intersection | Average vehicle delay increase is ≥ 15 seconds<br>or<br>LOS becomes E or F |
| If LOS = D | Significant Impact If: |
| Collector street intersection | Any net increase in average seconds of delay per vehicle |
| Arterial intersection | Average vehicle delay increase is ≥ 15 seconds<br>or<br>LOS becomes E or F |
| If LOS = E | Significant Impact If: |
| Collector street intersection | Any net increase in average seconds of delay per vehicle |
| Arterial intersection | |
| If LOS = F | Significant Impact If: |
| Collector street intersection | HCM V/C ratio net increase is ≥ 0.005 |
| Arterial intersection | |

DEFINITIONS:
Delay – Average stopped delay per vehicle, in seconds.
HCM – Highway Capacity Manual.
V/C – Volume-to-Capacity Ratio – This ratio is based on the amount of traffic traveling through the intersection, the lane geometries, and other factors affecting capacity such as one-street parking, bus operations near the intersections, and pedestrian volumes at the street crosswalks.
LOS: Refer to Table 3.13-1 for definitions.
Note: Function street classification in this table is from the City's previous Circulation Element. The 2010 LUCE has adopted a different typology for streets within the City but the significance criteria have not yet been revised.
Source: Fehr & Peers 2020.

## Methodology

### *Consistency with Circulation Plans, Programs, Ordinances, and Policies*

The analysis of consistency with circulation plans, programs, ordinances, and policies reviews the proposed Project and determines whether it would obstruct or conflict with the applicable plans, programs, ordinance, and policies described in Section 3.13.2, *Regulatory Framework*, including the relevant policies and regulations of the SCAG's RTP/SCS, as well as the City's LUCE and DCP, *Bike Action Plan*, *Pedestrian Action Plan*, and the SMMC sections that address the circulation system. Consistency of the proposed Project with such City policy framework and associated regulations is also discussed in more detail in Section 3.10, *Land Use and Planning*.

*Conflict with CEQA Guidelines Section 15064.3, Subdivision (b) (Vehicle Miles Traveled)*

CEQA Guidelines Section 15064.3 was adopted by OPR on December 28, 2018, and states that VMT is the appropriate measure of transportation impacts. CEQA Guidelines Sections 15064.3(c) and 15007 also states that the provisions of this section shall apply prospectively (i.e. new requirements in CEQA Guidelines amendments will apply to steps in the CEQA process not yet undertaken by the date when agencies must comply with the amendments). CEQA Guidelines Section 15064.3(c) further states that VMT analyses must be implemented Statewide by July 1, 2020. As previously stated, the NOP for the proposed Project was issued in December 2018, prior to the adoption of CEQA Guidelines Section 15064.3, and the Draft EIR was released before July 1, 2020. CEQA Guidelines Section 15064.3(c) 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. Therefore, a VMT-based analysis is not required for the proposed Project. Nevertheless, a VMT-based analysis consistent with the requirements of CEQA Guidelines Section 15064.3, is provided for informational purposes only.

The analysis of VMT for the proposed Project are based on the OPR's Technical Advisory, which recommends evaluating each component of a mixed-use project independently. Guidance is provided for several broad land use types that account for majority of the development projects that are proposed, including hotel, retail, and restaurant, and museum land use types (which are fundamentally retail land use types from a transportation perspective), as well as residential land use types (including affordable and market rate units). The estimates of VMT associated with the proposed Project are based on the total trip generation estimates. For office land use types, the suggested metric in OPR's Technical Advisory is VMT per employee. While there is no office land use type associated with the proposed Project, employee VMT estimates were calculated based on projected employment information provided by the Applicant. For residential uses, the suggested metric in OPR's Technical Advisory is VMT per capita (i.e., resident). Non-employee and non-resident VMT (e.g., hotel guests, restaurant and retail customers, and Cultural Use Campus visitors) were analyzed together.

The following steps were used to estimate VMT associated with the proposed Project, which was then compared with Citywide averages where available. For each land use type, the total trips were multiplied by the average trip length for that type of trip from the City's Transportation Demand Forecast Model (TDFM) which has trip length for transportation analysis zones (TAZs).[6] The

[6] A traffic analysis zone or transportation analysis zone (TAZ) is the unit of geography most commonly used in conventional transportation planning models. The size of a zone varies, but for a typical metropolitan planning software, a zone of under 3,000 people is common. The spatial extent of zones typically varies in models, ranging from very large areas in the exurb to as small as city blocks or buildings in central business districts.

number of total miles was divided by the number of people related to that use (e.g., employees, residents, and hotel guests and restaurant and retail customers) (see Appendix K).

**Employee VMT**

Step 1: Estimate the total number of employees: For employee VMT, estimate the total number of employees associated with the proposed Project.

Step 2: Determine the average VMT per employee: Multiply the estimated employee trips by the trip length, and then divide by the number of employees to calculate average VMT per employee.

**Residential VMT**

Step 1: Estimate the total number of residents: To estimate the total number of residents associated with the proposed Project, household size data is multiplied by the proposed number of residential units. The average household size for the Census Tract in which the Project site is located (Census Tract 7019.02) is 1.53. However, this average household size is more reflective of the typical Downtown residential units (i.e., studios, 1-bedroom units). In contrast, the proposed Project includes a mix of smaller and larger size units (i.e., 12 studio units, 55 one-bedroom units, 23 two-bedroom and 10 three-bedroom units). Therefore, because the Census Tract household size is not representative of the proposed Project, the Citywide household size by unit type data from the 2017 American Community Survey 5-Year Estimates is used, resulting in an average household size of 1.39 for studio and 1-bedroom units, 2.41 for two-bedroom units, and 3.09 for three-bedroom units.

Step 2: Determine the average VMT per resident: Multiply the estimated residential trips by the trip length, and divide by the total number of residents to calculate average VMT per capita.

**Hotel Visitors and Guests (Non-Employee and Non-Residential) VMT**

Estimate the number of non-employee and non-residential trips to and from the proposed Project: Subtract the number of net new daily trips made by employees and residents, from the total number of net new daily trips. The remaining trips can be attributed to hotel guests, restaurant and retail customers, and Cultural Use Campus visitors who are not otherwise staying at the hotel.

*Intersection Operations and Level of Service*

The intersection analysis presented in Impact T-2B summarizes the results of the Transportation Study prepared for the proposed Project by Fehr & Peers (see Appendix K). The scope of the Transportation Study conforms to standards set forth in adopted City's *Traffic Study Guidelines* and addresses the City's previously adopted significance criteria. The intersections included in the Transportation Study were identified jointly by Fehr & Peers and City staff based on the anticipated Project-generated trips and the anticipated magnitude of demand on the City's transportation system. Previous transportation and circulation studies (e.g., Transportation Study for the DCP Program EIR) were also considered to ensure that all potentially affected intersections were included in the analysis.

- Peak hour intersection impacts associated with the proposed Project were evaluated during typical weekday morning (7:30 to 9:30 A.M.) and afternoon (5:00 to 7:00 P.M.) peak hours and during the weekend midday (1:00 to 5:00 P.M.) peak hour. In order to evaluate the potential intersection impacts associated with the proposed Project, forecasts were developed for the Approval Year (2020) and Future Year (2025) traffic conditions both with and without Project-generated vehicle trips. These forecasts were derived from the City's TDFM, which was developed as part of the LUCE. This model produces cumulative traffic forecasts for the City of Santa Monica and the surrounding areas within the City of Los Angeles. The City's TDFM was recently calibrated based on the 2017 traffic counts and updated to reflect 2017 land use information. For consistency with the LUCE Program EIR, the City's TDFM was used to develop forecasts for the Approval Year (2020) and Future Year (2025) No Project traffic conditions. These volumes account for the operation of recently completed transportation projects (e.g., Metro E [Expo] LRT line and Colorado Esplanade), as well as several future improvements to the transportation network that are expected to be completed before 2025, which are likely to result in future capacity and circulation changes at various locations throughout the Downtown. The City's TDFM was used as to provide the following traffic forecasts:
- The Approval Year (2020) No Project traffic conditions represent the conditions expected during at the time of Project approval and provide the baseline for the Approval Year (2020) Plus Project impact analysis. To develop the Approval Year (2020) No Project traffic conditions, the land use in the City's TDFM was updated to include the Citywide projects that were completed between the time of the 2017 traffic counts and Approval Year (2020) (refer to Table 3.0-1 in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*). Outside of the City, the land use and through trips were developed using linear interpolation based on the LUCE traffic forecast (2030).
- The traffic generated by the proposed Project in the Approval Year (2020) was estimated using Project-specific trip rates and trip distribution was modeled across the surrounding street system. The Project-generated trips were added to the Approval Year (2020) No Project traffic conditions to create the Approval Year (2020) Plus Project traffic conditions.
- The Future Year (2025) No Project traffic conditions represent the conditions expected during the future and provide the baseline for the Future Year (2025) Plus Project impact

analysis. To develop the Future Year (2025) No Project traffic conditions, the land use file in the City's TDFM was updated to include the list of approved and pending (proposed) projects (refer to Table 3.0-1 in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*). These projects are conservatively assumed to all be completed between the Existing Year (2017) and Future Year (2025). Similar to the Approval Year (2020) traffic conditions, land use and through trips outside the City were linearly interpolated.

- The traffic generated by the proposed Project in the Future Year (2025) was estimated using Project-specific trip generation rates and trip distribution was modeled across the surrounding transportation network. The trips associated with the proposed Project were added to the Future Year (2025) No Project traffic conditions to form the Future Year (2025) Plus Project traffic conditions.

*Approval Year (2020) No Project Conditions*

CEQA Guidelines Section 15125 directs that an EIR "must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published at the time environmental analysis is commenced, from both a local and regional perspective. These environmental settings will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."[7]

However, the CEQA Guidelines and the Courts have recognized that the date for establishing an environmental baseline cannot be rigid. The California Supreme Court determined that "[n]either CEQA nor the CEQA Guidelines mandate a uniform, inflexible rule for determination of the existing conditions baseline. Rather, an agency enjoys the discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence."[8] The California Supreme Court further stated that *"Environmental conditions may vary from year to year and in some cases, it is necessary to consider conditions over a range of time periods. In some circumstances, peak impacts or recurring periods of resource scarcity may be as important environmentally as average conditions. Where environmental conditions are expected to change quickly during the period of environmental review for reasons other than the proposed project, project effects might reasonably be compared to predicted conditions at the expected date of approval, rather than to conditions at the time analysis is begun."*[9]

In compliance with CEQA case law, this EIR uses the anticipated Approval Year (2020) as the baseline rather than the year that the NOP was published for the proposed Project. The purpose of

[7] CEQA Guidelines Section 15125(a)
[8] Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.4th 310, 320
[9] Communities for a Better Environment, supra, 48 Cal.4th at p. 328

establishing the Approval Year (2020) No Project traffic conditions as the baseline for the transportation impact analysis is to develop a more accurate representation of traffic conditions that are expected to change over the time period in which the EIR is being prepared. A number of Court decisions have supported this alternative use of baseline traffic levels. For example, the Court of Appeal ruled that *"...for instance, where the issue involves an impact on traffic levels, the Draft EIR might necessarily take into account the normal increase in traffic over time. Since the environmental review process can take a number of years, traffic levels as of the time the project is approved may be a more accurate representation of the existing baseline against which to measure the impact of the project."*[10] Additionally, the California Supreme Court stated that *"to the extent a departure from the 'norm' of an existing conditions baseline promotes public participation and more informed decision making by providing a more accurate picture of a proposed project's likely impacts, CEQA permits the departure. Thus, an agency may forego analysis of a project's impacts on existing environmental conditions if such an analysis would be uninformative or misleading to decision makers and the public."*[11] Because an environmental baseline that differs from the date of the NOP is reasonable and results in a more accurate environmental analysis of transportation impacts, this EIR uses Approval Year (2020) No Project traffic conditions as the baseline for the transportation impact analysis.

*Future Year (2025) No Project Conditions*

The DCP envisions that Wilshire Boulevard, located one and a half blocks to the north of the Project site, will be transformed into a more pedestrian-friendly street and identifies the Wilshire Boulevard Streetscape Project, which will reduce lane space thereby creating a widened pedestrian space between Ocean Avenue and 4th Street. As part of this conceptual improvement, the sidewalk on the south side of Wilshire Boulevard will be widened to improve pedestrian access between the Third Street Promenade and Palisades Park. Consistent with the DCP, the Future Year (2025) No Project traffic conditions assume that there would be a lane reduction on Wilshire Boulevard from two eastbound through lanes between Ocean Avenue and 4th Street to a single eastbound through or shared through-right lane.

Signal timings at intersections were also optimized for the Future Year (2025) No Project traffic conditions to balance shifting demand patterns, where applicable. Although the replacement of the Pier Bridge connecting Colorado Avenue with the Santa Monica Pier is a potential future

[10] Save Our Peninsula Committee v. Monterey County Board of Supervisors (2001) 87 Cal.App.4th 99, 125-126, and Pfeiffer v. City of Sunnyvale City Council ("Pfeiffer"), Case No. H036310
[11] Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2013) 57 Cal. 4th 439.

transportation improvement, since this project has not been finalized, no change to the circulation of the Pier area has been assumed.

The City's *Bicycle Action Plan* (2011) includes recommended bicycle projects for 5-year implementation and 20-year vision plans. As of 2018, the majority of the 5-year implementation projects have been completed, including those nearest to the Project site. The DCP also identified as part of its 20-year vision further potential bicycle infrastructure improvements in the Downtown, including:

- As called for in the DCP, the City is currently exploring the potential of installing a cycle track on the west side of Ocean Avenue;
- Santa Monica Boulevard Bikeway, which includes shared lane markings (identified in the *Bike Action Plan* as a green "super-sharrow") from Ocean Avenue to 6th Street / 7th Street;
- Expo Bike and Pedestrian Path Project, which would construct a separated bicycle and pedestrian paths adjacent to the Metro E (Expo) LRT line.

*Project Trip Generation Methodology*

The proposed Project would generate net increase of 146 trips during the A.M. peak hour, 146 during the P.M. peak hour, and 168 trips during the weekend midday peak as shown in Table 3.13-7. The detailed methodology for calculating Project-generated trip is described below.

The trip estimates for the proposed Project assume that the implementation of effective TDM strategies in accordance with the City's TDM Ordinance and LUCE policies. Since the City's trip generation rates assume implementation of a TDM program in accordance with the City's TDM Ordinance, the Applicant would be required to prepare and implement a TDM plan that achieves the targeted levels of trip reductions as set forth in the Development Agreement. Potential TDM strategies for the proposed Project include, but shall not be limited to, ridesharing, parking pricing, and bicycle facilities (refer to Section 2.6.11, *Development Agreement*). These strategies discussed in the Transportation Study are for informational purposes only. Specific strategies required as part of the TDM plan would be determined during the Development Agreement process and would be finalized during the approval of the proposed Project.

## Table 3.13-7. Project Trip Generation

| Land Use | Size | Daily Rate | | A.M. Peak Hour Trips | | | P.M. Peak Hour Trips | | | Wknd Midday Peak Hour Trips | | | Week Day Trips | A.M. Peak Hour Trips | | | P.M. Peak Hour Trips | | | Wknd Midday Peak Hour Trips | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Rate | % In | % Out | Rate | % In | % Out | Rate | % In | % Out | | In | Out | Total | In | Out | Total | In | Out | Total |
| **Proposed Project** | | | | | | | | | | | | | | | | | | | | | | |
| Residential - Studio Units [a, b] | 12 | DU | 1.49 | 0.09 | 23% | 77% | 0.1 | 63% | 77% | 0.1 | 50% | 50% | 18 | 0 | 1 | 1 | 1 | 0 | 1 | 1 | 0 | 1 |
| Residential - One-Bedroom Units [a, b] | 55 | DU | 3 | 0.18 | 23% | 77% | 0.21 | 63% | 77% | 0.21 | 50% | 50% | 165 | 2 | 8 | 10 | 8 | 4 | 12 | 6 | 6 | 12 |
| Residential - Two-Bedroom Units [a, b] | 23 | DU | 5.14 | 0.32 | 23% | 77% | 0.35 | 63% | 77% | 0.35 | 50% | 50% | 118 | 2 | 5 | 7 | 5 | 3 | 8 | 4 | 4 | 8 |
| Residential - Three-Bedroom Units [a, b] | 10 | DU | 5.14 | 0.32 | 23% | 77% | 0.35 | 63% | 77% | 0.35 | 50% | 50% | 51 | 1 | 2 | 3 | 3 | 1 | 4 | 2 | 2 | 4 |
| Retail [c] | 12.04 | KSF | 29.31 | 1.29 | 62% | 38% | 1.97 | 48% | 52% | 1.97 | 52% | 48% | 353 | 10 | 6 | 16 | 15 | 12 | 24 | 12 | 12 | 24 |
| Restaurant [d] | 24.07 | KSF | 78.75 | 3.50 | 55% | 45% | 5.28 | 62% | 38% | 5.28 | 50% | 50% | 1,896 | 466 | 38 | 84 | 79 | 48 | 127 | 64 | 63 | 127 |
| Cultural Uses [e] | 35.50 | KSF | 7.26 | 0.68 | 91% | 9% | 0.80 | 15% | 85% | 1.28 | 51% | 49% | 258 | 22 | 2 | 24 | 4 | 24 | 28 | 23 | 22 | 45 |
| Publicly Accessible Open Space [f] | 0.63 | Acres | 50.00 | 6.43 | 50% | 50% | 4.46 | 52% | 48% | 2.32 | 62% | 38% | 32 | 2 | 2 | 4 | 2 | 1 | 3 | 1 | 0 | 1 |
| Hotel [g] | 120 | Room | 4.90 | 0.31 | 49% | 51% | 0.34 | 51% | 49% | 0.31 | 50% | 50% | 588 | 18 | 19 | 37 | 21 | 20 | 41 | 19 | 18 | 37 |
| **Total Project Trips** | | | | | | | | | | | | | **3,475** | **103** | **83** | **186** | **135** | **113** | **248** | **132** | **127** | **259** |
| **Existing Land Use** | | | | | | | | | | | | | | | | | | | | | | |
| Residential – Studio Units [a, h] | 12 | DU | 1.51 | 0.09 | 23% | 77% | 0.11 | 63% | 77% | 0.11 | 50% | 50% | 18 | 0 | 1 | 1 | 1 | 0 | 1 | 1 | 0 | 1 |
| Residential – One-Bedroom Units [a, h] | 7 | DU | 3.03 | 0.19 | 23% | 77% | 0.22 | 63% | 77% | 0.21 | 50% | 50% | 21 | 0 | 1 | 1 | 1 | 1 | 2 | 1 | 0 | 1 |
| Restaurant [i] | 12.39 | KSF | 79.27 | 0.93 | 55% | 45% | 5.50 | 62% | 38% | 6.27 | 50% | 50% | 982 | 7 | 5 | 12 | 42 | 26 | 68 | 39 | 39 | 78 |
| Commercial Office [j] | 14.01 | KSF | 9.74 | 0.83 | 86% | 14% | 0.91 | 16% | 84% | 0.10 | 54% | 46% | 136 | 10 | 2 | 12 | 2 | 11 | 13 | 1 | 0 | 7 |
| Medical Office [k] | 4.900 | KSF | 29.22 | 2.46 | 78% | 22% | 2.664 | 28% | 72% | 0.48 | 57% | 43% | 143 | 9 | 3 | 12 | 4 | 9 | 13 | 1 | 1 | 2 |
| Medical Spa [l] | 0.730 | KSF | 29.22 | 1.31 | 51% | 49% | 3.45 | 57% | 43% | 3.19 | 49% | 51% | 21 | 1 | 0 | 1 | 2 | 1 | 3 | 1 | 1 | 2 |
| Salon [m] | 1.200 | KSF | 40.00 | 1.21 | 100% | 0% | 1.45 | 17% | 83% | 5.08 | 36% | 64% | 48 | 1 | 0 | 1 | 0 | 2 | 2 | 2 | 4 | 6 |

## Table 3.13-7. Project Trip Generation (Continued)

| Land Use | Size | Daily Rate | A.M. Peak Hour Trips | | | P.M. Peak Hour Trips | | | Wknd Midday Peak Hour Trips | | | Week Day Trips | A.M. Peak Hour Trips | | | P.M. Peak Hour Trips | | | Wknd Midday Peak Hour Trips | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Rate | % In | % Out | Rate | % In | % Out | Rate | % In | % Out | | In | Out | Total | In | Out | Total | In | Out | Total |
| **Total Existing Trips** | | | | | | | | | | | | **1,369** | **28** | **12** | **40** | **52** | **50** | **102** | **46** | **45** | **91** |
| **Net Incremental Trips (Projected minus Existing Trips)** | | | | | | | | | | | | **2,110** | **75** | **71** | **146** | **83** | **63** | **146** | **86** | **82** | **168** |

Notes:
Proposed land uses based on Applicant's information and other conversations.
Existing land uses were fully occupied in July 2017, when baseline traffic counts were collected.
As described in the *Santa Monica Travel Demand Forecasting Model (TDFM) Trip Generation Rates,* Santa Monica TDFM trip generation rates for residential, retail and restaurant space incorporate internal capture and pass-by trips.

[a] It is assumed that the car-ownership per household for studio and one-bedroom multi-family residential land use types is one car, while the car-ownership per household for two- bedroom and three-bedroom multi-family residential land use types is two or more cars.

[b] Trip generation for project land use in 2030 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 18 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures and proximity to the Metro E (Expo) LRT line; in/out splits are applied from #220 Multifamily Housing, *Trip Generation, 9th Edition*, Institute of Transportation Engineers (ITE), 2017.

[c] Trip generation for project land use in 2030 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 18 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures and proximity to the Metro E (Expo) LRT line; in/out splits are applied from #820 Shopping Center, *Trip Generation, 9th Edition,* Institute of Transportation Engineers (ITE), 2017.

[d] Trip generation for project land use in 2030 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 18 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures and proximity to the Metro E (Expo) LRT line; in/out splits are applied from #932 High-Turnover Restaurant, *Trip Generation, 9th Edition*, Institute of Transportation Engineers (ITE), 2017.

[e] Trip generation was sourced from trip generation rates that were developed for six museum/cultural use spaces in Southern California, including a range of types such as art museums, historical museums, and children's museums. The rates and in/out splits for all six museums were averaged together to develop a conservative estimate for this site in the absence of a specific program identified for the cultural use space.

[f] Trip generation rate from "Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region", April 2002.

[g] Trip generation is empirically derived from observations at six other hotels in the downtown Santa Monica area. The trip generation and in/out splits were observed for each hotel on an average weekday during the A.M. and P.M. peak hours and an average weekend midday peak hour while the hotels were near 100% occupancy. The rates and in/out splits reflect the average of all observations.

[h] Trip generation for project land use in 2020 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 3 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures and proximity to the Metro E (Expo) LRT line; in/out splits are applied from #220 Multifamily Housing, *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers (ITE), 2017.

[i] Trip generation for project land use in 2020 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 3 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures; in/out splits are applied from #932 High-Turnover Restaurant, *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers (ITE), 2017. The A.M. trip rates are reduced to reflect that most existing restaurants are not open during the A.M. peak hour, but employees and vendors are likely to be making trips during that time.

[j] Trip generation for project land use in 2020 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 8 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures; in/out splits are applied from #710 General Office Building, *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers (ITE), 2017.

[k] Trip generation for project land use in 2020 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 8 in *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, is used so that rates account for LUCE TDM measures; in/out splits are applied from #720 Medical-Dental Office Building, *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers (ITE), 2017.

[l] Trip generation and in/out splits for project land use are applied from #492 Health/Fitness Club, *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers (ITE), 2017. The daily rate is assumed to be the same as #720 Medical-Dental Office Building, *Trip Generation Manual, 10th Edition*, Institute of Transportation Engineers (ITE), 2017.

[m] Trip generation and in/out splits for project land use are applied from #918 Hair Salon, *Trip Generation Manual, 9th Edition*, Institute of Transportation Engineers (ITE), 2012. The ITE Trip Generation manual does not include a daily rate. The daily rate is based on a phone survey of the existing salon's average number of daily appointments.

### Residential Trip Generation Rates

Residential trip generation for the proposed Project was determined based on the number and type of residential units proposed, including 12 studio units, 55 one-bedroom units, 23 two-bedroom units, and 10 three-bedroom units. Studio units were determined to generate a daily rate of 1.49 trips, while one-bedroom units would generate a daily rate of 3 trips, and two- and three-bedroom units would generate a daily rate of 5.14 trips, for a total of weekday 352 trips.[12, 13]

### Hotel Trip Generation

The City's TDFM does not provide specific trip generation rates for hotels; therefore, the trip generation rate for the proposed hotel was empirically derived. The City conducted counts at two Downtown hotel sites in 2017 with similar characteristics to the proposed hotel, which Fehr & Peers reviewed and used to refine the rates based on data collection conducted study in 2010 at four hotels in the area to produce updated Project-specific trip generation rates for this land use type. An hourly trip generation rate was developed based on the average observed trip generation for the A.M. and P.M. peak hours. Weekend midday peak hour trip generation was developed by interpolating the peak hour rates with *Trip Generation, 10th Edition* rates for these time periods (ITE 2017). The proposed hotel would generate a daily rate of 4.90 trips per hotel room, for a total of 588 weekday trips.

### Cultural Use Campus Trip Generation

The trip generation for Cultural Use Campus was sourced from trip generation rates that were developed for six museum/cultural use spaces in California, including a range of types such as art museums, historical museums, and children's museums, and a variety of sizes and visitor levels. The six museums include the Los Angeles County Museum of Art (LACMA), the Museum of Tolerance, the California African-American Museum, the HABITOT Children's Museum in the City of Berkeley, the Santa Barbara Children's Museum (MOXI), and the Orange County Museum of Art. The rates and in/out splits for all six museums were averaged together to develop a conservative estimate for the Project

[12] As described in Section 3.12-5 and Appendix K, it is assumed that the car-ownership per household for studio multi-family residential land use types is zero cars, one-bedroom multi-family residential land use types is one car, while the car-ownership per household for two- bedroom and three-bedroom multi-family residential land use types is two or more cars.

[13] Trip generation for project land use in 2030 from TDFM (Area Type 1), with Metro E (Expo) LRT line reduction from Table 18 in Santa Monica Travel Demand Forecasting Model Trip Generation Rates, is used so that rates account for LUCE TDM measures and proximity to the Metro E (Expo) LRT line; in/out splits are applied from #220 Multifamily Housing, *Trip Generation, 10th Edition* (ITE 2017).

site in the absence of a specific program identified for the cultural use space. A 35,500-sf Cultural Use Campus was therefore determined to generate a daily rate of 7.26 trips per 1,000 sf, for total of 258 weekday trips

**Retail Uses**

Local trip generation rates for retail uses were developed and calibrated from the City's TDFM (Area Type 1), with the Metro E (Expo) LRT line reduction from Table 18 in the City's TDFM Trip Generation Rates. Similar to hotel use, the ITE pass-by credit rates for retail uses was reviewed and used to help inform a reasonable pass-by trip rate specific to the Project site. Retail traffic daily rate was determined to be 29.31 per 1,000 sf for the 12,040-sf retail space, generating a total 353 weekday trips.

**Restaurant Uses**

Local trip generation rates for restaurants were developed and calibrated from the City's TDFM (Area Type 1), with the Metro E (Expo) LRT line reduction from Table 18 in the City's TDFM Trip Generation Rates. This is used so that rates account for LUCE TDM measures and proximity to the Metro E (Expo) LRT line; in/out splits are applied from #932 High-Turnover Restaurant from *Trip Generation Manual, 10th Edition* (ITE 2017). Restaurant traffic daily rate was determined to be 78.75 trips per 1,000 sf for the 24,070-sf restaurant land use type, for a total of 1,896 weekday trips.

**Publicly-Accessible Open Space Trip Generation**

The trip generation rate for the proposed publicly-accessible open space is from the *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (2002). Use of these trip generation rates is consistent with analysis of other recent park and open space projects in the City. Based on this consideration, the 0.63-acre publicly-accessible open space daily rate was determined to be 50.00 per acre, with the pass-by and district capture reduction, the total weekday traffic generation was calculated at 32 trips.

**Existing Land Uses Trip Generation**

The Project site is currently occupied by residential units, restaurants, office space, spa, and hair salon. Residential, restaurant, and office trip generation rates from the TDFM (described above) were applied to develop trip generation estimates for existing uses. The spa and hair salon trip generation were developed using ITE trip generation rates (ITE 2017). The existing trip generation was then subtracted from the proposed project trip generation to develop a "net new" trip generation.

*Project Trip Distribution and Assignment*

The geographic distribution of Project-generated trips is dependent on characteristics of the street system serving the Project site, the level of accessibility of routes to and from the Project site, the locations of residential areas from which employees and visitors would be drawn, and the destinations to which residents would be attracted. The trip distribution patterns of the proposed Project were informed by a select zone analysis of the Project site using the City's TDFM.

Approximately 60 percent of Project-generated trips would originate from east, 12 percent from the north, and 28 percent from the south of the Project site. Proposed site access and the results of the select zone analysis were used to assign the Project-generated trips to the study intersections (see Appendix K).[14] The Project site would have a single vehicle entrance on 1st Court, which would traverse the Project site, provide access to the subterranean parking garage, and right-turn only exit onto 2nd Street. Employees, residents and visitors would enter the Project site southbound on 1st Court from Arizona Avenue. Vehicles would exit the Project site to the east and would be directed southbound via right-turn only movement onto 2nd Street (refer to Figure 2-4).

*Hazards Due to Design Features Analysis*

This analysis evaluates whether construction of the proposed Project would result in temporary hazardous such as conflicts between vehicles, bicycles, and pedestrians. Additionally, this analysis evaluates whether there would be long-term operational hazards related to design features such as curved streets with inadequate sight distances, unsafe separation of vehicle, bicycle, and pedestrian traffic, or inadequate pedestrian facilities (e.g., incomplete sidewalks, lack of striped pedestrian crossings, etc.).

*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 (SMFD) regarding adequate turning radii on streets, response distances to buildings, etc.

### 3.13.4 Applicable Mitigation Measures from the DCP Program EIR

The DCP Program EIR does not include any applicable mitigation measures for transportation impacts associated with the proposed Project.

[14] Select zone analysis represents a project-only traffic model run, where the project's trips are distributed and assigned along a loaded transportation network. This procedure isolates the specific impact on the transportation network. Select zone analysis examines the spatial impacts of a new development and requires knowledge of the distribution of path flows or of the distribution of origin destination (O-D) specific link flows.

### 3.13.5 Project Impacts and Mitigation Measures

*Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

**T-1** **As a mixed-use development in the transit-rich and pedestrian-oriented Downtown, the proposed Project would be consistent with applicable programs, plans, ordinances, and policies addressing the City's circulation system, including vehicle, transit, bicycle, and pedestrian facilities. Therefore, impacts associated with the proposed Project would be *less than significant*.**

Impact Description T-1

The Project site is located along the western edge of the Downtown within a TPA, with new development within such a transit-rich TPA generally consistent with the intent of State, regional and City circulation programs, plans and policies (SCAG 2016; City of Santa Monica 2017). As described in 3.13.1, *Existing Setting*, the Project site is located within approximately 0.5 miles of the Downtown Santa Monica Station. Additionally there are 13 fixed-route bus lines with stops located within a 0.25-mile radius of the Project site and within walking distance of various other bus stops.. There is a network of bicycle facilities within the immediate Project vicinity – including Class II (i.e., striped) bicycle lanes on Ocean Avenue and 2nd Street. There is also complete network of sidewalks with signalized pedestrian crossings at all of the nearby intersections.

As described in Section 2.6.11, *Development Agreement*, the proposed Project would be subject to a Development Agreement, which would be negotiated with the City. The Development Agreement would set forth the community benefits of the proposed Project including the preparation and implementation of an enhanced TDM plan to provide trip reduction strategies to be implemented by the Applicant. At minimum, the proposed Project would include unbundled parking, onsite bicycle facilities (i.e., showers, racks, and lockers), transit pass subsidies, and participation in a Transportation Management Association. Additional measures to reduce vehicle trips and parking demand generated by the proposed Project would be negotiated with the City and may include, but not be limited to, guaranteed ride home program, a TDM coordinator, ridesharing, flexible work hours, transportation information center, wayfinding signage, and a commuter club. As part of the Development Agreement, the Applicant would be required to achieve the requirements of the City's TDM Ordinance, which calls for annual monitoring and reporting. The Applicant would be required to summarize the results of trip reduction measures, including their ability to achieve City required AVR targets, and describe the TDM efforts in place to reduce vehicle trips in an annual report delivered to the City. Additionally, the Applicant would be

required to make a monetary contribution towards transportation and pedestrian improvements in the Downtown, above and beyond Transportation Impact Fee Ordinance requirements. The proposed Project would also provide an onsite information center for employees, visitors, and residents to access information about local transit services available, including regional passenger rail, bus lines, and schedules. During the Development Agreement process the Applicant would be required to coordinate with the City and the Metro regarding the continued operation of the transit facilities adjacent to the Project site, including the Metro bus layover zone located adjacent to the Project site along the west side of 2nd Street (refer to Section 2.6.11, *Development Agreement*).

Although the proposed Project would generate additional vehicle traffic, incrementally increase VMT, and increase traffic congestion at some intersections within the City (see Impact T-2B), it would be substantially consistent with adopted plans and policy framework established in the SCAG RTP/SCS as well as LUCE and DCP. Therefore, a comprehensive analysis of consistency with applicable long-range planning documents and policies is provided in Section 3.10, *Land Use and Planning*. This analysis includes a rigorous discussion of consistency with development standards, including design guidelines and vehicle trip reduction strategies, to minimize transportation impacts associated with the proposed Project. As discussed therein, the proposed Project is consistent with these all applicable development standards, design guidelines, and other transportation-related strategies. Consistency with the *Bicycle Action Plan*, *Pedestrian Action Plan*, and SMMC is also summarized below. The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be *less than significant*.

*2016-2040 RTP/SCS*

The RTP/SCS aims to reduce or limit new trip generation and associated regional growth in traffic congestion and VMT by focusing growth, density, and land use intensity within existing urbanized areas. Additionally, the RTP/SCS strives towards enhancing the existing transportation system, maximizing multimodal transportation, and integrating land use into transportation planning. The RTP/SCS recommends local jurisdictions accommodate future growth within existing urbanized areas to reduce VMT, congestion, and GHG emissions. The RTP/SCS specifically encourages future growth to occur within existing HQTAs, which are described as generally walkable transit districts or corridors that are within 0.5 miles of a major transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The proposed Project supports these goals by including a mix of hotel, restaurant and retail, residential, cultural uses, and open space in close proximity to transit services within the Downtown, including the Downtown Santa Monica

Station and the various Big Blue Bus and Metro service routes, which are within walking distance of the Project site. Additionally, the proposed Project would encourage pedestrian activity through the provision of 22,407 sf of pedestrian-only onsite open space as well as a minimum 15-foot building-to-frontage (i.e., face of curb) line to create a widened sidewalk along 2nd Street in accordance with the DCP (see Chapter 4D Building Frontage Line of the DCP). The proposed Project would also provide a minimum of 231 bicycle parking spaces for visitors, employees, and residences improving overall access to active bicycle facilitates. As described in Section 3.10, *Land Use and Planning* the proposed Project would be consistent with all applicable goals of the 2016-2040 RTP/SCS.

*LUCE and DCP*

The LUCE serves as an integrated land use and transportation planning document governing existing and future land uses in the City to connect new housing and job opportunities with expanded transportation networks. The LUCE establishes goals, policies, and development criteria for land uses and circulation in the City. The LUCE's circulation policies describes a multimodal transportation system that minimizes congestion and pollution while ensuring safe and equitable access for residents, visitors, employees, and commercial businesses. The detailed standards, strategies, and policies for the Downtown, including urban development and circulation, are described in the DCP.

The primary goals of the LUCE and the DCP with regard to the circulation system within the City are focused on shifting the number of trips made by single occupancy vehicle to transit, bicycle, and pedestrian trips. To increase the use of alternative modes of transportation, the LUCE and the DCP support the creation of mixed-use communities with attractive and safe pedestrian and bicycle networks that are connected to key public transit services. The complete list of the goals and policies outlined by the City are described in Section 3.10 *Land Use and Planning*. As discussed therein, implementation of the proposed Project would be consistent with the City's goals, policies, and programs for sustainability, alternative transportation, transportation management, and GHG reduction.

One of the stated goals of the LUCE is the Citywide goal of no net new P.M. peak hour vehicle trips generated by land uses in the City by 2030. As described in the LUCE Program EIR, this goal will be achieved by changing travel behavior associated with both existing and future development in the City. The City's trip reduction goals are Citywide, understanding that individual new development will inevitably generate vehicle trips. To achieve the goal of no net new P.M. peak hour trips, the LUCE provides a framework for integrating land use and transportation to reduce vehicle trips; encouraging walking, bicycling, and transit use; and creating active, pedestrian-

oriented neighborhoods. The LUCE proposes the creation of a complete multimodal transportation system, which builds upon the City's investment in transit. The LUCE focuses future development into transit-oriented areas, such as the Downton to substantially reduce vehicle trips and to offset new vehicle trips with reductions elsewhere in the circulation system, such as from existing development.

The proposed Project is expected to generate net-new travel of approximately 146 trips in the weekday A.M. peak hour, 146 trips in the weekday P.M. peak hour and 168 trips in the weekend midday peak hour. The LUCE goal of generating no net new P.M. peak hour trips is not a requirement to be applied on a project-by-project basis. Rather, the intent of this goal is to reduce vehicle trips for existing and future uses on a Citywide basis through implementation of land use and transportation policies, programs, and projects that support and invest in the transportation system. The LUCE encourages that new projects be designed to support the use of alternative forms of transportation by providing housing, jobs, and local-serving retail and services in close proximity to public transit and incorporating design elements that would encourage walking and bicycling. As previously described, the proposed Project would be served by numerous public transit facilities, including the Downtown Santa Monica Station. As such, the location of the Project site would create maximum opportunities for public transit use by future residents, hotel guests, restaurant and retail customers, and Cultural Use Campus visitors consistent with LUCE goals and objectives.

Additionally, by developing a mix of land uses on a single site in the Downtown, the proposed Project would increase accessibility to multiple other destinations including restaurants, retail, office, entertainment, and residential uses. As a result of increased destination accessibility, the proposed Project would support the Citywide goal of reducing overall vehicle trips and VMT.

As described in Section 3.10, *Land Use and Planning* the proposed Project would be consistent with all applicable goals of the LUCE and the DCP.

*Bike Action Plan*

The Project site is located adjacent to the bicycle lanes on Ocean Avenue and 2nd Street and in close proximity to the bicycle lanes on Arizona Avenue. Implementation of the proposed Project would not physically interfere with any future bicycle facilities identified in the *Bike Action Plan*. The proposed Project would also not conflict with the City's goals/policies to increase bicycle trips in the City. Rather, the proposed Project would encourage employees, residents, and visitors to use existing bicycle facilities throughout the City through implementation of a TDM plan and the provision of onsite bicycle amenities such as secure bicycle parking, including short-term and

long-term bicycle racks and lockers, showers, and personal locker facilities. Therefore, the proposed Project would support the goals and actions of the *Bike Action Plan*.

*Pedestrian Action Plan*

The proposed Project would not conflict with the *Pedestrian Action Plan*. The Project site is one of three sites that has been designated as an Established Large Site (ELS) in the DCP. ELS are identified as areas that could potentially provide significant community benefits through circulation, open space, and cultural facilities that would otherwise not be anticipated from smaller projects. The proposed Project would result in a widened sidewalk width of a minimum of 15 feet on 2nd Street and would provide minimum sidewalk width requirements of 20 feet on Santa Monica Boulevard and 18 feet on Ocean Avenue. Expanded sidewalks would improve walkability to and from the Project site within the Downtown. The proposed Project would also provide approximately 22,407 sf of publicly-accessible ground-level open spaces allowing pedestrian access through the site and to surrounding areas, enhancing connectivity throughout the Project site, and improving the public's pedestrian experience. The diverse mix of Project land use types would also promote pedestrian activity onsite as well as in the surrounding area along Ocean Avenue and Santa Monica Boulevard. Overall, the proposed Project would also improve walkability through and around the Project site through the developing of active street frontages, expanding sidewalks, providing two publicly-accessible paseos, a courtyard , and a breezeway that would also attract pedestrian use and enliven the area. Therefore, the proposed Project would support the goals and actions of the *Pedestrian Action Plan*.

*Santa Monica Municipal Code*

The proposed Project would be implemented through a Development Agreement, and as such, would be subject to the standards and requirements set forth within the Development Agreement rather than the SMMC. However, the proposed Project would provide at least the minimum number of bicycle parking, bicycle storage/lockers, electric vehicle (EV) vehicle charging spaces as required by the SMMC. The proposed Project would provide parking as necessary to meet anticipated parking needs based on the shared parking demand for guests, employees, and visitors (Walker Consultants 2019). Additionally, as described in Section 2.6.11, *Development Agreement*, the Applicant would make a monetary contribution towards transportation and pedestrian improvements in the Downtown, above and beyond the minimum requirements of the Transportation Impact Fee Ordinance. Therefore, the proposed Project would not conflict with any of the applicable provisions of the SMMC.

*Would the proposed conflict or be inconsistent with CEQA Guidelines15064.3, subdivision (b);*

Impact Description T-2A

**T-2A** **The Project site is located within a 0.5-mile walking distance of the Downtown Santa Monica Station for the Metro E (Expo) LRT line as well as existing bus transit service, including Big Blue Bus and Metro service routes. Additionally, the proposed Project would have a FAR of more than 0.75, would not oversupply parking in exceedance of Coastal Commission requirements, and would be consistent with the goals of the 2016-2040 RTP/SCS, such as promoting mixed use infill development in TPAs. The proposed Project would be presumed to have a *less than significant* transportation impact related to VMT. Nevertheless, a VMT analysis is provided for informational purposes only.**

Pursuant to SB 743, OPR adopted CEQA Guidelines Section 15064.3(c), which states that the provisions of this section shall apply prospectively and must be implemented Statewide by July 1, 2020. The NOP for the proposed Project was issued on December 21, 2018, prior to the adoption of Section 15064.3, and the Draft EIR was released before July 1, 2020. Therefore, as described in Section 3.13.3, *Impact Assessment and Methodology*, a VMT analysis is not required for the proposed Project. Nevertheless, although not required, a VMT analysis consistent with CEQA Guidelines Section 15064.3 requirements is provided for informational purposes only.

As described in Section 3.13.3, *Impact Assessment and Methodology*, CEQA Guidelines Section 15064 emphasizes that a lead agency has the discretionary authority to establish thresholds of significance; however, the section also suggests screening criteria that indicate when a project may have a less than significant, transportation impact on the environment. Specifically, CEQA Guidelines Section 15064.3, subdivision (b)(1) states that "generally, projects within 0.5 mile of an existing major transit stop or an existing stop along a high quality transit corridor should be presumed to have a less than significant impact on VMT." This is also stated in OPR's *Updates to Technical Advisory on Evaluating Transportation Impacts in CEQA*, which contains OPR's screening criteria regarding the use of VMT in the assessment of transportation impacts. Therefore, following CEQA Section 15064.3, subdivision (b)(1) and OPR's Technical Advisory, the proposed Project could be presumed to have a *less than significant* transportation impact and no further VMT analysis would be required.

Per OPR's Technical Advisory, the presumption of a less than significant impact may not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

- Has a FAR of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking); and/or
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization).

The Project site is located within the Downtown, which is considered a TPA. The Project Site is within approximately 0.5 mile of the Downtown Santa Monica Station for the Metro E LRT and is accessible via 13 fixed-route bus lines with stops within a 0.25-mile radius. Additionally, the proposed Project would have a 2.95 FAR, and would be consistent with the RTP/SCS, particularly with regard to providing mixed -use development within TPAs (refer to Impact T-1 and Section 3.10, *Land Use and Planning*). Within the Downtown, there are no minimum parking requirements but maximum rates are specified by land use, in recognition of the high degree of non-automotive mobility and supply of existing parking provided on-street, in municipal garages and amongst existing developments. The proposed Project would provide parking in excess of the parking maximums in consideration of California Coastal Commission (Coastal Commission) requirements. Therefore, a quantitative VMT analysis has also been prepared for informational purposes following the guidance in OPR's Technical Advisory. Since the City has not yet adopted VMT thresholds and because the Project predates the applicability of CEQA Guidelines Section 15064.3, no determination of significance is made.

*Project VMT Calculation*

The analysis of VMT for the proposed Project is based on OPR's Technical Advisory, which recommends evaluating each component of a mixed-use project independently. The estimates of VMT associated with the proposed Project are based on the trip generation estimates for the Project presented in Table 3.13-7. For each use, the total trips are multiplied by the average trip length for that type of trip from the City's TDFM transportation analysis zones (TAZs) for the Project site and in the surrounding vicinity. The number of total miles is then divided by the number of people related to that use (i.e., employees, residents, other visitors). The following steps were used to estimate VMT associated with the proposed Project, which were then compared with Citywide and regional (Countywide) averages.

**Employee VMT**

<u>Estimate the total number of Project employees</u>: The proposed Project is estimated to generate 212 employees, composed of 85 retail/restaurant workers, 103 hotel workers, and 24 Cultural Use Campus workers, per information provided by the Applicant. Since the

hotel trip generation estimates calculated include trips by both hotel guests and employees, the number of employee trips are estimated by applying the AVR factor of 2.2, which is the AVR target established for this site per Santa Monica Municipal Code Section 9.53.040, resulting in an estimate 193 daily employee trips (212 employees each making a round trip with an AVR of 2.2).

Determine the average VMT per employee: To determine the average VMT per employee, the estimated number of employee trips is multiplied by the trip length and divided by the number of employees to calculate average VMT per employee.

As indicated in Table 3.13-7, the proposed commercial uses would generate 193 daily employee trips. While the proposed Project is located in the Santa Monica TDFM TAZ 138, this TAZ does not include hotel as a land use. Nearby TAZ 78 was referenced instead as it includes hotel and retail land uses. Based on the City's TDFM, the vehicle trip length for average home-based work trip attraction in TAZ 78 is 12.6 miles which is slightly higher than Citywide average of 12.1 miles. Therefore, the 193 employee vehicle trips of 12.6 miles each equals 2,432 total daily VMT. Dividing the total daily VMT by employee equates to 11.5 VMT per employee. This is roughly 40 percent less than the existing Citywide average of 19.2 VMT per employee. In comparison to the regional average for Los Angeles County, the proposed Project's 11.5 VMT per employee is more than 15 percent below existing regional average of 18.41 VMT per employee. Therefore, VMT per employee would be consistent with OPR recommended threshold that land use projects have a VMT per employee of 15 percent below that of existing regional average.

**Residential VMT**

Estimate the total number of residents for all residential units for the proposed Project: The proposed Project includes a total of 100 residential units (including deed-restricted affordable units, replacement rent-controlled units, and market rate units). The average household size for the census tract in which the Project Site is located in (Census Tract 7019.02) is 1.53. Applying this factor to the total number of residential units results in 153 people. In this case, the proposed Project's residential unit mix includes 2- or 3-bedroom units, which is different from the existing mix of predominantly 1-bedroom housing in the Census tract. Therefore, Citywide household size estimates from the 2017 American Community Survey 5-Year Estimates are used. The residential units are estimated to have an average household size of 1.39 for studio and 1-bedroom units, 2.41 for 2-bedroom units, and 3.09 for 3-bedroom units. Applying these factors results in an estimated project population of 180 people.

Multiply the estimated residential trips by the trip length and divide by the total number of residents to calculate average VMT per capita: As described in Table 3.13-7, the proposed residential uses would generate 352 daily residential trips. The Project site is located in TAZ 138. Based on the average home-based productions trip length in TAZ 138 is 5.5 miles, which is slightly higher than the Citywide average of 5.4 miles. The 352 residential trips of 5.5 miles each equals 1,936 total daily VMT. This equates to 10.8 VMT per capita, which is slightly greater than the Citywide average of 9.0 VMT per capita; as explained further below, this estimate is unexpectedly high as compared to the Citywide average for a number of reasons.

However, in comparison to the regional average for Los Angeles County, the proposed Project's 10.8 VMT per capita is more than 15 percent below the existing regional average of 13.44 VMT per capita. Therefore, the VMT per capita associated with the proposed Project would be consistent with OPR's recommended threshold that land use projects have a VMT per capita that is 15 percent below that of existing regional average.

**Non-Employee and Non-Residential (Hotel Guests, Restaurant and Retail Customers, and Cultural Use Campus Visitors) VMT**

Estimate the number of non-employee and non-residential trips to and from the proposed Project: If 545 daily trips are made by employees and residents, then the remaining 2,934 daily trips would be made by hotel guests, restaurant and retail customers, and Cultural Use Campus visitors.

Calculate total daily VMT for hotel guests, restaurant and retail customers, and Cultural Use Campus visitors: The average trip length for home-based-other trip attractions and non-home-based trip attractions in TAZ 138 is 9.1 miles. The average trip length for non-home-based trip productions in TAZ 138 is 5.6 miles. These trip types represent all other travel activity that is not directly related to commute trips or home-based trips, which would include hotel guests, restaurant and retail customers, and Cultural Use Campus visitors. Applying these trip lengths to the estimated non-employee and non-residential inbound and outbound trips yields an estimate of 21,565 total daily VMT. However, this likely represents a conservative analysis to estimating VMT for commercial uses since it does not account for the potential that new commercial (i.e., restaurant and retail) development can result in a redistribution of trips rather than the creation of new trips. Thus, it does not account for the potential that some trips could replace trips that would otherwise be made to and from other commercial destinations in the area.

In summary, the proposed Project would result in per employee VMT rate that is lower than existing Citywide per employee VMT and more than 15 percent lower than the existing regional VMT per employee. While residential infill in dense urban areas with good access to transit, bicycle, and pedestrian facilities (i.e., nonautomotive modes) such as the Downtown are known to ultimately decrease VMT, the proposed Project's residential VMT per capita would be slightly higher than the Citywide average (but more than 15 percent lower than the existing regional VMT per capita). The VMT analysis for the proposed Project is likely conservative because it is based on trip generation numbers that may be overestimated since it utilizes more traditional trip generation rates for LOS. VMT. For example, while the trip lengths for this area are short, reflecting the high degree of non-automotive access, the Project-generated trip estimates are based on a conservative trip calculation approved for the purpose of analyzing intersection LOS, which seeks to evaluate a worst-case scenario for traffic operations per the City's adopted LOS methodology. The worst-case scenario assumptions for the proposed Project assume a trip generation rate of two cars per household for all units of two or more bedrooms – but in actuality, the applicant proposes to build the maximum allowable number of residential spaces as defined by the DCP, which is fewer than 1 space per unit. The applicant is not including residential parking permits with units (known as "unbundled parking") allowing for flexibility to provide exactly the number of residential spaces as there is demand for at any given time. This could significantly lower the actual Project-generated trips (estimated to be approximately 282 daily trips compared with the conservatively estimated 353 shown in Table 4). Using the lower trip generation rate assumptions for the affordable units would reduce the VMT per capita to approximately 8.63, less than the Citywide average. Therefore, in comparison with the City's draft significance criterion 1, the proposed Project would be deemed to have a less than significant VMT impact.

Further, the proposed Project would be consistent with the overall intent of SB 743 to reduce VMT and GHGs, the development of multi-modal transportation networks, and a diversity of land uses. The proposed Project would develop a mixed-use project in the transit-rich and pedestrian-active Downtown. The proposed Project is comprised of a mixed-use development that would include a hotel, restaurant and retail uses, Cultural Use Campus, and new housing opportunities with affordable housing. The mix of land uses on a single site and in proximity to other nearby uses would minimize vehicle trips. Further, Ocean Avenue and Santa Monica Boulevard are highly utilized transit corridors, and the proposed Project would be well served by existing transit routes and the Metro E (Expo) LRT line. The accessibility to various mobility options and a variety of destinations would help minimize vehicle trips and decrease VMT. The proposed Project would also minimize VMT to and from the Project site by implementing unbundled parking and a TDM plan. In general, despite the fact that many of the TDM measures anticipated to be included as part

of the TDM plan associated with the proposed Project would minimize trip generation and VMT, their effectiveness are not fully accounted for in the Project's trip generation calculations. This is one of the reasons that the Project's residential VMT per capita is calculated to be slightly higher than existing Citywide average.

Furthermore, in terms of CARB's 2017 Scoping Plan Update, the proposed Project's residential VMT per capita and employee VMT per capita would be more than 16.8 percent lower than existing regional averages. Additionally, the total VMT calculated for the Project's combined residential and employee VMT would be 4,368 miles, which would be more than 23 percent lower than the "business as usual" VMT. Therefore, in comparison with the City's draft significance criterion 2, the proposed Project would be deemed have a less than significant VMT impact.

**Table 3.13-8. Proposed Project's Residential VMT per Capita and Employee VMT Per Capita**

| | Project VMT | Existing City Average VMT/ capita | Project Population | Business as Usual (BAU) VMT | Project VMT vs. BAU VMT |
|---|---|---|---|---|---|
| Commercial Employee | 2,432 | 19.2 | 212 | 4,070 | |
| Residential | 1,936 | 9.0 | 180 | 1,620 | |
| | **4,368** | | | **5,690** | **-1,322 (23% less)** |

Therefore, as described in Impact T-1, Impact GHG-2 (refer to Section 3.7, *Greenhouse Gas Emissions*), and Impact LU-2 (refer to Section 3.10, *Land Use and Planning*), the proposed Project would be consistent with goals, policies, and regulations related to GHG reduction in the 2016-2040 RTP, LUCE and DCP, AB/SB 32, SB 375, and recommendations of the State Attorney General, CARB, OPR and Climate Action Team.

Impact Description T-2B

**T-2B** **The proposed Project would exceed the City's previously adopted LOS significance criteria at four intersections under the Approval Year (2020) Plus Project traffic conditions and at six intersections under Future Year (2025) Plus Project traffic conditions. No feasible mitigation measures are available to eliminate these impacts; therefore, the proposed Project would result *significant and unavoidable* impacts to intersection operations based on LOS thresholds.**

Pursuant to CEQA Guidelines Section 21099(b)(2), vehicle delay as described by LOS or similar measures of capacity or traffic congestion, shall not be considered significant impacts on the

environment. Nevertheless, the analysis of intersection and street segment operations using LOS is presented below to comply with the City's *Traffic Study Guidelines*, using the City's previously adopted significance thresholds.

*Approval Year (2020) Plus Project*

As previously described, the proposed Project would generate net increase of 146 trips during the A.M. peak hour, 146 during the P.M. peak hour, and 168 trips during the weekend midday peak as shown in Table 3.13-7. In order to evaluate the impacts of the proposed Project on intersection LOS in the Approval Year (2020), the net trip generation associated with the proposed Project was added to the Approval Year (2020) No Project traffic conditions to create the Approval Year (2020) Plus Project traffic conditions. compares the Approval Year (2020) No Project and Approval Year (2020) Plus Project traffic conditions for the 40 study intersections.

With the implementation of the proposed Project, traffic would exceed the City's previously adopted LOS significance criteria at four intersections. Specifically, with the implementation of the proposed Project, Project-generated trips would create significant impacts at the following intersections under Approval Year (2020) Plus Project traffic conditions:

- Study Intersection No. 1: Palisades Beach Road (PCH) & California Incline (weekend midday hour);
- Study Intersection No. 2: Ocean Avenue & California Avenue (P.M. and weekend midday peak hours);
- Study Intersection No. 11: 2nd Street & Wilshire Boulevard (P.M. and weekend midday peak hours); and
- Study Intersection No. 16: Main Street & Olympic Drive (A.M. and weekend midday peak hours).

Changes to V/C ratios or vehicle delays at these four impacted intersections would range from a barely measurable less than 1 percent change in V/C ratio at Main Street & Olympic Drive during the A.M. peak hour to an increased delay of up to 2 seconds at the Palisades Beach Road (PCH) & California Incline intersection during the A.M. peak hour. It should be noted that the four impacted intersections currently operate at congested conditions (LOS E or F) during one or more of the peak hours. As such, the addition of even a small number of vehicle trips could result in a significant impact. Nevertheless, based on the City's previously adopted LOS significance criteria, the proposed Project would result in significant impacts on four intersections under Approval Year (2020) Plus Project traffic conditions. As discussed further below, due to the lack of feasible mitigation measures, the impacts at these intersections would remain *significant and unavoidable*.

## Table 3.13-9. Analysis of Project Impacts under Approval Year (2020) Traffic Conditions

| Number | Intersection | Peak Hour | Class | Approval Year No Project (2020) | | | Approval Year Plus Project (2020) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project** | | | | | | | | | | | |
| **1** | **Palisades Beach Road (PCH) & California Incline** | **A.M.** | **A** | **1.196** | **69** | **E** | **1.205** | **71** | **E** | **2** | **Yes** |
| | | P.M. | A | 1.008 | 47 | D | 1.010 | 48 | D | 1 | No |
| | | **WKND** | **A** | **1.203** | **88** | **F** | **1.206** | **90** | **F** | **0.003** | **No** |
| **2** | **Ocean Avenue & California Avenue** | **A.M.** | **A** | **0.937** | **72** | **E** | **0.944** | **72** | **E** | **0** | **No** |
| | | **P.M.** | **A** | **1.192** | ****** | **F** | **1.203** | ****** | **F** | **0.011** | **Yes** |
| | | **WKND** | **A** | **1.252** | ****** | **F** | **1.263** | ****** | **F** | **0.011** | **Yes** |
| 2 | Ocean Avenue & Wilshire Boulevard | A.M. | A | 0.299 | 12 | B | 0.303 | 12 | B | 0 | No |
| | | P.M. | A | 0.392 | 22 | C | 0.396 | 22 | C | 0 | No |
| | | WKND | A | 0.398 | 28 | C | 0.402 | 28 | C | 0 | No |
| 4 | Ocean Avenue & Arizona Avenue | A.M. | A | 0.256 | 7 | A | 0.260 | 7 | A | 0 | No |
| | | P.M. | A | 0.367 | 13 | B | 0.362 | 13 | B | 0 | No |
| | | WKND | A | 0.356 | 13 | B | 0.354 | 13 | B | 0 | No |
| 5 | Ocean Avenue & Santa Monica Boulevard | A.M. | A | 0.303 | 9 | A | 0.323 | 10 | A | 1 | No |
| | | P.M. | A | 0.443 | 31 | C | 0.460 | 33 | C | 2 | No |
| | | WKND | A | 0.482 | 42 | D | 0.477 | 43 | D | 1 | No |
| 6 | Ocean Avenue & Broadway | A.M. | A | 0.358 | 8 | A | 0.366 | 8 | A | 0 | No |
| | | P.M. | A | 0.552 | 37 | D | 0.553 | 36 | D | -1 | No |
| | | WKND | A | 0.581 | 47 | D | 0.582 | 46 | D | -1 | No |
| 7 | Ocean Avenue & Colorado Avenue | A.M. | A | 0.368 | 25 | C | 0.380 | 26 | C | 1 | No |
| | | P.M. | A | 0.511 | 47 | D | 0.519 | 48 | D | 1 | No |
| | | WKND | A | 0.456 | 36 | D | 0.467 | 36 | D | 0 | No |
| 8 | Ocean Avenue & Moomat Ahiko Way | A.M. | A | 0.439 | 25 | C | 0.444 | 25 | C | 0 | No |
| | | P.M. | A | 0.527 | 24 | C | 0.528 | 24 | C | 0 | No |
| | | WKND | A | 0.455 | 25 | C | 0.456 | 25 | C | 0 | No |
| 9 | Ocean Avenue & Olympic Drive | A.M. | A | 0.409 | 11 | B | 0.414 | 11 | B | 0 | No |
| | | P.M. | A | 0.548 | 14 | B | 0.548 | 14 | B | 0 | No |
| | | WKND | A | 0.536 | 35 | C | 0.542 | 35 | C | 0 | No |
| 10 | Ocean Avenue & Pico Boulevard | A.M. | A | 0.491 | 20 | B | 0.499 | 21 | C | 1 | No |
| | | P.M. | A | 0.572 | 29 | D | 0.573 | 39 | D | 0 | No |
| | | WKND | A | 0.484 | 20 | C | 0.494 | 30 | C | 0 | No |
| **11** | **2nd Street & Wilshire Boulevard** | A.M. | A | 0.364 | 36 | D | 0.365 | 36 | D | 0 | No |
| | | **P.M.** | **A** | **3.392** | **71** | **E** | **0.392** | **66** | **E** | **-5** | **No** |
| | | **WKND** | **A** | **0.762** | ****** | **F** | **0.768** | ****** | **F** | **0.006** | **Yes** |

## Table 3.13-9. Analysis of Project Impacts under Approval Year (2020) Traffic Conditions (Continued)

| Number | Intersection | Peak Hour | Class | Approval Year No Project (2020) | | | Approval Year Plus Project (2020) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project (Continued)** | | | | | | | | | | | |
| 12 | 2nd Street & Arizona Avenue | A.M. | C | 0.327 | 29 | C | 0.359 | 29 | C | 0 | No |
| | | P.M. | C | 0.397 | 29 | C | 0.435 | 30 | C | 1 | No |
| | | WKND | C | 0.364 | 29 | C | 0.401 | 29 | C | 0 | No |
| **13** | **2nd Street & Santa Monica Boulevard** | A.M. | A | 0.336 | 29 | C | 0.355 | 31 | C | 2 | No |
| | | **P.M.** | **A** | **1.135** | **97** | **F** | **1.038** | **89** | **F** | **-8** | **No** |
| | | **WKND** | **A** | **1.088** | **86** | **F** | **0.953** | **83** | **F** | **-3** | **No** |
| 14 | 2nd Street & Broadway | A.M. | C | 0.283 | 27 | C | 0.282 | 27 | C | 0 | No |
| | | P.M. | C | 0.281 | 27 | C | 0.288 | 28 | C | 1 | No |
| | | WKND | C | 0.350 | 29 | C | 0.350 | 29 | C | 0 | No |
| 15 | 2nd Street & Colorado Avenue | A.M. | A | 0.294 | 35 | C | 0.300 | 36 | D | 1 | No |
| | | P.M. | A | 0.320 | 35 | C | 0.340 | 36 | D | 1 | No |
| | | WKND | A | 0.374 | 35 | C | 0.388 | 35 | C | 0 | No |
| **16** | **Main Street & Olympic Drive** | **A.M.** | **C** | **0.690** | **94** | **F** | **0.696** | **94** | **F** | **0.006** | **Yes** |
| | | P.M. | C | 0.378 | 22 | C | 0.384 | 22 | C | 0 | No |
| | | **WKND** | **C** | **0.614** | **81** | **F** | **0.619** | **80** | **E** | **0.005** | **Yes** |
| 17 | Main Street & Pico Boulevard | A.M. | A | 0.544 | 25 | C | 0.553 | 25 | C | 0 | No |
| | | P.M. | A | 0.441 | 25 | C | 0.443 | 25 | C | 0 | No |
| | | WKND | A | 0.524 | 30 | C | 0.536 | 30 | C | 0 | No |
| 18 | 4th Street & Wilshire Boulevard | A.M. | A | 0.287 | 28 | C | 0.288 | 28 | C | 0 | No |
| | | P.M. | A | 0.293 | 28 | C | 0.294 | 28 | C | 0 | No |
| | | WKND | A | 0.324 | 29 | C | 0.325 | 29 | C | 0 | No |
| 19 | 4th Street & Arizona Boulevard | A.M. | A | 0.311 | 26 | C | 0.288 | 28 | C | 1 | No |
| | | P.M. | A | 0.372 | 30 | C | 0.294 | 28 | C | 1 | No |
| | | WKND | A | 0.381 | 30 | C | 0.325 | 29 | C | 1 | No |
| 20 | 4th Street & Santa Monica Boulevard | A.M. | A | 0.294 | 23 | C | 0.310 | 24 | C | 1 | No |
| | | P.M. | A | 0.274 | 28 | C | 0.292 | 29 | C | 1 | No |
| | | WKND | A | 0.304 | 29 | C | 0.324 | 29 | C | 0 | No |
| 21 | 4th Street & Broadway | A.M. | A | 0.394 | 35 | C | 0.398 | 35 | C | 0 | No |
| | | P.M. | A | 0.495 | 41 | D | 0.487 | 41 | D | 0 | No |
| | | WKND | A | 0.476 | 41 | D | 0.475 | 41 | D | 0 | No |
| 22 | 4th Street & Colorado Avenue | A.M. | A | 0.303 | 17 | B | 0.304 | 17 | B | 0 | No |
| | | P.M. | A | 0.429 | 23 | C | 0.432 | 24 | C | 1 | No |
| | | WKND | A | 0.423 | 24 | C | 0.428 | 24 | C | 0 | No |

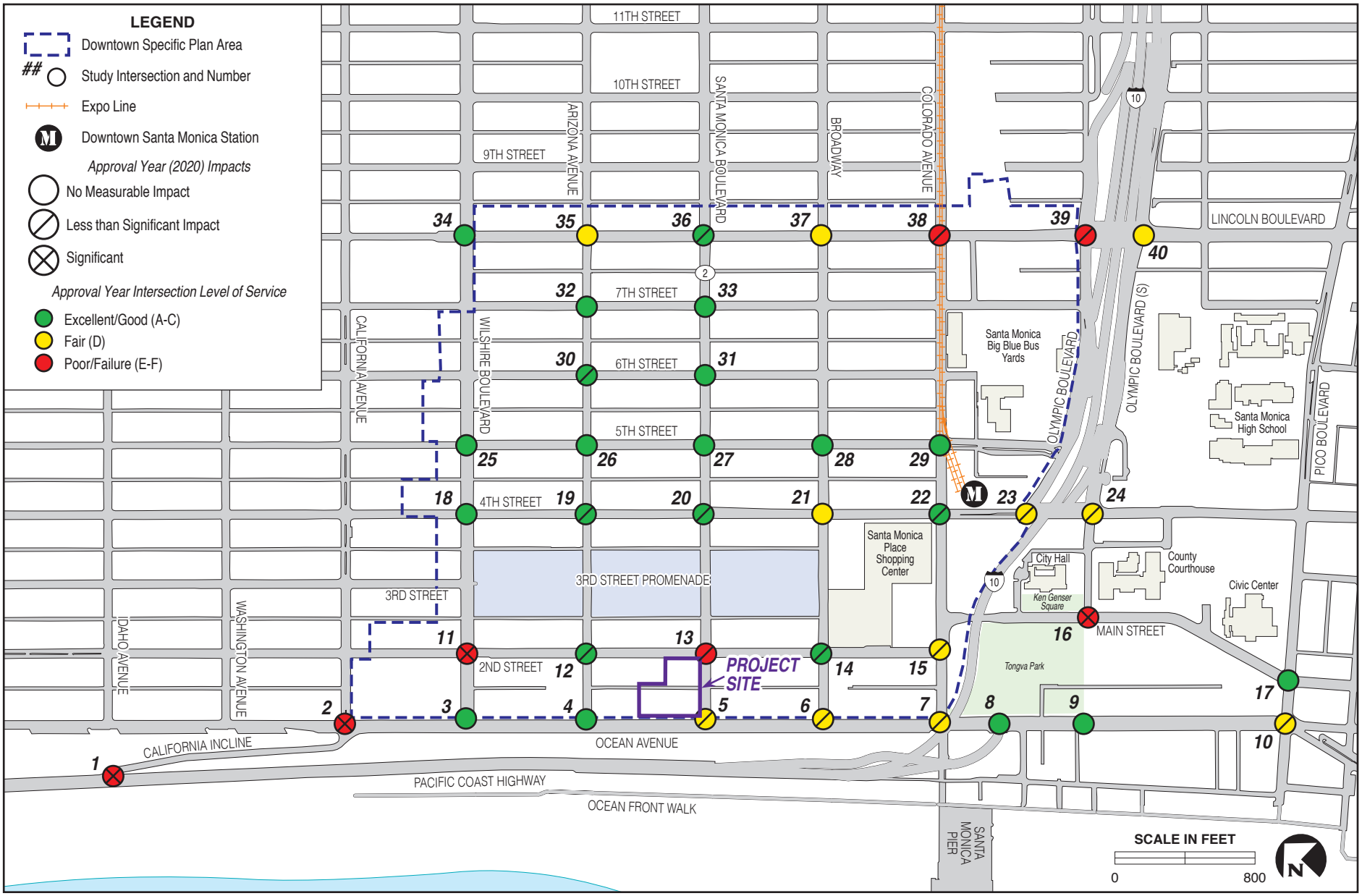
## Table 3.13-9. Analysis of Project Impacts under Approval Year (2020) Traffic Conditions (Continued)

| Number | Intersection | Peak Hour | Class | Approval Year No Project (2020) | | | Approval Year Plus Project (2020) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project (Continued)** | | | | | | | | | | | |
| 23 | 4th Street & I-10 WB Off-Ramp | A.M. | A | 0.704 | 39 | D | 0.720 | 42 | D | 3 | No |
| | | P.M. | A | 0.574 | 29 | C | 0.583 | 29 | C | 0 | No |
| | | WKND | A | 0.467 | 26 | C | 0.481 | 26 | C | 0 | No |
| 24 | 4th Street & I-10 EB Off-Ramp | A.M. | A | 0.574 | 41 | D | 0.577 | 41 | D | 3 | No |
| | | P.M. | A | 0.557 | 25 | C | 0.558 | 24 | C | 0 | No |
| | | WKND | A | 0.538 | 43 | D | 0.542 | 44 | D | 0 | No |
| 25 | 5th Street & Wilshire Boulevard | A.M. | A | 0.289 | 17 | B | 0.291 | 20 | B | 0 | No |
| | | P.M. | A | 0.391 | 18 | B | 0.318 | 21 | C | 0 | No |
| | | WKND | A | 0.393 | 16 | B | 0.496 | 25 | C | 0 | No |
| 26 | 5th Street & Arizona Avenue | A.M. | C | 0.288 | 20 | B | 0.298 | 20 | B | 0 | No |
| | | P.M. | C | 0.316 | 21 | C | 0.318 | 21 | C | 0 | No |
| | | WKND | C | 0.500 | 25 | C | 0.496 | 25 | C | 0 | No |
| 27 | 5th Street & Santa Monica Boulevard | A.M. | A | 0.287 | 24 | C | 0.292 | 23 | C | -1 | No |
| | | P.M. | A | 0.373 | 22 | C | 0.380 | 22 | C | 0 | No |
| | | WKND | A | 0.369 | 27 | C | 0.374 | 27 | C | 0 | No |
| 28 | 5th Street & Broadway | A.M. | C | 0.377 | 24 | C | 0.378 | 24 | C | 0 | No |
| | | P.M. | C | 0.388 | 22 | C | 0.388 | 23 | C | 0 | No |
| | | WKND | C | 0.449 | 27 | C | 0.448 | 22 | C | 0 | No |
| 29 | 5th Street & Colorado Avenue | A.M. | A | 0.324 | 22 | C | 0.324 | 22 | C | 0 | No |
| | | P.M. | A | 0.426 | 23 | C | 0.427 | 23 | C | 0 | No |
| | | WKND | A | 0.417 | 24 | C | 0.418 | 24 | C | 0 | No |
| 30 | 6th Street & Arizona Avenue | A.M. | C | 0.257 | 17 | B | 0.257 | 18 | B | 1 | No |
| | | P.M. | C | 0.386 | 20 | B | 0.389 | 20 | B | 0 | No |
| | | WKND | C | 0.394 | 16 | B | 0.404 | 16 | B | 0 | No |
| 31 | 6th Street & Santa Monica Boulevard | A.M. | A | 0.320 | 15 | B | 0.333 | 15 | B | 0 | No |
| | | P.M. | A | 0.401 | 18 | B | 0.415 | 18 | B | 0 | No |
| | | WKND | A | 0.487 | 17 | B | 0.509 | 17 | B | 0 | No |
| 32 | 7th Street & Arizona Avenue | A.M. | C | 0.336 | 21 | C | 0.336 | 21 | C | 0 | No |
| | | P.M. | C | 0.364 | 20 | B | 0.362 | 20 | B | 0 | No |
| | | WKND | C | 0.416 | 21 | C | 0.418 | 21 | C | 0 | No |
| 33 | 7th Street & Santa Monica Boulevard | A.M. | A | 0.353 | 19 | B | 0.360 | 19 | B | 0 | No |
| | | P.M. | A | 0.383 | 19 | B | 0.392 | 19 | B | 0 | No |
| | | WKND | A | 0.425 | 21 | C | 0.432 | 21 | C | 0 | No |

## Table 3.13-9. Analysis of Project Impacts under Approval Year (2020) Traffic Conditions (Continued)

| Number | Intersection | Peak Hour | Class | Approval Year No Project (2020) | | | Approval Year Plus Project (2020) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project (Continued)** | | | | | | | | | | | |
| 34 | Lincoln Boulevard & Wilshire Boulevard | A.M. | A | 0.451 | 22 | C | 0.455 | 22 | C | 0 | No |
| | | P.M. | A | 0.447 | 22 | C | 0.450 | 22 | C | 0 | No |
| | | WKND | A | 0.504 | 22 | C | 0.506 | 22 | C | 0 | No |
| 35 | Lincoln Boulevard & Arizona Avenue | A.M. | A | 0.812 | 50 | D | 0.815 | 50 | D | 0 | No |
| | | P.M. | A | 0.800 | 38 | D | 0.800 | 38 | D | 0 | No |
| | | WKND | A | 0.648 | 30 | C | 0.648 | 30 | C | 0 | No |
| 36 | Lincoln Boulevard & Santa Monica Boulevard | A.M. | A | 0.487 | 24 | C | 0.495 | 25 | C | 1 | No |
| | | P.M. | A | 0.568 | 27 | C | 0.577 | 28 | C | 1 | No |
| | | WKND | A | 0.600 | 31 | C | 0.610 | 33 | C | 2 | No |
| 37 | Lincoln Boulevard & Broadway | A.M. | A | 0.545 | 30 | C | 0.545 | 30 | C | 0 | No |
| | | P.M. | A | 0.584 | 31 | C | 0.586 | 31 | C | 0 | No |
| | | WKND | A | 0.673 | 38 | D | 0.673 | 38 | D | 0 | No |
| **38** | **Lincoln Boulevard & Colorado Avenue** | **A.M.** | **A** | **0.525** | **71** | **E** | **0.525** | **71** | **E** | **0** | **No** |
| | | P.M. | A | 0.521 | 53 | D | 0.522 | 52 | D | -1 | No |
| | | WKND | A | 0.623 | 52 | D | 0.628 | 54 | D | 2 | No |
| **39** | **Lincoln Boulevard & I-10 Westbound Off-Ramp** | **A.M.** | **A** | **0.959** | **91** | **F** | **0.961** | **91** | **F** | **0.002** | **No** |
| | | P.M. | A | 0.698 | 40 | D | 0.699 | 40 | D | 0 | No |
| | | WKND | A | 0.833 | 53 | D | 0.834 | 53 | D | 0 | No |
| 40 | Lincoln Boulevard & I-10 Eastbound On-Ramp | A.M. | A | 0.807 | 38 | D | 0.808 | 38 | D | 0 | No |
| | | P.M. | A | 0.550 | 30 | C | 0.552 | 30 | C | 0 | No |
| | | WKND | A | 0.761 | 36 | D | 0.762 | 36 | D | 0 | No |

Notes:
* Average stopped delay per vehicle, in seconds.
** Indicates oversaturated conditions. Delay cannot be calculated.
A Arterial intersection,
C Collector intersection
Source: Fehr & Peers 2020.




wood.

**Approval Year (2020) Levels of Service**
**Ocean Avenue Project Impacted Intersections**

**FIGURE 3.13-3**

*Future Year (2025) Plus Project*

As previously described, the proposed Project would generate net increase of 146 trips during the A.M. peak hour, 146 during the P.M. peak hour, and 168 trips during the weekend midday peak as shown in Table 3.13-7. In order to evaluate the impacts of the proposed Project on intersection LOS under Future Year (2025) traffic conditions, the net trip generation associated with the proposed Project was added to the Future Year (2025) No Project traffic conditions to create the Future Year (2025) Plus Project traffic conditions. compares the Future Year (2025) No Project and Future Year (2025) Plus Project traffic conditions for the study intersections. With the implementation of the proposed Project, traffic would exceed City's previously adopted LOS significance criteria at six of the 40 study intersections. Specifically, the project would create significant impacts at the following intersections under Future Year (2025) Plus Project traffic conditions:

- Study Intersection No. 1: Palisades Beach Road (PCH) & the California Incline (A.M. peak hour);
- Study Intersection No. 2: Ocean Avenue & California Avenue (all peak hours);
- Study Intersection No. 12: 2nd Street & Arizona Avenue (weekend midday peak hour);
- Study Intersection No. 13: 2nd Street & Santa Monica Boulevard (P.M. and weekend midday peak hours);
- Study Intersection No. 16: Main Street & Olympic Drive (A.M. and weekend midday peak hours); and
- Study Intersection No. 19: 4th Street & Santa Monica Boulevard (all peak hours).

Changes to V/C ratios or vehicle delays would range from a barely measurable less than 1 percent change in V/C ratio at Main Street & Olympic Drive during the A.M. and weekend peak hours to an increased delay of up to 3 seconds at the Ocean Avenue & California Avenue intersection during the A.M. peak hour. It should be noted that the six impacted intersections currently operate at congested conditions (LOS E or F during one or more of the peak hours), and as such, the addition of even a small number of vehicle trips could result in significant impacts. Therefore, based on the City's previously adopted LOS significance criteria, the proposed Project would result in significant impacts on six intersections under Future Year (2025) Plus Project traffic conditions. As discussed below, due to the lack of feasible mitigation measures, these impacts are considered *significant and unavoidable*.

## Table 3.13-10. Analysis of Project Impacts under Future Year (2025) Traffic Conditions

| Number | Intersection | Class | Peak Hour | Future Year (2025) | | | Future Year plus Project (2025) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project** | | | | | | | | | | | |
| **1** | **Palisades Beach Road (PCH) & California Incline** | **A** | **A.M.** | **1.109** | **65** | **E** | **1.118** | **67** | **E** | **2** | **Yes** |
| | | A | P.M. | 0.949 | 49 | D | 0.949 | 50 | D | 1 | No |
| | | A | WKND | 1.243 | 53 | D | 1.245 | 54 | D | 1 | No |
| **2** | **Ocean Avenue & California Avenue** | **A** | **A.M.** | **0.747** | **57** | **E** | **0.751** | **60** | **E** | **3** | **Yes** |
| | | **A** | **P.M.** | **1.141** | ****** | **F** | **1.152** | ****** | **F** | **0.011** | **Yes** |
| | | **A** | **WKND** | **1.949** | ****** | **F** | **1.960** | ****** | **F** | **0.011** | **Yes** |
| **3** | **Ocean Avenue & Wilshire Boulevard** | A | A.M. | 0.334 | 13 | B | 0.337 | 13 | B | 0 | No |
| | | A | P.M. | 0.458 | 47 | D | 0.462 | 46 | D | -1 | No |
| | | **A** | **WKND** | **0.449** | **65** | **E** | **0.453** | **64** | **E** | **-1** | **No** |
| 4 | Ocean Avenue & Arizona Avenue | A | A.M. | 0.302 | 8 | A | 0.307 | 8 | A | 0 | No |
| | | A | P.M. | 0.348 | 12 | B | 0.348 | 12 | B | 0 | No |
| | | A | WKND | 0.362 | 13 | B | 0.367 | 13 | B | 0 | No |
| 5 | Ocean Avenue & Santa Monica Boulevard | A | A.M. | 0.325 | 10 | A | 0.339 | 11 | B | 1 | No |
| | | A | P.M. | 0.460 | 25 | C | 0.476 | 27 | C | 2 | No |
| | | A | WKND | 0.512 | 37 | D | 0.525 | 38 | D | 1 | No |
| **6** | **Ocean Avenue & Broadway** | A | A.M. | 0.407 | 13 | B | 0.415 | 13 | B | 0 | No |
| | | **A** | **P.M.** | **0.630** | **61** | **E** | **0.639** | **61** | **E** | **0** | **No** |
| | | **A** | **WKND** | **0.657** | **61** | **E** | **0.666** | **61** | **E** | **0** | **No** |
| 7 | Ocean Avenue & Colorado Avenue | A | A.M. | 0.384 | 26 | C | 0.396 | 26 | C | 0 | No |
| | | A | P.M. | 0.464 | 37 | D | 0.472 | 38 | D | 1 | No |
| | | A | WKND | 0.591 | 46 | D | 0.596 | 46 | D | 0 | No |
| 8 | Ocean Avenue & Moomat Ahiko Way | A | A.M. | 0.462 | 26 | C | 0.467 | 26 | C | 0 | No |
| | | A | P.M. | 0.497 | 25 | C | 0.498 | 25 | C | 0 | No |
| | | A | WKND | 0.558 | 32 | C | 0.563 | 32 | C | 0 | No |
| 9 | Ocean Avenue & Olympic Drive | A | A.M. | 0.464 | 13 | B | 0.469 | 13 | B | 0 | No |
| | | A | P.M. | 0.584 | 16 | B | 0.585 | 16 | B | 0 | No |
| | | A | WKND | 0.574 | 42 | D | 0.580 | 42 | D | 0 | No |
| 10 | Ocean Avenue & Pico Boulevard | C | A.M. | 0.571 | 21 | C | 0.580 | 21 | C | 0 | No |
| | | C | P.M. | 0.546 | 37 | D | 0.556 | 38 | D | 1 | No |
| | | C | WKND | 0.563 | 30 | C | 0.570 | 30 | C | 0 | No |
| **11** | **2nd Street & Wilshire Boulevard** | **A** | **A.M.** | **0.607** | **76** | **E** | **0.609** | **75** | **E** | **-1** | **No** |
| | | **A** | **P.M.** | **1.127** | ****** | **F** | **0.927** | ****** | **F** | **-0.2** | **No** |
| | | **A** | **WKND** | **2.792** | ****** | **F** | **2.792** | ****** | **F** | **0** | **No** |

## Table 3.13-10. Analysis of Project Impacts under Future Year (2025) Traffic Conditions (Continued)

| Number | Intersection | Class | Peak Hour | Future Year (2025) | | | Future Year plus Project (2025) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project (Continued)** | | | | | | | | | | | |
| **12** | **2nd Street & Arizona Avenue** | C | A.M. | 0.279 | 27 | C | 0.306 | 27 | C | 0 | No |
| | | C | P.M. | 0.423 | 29 | C | 0.454 | 30 | C | 1 | No |
| | | **C** | **WKND** | **0.586** | **33** | **C** | **0.622** | **36** | **D** | **3** | **Yes** |
| **13** | **2nd Street & Santa Monica Boulevard** | A | A.M. | 0.642 | 36 | D | 0.482 | 31 | C | -5 | No |
| | | **A** | **P.M.** | **2.279** | ** | **F** | **1.339** | ** | **F** | **0.06** | **Yes** |
| | | **A** | **WKND** | **1.279** | ** | **F** | **1.265** | ** | **F** | **-0.011** | **No** |
| 14 | 2nd Street & Broadway | A | A.M. | 0.345 | 29 | C | 0.349 | 30 | C | 1 | No |
| | | A | P.M. | 0.403 | 29 | C | 0.411 | 30 | C | 1 | No |
| | | A | WKND | 0.439 | 33 | C | 0.439 | 33 | C | 0 | No |
| 15 | 2nd Street & Colorado Avenue | A | A.M. | 0.371 | 39 | D | 0.378 | 39 | D | 0 | No |
| | | A | P.M. | 0.435 | 37 | D | 0.454 | 38 | D | 1 | No |
| | | A | WKND | 0.456 | 43 | D | 0.461 | 43 | D | 0 | No |
| **16** | **Main Street & Olympic Drive** | **C** | **A.M.** | **0.771** | ** | **F** | **0.777** | ** | **F** | **0.006** | **Yes** |
| | | C | P.M. | 0.416 | 19 | B | 0.420 | 18 | B | -1 | No |
| | | **C** | **WKND** | **0.661** | **100** | **F** | **0.667** | **99** | **F** | **0.006** | **Yes** |
| 17 | Main Street & Pico Boulevard | A | A.M. | 0.496 | 25 | C | 0.504 | 25 | C | 0 | No |
| | | A | P.M. | 0.415 | 23 | C | 0.423 | 24 | C | 1 | No |
| | | A | WKND | 0.591 | 45 | D | 0.602 | 46 | D | 1 | No |
| 18 | 4th Street & Wilshire Boulevard | A | A.M. | 0.526 | 42 | D | 0.529 | 42 | D | 0 | No |
| | | A | P.M. | 0.493 | 37 | D | 0.491 | 37 | D | 0 | No |
| | | A | WKND | 0.566 | 47 | D | 0.568 | 48 | D | 1 | No |
| **19** | **4th Street & Arizona Boulevard** | A | A.M. | 0.472 | 28 | C | 0.481 | 29 | C | 1 | No |
| | | **A** | **P.M.** | **0.631** | **65** | **E** | **0.624** | **68** | **E** | **3** | **Yes** |
| | | **A** | **WKND** | **0.708** | **97** | **F** | **0.722** | ** | **F** | **0.014** | **Yes** |
| 20 | 4th Street & Santa Monica Boulevard | A | A.M. | 0.481 | 24 | C | 0.497 | 25 | C | 1 | No |
| | | A | P.M. | 0.370 | 26 | C | 0.375 | 27 | C | 1 | No |
| | | A | WKND | 0.495 | 32 | C | 0.515 | 35 | C | 3 | No |
| 21 | 4th Street & Broadway | A | A.M. | 0.539 | 39 | D | 0.541 | 39 | D | 0 | No |
| | | A | P.M. | 0.587 | 46 | D | 0.588 | 46 | D | 0 | No |
| | | A | WKND | 0.582 | 44 | D | 0.587 | 44 | D | 0 | No |
| 22 | 4th Street & Colorado Avenue | A | A.M. | 0.407 | 19 | B | 0.408 | 19 | B | 0 | No |
| | | A | P.M. | 0.437 | 23 | C | 0.441 | 23 | C | 0 | No |
| | | A | WKND | 0.438 | 26 | C | 0.444 | 26 | C | 0 | No |

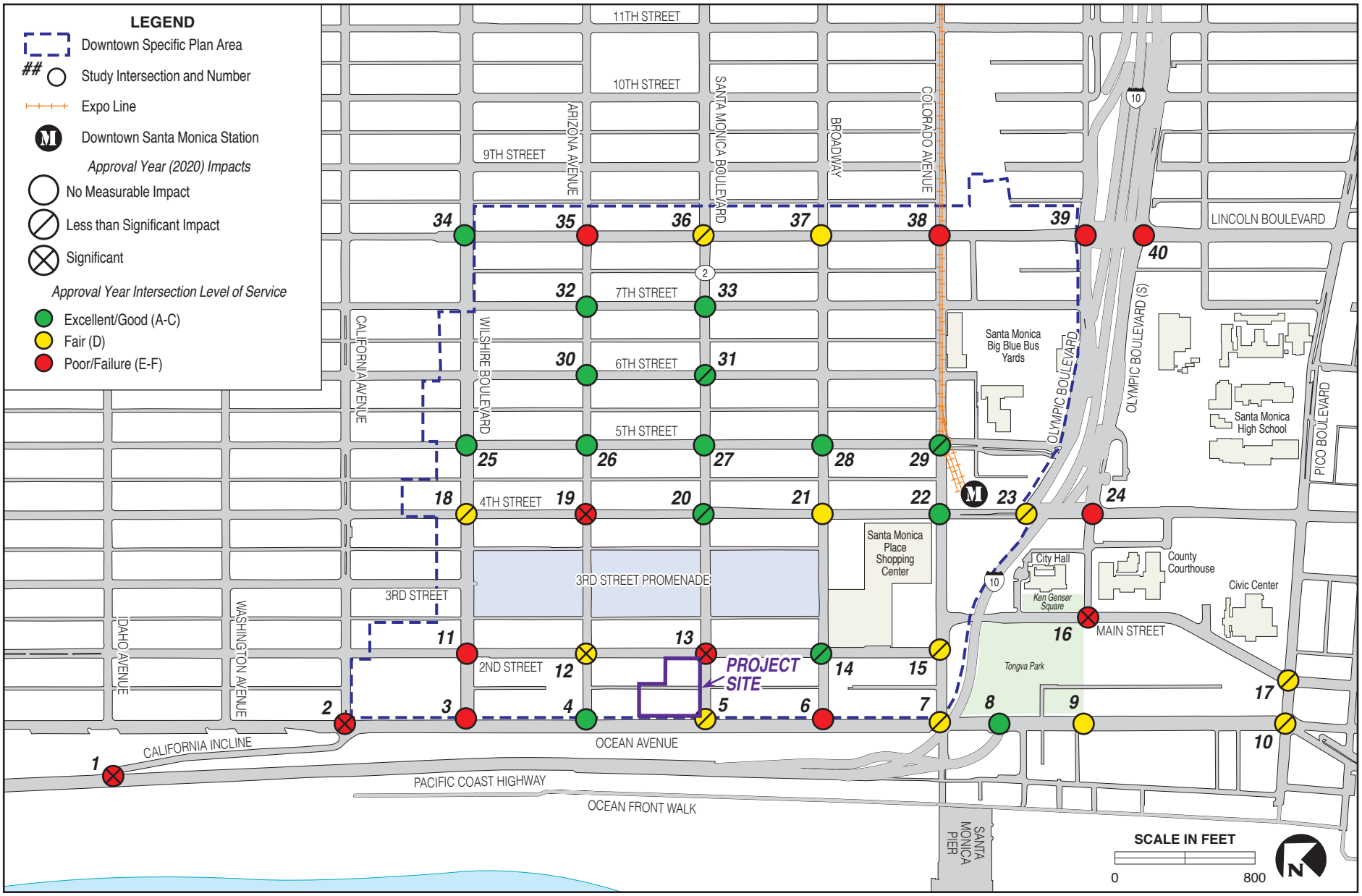
## Table 3.13-10. Analysis of Project Impacts under Future Year (2025) Traffic Conditions (Continued)

| Number | Intersection | Class | Peak Hour | Future Year (2025) | | | Future Year plus Project (2025) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project (Continued)** | | | | | | | | | | | |
| 23 | 4th Street & I-10 WB Off-Ramp | A | A.M. | 0.718 | 36 | D | 0.733 | 39 | D | 3 | No |
| | | A | P.M. | 0.582 | 28 | C | 0.580 | 28 | C | 0 | No |
| | | A | WKND | 0.585 | 27 | C | 0.599 | 27 | C | 0 | No |
| **24** | **4th Street & I-10 EB Off-Ramp** | **A** | **A.M.** | **0.604** | **57** | **E** | **0.607** | **57** | **E** | **0** | **No** |
| | | A | P.M. | 0.553 | 26 | C | 0.554 | 26 | C | 0 | No |
| | | A | WKND | 0.557 | 55 | D | 0.562 | 55 | D | 0 | No |
| 25 | 5th Street & Wilshire Boulevard | A | A.M. | 0.285 | 16 | B | 0.287 | 16 | B | 0 | No |
| | | A | P.M. | 0.382 | 17 | B | 0.384 | 17 | B | 0 | No |
| | | A | WKND | 0.461 | 17 | B | 0.462 | 17 | B | 0 | No |
| 26 | 5th Street & Arizona Avenue | C | A.M. | 0.231 | 19 | B | 0.231 | 19 | B | 0 | No |
| | | C | P.M. | 0.430 | 22 | C | 0.440 | 22 | C | 0 | No |
| | | C | WKND | 0.512 | 27 | C | 0.516 | 27 | C | 0 | No |
| 27 | 5th Street & Santa Monica Boulevard | A | A.M. | 0.268 | 22 | C | 0.274 | 22 | C | 0 | No |
| | | A | P.M. | 0.391 | 21 | C | 0.399 | 21 | C | 0 | No |
| | | A | WKND | 0.403 | 24 | C | 0.408 | 24 | C | 0 | No |
| 28 | 5th Street & Broadway | C | A.M. | 0.350 | 23 | C | 0.349 | 23 | C | 0 | No |
| | | C | P.M. | 0.405 | 21 | C | 0.404 | 21 | C | 0 | No |
| | | C | WKND | 0.496 | 23 | C | 0.546 | 23 | C | 0 | No |
| 29 | 5th Street & Colorado Avenue | A | A.M. | 0.371 | 23 | C | 0.372 | 23 | C | 0 | No |
| | | A | P.M. | 0.427 | 24 | C | 0.428 | 24 | C | 0 | No |
| | | A | WKND | 0.545 | 27 | C | 0.546 | 28 | C | 1 | No |
| 30 | 6th Street & Arizona Avenue | C | A.M. | 0.250 | 19 | B | 0.259 | 19 | B | 0 | No |
| | | C | P.M. | 0.458 | 20 | B | 0.469 | 20 | B | 0 | No |
| | | C | WKND | 0.410 | 14 | B | 0.424 | 14 | B | 0 | No |
| 31 | 6th Street & Santa Monica Boulevard | A | A.M. | 0.311 | 15 | B | 0.325 | 15 | B | 0 | No |
| | | A | P.M. | 0.499 | 22 | C | 0.513 | 22 | C | 0 | No |
| | | A | WKND | 0.495 | 18 | B | 0.516 | 19 | B | 1 | No |
| 32 | 7th Street & Arizona Avenue | C | A.M. | 0.298 | 18 | B | 0.298 | 18 | B | 0 | No |
| | | C | P.M. | 0.410 | 20 | B | 0.416 | 20 | B | 0 | No |
| | | C | WKND | 0.409 | 18 | B | 0.415 | 18 | B | 0 | No |
| 33 | 7th Street & Santa Monica Boulevard | A | A.M. | 0.341 | 18 | B | 0.348 | 17 | B | -1 | No |
| | | A | P.M. | 0.416 | 19 | B | 0.425 | 19 | B | 0 | No |
| | | A | WKND | 0.421 | 21 | C | 0.428 | 20 | B | -1 | No |

## Table 3.13-10. Analysis of Project Impacts under Future Year (2025) Traffic Conditions (Continued)

| Number | Intersection | Class | Peak Hour | Future Year (2025) | | | Future Year plus Project (2025) | | | V/C or Delay Increase | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | V/C | Delay | LOS | V/C | Delay | LOS | | |
| **Development of the Ocean Avenue Project (Continued)** | | | | | | | | | | | |
| 34 | Lincoln Boulevard & Wilshire Boulevard | A | A.M. | 0.454 | 22 | C | 0.458 | 22 | C | 0 | No |
| | | A | P.M. | 0.438 | 21 | C | 0.440 | 21 | C | 0 | No |
| | | A | WKND | 0.520 | 23 | C | 0.523 | 23 | C | 0 | No |
| **35** | **Lincoln Boulevard & Arizona Avenue** | A | A.M. | 0.757 | 35 | C | 0.757 | 35 | C | 0 | No |
| | | **A** | **P.M.** | **0.898** | **59** | **E** | **0.896** | **59** | **E** | **0** | **No** |
| | | A | WKND | 0.564 | 31 | C | 0.568 | 31 | C | 0 | No |
| 36 | Lincoln Boulevard & Santa Monica Boulevard | A | A.M. | 0.477 | 24 | C | 0.486 | 24 | C | 0 | No |
| | | A | P.M. | 0.609 | 35 | C | 0.619 | 37 | D | 2 | No |
| | | A | WKND | 0.659 | 41 | D | 0.669 | 45 | D | 4 | No |
| 37 | Lincoln Boulevard & Broadway | A | A.M. | 0.584 | 38 | D | 0.585 | 38 | D | 0 | No |
| | | A | P.M. | 0.585 | 34 | C | 0.587 | 34 | C | 0 | No |
| | | A | WKND | 0.643 | 38 | D | 0.643 | 38 | D | 0 | No |
| **38** | **Lincoln Boulevard & Colorado Avenue** | **A** | **A.M.** | **0.580** | **67** | **E** | **0.580** | **67** | **E** | **0** | **No** |
| | | A | P.M. | 0.544 | 51 | D | 0.545 | 50 | D | -1 | No |
| | | A | WKND | 0.761 | 50 | D | 0.766 | 51 | D | 1 | No |
| **39** | **Lincoln Boulevard & I-10 Westbound Off-Ramp** | **A** | **A.M.** | **0.981** | **100** | **F** | **0.982** | **100** | **F** | **0.001** | **No** |
| | | A | P.M. | 0.763 | 44 | D | 0.764 | 44 | D | 0 | No |
| | | **A** | **WKND** | **0.865** | **64** | **E** | **0.866** | **64** | **E** | **0** | **No** |
| **40** | **Lincoln Boulevard & I-10 Eastbound On-Ramp** | A | A.M. | 0.755 | 29 | C | 0.756 | 29 | C | 0 | No |
| | | A | P.M. | 0.568 | 30 | C | 0.570 | 30 | C | 0 | No |
| | | **A** | **WKND** | **0.900** | **59** | **E** | **0.901** | **59** | **E** | **0** | **No** |

Notes:
* Average stopped delay per vehicle, in seconds.
** Indicates oversaturated conditions. Delay cannot be calculated.
A Arterial intersection
C Collector intersection
Source: Fehr & Peers 2020.




wood.

**Future Year (2025) Levels of Service**
**Ocean Avenue Project Impacted Intersections**

**FIGURE 3.13-4**

Mitigation Measures

Mitigation measures for each of the ~~seven~~ significant impacts under the Approval Year (2020) and Future Year (2025) Plus Project traffic conditions were considered in the Transportation Study (see Appendix K). The potentially significant impact at 2nd Street & Wilshire Boulevard could be mitigated to less than significant through the re-striping of travel lanes. However, as discussed in detail in the Transportation Study, none of the other impacts would be mitigated without potential secondary impacts to pedestrian safety goals and policies outlined in the LUCE and DCP. Therefore, under both the Approval Year (2020) and Future Year (2025) Plus Project traffic conditions, the proposed Project would result in significant and unavoidable impacts~~ at six intersections~~.

Residual Impacts

As previously described, there are no feasible mitigation measures available to either reduce or eliminate the potentially significant impacts at any of the other intersections. Therefore, based on the City's previously adopted significance criteria, impacts would remain *significant and unavoidable*.

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

**T-3 The proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts related to hazards due to design features would be *less than significant*.**

Impact Description T-3

As described in Section 2.6.8, *Access, Circulation, and Parking*, under the proposed Project, vehicle access to the Project site would continue to be provided via 1st Court, a 20-foot-wide one-way southbound alleyway. However, 1st Court would be reconfigured to an L-shape, requiring vehicles to exit onto 2nd Street on the northern side of the 2nd Street Building. One-way traffic would circulate to the site from Arizona Avenue southbound onto 1st Court and into the entry of the proposed subterranean parking garage (located approximately 190 feet south of Arizona Avenue). Except for emergency vehicles, delivery and other private vehicles would no longer be able to reach Santa Monica Boulevard from 1st Court as the southern portion of the alley would be converted into the proposed Santa Monica Boulevard Paseo (see Impact T-4). Rather, the alleyway would provide a right-turn only exit onto 2nd Street. Similarly, the exit lane from the proposed subterranean garage would connect to the realigned 1st Court and right-turn only exit onto 2nd

Street (refer to Figure 2-4).

The proposed Project would generate approximately 3,475 trips per day with up to 259 trips during the midday weekend peak hour (approximately 1.08 per minute) and lower volumes during the A.M. and P.M. peak hours (refer to Table 3.13-7; see Appendix K). All vehicles associated with these trips would enter the Project site via 1st Court. Loading and deliveries, which would occur during off peak hours, would occur within commercial loading zones onsite along the reconfigured alleyway across from the proposed Hotel Building and adjacent to the ground floor service area of the 2nd Street Building. Vehicles would exit 1st Court by turning right onto 2nd Street and cross a pedestrian sidewalk as well as a Class II (i.e., striped) bicycle lane.

Increased Project-generated trips along 2nd Street, particularly heavy delivery trucks, could block or delay existing pedestrian, bicyclist, and vehicle traffic along 2nd Street. However, the proposed exiting alleyway would be designed to minimize such conflicts. The driveway onto 2nd Street would be one lane (merging from two lanes on the alley), stop-controlled, and would include mirrors to prevent vehicle conflicts with bicycle and pedestrians. Additionally, turning movements at the proposed vehicle exit as well as the existing offsite parking garage driveway are limited to right-turn only movements, that are signed and separated by double yellow striping. Therefore, compliance with exiting traffic laws would eliminate the potential for vehicle conflicts. Consequently, typical vehicle traffic associated with the proposed Project would not interfere with pedestrian, bicycles, or vehicles along 2nd Street.

*The Downtown Farmer's Market occurs on Wednesday and Saturdays and results in partial street closures.*

During special events for the Cultural Use Campus, most passengers will load at the valet zone in the subterranean garage. The nature of valet is that the cars being retrieved in the subterranean parking garage will naturally be metered out since the guests cannot all get to their cars at once.

On a few occasions during the week, portions of Arizona Avenue (on Wednesdays and Saturdays between 6:00 A.M. and 2:00 P.M.) and 2nd Street (on Wednesdays between 6:00 A.M. and 2:00 P.M.) are closed to for the Downtown Farmer's Market. During these times, vehicle access to Arizona Avenue is blocked and through-traffic must use parallel streets. The Downtown Farmer's Market is a regular event with signage and special traffic barriers that are deployed to

redirect traffic. Because the farmer's market closures take place on relatively minor streets in the Downtown grid network and is a known, regular occurrence that does not preclude vehicle access to neighboring development, the proposed Project would follow typical detours for the City. Vehicle access to the Project site via 1st Court and right-turn only exit onto 2nd Street are outside of the typical footprint of the Saturday Farmer's Market and would not negatively impact the market by requiring special access, nor would the Project access be limited by the Market. Under the typical Wednesday Farmer's Market setup, small vehicle access to 1st Court remains open, although larger vehicles, such as delivery trucks would be unable to enter the alleyway. This condition exists today for the developments along 1st Court. On Wednesdays, vehicles must approach from Ocean Avenue, and on Saturdays, access from bot h2ns Street and Ocean Avenue is available to 1st Court obstructed Vehicles exiting the Project would continue to turn right onto 2nd Street, heading away from the Farmer's Market. The Project exit driveway is located east of the Farmer's Market closure.


*During the Downtown Farmer's Market, Arizona Avenue is closed from 2nd Street to 3rd Court. However, vehicles would continue to be able to access the Project site via 1st Court by simply diverting to Wilshire Boulevard or Santa Monica Boulevard to access Ocean Avenue and turn eastbound onto Arizona Avenue.*

The City and SMFD would review all proposed street improvements for safety and compliance with City requirements (including those related to hazardous visual obstructions) prior to the issuance of a building permit. As such, the proposed Project would not include any hazardous design feature such as sharp curves or dangerous intersections either on- or off-site (e.g., all proposed intersections would be at right-angles and signal or stop controlled). Therefore, impacts would be *less than significant*.

*Would the project result in inadequate emergency access?*

**T-4** **Emergency access to the Project site is currently adequate and would be maintained following the construction of the proposed Project. During construction, emergency access could be impeded due to heavy haul truck traffic, temporary lane closures, or other construction activities. However, with implementation of a Construction Impact Management Plan, impacts of construction on emergency access would be *less than significant with mitigation*.**

Impact Description T-4

*Construction*

During construction, short-term impacts on emergency access would be potentially significant due to the presence of perimeter construction fencing, heavy construction equipment, construction workers, and large excavations and/or trenches. As discussed in Section 3.3, *Construction Effects*, the Applicant would be required to prepare a CIMP in accordance with MM CE-1, as required by the City's Construction Management Ordinance. The CIMP would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking. The CIMP would also establish procedures for coordination with local emergency services, training for flagman for emergency vehicles traveling through the work zone, and other measures as necessary to facilitate emergency vehicle travel. Thus, the CIMP would ensure the continued provision of emergency access during construction of the proposed Project. Implementation of MM CE-1 would ensure that construction impacts on emergency access would be *less than significant with mitigation*.

*Operation*

As discussed in Sections 4.4, *Effects Found Not to Be Significant*, emergency access to the Project site is currently available directly from surrounding arterial streets, including Ocean Avenue, Santa Monica Boulevard, and 2nd Street. Additionally, the Project site is bisected by 1st Court, which provides also provides emergency access.

Under the proposed Project, the southern portion of 1st Court, which traverses the Project site to provide a mid-block connection between Arizona Avenue and Santa Monica Boulevard, would be repurposed as a pedestrian-only paseo and a loading zone. In its place, the proposed Project would provide a new driveway from 1st Court heading east along the northern portion of the Project site towards 2nd Street (where 1st Court would terminate), permitting one-way right-turn only vehicle exit onto 2nd Street. However, emergency access would be maintained as the southern portion of 1st Court that would serve as the Santa Monica Boulevard Paseo would be closed with removable

bollards for emergency vehicles (refer to Figure 2-4). The 20-foot wide drive aisle, with adjacent paved areas, would provide sufficient space for Class WB-50 trucks (i.e., 5 axles; 55 feet in length) as well as emergency vehicles (e.g., fire trucks, ambulances, etc.)

The proposed circulation plan and access to the Project site with the associated street improvements would be reviewed and approved by the City and the SMFD to ensure compliance with City code requirements and the provision of adequate emergency access. For example, the proposed Project would be subject to the SMMC Section 9.04.10.08.060(d) which states, *"the design, location or position of any parking layout, entry, driveway, approach, or access from any street or alley shall be approved by the Parking and Traffic Engineer."* Site plan approval from the City and SMFD would ensure that proposed Project provides sufficient access for emergency vehicles prior to issuance of a building permit. Therefore, emergency access would be maintained following construction of the proposed Project and impacts would be *less than significant*.

Residual Impacts

Implementation of MM CE-1 would reduce construction-related impacts on the street network and allow for the continued emergency access to the Project site. By requiring haul trips to be restricted between 9:00 A.M. and 4:00 P.M., impacts on the surrounding transportation network would be reduced during the A.M. and P.M. peak hours. Additionally, MM CE-1 would require coordination with all affected agencies (e.g., Big Blue Bus, Metro, Police Department, Fire Department, Public Works Department, and Planning & Community Development Department), Downtown Farmer's Market operators, and all owners and residential and commercial tenants of property within a radius of 500 feet. With this coordination and the implementation of measures identified in the CIMP (e.g., flaggers), potential effects on emergency access would be minimized. As such, implementation of MM CE-1 would reduce construction-related impacts to *less than significant with mitigation*.

### 3.13.6 Cumulative Impacts

*Consistency with Circulation Plans/Programs/Ordinances/Policies*

The proposed Project would include mixed-use development proximate to multiple transit options, bicycle and pedestrian improvements, and the implementation of a TDM plan and payment of the required transportation impact fees, all of which would encourage the use of alternative transportation. Although the residential VMT per capita associated with the proposed Project would be slightly greater than the Citywide average, it would be more than 15 percent lower that the regional average VMT and the proposed Project would be consistent with goals, policies, and regulations related to GHG reduction in the 2016-2040 RTP, LUCE and DCP, AB/SB 32, SB 375,

and recommendations of the State Attorney General, OPR and Climate Action Team. As such the proposed Project would not result in a substantial contribution to cumulatively considerable impacts related to transportation plans and policies.

*Conflict with CEQA Guidelines Section 15064.3, Subdivision (b)*

**Vehicle Miles Travelled**

As discussed under OPR's Technical Advisory, "metrics such as VMT per capita or VMT per employee, (i.e., metrics framed in terms of efficiency as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less than significant project impact would imply a less than significant cumulative impact, and vice versa."

**Intersection Operations and Level of Service**

The LOS analysis for the proposed Project is based on the City's TDFM, which considers the traffic volumes associated with growth in the City through at Future Year (2025), including but not limited to the trip generation associated with the cumulative projects. As described under Impact T-2B above, the proposed Project would result in a *less than significant* impact at most of the study intersections. However, even with implementation of the proposed TDM plan and all feasible mitigation measures, the proposed Project would exceed the City's adopted LOS thresholds at six study intersections, thereby resulting in a substantial contribution to a cumulatively considerable impact on intersection operations.

*Hazards Due to Design Features and Emergency Access*

During construction, emergency access could be impeded as a result of the construction traffic particularly heavy haul trucks and other construction equipment (e.g., cement trucks and cranes), that may disrupt traffic flows, limit turn lane capacities, and generally slow traffic movement. However, with the implementation of MM CE-1, construction impacts related emergency access would be reduced to *less than significant*. As acknowledged in the DCP Program EIR, potential overlap of construction activities in the Downtown could potentially result in a significant increase in daily construction vehicle trips within Downtown. As with the Project, cumulative projects that have discretionary approval would be required to implement a CIMP. These plans, which would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking in the area, would be reviewed by the City with an

understanding of the other cumulative projects undergoing construction in the vicinity simultaneously. Thus, implementation of the City-approved CIMP for cumulative projects would ensure the continued provision of emergency access. With the implementation of MM CE-1, the proposed Project would not result in a substantial contribution to cumulatively considerable impacts related to emergency access.

With regard to operation, hazards due to design features and emergency access are generally specific the Project site and the proposed Project and associated impacts are generally not additive between cumulative projects. Further, as with the proposed Project, each of the cumulative projects would be subject to site plan review and would meet City street design and access requirements. Therefore, implementation of the proposed Project would not result in a substantial contribution to cumulatively considerable impacts related to design features and inadequate emergency access.

## 3.14 TRIBAL CULTURAL RESOURCES

This section of the Environmental Impact Report (EIR) provides an assessment of potential impacts to tribal cultural resources that could result from implementation of the proposed Ocean Avenue Project (Project). Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: 1) included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register); or 2) included in a local register of historical resources as defined in California Environmental Quality Act (CEQA) Section 21074. Tribal cultural resources may also include resources determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is considered a tribal cultural resource to the extent that the cultural landscape is geographically defined in terms of the size and scope. Archaeological resources, which are further described in Section 3.4, *Cultural Resources*, may also be considered tribal cultural resources, if they meet these criteria.

### 3.14.1 Environmental Setting

Ethnography

The Project site is located within the traditional ethnographic territory of the Takic-speaking Gabrieleño/Tongva. The Gabrieleño/Tongva occupied a territory that covered more than 1,500 square miles centered in the Los Angeles Basin and extending south into a portion of Orange County, as far east as the San Bernardino-Riverside area, and north into a portion of Topanga Canyon. The Gabrieleño/Tongva territory also included the southern Channel Islands (i.e., Santa Catalina, San Clemente, and San Nicolas islands).

*The Gabrieleño/Tongva occupied a territory that covered more than 1,500 square miles centered in the Los Angeles Basin, including diverse coastal resources in what is now Santa Monica. Photo: Mary Leighton Thomson circa 1900. "Wiyot's Children," Gabrielino Indian of Village of Sa-anga, Playa del Rey, CA*

More than 50 villages were located within this territory with populations that ranged from approximately 50 to 150 individuals. Each community consisted of one or more lineages which controlled a specific geographic territory that included a permanent residential settlement, various

hunting and gathering areas, and ritual sites. The extended family social group slept in large, circular, domed houses with bent pole frames covered by dried tule (McCawley 1996).

The Gabrieleño/Tongva had access to diverse coastal and littoral resources. Subsistence resources included native grass seeds, acorns, pinyon pine nuts, seeds and berries, mule deer, pronghorn, mountain sheep, rabbits and rodents, quail and water fowl, snakes, lizards, insects, freshwater fish, and a variety of marine fish, shellfish, and sea mammals (McCawley 1996). Acorn meal was the staple of the Gabrieleño/Tongva diet. Acorns were processed in stone or wooden mortars and the bitter tannin was leeched out with water. The acorn meal was then boiled in tightly woven, watertight baskets using heated rocks. Similarly, the black walnut was another important plant resource. Small schooling fish were caught with nets while large fish were caught with shell or bone hooks. Deer and elk were hunted from blinds. Smaller animals were also important to the diet. Rabbits were herded into nets and rodents were smoked out of their burrows. Coastal groups used ocean-going plank canoes and tule balsa canoes for fishing (McCawley 1996). During this time, fishing and sea mammal hunting became more important, corresponding to development of the plank canoe, single-piece shell fishhooks, and harpoons. The bow and arrow also appeared, as well as increasing cultural complexity and technological innovation.

The Gabrieleño/Tongva exhibited a complex culture, social organization, religious beliefs, and art and material production. The Gabrieleño/Tongva were known for excellent artisanship in the form of pipes, ornaments, cooking implements, inlay work, and basketry. Although few specifics are known of Gabrieleño/Tongva life, their economic system managed food reserves (i.e., storage and processing), exchanged goods, and distributed resources.

Due to the level of historic and current urban development within the City of Santa Monica (City), the full extent and density of Gabrieleño/Tongva occupation within the vicinity of the Project site is difficult to accurately characterize as numerous resources have most likely been disturbed without professional documentation. However, the Gabrieleño/Tongva village at Kuruvungna Springs located approximately 3 miles north of the Project site indicates that the Gabrieleño/Tongva occupied and utilized natural resources within the proposed Project vicinity over an extended period (City of Santa Monica 2017).

Native American Heritage Commission Sacred Lands File

As described in Section 3.4, *Cultural Resources*, the Native American Heritage Commission (NAHC) was contacted on June 13, 2019 to request a review of their Sacred Lands File (SLF), including records associated with the proposed Project site. The NAHC responded on June 26, 2019, stating that the SLF indicated the presence of Native American cultural resources within the

Downtown; however, the NAHC would not provide the location or nature of these resource(s) and recommended that the City contact Native American individuals and organizations to elicit information and/or concerns regarding any cultural resource issues related to the proposed Project.

Tribal Cultural Resources Consultation

As part of the tribal consultation process required by Assembly Bill (AB) 52, the City sent a request for tribal consultation to the list of tribes provided by the NAHC. The letters, which were sent on February 14, 2019, described the Project site within the Downtown and requested input on the proposed Project from these individuals and organizations. Of the 18 individuals and organizations contacted, one tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, responded with comments. The Gabrieleño Band of Mission Indians – Kizh Nation, represented by Mr. Andrew Salas (Chairperson), the City, represented by Ms. Rachel Kwok (Environmental Planner, Planning & Community Development Department) discussed the proposed Project during a telephone call on the week of July 15, 2019. Mr. Salas followed-up on July 24, 2019 in an email explaining the Kizh Nation's concerns regarding potential impacts to tribal cultural resources and requesting the incorporation of suggested mitigation measures.

Mr. Salas provided a map from 1938 illustrating 101 Santa Monica Boulevard and 1133 Ocean Avenue adjacent to ethnohistoric Gabrieleño/Tongva villages, including *Suangna* and *Comicrabit*, trade routes, and waterways. Mr. Salas indicated that these trade routes and waterways are considered cultural landscapes according to CEQA Section 21074. Due to the proximity of tribal villages, trade routes, and waterways to the proposed Project, Mr. Salas indicated that there is a potential for the proposed Project to impact tribal cultural resources. He requested that the Applicant provide for tribal monitoring by a representative of the Kizh Nation during all ground disturbances associated with the proposed Project, including: grubbing, tree removal, pavement removal, potholing, augering, boring, drilling, trenching, grading, and excavation. Mr. Salas, on behalf of the Kizh Nation, also requested a protocol and treatment measures to in the event of unanticipated discovery of tribal cultural resources, archaeological resources, human remains, and/or associated funerary objects.

On August 14, 2019, Ms. Kwok emailed draft mitigation measure language to Mr. Salas intended to address potential impacts to tribal cultural resources identified by the Kizh Nation. Ms. Kwok followed up with additional correspondence on September 4, 2019 confirming receipt of the draft mitigation measure language. On September 5, 2019, the Gabrieleño Band of Mission Indians – Kizh Nation, represented by Mr. Matthew Teutimez (Biologist), indicated that he would review the draft mitigation measure language. Ms. Kwok followed up on this draft mitigation measure language again on September 11, 2019. That same day, Mr. Salas, on behalf of the Kizh Nation,

agreed to the recommended mitigation measure language (see MM TCR-1 below), which concluded the AB 52 consultation process.

### 3.14.2 Regulatory Framework

Assembly Bill 52

AB 52 was approved by former California State Governor Edmund Gerry "Jerry" Brown, Jr. on September 25, 2014. The bill amended California Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native American tribes that require consideration under CEQA, known as tribal cultural resources (as defined in PRC Section 21074[a]). On July 30, 2016, the California Natural Resources Agency adopted the final text to update Appendix G of the CEQA Guidelines for tribal cultural resources, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a Lead Agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the Lead Agency shall provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the Lead Agency (PRC Section 21080.3.1[b]). Tribes interested in consultation must respond in writing within 30 days from receipt of the Lead Agency's formal notification and the Lead Agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1[d] and 21080.3.1[e]).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures that would mitigate or avoid a significant effect, if a significant effect exists on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2[b]).

If a California Native American tribe has requested consultation pursuant to PRC Section 21080.3.1 and has failed to provide comments to the Lead Agency, or otherwise failed to engage in the consultation process, or if the Lead Agency has complied with PRC Section 21080.3.1(d)

and the California Native American tribe has failed to request consultation within 30 days, the Lead Agency may certify an EIR or adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND) (PRC Section 21082.3[d][2] and [3]).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the Lead Agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the Lead Agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all the information to the public.

However, confidentiality does not apply to data or information that are, or become publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the project applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the Lead Agency, a California Native American tribe, or another public agency (PRC Section 21082.3[c][2][B]).

### 3.14.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following threshold of significance regarding tribal resource impacts is based on the Appendix G of the CEQA Guidelines. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not mandatory, it is routinely sanctioned by the courts. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on tribal cultural resources if:

a) The project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place,

or object with cultural value to a California Native American tribe, and that is at least one of the following:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or

ii. A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the Lead Agency shall consider the significance of the resource to a California Native American tribe.

Methodology

The impact analysis for tribal cultural resources is based on information provided during outreach with relevant California Native American tribes pursuant to AB 52, the findings of the Phase I Cultural Resources Assessment related to buried archaeological resources, the Project site's location relative to known tribal activities in the vicinity, site-specific geologic and topographic conditions, and the footprint and depth of the subsurface excavation associated with the proposed Project.

### 3.14.4 Applicable Mitigation Measures from the Downtown Community Plan

The Downtown Community Plan Program EIR does not include any applicable mitigation measures for potential impacts to tribal cultural resources associated with the proposed Project.

### 3.14.5 Project Impacts and Mitigation Measures

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is at least one of the following:*

*- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or*

*- A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the Lead Agency shall consider the significance of the resources to a California Native American tribe?*

**TCR-1 Tribal cultural resources, as defined in PRC Section 21074, may be inadvertently uncovered during ground disturbing activities associated with**

**the proposed Project. Damage or destruction of such tribal cultural resources would be a potentially significant impact. However, with tribal monitoring agreed to by the Kizh Nation during the AB 52 consultation process, impacts would be reduced to *less than significant with mitigation.***

Impact Description (TCR-1)

As previously discussed, the Downtown was a favorable environment for Native American settlement. The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the Project site is sensitive for tribal cultural resources given its location along the coast and within an area of historic use by Gabrieleño/Tongva villages, such as *Suangna* and *Comicrabit*, and trade routes and waterways, which are considered cultural landscapes pursuant to CEQA Section 21074. Due to the proximity of tribal villages, trade routes, and waterways to the proposed Project and the proposed excavation depth to 35 feet below ground surface (bgs), the Kizh Nation indicated that there is a potential for the proposed Project to impact tribal cultural resources. Therefore, as agreed to by the Kizh Nation during the AB 52 consultation process, a tribal monitor from the Kizh Nation would be present during excavation activities associated with Project construction as required by MM TCR-1. Monitors would observe excavation activities associated with construction of the proposed Project, including site pavement demolition, soil excavation, grading, and trenching, specifically for tribal cultural resources. Consistent with Project-specific mitigation measures (MMs) CR-2a, CR-2b, and CR-3, any discovery of previously unknown buried resources would trigger an immediate stop in construction while the resource is evaluated (refer to Section 3.4, *Cultural Resources*). Depending on the resource value, treatment plans would be developed in consultation with the City, tribal representatives, and Project archaeologists. With the implementation of MM TCR-1, impacts to tribal cultural resources would be *less than significant with mitigation*.

Mitigation Measures

*MM-TCR-1* ***Native American Construction Monitoring.*** *Prior to issuance of demolition permit, a Native American tribal monitor from the Gabrieleño Band of Mission Indians – Kizh Nation shall be retained by the Applicant. The appropriate Native American monitor shall be selected based on consultation under AB 52 and shall be identified on the most recent contact list provided by the Native American Heritage Commission. The Native American monitor shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall consider the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (e.g., younger*

*alluvium versus older alluvium), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrieleño Band of Mission Indians – Kizh Nation.*

### 3.14.6 Cumulative Impacts

A cumulative impact to tribal cultural resources would result if the potential impacts associated with the proposed Project, when combined with other related past, present, and future projects, would cumulatively increase the potential for tribal cultural resources to be altered or damaged. The potential to create adverse cumulative impacts to such resources depends on the nature of each project, including its specific site and surroundings.

Each development proposal received by the City is required to undergo review under existing City regulations and policies and/or tribal consultation under AB 52 to determine the potential for impacts to tribal cultural resources. If there is a potential for significant impacts on a tribal cultural resource, an investigation would be required to determine the nature and extent of the resource and identify appropriate mitigation measures. The mitigation would have the potential to reduce impacts on tribal cultural resources, but would not necessarily reduce that impact to less than significant. For example, recovery of human remains and associated burial related artifacts would reduce a project's impact on tribal cultural resources, but would not necessarily mitigate the impact below cumulatively considerable levels. It is reasonable to assume that some number of past projects within the Gabrieleño/Tongva territory were not capable of fully mitigating this impact on tribal cultural resources. Given the substantial urbanization within the City and other municipalities within the Gabrieleño/Tongva territory, impacts on tribal cultural resources would be cumulatively considerable.

There is the potential for proposed Project ground disturbances to impact unknown tribal cultural resources, given that these resources are identified within the proposed Project vicinity. If this were to occur, depending on the nature of the resource, the proposed Project would have a cumulatively considerable contribution to impacts on tribal cultural resources. However, with the implementation of MM TCR-1, as agreed to by the Gabrieleño Band of Mission Indians – Kizh Nation during the AB 52 consultation process, potential adverse impacts to these tribal cultural resources would be mitigated. Therefore, the proposed Project would not contribute to cumulatively considerable impacts on tribal cultural resources.

### 3.14.7 Residual Impact

The implementation of MM TCR-1, requiring the monitoring of construction activities, would reduce impacts associated with the proposed Project to *less than significant*.

## 3.15 UTILITIES

This section analyzes existing and planned utilities and evaluates the operation and capacity of these utilities to serve the proposed Ocean Avenue Project (Project). Utilities necessary to meet future demands for the proposed Project include domestic water, wastewater (i.e., sewer), solid waste management services, and energy services (i.e., electricity and natural gas). This utilities analysis is divided into three subsections: (1) water infrastructure and supply; (2) wastewater collection, conveyance, and treatment; and (3) solid waste management. Energy services – including electricity and natural gas – are addressed in Section 3.5, *Energy*.

The City of Santa Monica (City) – including the Downtown and the Project site – is currently served by the following utilities:

**Table 3.15-1. Utilities Serving the Project Site**

| Utility | Service Provider |
|---|---|
| Water | City of Santa Monica Department of Public Works, Water Resources Division |
| Wastewater | City of Santa Monica Department of Public Works, Water Resources Division |
| Solid Waste | City of Santa Monica Department of Public Works, Resource Recovery and Recycling Division |

### 3.15.1 Water Infrastructure and Supply

This subsection describes the current status of potable water in the City, including a discussion of local water conservation initiatives and the ability of the City's water infrastructure and supply to meet existing and projected water demands.

#### 3.15.1.1 Environmental Setting – Water Infrastructure and Supply

<u>Water Service</u>

The City's Department of Public Works, Water Resources Division (Water Resources Division) is a retail water agency that provides potable and non-potable water throughout the City for single- and multi-family residential, commercial, and industrial uses, as well as landscaping irrigation and fire protection. The City distributes water to approximately 18,000 metered service connections through a 250-mile network of water lines ranging from 6 to 36 inches in diameter (City of Santa Monica 2016a, 2018). These connections provide service to approximately 91,400 residents and

thousands of commercial and industrial uses that support a fluctuating population of employees, visitors, and tourists (City of Santa Monica 2018a).[1]

The Downtown is served by 153 active water line segments, totaling approximately 12.6 miles and generally ranging from 6 to 16 inches in diameter, according to the City's Geographic Information System (GIS) Open Data Hub and the planning-level Civil Engineering Study performed for the Downtown Community Plan (DCP) (KPFF Consulting Engineers [KPFF] 2014). Water lines within the Downtown comprise a grid-pattern that runs along existing streets and alleys with a pressure regulator located at Wilshire Boulevard and 7th Street (KPFF 2014). Eight static pressure zones within the Downtown provide sufficient water pressure to customers at above 50 pounds per square inch (PSI). The age of individual water lines in the Downtown varies because upgrades to portions of the distribution system occur incrementally. The City has developed an asset management system for methodical replacement of aging water pipes, where improvements are typically funded on an annual basis as part of the City's Capital Improvements Projects program. Water lines are also upgraded as a part of new development, if necessary, to increase capacity to serve the project.

The Project site is served by four water mains that run through Ocean Avenue, Santa Monica Boulevard, 1st Court, and 2nd Street. These include a 12-inch water main along Ocean Avenue, an 8-inch water main along 1st Court, a 12-inch water main along 2nd Street, and a 12-inch water main along Santa Monica Boulevard (KPFF 2020; see Appendix L). The water main along Ocean Avenue has two tie-ins to the Project site, the water main along 1st Court has six tie-ins to the Project site, and the water main along 2nd Street has one tie-in to the Project site. The water main along Santa Monica Boulevard does not have a direct tie-in to the Project site; however, the water mains on Ocean Avenue, 1st Court, and 2nd Street connect to this water main.

The Project Site is not currently a recipient of recycled water from the SMURFF. Although not currently connected to the Project site, a 4-inch diameter distribution line for recycled water – commonly referred to as purple pipe – is located in Ocean Avenue. This distribution line extends from the Santa Monica Urban Runoff Recycling Facility (SMURRF) located south of Colorado Avenue, approximately 2.5 miles north to San Vicente Boulevard (City of Santa Monica 2014).

Fire Flows

The City conducted a fire flow test for the Project site in May 2019 using three hydrants on Ocean Avenue, 2nd Street, and Santa Monica Boulevard with tie-ins to the 12-inch water mains along

[1] According to the U.S. Census Bureau's 2018 1-year estimates from the American Community Survey, the population of Santa Monica is 91,417 residents.

each of these streets. These fire hydrants were selected and tested due to their proximity to the Project site; however, additional fire hydrants are located nearby and are also available for fire protection (KPFF 2019; see Appendix L). Based on the flow test of the three fire hydrants, the static pressure available at the Project site ranges between 70 PSI along 2nd Street to 74 PSI along Ocean Avenue (KPFF 2019; see Table 3.15-2). The 2019 Fire and Domestic Water Study prepared by KPFF (2019) determined that the maximum available flow for the Project site is 4,143 gallons per minute (GPM) at 20 PSI (see Appendix L).

**Table 3.15-2. Existing Fire Flow**

| Fire Hydrant | Static Pressure (PSI) | Residual Pressure (PSI) | Flow (GPM) | Rated Capacity at 20 PSI (GPM) |
|---|---|---|---|---|
| Ocean Avenue | 74 | 58 | 2,148 | 4,143 |
| 2nd Street | 70 | 58 | 2,541 | 5,491 |
| Santa Monica | 72 | 58 | 2,541 | 5,161 |

Notes:
The fire flow tests were determined in accordance with Appendix B of the 2016 California Fire Code, which has been adopted by the Santa Monica Municipal Code (SMMC) (refer to Section 3.8, *Hazards and Hazardous Materials.*
All the fire hydrants are connected through the public water mains; the lowest fire hydrant rated capacity at 20 PSI was used to be conservative.
Source: KPFF 2019; see Appendix L.

Water Supply

The City's potable water supply consists of local groundwater and imported water from the Metropolitan Water District of Southern California (MWD). Additionally, non-potable treated urban runoff water is produced by the SMURRF for landscaping irrigation and other approved non-potable water uses. The City's water supply portfolio consists of imported water from MWD connections (29 percent) and local supplies, including local groundwater basins (52 percent), existing conservation efforts (18 percent), and recycled water from the SMURFF (1 percent). The City's annual water supply from 2017 was approximately 11,498 acre-feet (AF), including 4,139 AF (36 percent) imported water from MWD and 7,499 AF (64 percent) from local potable water supplies (City of Santa Monica 2018a).[2]

Between 2012 and 2017, the combined water supply from local water and imported water has ranged from a low of approximately 11,467 (2015) acre-feet per year (AFY) to a high of 14,050 AFY (2013), with an average of approximately 12,690 AFY (City of Santa Monica 2018a). The State is recovering from the historic eight-year long drought. Although many emergency drought

[2] Annual water supply data from 2017 was the most recent publicly available data provided in the City's Sustainable Water Master Plan Update (December 2018).

regulations were lifted in April 2017, the State continues to regulate the use of water, including prohibitions on wasteful water practices, to optimize urban water use efficiencies and build resilience over the long term. The City has seen reduced water demand on average from 2012 to 2017 due to the implementation of new water conservation programs and policies implemented since the adoption of the Sustainable Water Master Plan (SWMP), which was revised in December 2018.

*Groundwater*

The City obtains its local groundwater supply from the SMGB. As further described in Section 3.9, *Hydrology and Water Quality*, the SMGB has a surface area of 50.2 square miles and underlies the entire City, as well as Culver City, Beverly Hills, and portions of western Los Angeles. The SMGB is bounded by impermeable rocks of the Santa Monica Mountains to the north, the Ballona Escarpment to the south, the Newport-Inglewood fault to the east, and the Pacific Ocean to the west. Extensive faulting within the SMGB separates it into five subbasins: Arcadia Subbasin, Charnock Subbasin, South Santa Monica or Coastal Subbasin, Crestal Subbasin, and Olympic Subbasin (City of Santa Monica 2018a). Groundwater in the SMGB is replenished by percolation from rainfall and by surface runoff from the Santa Monica Mountains.

The SMGB is unadjudicated and the City is currently the only municipality with a history of pumping significant volumes of water from the SMGB (City of Santa Monica 2018a). The City currently operates 10 active wells in the Charnock, Arcadia, and Olympic Subbasins of the SMGB (City of Santa Monica 2018a). The 10 wells have a combined capacity of approximately 7,980 GPM; however, due to the close proximity of these wells within the subbasins, they cannot be pumped at full capacity simultaneously (City of Santa Monica 2018a). The City is in the process of permitting additional wells in the Coastal and Olympic Subbasins and has plans for at least two more in the near future (City of Santa Monica 2018a).

The sustainable yield from the SMGB is a critical component to ensure overall groundwater production remains within sustainable limits of the basin. A preliminary Sustainable Yield Analysis was prepared by Richard C. Slade & Associates (Slade) in 2017. Since then, additional analysis has been conducted to refine and update the Sustainable Yield Analysis, including the Coastal Subbasin Exploratory Boring Program and a digital elevation mapping study that analyzed the potential recharge from the nearby mountain front. The updated Sustainable Yield Analysis estimate for the Santa Monica Basin is between 11,800 and 14,725 AFY. To substantiate the assessment conducted by Slade, ICF International, Inc. (ICF) prepared a separate estimate of the average sustainable yield using a water-balance approach. Based on ICF's water-balance approach, the average sustainable yield was estimated to be between 11,416 to 13,722 AFY. Between 2010

and 2017 the City has pumped between a minimum of 3,320 AFY (2010) and a maximum of 11,001 AFY (2016) (City of Santa Monica 2018a). Therefore, the sustainable yield estimates developed by Slade and ICF provide a strong level of confidence that the City can continue pumping from the SMGB in an ongoing manner into the future without negatively impacting the basin or creating overdraft conditions (City of Santa Monica 2018a).

The Santa Monica Water Treatment Plant is designed to treat water from all of the City's well fields to drinking water quality standards prior to distribution to residents. The Santa Monica Water Treatment Plant filters groundwater contamination using granular activated carbon. Water drawn from the well fields is combined and delivered to the City's treatment plant where it undergoes a five-step process to eliminate/reduce any remaining contaminants and achieve drinking water quality standards. The Santa Monica Water Treatment Plant currently produces approximately 75 percent of the City's potable water (Water Resources Division 2019).


*The Santa Monica Water Treatment Plant treats groundwater drawn from the SMGB to supply potable water to the City's customers.*

*Imported Water*

MWD was formed in 1928 to supplement the water supplies of its local governments – including the City, as a founding member agency – with imported water from the Sacramento-San Joaquin River Delta (Delta) via the State Water Project's (SWP) California Aqueduct and from the Colorado River via the Colorado River Aqueduct. The City is contracted to receive a Tier 1 (Base) water allocation of 11,515 AFY from MWD, which is the amount of water that the City is entitled to purchase annually at the Tier 1 rate. The City is typically allowed to purchase Tier 2 water; however, the Tier 2 rate is higher. During drought periods, the amount of Tier 2 water available for purchase is generally reduced (City of Santa Monica 2018a). However, the City currently receives a Tier 1 water allocation of 7,406 AFY and has not exceeded its Tier 1 water allocation since 2010 and the use of imported water has been declining since 2005 as groundwater production from the SMGB has been increasing (City of Santa Monica 2018a).

Imported water from MWD is treated prior to delivery to the City. MWD operates and maintains five water treatment facilities, two of which serve the City: the Robert B. Diemer (Diemer)

Treatment Plant in Yorba Linda; and the Joseph Jensen (Jensen) Treatment Plant at the northwest end of San Fernando Valley. These treatment facilities have a combined capacity of up to 1,270 million gallons per day (MGD). The City's Tier 1 allocation of 7,406 AFY from MWD amounts to less than 1 percent of the available treatment plant capacity (City of Santa Monica 2018a).

The City's imported water supply is delivered via two 24-inch connections. SM-1, located at the Santa Monica Water Treatment Facility, has a 21,720 AFY capacity and SM-2, located at the Charnock Well Field, has a 18,100 AFY capacity. The hydraulic grade of MWD water is high enough to deliver water to all three pressure zones within the City's service area without additional pumping.[3]

MWD anticipates the ability to reliably serve all of its customers under the single driest year and multiple dry year scenarios through 2040 (MWD 2016). Although the City's current water supply includes imported MWD water, the City has adopted the SWMP. The City's SWMP aims to achieve water self-sufficiency (i.e., no imported water from MWD) by 2023, after which imported water will be maintained at the minimum amount possible (170 AFY) for emergency purposes (City of Santa Monica 2018a).[4] Although the original SWMP planning process aimed for the City to be completely self-sufficient by 2020, further analysis was conducted during the December 2018 revision and the achievement goal was extended to 2023 (City of Santa Monica 2018a). Several factors contributed to this, including new State regulations, the timeline for recharging local groundwater basins, and the need to confirm and refine preliminary sustainable yield estimates of the Santa Monica Groundwater Basin (SMGB) (see Section 3.15.1.2, *Regulatory Setting – Water Infrastructure and Supply*). The recent update to the SWMP provides an up-to-date, comprehensive review of the City's water supply using recent planning information and the newly-developed distribution system hydraulic model to assess the City's water infrastructure needs. The SWMP includes an evaluation of expanded water demand management measures and a variety of water supply alternatives including recycled water, groundwater injection, stormwater collection and treatment, rainwater harvesting, gray-water applications, and other water rights and exchange opportunities. The SWMP also describes projected water supply and demand scenarios and characterizes the approximate magnitude of supply deficits or unpredictability (City of Santa Monica 2018a).

[3] The City's water system is divided into three pressure zones: 250-, 350-, and 500-foot zones. Each zone designation corresponds to ground elevations above the 250-foot, 350-foot, and 500-foot ground elevation contours within the City boundary. A complete description of these zones and facilities is provided in the City's Urban Water Management Plan (City of Santa Monica 2016a).

[4] The City must purchase 170 AFY to maintain MWD connections in good condition. These MWD connections must be maintained in the event the City must import water from MWD for emergency purposes.

*Urban Treated Runoff (Recycled Water)*

The SMURRF generates the City's supply of urban treated runoff water through removal of pollutants, including sediment, oil, grease, and pathogens, prior to reuse or release to the Santa Monica Bay. The SMURRF treats dry weather urban runoff from the City's Pico-Kenter and Santa Monica Pier drainage areas. The SMURRF is designed to effectively treat up to 0.5 MGD of urban runoff. The treated water is pumped through a reclaimed water distribution system to serve the City's non-potable water needs, such as park landscaping, street sweeping, etc. (City of Santa Monica 2018a).

*The SMURRF has the capacity to capture and treat approximately 0.5 MGD of urban runoff, contributing an average of 154 AFY of recycled water for non-potable use in the City.*

The SMURRF ensures urban contaminants are removed and influent water (i.e., water than flows into the facility) is treated to comply with State standards for recycled water. Urban treated runoff water from the SMURRF accounts for approximately 1 percent of the City's overall water supply. The SMURRF has a maximum production capacity of 560 AFY, although it currently operates at approximately 98 AFY (i.e., 17.5 percent of capacity). The City's most recent conservation efforts have significantly reduced the dry weather runoff reaching the SMURRF and has had to supplement runoff influent with potable water to meet third-party contracts for SMURRF water and keep equipment operational (City of Santa Monica 2018a).

As previously described, an existing 4-inch diameter distribution line for recycled water – commonly referred to as purple pipe – is located along Ocean Avenue. This pipeline extends from the SMURRF approximately 2.5 miles north to San Vicente Boulevard (City of Santa Monica 2014).

*Sustainable Water Infrastructure Project*

In August 2018, the City Council awarded a contract for design and construction of the Sustainable Water Infrastructure Project (SWIP), which will upgrade the existing SMURRF and construct a new Advanced Water Purification Facility (AWPF) (City of Santa Monica 2018a). The City plans to achieve water self-sufficiency by increasing the supply from non-potable sources through the SWIP. The SWIP includes three project elements:

- **Element 1: Brackish/Saline Impaired Groundwater Treatment and Reuse.** This element would provide for the installation of a containerized reverse osmosis (RO) unit to the existing water treatment configuration at the SMURRF. In addition, the City will install a shallow impaired groundwater supply well adjacent to the planned Clean Beaches Initiative (CBI) Project.
- **Element 2: Recycled Municipal Wastewater Treatment and Conjunctive Reuse.** This element would provide for the construction of an innovative below ground advanced water treatment facility (AWTF) for recycled water at a location beneath the Civic Center surface parking lot. When completed, the AWTF would advance treat up to 1.0 MGD (1,120 AFY) of municipal wastewater for permitted conjunctive reuse.
- **Element 3: Stormwater Harvesting, Treatment, and Reuse.** This element provides for the construction of two below ground stormwater harvest tanks which were discussed and modeled in the State Water Resources Control Board's (SWRCB's) Enhanced Watershed Management Plan (EWMP) for Santa Monica Bay Jurisdictional Groups 2 & 3. The tanks would harvest stormwater that is typically discharged to the Pico-Kenter outfall and the ocean, where it has the potential to adversely impact beach water quality.

Combined, the SWIP and the CBI will produce approximately 1.5 MGD (1,680 AFY) of water for immediate non-potable reuse, and when properly permitted, for indirect potable reuse via aquifer recharge. All non-potable water would be distributed via the City's existing non-potable water purple pipe system. Benefits of the SWIP include capturing stormwater and urban runoff for treatment and reuse, improving beach water quality and complying with SWRCB's EWMP requirements. The SWIP, by diverting up to 1 MGD (1,120 AFY) of wastewater for treatment, will also free up additional hydraulic capacity in a portion of the City's sewer system. The SWIP is currently under construction and is expected to be completed by late 2020 (City of Santa Monica 2016b, 2018a).

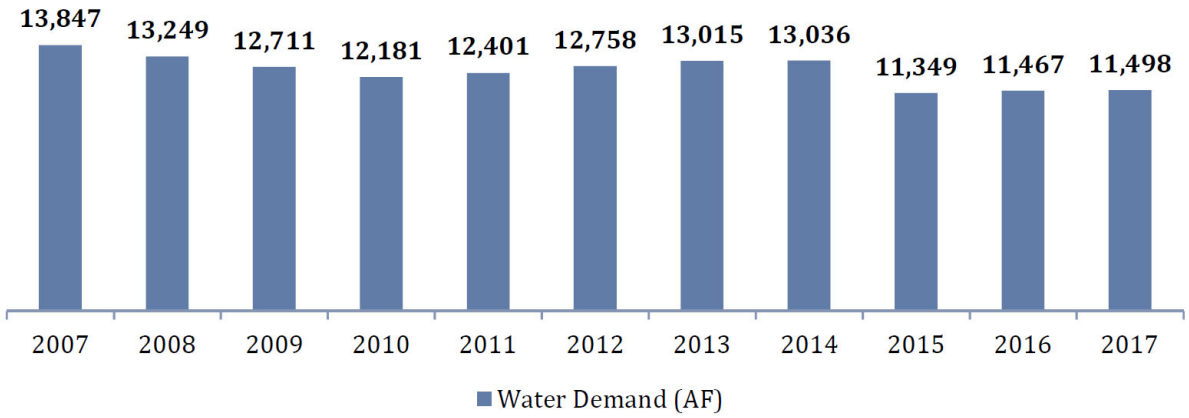
Water Demand

*Citywide Water Demand*

Average water demand within urban areas can fluctuate based on weather, drought, available supply, growth and development, the economy, and effectiveness of conservation programs. While the extent of these effects may vary based on local conditions, there is a general increase in demands with increased economic activity and hotter, drier weather conditions. The demand for potable water in the City has fluctuated over time. As shown in Chart 3.15-1, the City's demand decreased from 13,847 AF in 2007 to 12,181 AF in 2010, and then gradually increased to 13,036 AF 2014, but did not return to the 2007 demand level. Water demand dropped approximately 14 percent from 2014 to 11,349 AF in 2015 due in large part to water conservation measures and mandatory drought restrictions, with 68 percent of the reduction attributed to

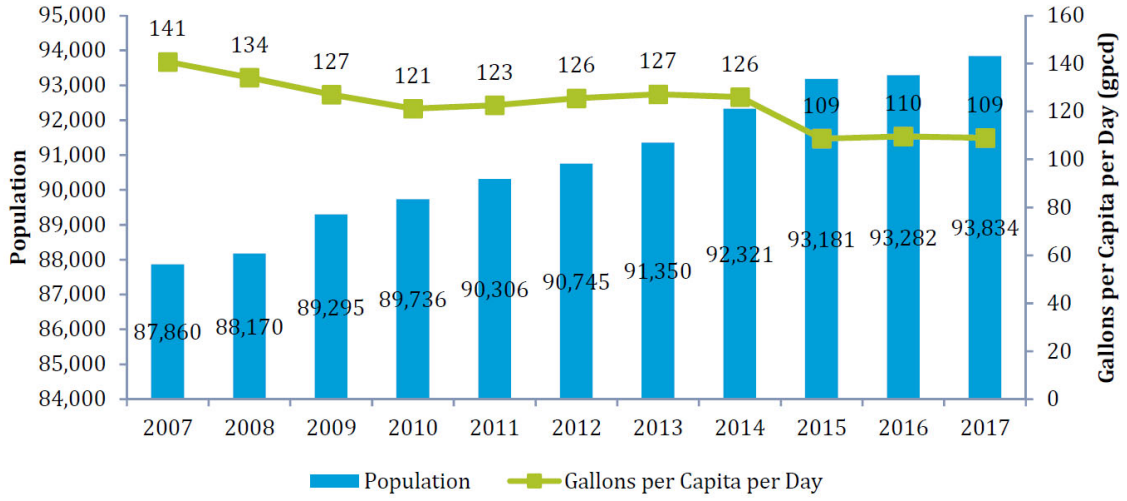
residential savings. From 2015 to 2017, water demand slightly increased from 11,349 to 11,498 AF but has not returned to the 2014 demand level (City of Santa Monica 2018a; see Chart 3.15-1). Overall, the City has seen an approximate 25.5 percent reduction in per capita water use from 141 gallons of water per capita per day (gpcd) in 2007 to 109 gpcd in 2017 (City of Santa Monica 2018a; see Chart 3.15-2). This decline is generally attributable to ongoing and growing water conservation programs, such as the SWMP and Water Net Neutrality Ordinance, which was adopted in 2017 as part of the City's strategy to achieve water self-sufficiency.

**Chart 3.15-1. Annual City-wide Population and Water Demand**




Source: City of Santa Monica 2018a.

**Chart 3.15-2. Annual City-wide Population and Water Demand**




Source: City of Santa Monica 2018a.

*Project Site Water Demand*

The Project site currently generates demand for potable water associated with the existing residential, restaurant, salon, medical spa, and office uses onsite. Existing water demand for the Project site was estimated using Sewage Generation Factors (SGF) established in the site-specific Sanitary Sewer Study by KPFF (2020) using a water-sewer ratio of 115 percent to adjust from sewer demand to water demand for each existing building use. Table 3.15-3 below provides the total water demand as well as the peak flow using a standard peaking factor of 2.5 to identify existing site usage at peak hours daily and annually (KPFF 2020).

**Table 3.15-3. Existing Site Water Use**

| Existing Use | Size | Water Demand Factor[a] | Water Demand (GPD)[b] |
|---|---|---|---|
| **Residential** | | | |
| Apartments | 19 units | 138 GPD per unit | **2,622** |
| **Retail and Restaurants** | | | |
| Restaurant | 413 seats | 35 GPD per seat | 14,455 |
| Storage | 690 sf | 35 GPD per 1,000 sf | 25 |
| Salon | 1,175 sf | 489 GPD per 1,000 sf | 575 |
| Medical Spa | 725 sf | 1,150 GPD per 1,000 sf | 834 |
| **Office** | | | |
| Commercial | 14,005 sf | 138 GPD per 1,000 sf | 1,933 |
| Medical | 4,875 sf | 288 GPD per 1,000 sf | 1,404 |
| | | **Average Daily Demand** | **21,847 GPD / 25 AFY** |
| | | **Peak Demand (Peaking Factor = 2.5)** | **54,618 GPD / 62 AFY** |

Notes: [a] The Water Demand Factor for each use was calculated using the 2020 Sanitary Sewer Study Table 1: Existing Sewer Flow's SGF values multiplied by a 1.15 (i.e., the water-sewer ratio identified in the 2019 Fire and Domestic Water Study).
Source: KPFF 2019, 2020; see Appendix L.

Water Conservation

The City has actively worked to conserve water for decades. The City passed the "No Water Waste" Ordinance in 1993. The City's Water Efficient Landscape and Irrigation Standards were established in 2008 and continue to be updated. The City's Water Shortage Response Plan (WRSP) was adopted in 2009 and was instrumental in responding to the most recent drought (see Section 3.15.1.2, *Regulatory Setting – Water Infrastructure and Supply*). The City declared a Stage 2 Water Supply Shortage August 12, 2014, that required all residents to reduce water use by 20 percent and also enforced other water savings. These mandatory water demand reductions remain in place.

The City has also been a signatory to the California Water Efficiency Partnership (formerly the California Urban Water Conservation Council) Memorandum of Understanding (MOU) since 1991. The City has actively implemented the organization's best management practices (BMPs) for more than 27 years, including the current BMPs:

- BMP 1: Utility Operations
- BMP 2: Public Education & Outreach
- BMP 3: Residential Programs
- BMP 4: Commercial, Institutional, and Industrial Programs
- BMP 5: Landscape Programs

More recent efforts include creation of the Water Conservation Unit (WCU), which was launched in 2015 to manage key water conservation programs and policies. The WCU has implemented several new programs, including Water Use Allowances (WUAs), WUA Exceedance Citations, Enhanced Water Waste Patrols, Water School, Water Use Consultations and specialized trainings, enhanced rebate programs, and customer outreach. Public outreach continues to be a focus of the City and WCU, including regular publication of "The Water Issue" in collaboration with the Santa Monica Daily Press. This publication provides information about the City's water infrastructure, efficient landscaping, and the importance of water conservation.

As further described in Section 3.15.1.2, *Regulatory Setting – Water Infrastructure and Supply*, the Water Neutrality Ordinance became effective in July 2017 and limits water use for new developments to the average 5-year historical use for the parcel. Exceedances of this value must be offset through onsite or offsite development that reduces water demand at a ratio of 1:1, or payment of in-lieu fees.

<u>Future Water Demand</u>

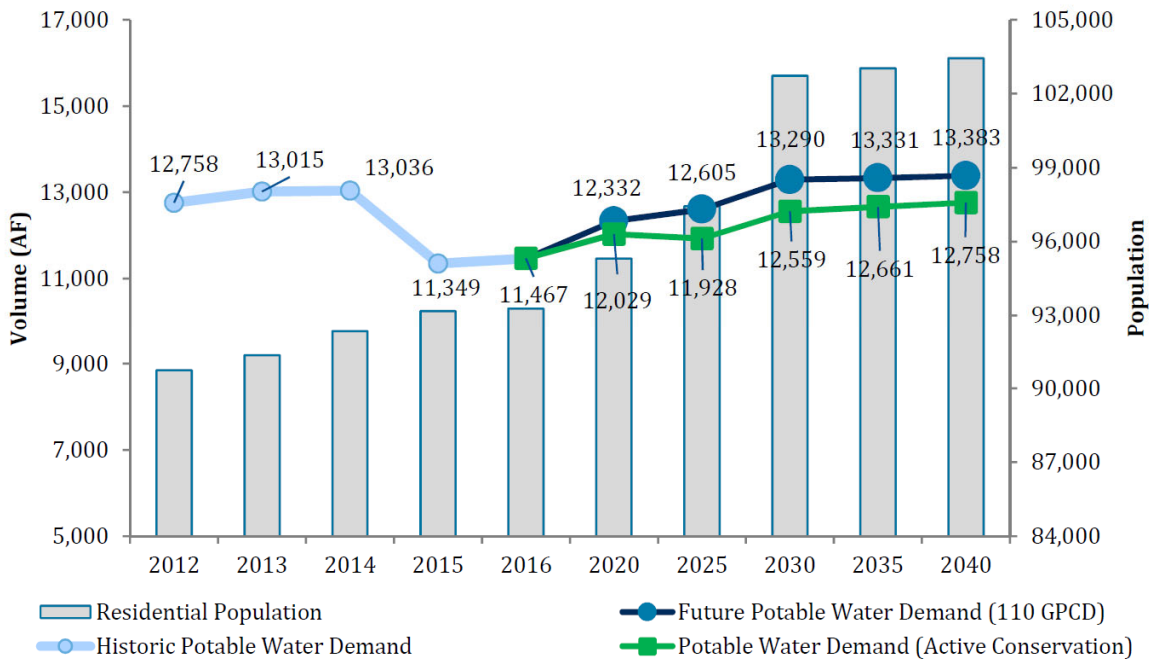
To meet its water self-sufficiency goals and eliminate its reliance on imported water, the City has projected future annual potable water use needs for planning years 2020, 2025, 2030, 2035, and 2040. Potable water demand projections are based on historical water demand unit rates, population growth projects, and estimates of non-revenue water. The City's implementation of the water conservation programs and policies from 2015 through 2017 has resulted in a significant reduction in potable water use, even with increases in residential population (refer to Chart 3.15-1 and Chart 3.15-2). While it is possible that the City's currently estimated per capita water use could be reduced further through additional focused conservation messaging and new water conservation programs, for planning purposes it is assumed that the City's future water usage will be similar to 2015 to 2017 demand (i.e., 110 gpcd).

### Table 3.15-4. City-wide Potable Water Demand Projections

| Projections | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Unit water Use Rate (gpcd) | 110 | 110 | 110 | 110 | 110 |
| Population[1] | 95,315 | 97,429 | 102,726 | 103,038 | 103,440 |
| Potable Water Demand (AF) | 11,744 | 12,005 | 12,657 | 12,696 | 12,745 |
| Non-Revenue Water[2] (AF) | 587 | 600 | 633 | 635 | 637 |
| **Adjusted Potable Water Demand** | **12,332** | **12,605** | **13,290** | **13,331** | **13,383** |

Notes:
[1] Population data provided by the City's Planning & Community Development Department.
[2] Non-revenue Water Loss Rate for the City is 5 percent.
Source: City of Santa Monica 2018a.

### Chart 3.15-3. City-wide Potable Water Demand Projections




Source: City of Santa Monica 2018a.

Projected Water Supply and Water Self-sufficiency

The City has historically met its water demand through a combination of local groundwater supplies and imported MWD water, supplemented by treated urban runoff water for non-potable water demands. The 2015 UWMP estimated the total maximum projected water supply available to the City from 2015 through 2040 to be approximately 20,469 AFY, consisting of 7,406 AFY of imported MWD water, 12,500 AFY of local groundwater from the SMGB, and 560 AFY of urban treated runoff water. The reliability estimates assume full production of the SMGB sustainable yield of 12,500 AF; however, as previously noted the existing maximum production capacity in

the SMGB is approximately 9,000 AFY due to the limitations from the existing wells. However, under the SWMP, the City is pursuing a goal for maximum self-sufficiency by 2023 and will reduce imported water to the minimum amount possible to maintain MWD connections for emergency purposes only (City of Santa Monica 2018a).

*The Arcadia Water Treatment Plant is located near the intersection of Wilshire Boulevard and Bundy Street, and will be expanded to increase capacity to provide domestic water to the City of Santa Monica.*

The SWMP explores strategies to address existing shortfalls in local water supply, such as alternative water supplies, additional groundwater extraction, and expanded conservation efforts (City of Santa Monica 2018a). In June 2019, the City selected a consultant to design, engineer, and construct the Olympic and Charnock Water Transmission Mains Project. This project will include capacity expansion of the Arcadia Water Treatment Plant, production efficiency enhancements, and drilling or acquisition of an additional groundwater supply wells to enhance resiliency. Additionally, conservation efforts could contribute over 3,000 AFY to the City's water supply portfolio by 2023 (City of Santa Monica 2018a). Projected water supply availability incorporating these improvements and conservation strategies are reported in Table 3.15-5. The City expects that local supplies will exceed demand by 2023 and will continue to exceed projected demand by over 1,000 AFY through 2040.

## Table 3.15-5. Projected City-wide Water Supply and Demand

| Projected Demand / Supplies | Projected Demand / Supply (AFY) | | | | | |
|---|---|---|---|---|---|---|
| | 2020 | 2023 | 2025 | 2030 | 2035 | 2040 |
| **Projected Demand** | | | | | | |
| Projected Potable Water Demand (110 GPCD) | 12,332 | 12,495 | 12,605 | 13,290 | 13,331 | 13,383 |
| Projected Potable Water Demand (with conservation) | 12,029 | 11,928 | 11,928 | 12,559 | 12,661 | 12,758 |
| Projected Water Demand Range | 12,029 – 12,332 | 11,928 – 12,495 | 11,928 – 12,605 | 12,559 – 13,290 | 12,611 – 13,331 | 12,758 – 13,383 |
| **Projected Supplies** | | | | | | |
| Arcadia Water Treatment Plant | 9,603 | 9,525 | 10,932a | 10,932a | 10,932a | 10,932a |
| Closed Circuit Reverse Osmosis | - | 2,812 | 2,812 | 2,812 | 2,812 | 2,812 |
| Recycled Water | 560 | 560 | 560 | 560 | 560 | 560 |
| Imported Water[b] | 1,866 – 2,169 | 170 | 170 | 170 | 170 | 170 |
| **Groundwater Recharge** | | | | | | |
| Groundwater Recharge from SWIP[c] | - | 1,030 | 1,030 | 1,030 | 1,030 | 1,030 |
| **Total** | 12,029 – 12,332 | 14,097 | 15,504 | 15,504 | 15,504 | 15,504 |
| **Projected Excess Water Supply** | - d | 1,602 – 2,169 | 2,899 – 3,576 | 2,214 – 2,945 | 2,173 – 2,893 | 2,121 – 2,746 |

Notes:
[a] This includes drilling or acquisition of additional groundwater wells that may be required to sustain water self-sufficiency.
[b] The City will maintain its MWD connection for emergency purposes once groundwater improvements come online in 2023. The City will continue to import 170 AFY in order to maintain connections.
[c] The Initial Study (IS) / Mitigated Negative Declaration (MND) prepared for the SWIP identified approximately 1.0 MGD (1,120 AFY) available for groundwater recharge and the Sustainable Yield Analysis prepared by Slade identified 1,000 to 1,130. Therefore, this supply estimate of 1,030 is conservative.
[d] The City will use imported water necessary to meet water demands until groundwater improvements come online in 2023.
Source: City of Santa Monica 2018a.

### 3.15.1.2 Regulatory Setting – Water Infrastructure and Supply

State Policies and Regulations

*Sustainable Groundwater Management Act* (2014). The Sustainable Groundwater Management Act (SGMA) requires the designation of groundwater sustainability agencies (GSAs) by one or more local agencies and the adoption of groundwater sustainability plans (GSPs) for basins designated as medium- or high-priority by the California Department of Water Resources (DWR). SGMA grants new powers to GSAs, including the power to adopt rules, regulations, ordinances, and resolutions; regulate groundwater extractions; and to impose fees and assessments. SGMA also allows the SWRCB to intervene if local agencies will not or do not meet the SGMA requirements.

As required by SGMA, the Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) was formed under a MOU between the City of Santa Monica, City of Beverly Hills, City of Los Angeles Department of Water and Power (LADWP), City of Culver City, and the County of Los Angeles. The City is the only entity currently pumping groundwater from the SMGB, so the City is designated as the lead agency and point of contact for the SMBGSA. The SMGB is designated as a medium-priority basin and is not experiencing critical overdraft conditions (City of Santa Monica 2018a). Because the City plans to expand use of groundwater in the SMGB, SGMA provides the City with an opportunity to manage the SMGB and its key subbasins to sustain the City's expanded use of groundwater. Because the SMGB is designated medium-priority and does not experience critical overdraft conditions, the GSP for the SMGB must be adopted by January 31, 2022.

*California Governors Drought Declarations*. As a result of prolonged drought, former California State Governor Brown proclaimed a State of Emergency on January 17, 2014 and directed State officials to take all necessary actions to make water immediately available. Seven subsequent proclamations built upon and provided further guidance regarding the original order. Notably, Executive Order (EO) B-29-15, adopted on April 1, 2015, ordered the SWRCB to impose restrictions necessary to achieve a 25 percent reduction in potable urban water usage through February 28, 2016. The EO directed DWR to lead a State-wide initiative, in partnership with local agencies, to collectively replace 50 square feet (sf) of lawns and ornamental turf with drought tolerant landscapes. The most recent proclamation, EO B-37-16 on May 9, 2016, directed the SWRCB and DWR to set new water reduction targets, building upon Senate Bill (SB) 7 (California Water Conservation Act). Among other provisions, it also provides guidance for new water use prohibitions and updated requirements for Water Shortage Contingency Plans.

On February 8, 2017, the SWRCB extended water conservation regulations, continuing the prohibition of wasteful practices and conservation mandates. While heavy rains in 2016 and 2017 had reduced drought conditions in some portions of the State, the SWRCB concluded: (1) drought continues to exist in portions of the State, and snowpack and reservoir conditions for the end of the water year remain subject to significant change; (2) the drought conditions may persist or continue locally through the end of the water year; and (3) additional action by both the SWRCB and local water suppliers will likely be necessary to prevent waste and unreasonable use of water and to further promote conservation.

On April 7, 2017 the Governor declared an end to California's drought emergency in EO B-40-17 for most counties, including Los Angeles County. However, the EO notes that *"…the next drought*

*could be around the corner,"* and *"Conservation must remain a way of life."* Accordingly, conservation actions taken in EO B-37-16 remain in effect.

*California Water Plan.* The California Water Plan (California Water Code Section 10005[a]) provides a collaborative framework for water managers, legislators, and the public to consider options and make decisions regarding the State's water future. The plan is updated every 5 years and outlines actions that bring reliability, restoration, and resilience to California water resources. The plan reinforces the value of integrated water management and examining policies that allow water managers to combine flood management, environmental stewardship, and surface water and groundwater supply. The California Water Plan Update 2018 was released for public review on December 21, 2018 and the final plan was released in June 2019.

*California Urban Water Management Planning Act.* The Urban Water Management Planning Act (UWMPA) (California Water Code Division 6, Part 2.6, Sections 10610 et seq.) was developed to address concerns over potential water supply shortages throughout California. The UWMPA requires information on water supply reliability and water use efficiency measures. As part of the UWMPA, municipal water suppliers that serve over 3,000 customers or provide more than 3,000 AFY are required to develop and implement Urban Water Management Plans (UWMPs) to describe water supply, service area demand, population trends, and efforts to promote efficient use and management of water resources. An UWMP is intended to serve as a water supply and demand planning document that is updated every 5 years to reflect changes in the water supplier's service area, including water supply trends as well as conservation and water use efficiency policies.

*Senate Bill 610.* SB 610 and SB 221 became effective January 1, 2002. SB 610, codified in California Water Code Division 6, Part 2.6, Sections 10910 et seq., describes requirements for water supply assessments (WSAs) and UWMPs applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that water suppliers must prepare a WSA for projects that are subject to CEQA and exceed a specified minimum size to determine whether the projected water demand associated with the project is included as part of the most recently adopted UWMP. The size requirement is specified according to development type but generally includes developments with water consumption that would be equivalent to or greater than the amount of water required by a 500 dwelling unit project. The proposed Project includes 100 residential units and 120 hotel guest rooms, which is substantially below this threshold. Therefore, a WSA is not be required for the proposed Project.

*Water Conservation Act* (2009). The Water Conservation Act mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20 percent per capita water

consumption reduction State-wide by 2020, as described in the 20 x 2020 State Water Conservation Plan (SWRCB 2010). UWMP updates must incorporate a description of how the water supplier will achieve this reduction, in addition to SB 610 requirements.

Urban water retailers can achieve the Act's water reduction goals using one of four specified methods:

- Option 1: 80 percent of baseline use (reduction of 20 percent)
- Option 2: Sum of specified performance standards
- Option 3: 95 percent of DWR Hydrologic Region target from the draft 20 x 2020 State Water Conservation Plan
- Option 4: A flexible alternative designed to adjust to local circumstances

Urban retail water suppliers must monitor and report compliance on an individual or regional basis. Individual urban retail water suppliers are not required to achieve a reduction in urban per capita water use greater than 20 percent. Compliance with the water reduction target is required for continued State water grants and loan eligibility. After 2021, failure of urban retail water suppliers to meet their targets establishes a violation of law for administrative or judicial proceedings.

*California Code of Regulations, Title 20.* California Code of Regulations (CCR), Title 20, Sections 1605.1(h) and 1605.1(i) establishes efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads, lavatory faucets, and flush toilets. Amongst these standards, the maximum flow rate is 1.2 GPM at 60 PSI for residential lavatory faucets and aerators, 1.8 GPM with optional temporary flow of 2.2 GPM at 60 PSI for kitchen faucets and aerators, 0.5 GPM at 60 PSI for public lavatory faucets, and 1.8 gallons per flush for flush toilets, effective January 1, 2016. Additionally, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

*California Green Building Standard Code (CALGreen).* CALGreen builds on standards established under CCR, Title 20 and sets forth water efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures. Updates to CALGreen were published July 1, 2019 and became effective January 1, 2020. Mandatory standards for water use are shown in Table 3.15-6.

**Table 3.15-6. CALGreen Mandatory Maximum Flow Rates**

| Fixture Type | Maximum Allowable Flow Rate – Residential | Maximum Allowable Flow Rate – Nonresidential |
|---|---|---|
| Showerheads | 1.8 GPM at 80 PSI | 2.0 GPM at 80 PSI |
| Lavatory Faucet | 1.2 GPM at 60 PSI | 0.5 GPM at 60 PSI |
| Kitchen Faucet | 1.8 GPM at 60 PSI | 1.8 GPM at 60 PSI |
| Water Closets | 1.28 gallons per flush | 1.28 gallons per flush |
| Floor-mounted Urinals | 0.5 gallons per flush | 0.5 gallons per flush |
| Wall-mounted Urinals | 0.125 gallons per flush | 0.125 gallons per flush |

Source: CALGreen Building Standards Code Section 4.303.

*California Fire Code*. The 2016 California Fire Code is one of 12 parts of an official compilation referred to as the California Building Standards Code. The purpose of the California Fire Code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The CFC includes standards for water supply and pressure to adequately support firefighting capabilities, including appendix standards for automatic fire sprinkler systems that reduce water demands to a building for firefighting reduce up to 75 percent with a minimum required fire-flow 1,500 GPM. The latest CFC published by the California Building Standards Commission were adopted in 2016 and became effective January 1, 2017.

Regional Policies and Regulations

*Metropolitan Water District of Southern California.* MWD is composed of 26 member agencies who have preferential rights to purchase water and is the largest water wholesaler for domestic and municipal uses in Southern California. MWD meets water demand through assessments of projected supply and demand through 2040 that are presented in MWD's Regional UWMP. These assessments consider projections for average year conditions, single dry year conditions, and multiple dry year conditions. The 2015 Regional UWMP shows that MWD can provide reliable water supplies under all conditions through 2040 (MWD 2016).

MWD also prepares an Integrated Water Resources Plan (IRP) that provides a water management framework that includes plans and programs for meeting future water needs. The IRP addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP was adopted in January 2016 and establishes a water supply reliability mission of providing its service area with adequate and reliable supply of high-

quality water to meet present and future needs in an environmentally and economically responsible way (LADPW et al. 2016). The IRP also includes a number of strategies to meet future water demand.

Local Policies and Regulations

*2010 Santa Monica General Plan Land Use and Circulation Element.* The City's Land Use and Circulation Element (LUCE) includes policies that promote water conservation and sustainability:

Policy S6.1. Ensure sufficient water supplies for new development.

Policy S6.2. Implement the recommendations of the 2005 Santa Monica UWMP, including increasing water supply and conservation measures such as the City's no waste ordinance, landscape ordinance, wastewater control ordinance, and low-flow ordinance, and complete an assessment of the viability of additional urban run-off recycling.

Policy S6.3. Implement landscape water conservation requirements for new construction projects.

Policy S6.4. Continue to remediate the City's own contaminated groundwater supply.

Policy S6.5. Continue the City's water-using appliances retrofit upon resale ordinance to encourage water conservation.

Policy S6.6. Continue to explore and expand additional potential water conservation measures for the community, such as expanding reclaimed water access and availability.

Policy S6.7. Increase the use of groundwater consistent with the safe yield of the SMGB and reduce reliance on imported surface water supplies from the MWD. As necessary, implement conservation measures as identified in the City's Water Shortage Response Plan (WSRP) to ensure that adequate water supplies are available to the City.

Policy S6.8. Prepare a City-wide Groundwater Management Plan, and as part of that effort, conduct groundwater studies to confirm or adjust as necessary the safe yields of the Arcadia and Olympic Subbasins.

*Downtown Community Plan.* The DCP includes the following policies to encourage water conservation and the use of recycled water for irrigation purposes:

Policy SI1.1. Require new development to meet or exceed the City's water conservation and water neutrality requirements of the water self-sufficiency programs.

Policy SI1.2. Where purple pipe is accessible to new development, require the use of recycled water for irrigation.

*Santa Monica Municipal Code.* The Santa Monica Municipal Code (SMMC) establishes conservation measures, provides the framework for water conservation planning, and establishes water consumption limits and fees for new development. Conservation measures include, but are not limited to, such items as watering hours, restrictions on watering pavement or washing surfaces, and development standards for water features to ensure resource efficiency and reduced waste.

- *Section 7.16 – Water Conservation.* Requires water conservation measures, including limited watering hours, restriction on watering pavement or washing surfaces, and development standards for water features to ensure resource efficiency and reduced waste. Additionally, this section establishes water consumption limits and fees for new development.
- *Section 8.44.050 – Requirements for Automatic Fire Extinguishing and Protection Sprinkler Systems.* Requires automatic sprinklers installed in all newly constructed buildings except detached one-story or two-car residential garages.
- *Section 7.16.050 – Water Neutrality Ordinance.* The City adopted a Water Neutrality Ordinance on May 23, 2017. Under this ordinance, new development must offset all increases in water demand at a ratio of 1:1, except for 100 percent affordable housing projects, which must offset water demand at a ratio of 0.5:1. These water offsets must be achieved with onsite water efficiency measures. However, if onsite efficiency measures cannot be reasonably achieved, the applicant may achieve requirements by payment of in-lieu fees or performing/undertaking the requirements at an offsite location. In lieu fees are determined by City Council resolution on a case-by-case basis and must fund City efforts to reduce new water demand.
- *Section 8.106 – Green Building Ordinance.* The City adopted a Green Building Ordinance in 2008, with updates in December 2016. This ordinance requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction, major remodels, and new or remolded landscapes. Additionally, overhead spray irrigation is banned for all new developments and for new landscape on existing developments, and turf grass is banned on new commercial developments and is limited to 20 percent of landscaped area for new residential developments. Landscape plans are required for all new developments (major remodels and new construction) and at least two inspections must be performed prior to approval and Certificate of Occupancy.
- *Section 1.475 – Sustainability Rights Ordinance.* The Sustainability Rights Ordinance codifies the City's commitment to sustainability, including:

1. Restoring, protecting and preserving the City's natural environment and all of its components and communities including, but not limited to the air, water, soil, and climate upon which all living things depend;
2. Creating and promoting sustainable systems of food production and distribution, energy production and distribution, transportation, waste disposal, and water supply; and
3. To the full extent legally possible, subordinating the short term, private, financial interests of corporations and others to the common, long-term interest of achieving environmental and economic sustainability.

To effectuate these rights, this ordinance allows City residents to bring actions to protect groundwater aquifers, atmospheric systems, marine waters, and native species within the boundaries of the City.

*Sustainable Water Master Plan.* The SWMP was initially adopted in December 2014 to provide an up-to-date, comprehensive evaluation of the City's water system using available planning information to assess the City's water system infrastructure needs.

The City initiated a comprehensive update of the SWMP in 2017 to incorporate new information regarding local groundwater resources and to integrate new water conservation programs and alternative water supply opportunities. On January 9, 2018, City staff reported to City Council that further analysis was needed to assess whether the City could meet its water self-sufficiency goal by 2020. An update to the SWMP was prepared by the City's Water Resources Division and presented to City Council on November 27, 2018. The SWMP update incorporated additional information (i.e., treatment feasibility study findings for the Olympic Wellfield and production efficiency enhancements for the Arcadia Water Treatment Plant) to refine the pathway to achieve water self-sufficiency. The updated SWMP confirmed that achieving water self-sufficiency in the future is practical and cost effective, but the projected date of reaching that goal would be 2023. The delay from the original date is due to new State drinking water requirements implemented in 2018, permitting requirements for alternative water supply projects, and results of recently completed feasibility studies which resulted in longer timelines for project completion relative to previous estimates (City of Santa Monica 2018a).

*Santa Monica Urban Water Management Plan*. The UWMP reflects the City's supply, demand, and reliability of City available water supplies along with an updated presentation of future supplies, demand forecasts, and measures to monitor and control future demand. The UWMP is prepared in compliance with the UWMPA and is updated every 5 years to reflect changes in the water supplier's service area and conservation and water use efficiency policies. The UWMP is

consistent with SB 7 water conservation goals that require urban water suppliers to achieve a 20 percent per capita water consumption reduction by year 2020 State-wide.

*Water Shortage Response Plan.* Pursuant to SMMC Section 7.16.030 and California Water Code Section 10632, the Santa Monica City Council adopted a Water Shortage Response Plan (WSRP). The WSRP is intended as an action plan and is designed to reduce water demand during water shortages. The WSRP establishes five stages of water shortage severity based on predicted or actual water supply reductions. Each stage establishes voluntary or required water use reductions ranging from 10 percent to 50 percent. Penalties and remedies for violation of the WSRP are contained in other provisions of the SMMC.

#### 3.15.1.3 Impact Assessment Methodology – Water Infrastructure and Supply

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not mandatory, it is routinely sanctioned by the courts. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on water infrastructure and supply if:

a) The project would require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects; and/or

b) Water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be insufficient.

Methodology

The proposed Project has been evaluated to determine its effects on water infrastructure and supply. This analysis utilizes existing and projected Citywide water supply and demand data from the City's SWMP (City of Santa Monica 2018a) as well as supporting technical studies that were also referenced in the DCP Program EIR (City of Santa Monica 2017b).

The City's Office of Sustainability and the Environment (OSE) recommends large complex projects such as the proposed Project submit independent water demand estimates to be reviewed

by OSE staff (OSE 2019). Therefore, KPFF prepared a Project-specific Sanitary Sewer Study and Fire and Domestic Water Study (see Appendix L) using Project-specific water demand factors. This study estimated that the proposed Project would have an average water demand of 68,172 GPD (77 AFY), including a peak demand of 170,430 GPD (191 AFY) (see Table 3.15-7).[5]

The ability of the local water lines to serve the Project site is based on KPFF's (2019) calculated fire flow at three fire hydrants located adjacent to the Project site (see Appendix L). The results of Fire and Domestic Water Study testing were analyzed to calculate adequate pressure and flow for firefighting purposes.

The analysis of water supply estimates the total water demand generated by the proposed Project and compares that demand to the City's available water supply.

#### 3.15.1.4 Applicable Mitigation Measures from the DCP Program EIR – Water Infrastructure and Supply

The DCP Program EIR does not include any mitigation measures related to water infrastructure and supply that would be applicable to the proposed Project. However, as required by DCP Program EIR Mitigation Measure (MM) U-1 of the DCP Program EIR, the City conducts ongoing evaluations to ensure its water infrastructure system is adequate to meet service needs and that infrastructure system improvements are implemented as needed as part of the City's Capital Improvement Program.`

#### 3.15.1.5 Project Impacts and Mitigation Measures – Water Infrastructure and Supply

*Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

**UT-1** **Implementation of the proposed Project would increase operational water demand at the Project site for hotel, residential, restaurant and retail uses, and cultural uses. However, with the exception of ~~minor~~ onsite trenching for new connections <u>and any in-kind replacement of the 8-inch water main in 1st Court adjacent to/within the Project site</u>, the proposed Project would not require or result in the substantial construction or expansion of existing water facilities. Therefore, potential impacts to water infrastructure would be *less than significant*.**

[5] This increase in projected demand compared to the City's Water Neutrality Calculator is likely due to KPFF's use of sewer generation factors for each use. For example, KPFF provided a sewer generation factor for each size of apartment unit, whereas the City's Water Neutrality Calculator simply calculates based on an average.

Impact Description (UT-1)

*Construction*

As described in Section 2.7, *Construction Activities* and Section 3.6, *Geology and Soils* (refer to Impact GEO-2) construction of the proposed Project would require water for dust control, equipment cleaning, soil excavation and export, and re-compaction and grading activities. Based on a review of construction projects of similar size, duration, and type of construction (e.g., The Plaza, which includes 357,000 sf of mixed-use development, open space, and a three-level subterranean parking garage; City of Santa Monica 2018b), water use is conservatively estimated at 1,000 to 2,000 GPD during construction, depending on the phase (e.g., demolition, excavation, building construction, etc.). Temporary construction-related water use would be less than existing water consumption at the Project site, which is estimated to be approximately 21,847 GPD (refer to Table 3.15-3) and could be accommodated by the existing water infrastructure onsite. Therefore, temporary construction-related impacts associated with water demand and water infrastructure would be *less than significant*.

As described in Section 2.6.9, *Utilities and Services* water would be supplied by the City from existing City water mains, including one or more of the following: 12-inch main in Ocean Avenue, 12-inch main in 2nd Street, and 12-inch main in Santa Monica Boulevard. The proposed Project would connect to the City's water supply system with new laterals installed within the Project site. The existing 8-inch water main in 1st Court would remain protected in place ~~within an enclosed concrete utility box~~ during construction. The existing water main in 1st Court could potentially experience tremendous stress due to the temporary excavation of 1st Court. Accordingly, prior to approval an offsite improvement permit by the City's Public Works Department, the City Engineer would review final design plans (including the final excavation plans and potential impacts on the 8-inch water main) and shall confirm in his or her sole discretion whether the design plans and their impact on the water main would reasonably require replacement by the Applicant. If such replacement is required, it would be completed as part of the proposed Project and prior to issuance of a Certificate of Occupancy. None of the other previously identified water mains would be affected by the proposed Project. In addition to the proposed laterals, and as required by DCP Policy SI1.2, the proposed Project may also include a connection to the existing 4-inch diameter purple pipe along Ocean Avenue (for recycled water). Recycled water could be used to reduce overall water demand, as required by the Water Neutrality Ordinance and LUCE polices (e.g., Policy S6.3), associated with operational landscaping irrigation.

Construction impacts associated with the installation of laterals and the potential installation of a purple pipe connection would primarily involve minor trenching onsite. Prior to ground

disturbance, all proposed work associated with the water laterals shall be subject to review and approval by the City Department of Public Works. All appropriate permits (e.g., public right-of-way permits) would be obtained as necessary. In addition, any pipeline construction within the public right-of-way would be conducted in accordance with a City-required Construction Impact Mitigation Plan to address on-street parking, pedestrian and bicycle safety, and heavy truck traffic. The construction contractor would be required to notify the City Public Works Department in advance of ground disturbance activities to existing avoid water lines and/or disruption of water service to offsite properties. Therefore, impacts on water infrastructure from construction activities would be *less than significant.*

*Operation*

In order to assess the operational water infrastructure needs associated with the proposed Project, KPFF prepared a Project-specific Fire and Domestic Water Study (see Appendix L). Domestic water demand is the primary contributor to water consumption associated with the proposed Project (see Impact UT-2); fire flow represents the peak water demand on the City's water infrastructure, including water flow and pressure. The average water demand associated with the proposed Project is 68,172 GPD (approximately 48 GPM). The required fire flow for the proposed Project would generate a demand of approximately 118 GPM of domestic water and 2,625 GPM of fire water totaling 2,743 GPM.[6] As shown in Table 3.15-2, based on the flow test of three fire hydrants adjacent to the Project site, the static pressure of the water supply system available at the Project site ranges between 70 PSI along 2nd Street to 74 PSI along Ocean Avenue. The total available flow is 4,143 GPM at 20 PSI, therefore, the existing water flow and pressure is adequate to serve the proposed Project in accordance with Appendix B of the 2016 California Fire Code.

With regard to the use of recycled water for operational landscaping irrigation, the proposed Project would reuse onsite water collected from stormwater runoff, recovered and treated water from onsite uses (e.g., air conditioning and hotel wash-water), and/or recycled water from the City's SMURRF. These options would be explored as final design plans are further developed. The SMURRF currently operates 17.5 percent of capacity; therefore, use of recycled water would not require an expansion of this facility.

[6] Per SMMC Section 8.44.050, the proposed Project would include a fire sprinkler system in each of the proposed buildings. According to the 2016 California Fire Code, operation of an automatic fire sprinkler system can reduce water demands for firefighting by up to 75 percent. Therefore, the 2016 California Fire Code permits a 50 percent reduction in fire flows for sprinklered buildings.

The City's water network has adequate capacity and the proposed Project would not result in the need for new or additional water infrastructure. Impacts to water infrastructure would be *less than significant*.

*Would the water supply available to serve the project from existing entitlements and resources be insufficient, or would new or expanded entitlements be needed?*

**UT-2 The proposed Project would increase water demand, but this demand would be adequately met by existing and planned future water supplies. This impact would be *less than significant.***

Impact Description (UT-2)

As described in Section 3.15.1.1, *Environmental Setting – Water Infrastructure and Supply*, the existing water demand associated with the Project site is approximately 21,847 GPD (25 AFY) (KPFF 2020). The proposed hotel, residential, restaurant and retail uses, and cultural uses would increase water demand at the Project site. Using Project-specific water demand factors, KPFF (2019) calculated a projected water demand of 68,172 GPD (78 AFY) (see Table 3.15-7). Therefore, the proposed Project operations would increase demand by approximately 46,325 GPD (52 AFY).

**Table 3.15-7. Projected Water Demand for the Proposed Project**

| Existing Use | Size | Water Demand Factor[ia] | Water Demand (GPD) |
|---|---|---|---|
| **Hotel** | | | |
| Rooms | 120 rooms | 138 GPD per room | 16,560 |
| Spa | 4,400 sf | 288 GPD per 1,000 sf | 1,268 |
| Meeting/Banquet Space | 8,700 sf | 403 GPD per 1,000 sf | 3,507 |
| Kitchen | 4,270 sf | 345 GPD per 1,000 sf | 1,473 |
| Lobbies/Lounges | 15,510 sf | 58 GPD per 1,000 sf | 900 |
| **Residential** | | | |
| 3-bedroom | 10 units | 219 GPD per unit | 2,190 |
| 2-bedroom | 23 units | 173 GPD per unit | 3,979 |
| 1-bedroom | 55 units | 127 GPD per unit | 6,985 |
| Studio | 12 units | 87 GPD per unit | 1,044 |
| **Retail and Restaurants** | | | |
| Restaurant Outdoor Dining | 165 seats | 35 per seat | 5,775 |
| Restaurant Indoor Dining | 638 seats | 35 per seat | 22,330 |
| Retail | 12,040 sf | 29 GPD per 1,000 sf | 350 |

| Existing Use | Size | Water Demand Factor[ia] | Water Demand (GPD) |
|---|---|---|---|
| **Other Uses** | | | |
| Cultural Building | 35,500 sf | 35 GPD per 1,000 sf | 1,243 |
| Observation Deck | 240 sf | 58 GPD per 1,000 sf | 14 |
| Shared Services (Trash Room, Storage, Plumbing) | 15,820 sf | 35 GPD per 1,000 sf | 554 |
| | | **Average Daily Demand[b]** | **68,172 GPD / 77 AFY** |
| | | **Peak Demand (Peaking Factor = 2.5)[b]** | **170,430 GPD / 191 AFY** |

Notes: [a] The Water Demand Factor for each use was calculated using the 2019 Fire and Domestic Water Supply Table 2: Proposed Domestic Water Demand Summary's SGF values multiplied by a 1.15 (i.e., the water-sewer ratio identified in the 2019 Fire and Domestic Water Study).
[b] The average water demand and peak demand presented in this table are slightly greater than those presented by KPFF (2019) due to rounding up to the nearest gallon for each use.
Source: KPFF 2019; see Appendix L.

The proposed Project would be required to comply with the City's Water Neutrality Ordinance, and City's Green Building Ordinance, which requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction (SMMC Section 8.106). As described in Impact UT-1, recycled water may be used to reduce overall water demand associated with operational landscaping irrigation. The proposed Project may also reuse onsite water collected from stormwater runoff, recovered and treated water from onsite uses (e.g., air conditioning and hotel wash-water), and/or recycled water from the City's SMURRF. These options would be explored as plans are further developed.

As described in Section 3.15.1.2, *Environmental Setting – Water Infrastructure and Supply* (refer to Table 3.15-5), the City expects to meet all water demand in 2023 and will produce 14,097 AF with a projected excess water supply of between 1,602 and 2,169 AF. These water demand projections in the SWIP account for development and associated population growth under the LUCE and the DCP – including the proposed Project (City of Santa Monica 2018a). Following the completion of construction and operation of the proposed Project in 2024, the water demand associated with the proposed Project would constitute less than 1 percent of the City's total water supply. Even with the conservative assumption that the proposed Project is not accounted for in the SWIP, the proposed Project would constitute approximately 3 to 5 percent of the City's projected excess water supply. Therefore, the City would be able to serve the proposed Project without additional unplanned new or expanded entitlements. Further, implementation of the proposed Project would not adversely effect on the ability of the City to meet its goal for maximum self-sufficiency by 2023 under the SWMP. Therefore, impacts would be considered *less than significant*.

Nevertheless, the proposed Project would be required to comply with the Water Neutrality Ordinance, which requires all development within the City, including the Downtown, to offset all net new water use. Consistent with the requirements of the Water Neutrality Ordinance, if the Director of the City Department of Public Works determines that water efficiency measures cannot be reasonably achieved onsite, the Applicant may satisfy the off-set requirement by:

1. Paying the in-lieu water off-set fee, amounting to $0.18 per gallon (City of Santa Monica 2019b), which will be used to fund the City's Water Neutrality Direct Install Program. The City will create a list of existing properties that want to have new toilets, showerheads, and faucet aerators installed as part of the City's Direct Install Option. These pre-registered sites would receive these fixtures free of charge.

2. Performing the off-set requirements and an offsite location within the City. Under this developer installation option, the Applicant would be required to identify individual properties and perform the installation (The criteria for equivalent performance of the off-set requirements at an offsite location shall be approved in writing by the Director of the City Department of Public Works prior to commencement.)

Specific water conservation features that exceed Title 20 efficiency standards have not yet been identified, but the Applicant would implement features on the Project site to minimize increased water demand and thereby align with the City's continued water conservation mission. If onsite water efficiency measures cannot completely offset the 46,325 GPD (52 AFY) increase in water use, the Applicant would satisfy the off-set requirement through the direct install option and/or the developer installation option.

#### 3.15.1.6 Cumulative Impacts – Water Infrastructure and Supply

A cumulative impact related to water infrastructure and supply would result if the potential impacts associated with the proposed Project, when combined with other past, present, and future projects (refer to Table 3.0-1), would require construction of new or expanded water infrastructure, would require new or expanded entitlements, or would adversely affect the ability of the City to meet its goal for maximum self-sufficiency by 2023 under the SWMP.

<u>Water Infrastructure</u>

The proposed Project, along with other past, present, and future projects in the City would cumulatively increase the demand on the existing water distribution system and could potentially require relocation or construction of new or expanded water infrastructure, the construction or relocation of which could cause significant environmental effects. However, as with the proposed

Project, individual projects would be subject to City review to ensure that the existing water lines would be adequate to meet domestic water and fire flow demands. The DCP Program EIR identified 17 water line segments within the Downtown that appear to be undersized or operating at or near capacity and would likely need to be upgraded during development under the DCP. These potential upgrades include 12 segments that are currently undersized and may need to be increased to 12 inches or more and 5 segments that are currently at or near capacity and would likely need to be expanded to accommodate the development anticipated under the DCP (City of Santa Monica 2017b; KPFF 2014). Replacement of these water line in the Downtown would require excavation, cut/cap or removal of older water lines, and installation of the new water lines located within existing paved streets and public rights-of-way. This would involve typical short-term construction impacts, such as air emissions, noise, and disruption of pedestrian, bicycle, and vehicle traffic. The City continually conducts evaluations to ensure its water infrastructure system is adequate to meet service needs and infrastructure system improvements would be implemented as needed as part of the City's Capital Improvement Program (and as required by DCP MM U-1). The City's ongoing efforts to maintain and upgrade public infrastructure would ensure that cumulative impacts, associated with the relocation, construction, or expansion of new water facilities would be less than significant. However, as described in Impact UT-1, implementation of the proposed Project would not affect any of these water lines. Therefore, the proposed Project would not result in a considerable contribution to cumulative water infrastructure impacts.

Water Demand and Supply

Cumulative water supply impacts are considered on a City-wide and regional basis in accordance with the City's SWMP. As discussed under Impact UT-1 above, implementation of the proposed Project would result in a net increase in water demand at the Project site relative to existing conditions. However, as described in Section 3.15.1.1, *Environmental Setting – Water Infrastructure and Supply*, according to the demand projections in the SWMP – which account for development and associated population growth under the LUCE and the DCP – the City's water supply is adequate to meet City-wide demand through 2040. Therefore, the proposed Project would not contribute to cumulatively considerable impacts to water supply.

The City will continue to monitor water supply and demand as part of its SWMP and achievement of its goal for maximum self-sufficiency by 2023. Further, as required by State law, the City must prepare a UWMP every 5 years, to assess existing water demand within the City, as well as projected increases in water demand due to growth and development. Under the provisions of SB 610, the City is required to prepare a comprehensive WSA for larger development projects within its service area (i.e., projects with water demand equivalent to at least 500 dwelling units, or 1,000

employees/500,000 sf of shopping centers or business establishments). The WSA for such projects would identify growth that may not have been included within the City's future water demand projections and evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources, if needed.

Over the long-term, climate change may affect yields from the SMGB and deliveries from regional sources. Climate change is exacerbating ongoing problems with groundwater throughout California such as overdraft, seawater intrusion, land subsidence, and water quality degradation. While the City has historically met its water demand through a combination of local groundwater supplies and imported MWD water, under the SWMP, the City is pursuing a goal for maximum self-sufficiency by 2023. The City will reduce imported water to the minimum amount possible to maintain MWD connections for emergency purposes only (City of Santa Monica 2018a). The SWMP water supply projections consider potential vulnerability of the SMGB due to climate change during the planning horizons addressed. However, to further refine its evaluation of potential climate change impacts to its water supply, the City is exploring robust decision-making methods to model a focused suite of likely climate change scenarios, developed in consultation with the City's Office of Sustainability and Environment and recognized climate change experts with local knowledge. These climate stress test scenarios will be utilized to assess how to best ensure the continued reliability and resiliency of the City's water supply after the planning horizon evaluated in the SWMP (City of Santa Monica 2018a).

With respect to drought, the SWMP describes City actions to broaden its water portfolio to include local groundwater and treated non-conventional water resources such as dry and wet weather runoff, municipal wastewater and brackish groundwater. By not relying on any one source of water, the City will lower its vulnerability to drought and other natural disasters as it moves to meet its goal for maximum self-sufficiency by 2023.

The SWMP also concludes that future changes to groundwater salinity/water quality would be insignificant through the planning horizon. This is primarily because the City's principal water supply wellfields are located inland and remote from the coast. Overall, salinity intrusion due to climate change is expected to be gradual, allowing enough time to modify the City's reverse osmosis treatment facilities in response. Therefore, vulnerability to salt water intrusion and water quality degradation is considered to be low as various long-range adaptive engineering measures are available.

#### 3.15.1.7 Residual Impacts – Water Infrastructure and Supply

The City continually conducts evaluations to ensure its water infrastructure system is adequate to meet service needs and infrastructure system improvements would be implemented as needed as part of the City's Capital Improvement Program (and as required by DCP MM U-1).

The 2018 SWMP update set City water policies achieve water self-sufficiency by 2023. Temporary construction-related water use would be less than existing water consumption at the Project site, which is estimated to be approximately 21,847 GPD (refer to Table 3.15-3). Existing water infrastructure onsite could accommodate construction-related water usage. Following the completion of construction and operation of the proposed Project in 2024, the water demand associated with the Project would constitute less than 1 percent of the City's total water supply. Even the conservative assumption that the Project is not accounted for in the SWIP, the proposed Project would constitute approximately 3 to 5 percent of the City's projected excess water supply. Implementation of the proposed Project would not adversely effect on the ability of the City to meet its goal for maximum self-sufficiency by 2023 under the SWMP. With the implementation of all applicable State and City regulations, residual impacts to water infrastructure and supply would be *less than significant.*

### 3.15.2 Wastewater Collection, Conveyance, and Treatment

#### 3.15.2.1 Environmental Setting – Wastewater Collection, Conveyance, and Treatment

<u>City-wide Wastewater Management</u>

The City's Water Resources Division is responsible for all facilities that support the collection and conveyance of wastewater and stormwater runoff, necessary to protect the community from sewer system overflows, reduce local flooding, and promote overall water quality in the Santa Monica Bay. Wastewater is collected through the City's sewer system, which flows into the City's 72-inch diameter Coastal Interceptor Sewer (CIS) connection, and is ultimately conveyed to the Hyperion Water Reclamation Plant (HWRP) located in Playa del Rey, approximately 7 miles southeast of the Downtown (City of Santa Monica 2015).

The City's sewer system, including the City's CIS connection, consists of approximately 152 miles of pipelines ranging from 6 inches to 72 inches in diameter, approximately 2,800 maintenance holes, two flow monitoring and sampling stations, and a 26-MGD pumping station, referred to as the Moss Avenue Pump Station (MAPS). The system serves an area of 5,400 acres divided into 10 primary service areas (i.e., sewer drainage basins). The network of sewer lines convey

wastewater by gravity west towards the ocean and the City's CIS connection (City of Santa Monica 2017a).

The CIS is a 9.4-mile-long pipeline that ranges in diameter from 24 to 72 inches that serves the entire coastal area of the Santa Monica Bay north of the HWRP to Topanga State Beach near Malibu. The CIS conveys wastewater directly to the HWRP from Pacific Palisades, Venice, Mar Vista, the City of Santa Monica, and adjacent areas served by the Los Angeles County Sanitation District (e.g., Marina Del Rey). In addition to providing sewer services to City customers, the City's CIS connection collects pass through wastewater from City of Los Angeles to the north, which is conveyed to and metered through the monitoring station located at 415 Pacific Coast Highway. This City's wastewater is combined with this flow and conveyed to the MAPS, through the monitoring station located at 3000 Main Street, and into the 60-inch CIS owned by the City of Los Angeles.


wood.

**Regional Sewer System**

**FIGURE 3.15-1**

Following the 1994 Northridge Earthquake, the City completed an upgrade of approximately 80 percent of the local sewer collection system pipelines, maintenance holes, and appurtenances, as well as the full replacement of the City's CIS connection and the MAPS in 2002 (City of Santa Monica 2017a). The current capacity of the City's CIS connection is 80 cubic feet per second (cfs) or 51.7 MGD, which was designed to meet estimated City wastewater flows through 2090, the sunset year for the CIS (City of Santa Monica 2017a). Current City net flows average 9.23 MGD, which is 17.9 percent of the CIS capacity. Combined with City of Los Angeles wastewater flows, the total flow pass-through to the HWRP averages 13.29 MGD. As such, the City's 9.23 MGD of wastewater flows contributes approximately 2.7 percent of the daily flows received by the HWRP (City of Santa Monica 2017b).

City-wide Wastewater Treatment

Wastewater from the City is collected by the City's sewer system and is treated at the HWRP. The HWRP is owned and operated by the City of Los Angeles Department of Public Works (LADPW). The treatment process at HWRP consists of preliminary, primary, and secondary treatment.[7] The HWRP receives approximately 340 MGD of wastewater. The HWRP has a dry weather capacity of approximately 450 MGD processed through full secondary treatment and a wet weather capacity of approximately 850 MGD (LASAN 2019). The wet weather capacity is greater because some surface water runoff flows into the sewer system through sewer maintenance holes.

Following the secondary treatment of wastewater, the majority of effluent from HWRP is discharged into the Santa Monica Bay located approximately 1,100 feet west of the HWRP. HWRP has two 12-foot-diameter outfalls that discharge into the Santa Monica Bay: a 5-mile outfall pipeline and a 1-mile outfall pipeline. The 5-mile outfall pipeline is used to discharge secondary treated effluent on a daily basis. The 1-mile outfall pipeline is only used on an emergency basis or when repairs are being completed on the 5-mile outfall. Remaining flows are conveyed to the West Basin Water Reclamation Plant of the West Basin Municipal Water District in Carson, California, for tertiary treatment before reuse as reclaimed water.

[7] Preliminary treatment is the first step in wastewater treatment and consists of a screening process to remove large solids, such as branches, plastics, and rags, as well as smaller solids like sand and grit. During primary treatment, wastewater is held for two hours to allow heavy solids to settle to the bottom of the tanks while oil and grease can float to the top. The heavy solids are removed and transported to the solids handling area of the plant for further processing. Secondary treatment involves reactor tanks with bacteria living in the wastewater and consuming most of the remaining organic solids. These "plumped up" bacteria settle to the bottom of the tanks where they are sent to the clarifiers for final settling and collection (City of Los Angeles Bureau of Sanitation 2019).

Effluent from the HWRP is required to meet the Los Angeles Regional Water Quality Control Board's (LARWQCB) requirements for a recreational beneficial use at Santa Monica Bay. The LARWQCB imposes performance standards on water quality that are more stringent than the standards of the National Pollution Discharge Elimination System (NPDES) permit required under the Clean Water Act. Accordingly, HWRP effluent to the Santa Monica Bay is continually monitored by the City of Los Angeles Environmental Monitoring Division (EMD) to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Additionally, the Los Angeles Division of Drinking Water (DDW) and the LAWRQCB establish treatment and water quality requirements for various qualities of recycled water, depending on the intended use (LADWP and City of Los Angeles Bureau of Sanitation [LASAN] 2018).

*The Hyperion Water Reclamation Plant, located south of the Los Angeles International Airport, is the City's oldest and largest wastewater treatment facility, in operation since 1894. The plant has been expanded and improved numerous times over the last 100+ years.*

Future services of the HWRP are planned under the City of Los Angeles' adopted 2018 Wastewater Facilities Plan (WWFP), which is included as Volume 2 of the One Water LA 2040 Plan and implemented by the LASAN and LADWP (LADWP and LASAN 2018). The WWFP describes the City of Los Angeles' existing wastewater collection and water reclamation plants and recommends improvements to meet future conditions. The WWFP is a guide for future system improvements to LASAN's wastewater collection and treatment facilities. The WWFP extends the planning horizon of LASAN's 2006 Water Integrated Resources Plan Facilities Plan (IRP Facilities Plan) and incorporates expansion, updates, and enhancements made since 2006, as well as LADWP's 2015 UWMP. It is anticipated that the WWFP will be updated within the next 10 years to incorporate system modifications as well as changes in flow conditions, regulatory framework, and overall vision for sewer system operations and water reuse. Projected average

annual wastewater flows for the HWRP are 256 MGD in 2020, 275 MGD in 2030, and 283 MGD in 2040 (LADWP and LASAN 2018).

Downtown Sewer System

The Downtown is served by 192 sewer line segments, totaling approximately 9.3 miles. Sewer lines in the Downtown range in size from 6 to 36 inches in diameter. Approximately 80.5 percent of the sewer lines are composed of vitrified clay pipes, 19.0 percent are comprised of various types of plastic pipes, and the remaining 0.5 percent is comprised of reinforced concrete pipes (City of Santa Monica 2017b; KPFF 2014). Vitrified clay pipes have a life expectancy of approximately 100 years, but they can last well beyond their expected life (National Clay Pipe Institute 2015). As clay pipes age, they are often subject to damage from root systems and to infiltration of groundwater or rainwater through cracks, joints, and aging gaskets. Exact dates for the construction of the City's sewer system are not available; however, given that the City has never constructed its own lift station, the sewer system was likely constructed shortly after the HWRP, which was constructed in 1925. Therefore, it is estimated that the City's vitrified clay pipes were mostly installed sometime between 1925 and 1950; however, 55 of the 151 pipe segments composed of vitrified clay were lined with plastic in 1999, following the 1994 Northridge Earthquake. The City's plastic pipes were installed starting in 1995 (City of Santa Monica 2017b; Arden 2014).

Sewer lines across the Downtown that are east of Ocean Avenue and north of Broadway flow south and empty into the sewer lines that run west along Broadway and Colorado Avenue. The sewer lines along Ocean Avenue flow south and empty into the sewer system at Colorado Avenue between 1st Street and 2nd Street. The sewer lines that flow west along Olympic Boulevard empty into the sewer lines along Colorado Avenue at 5th Street.

All wastewater in the Downtown is conveyed southerly to the Colorado Ocean Relief Sewer, an approximately 500-foot section of sewer line consisting of two sewer line segments that exit the Downtown carrying wastewater south from two points along Colorado Boulevard between 1st Street and 2nd Street. The Colorado Ocean Relief Sewer crosses under the Interstate (I-) 10 Freeway near Colorado Avenue and 2nd Street. While most of the Downtown's sewer system operates using gravity flow, the Colorado Ocean Relief Sewer is an inverted siphon sewer providing pressurized conveyance of wastewater through this corridor. Because these segments carry effluent under the freeway and back up on the other side, they are not able to operate based on gravity alone; therefore, a pump is used to move the wastewater through the pipe. The Colorado Ocean Relief Sewer was constructed between 2008 and 2009 to relieve stress on the existing sewer line, which was damaged in the 1994 Northridge Earthquake. As part of the project, the original sewer was

relined. The two sewers are now functioning and provide system redundancy, as well as existing and future capacity for the Downtown sewer system (City of Santa Monica 2017b; Arden 2014).

Project Site Sewer System

The Project site is served by three existing sewer mains, including an 18-inch sewer main in Ocean Avenue, an 18-inch sewer main in 2nd Street; and an 8-inch sewer main in 1st Court, which runs in between and parallel to Ocean Avenue and 2nd Street (KPFF 2020; see Appendix L). Existing buildings on the Project site generate a daily wastewater average of 19,386 GPD that flows into the 8-inch sewer main in 1st Court and away from the Project site to the southeast (KPFF 2020). Based on a conservative peaking factor of 2.5 used by KPFF (2020),[8] the peak wastewater generation for the existing Project site is 48,467 GPD. In addition to the wastewater generated at the Project site, the 1st Court sewer main also receives wastewater flows from the surrounding development along 1st Court and Arizona Avenue.

**Table 3.15-8 Existing Site Wastewater Generation**

| Existing Use | Size | Sewer Generation Factor | Sewer Flow (GPD) | Peak / Max Flow (Peaking Factor 2.5) (GPD) |
|---|---|---|---|---|
| **Residential** | | | | |
| Apartments | 19 units | 150 GPD per unit | 2,850 | 7,125 |
| **Retail and Restaurants** | | | | |
| Restaurant | 413 seats | 30 GPD per seat | 12,390 | 30,975 |
| Storage | 690 sf | 30 GPD per 1,000 sf | 21 | 53 |
| Salon | 1,175 sf | 425 GPD per 1,000 sf | 500 | 1,250 |
| Medical Spa | 725 sf | 1,000 GPD per 1,000 sf | 725 | **1,813** |
| **Office** | | | | |
| Commercial | 14,005 sf | 120 GPD per 1,000 sf | 1,681 | 4,203 |
| Medical | 4,875 sf | 250 GPD per 1,000 sf | 1,219 | 3.048 |
| | | **Total** | **19,386** | **48,467** |

Notes: Based on the City of Angeles Sewage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories.
Seat number was estimated using proposed square footage and multiplying by the factor of 1 seat per 30 sf for the restaurant and retail space.
All existing wastewater is conveyed to the 80-inch sewer main along 1st Court.
Source: KPFF 2020; see Appendix L.

[8] The peaking factor is the ratio of peak measured flow to average dry weather flow. This ratio is used in capacity analysis to expresses the degree of fluctuation in flow rate over the monitoring period (KPFF 2020).

Sewer lines have a flow capacity based on the diameter and slope of the pipe. To ensure that wastewater flows would be adequately accommodated, the City reviews sewer lines based on the guidelines for sewer design and operations from the Los Angeles Bureau of Engineering Manual – Part F. According to this guidance, sewer lines should be sized so the depth of the Peak Dry Weather Flow (PDWF), projected for the design period, shall be no more than 50 percent of the pipe diameter (d/D = 0.5 where d = depth of flow and D = pipe diameter). The City uses this design screening criteria of d/D = 0.5 for both PDWF and Peak Wet Weather Flow (PWWF) to assess whether future upgrades are needed to the City sewer system.

On average, the 1st Court main carries a total of 113,000 GPD at an average water depth of 3.12 inches with a d/D ratio of 0.39. However, during maximum peak flow conditions, the main was recorded carrying up to 170,000 GPD with a water depth of 3.98 inches and a d/D ratio of 0.50. Given that the sewer main operates with a d/D ratio at or below 0.5 under both average and maximized wastewater flow conditions, the main complies with City sewer design criteria that require a d/D equal to or greater than 0.5 for sewer pipes less than 15 inches in diameter (KPFF 2020; see Appendix L).

Sewer mains that run ~~along~~ within Ocean Avenue on the west side of the Project site and 2nd Street on the east side of the proposed Project site are also consistent with City sewer design criteria. The 18-inch sewer main that runs under Ocean Avenue north of Santa Monica Boulevard carries an average of 324,000 GPD and maximum flows of 634,000 GPD, operating at d/D ratios of 0.20 and 0.28 respectively. The 18-inch main that runs under 2nd Avenue north of Santa Monica Boulevard carries an average of 513,000 GPD with maximum flows of 867,000 GPD, operating at d/D ratios of 0.25 and 0.32 respectively~~. Existing d/D ratios for sewage lines leading from the Project site to treatment processing are below 0.5~~ (KPFF 2020; see Appendix L).

Based on the City's sewer modeling, downstream capacity deficiencies in the 2nd Street and Ocean Avenue laterals were identified downstream of Santa Monica Boulevard.

### 3.15.2.2 Regulatory Setting – Wastewater Collection, Conveyance, and Treatment

Federal Policies and Regulations

*Federal Water Pollution Control Act* (1948). The Federal Water Pollution Control Act, which was expanded in 1972 and now commonly known as the Clean Water Act, is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, including discharge waters of wastewater treatment processes. The Clean Water Act, in combination with other Federal environmental laws, regulates the location, type, planning, and funding of wastewater treatment facilities.

*National Pollutant Discharge Elimination System*. As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) program regulates point sources that discharge pollutants into waters of the U.S. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The NPDES permit system is authorized and implemented by States and local water boards.

State Policies and Regulations

Operation of HWRP is subject to regulations set forth by the California Department of Public Health (CDPH) and the SWRCB in compliance with the Clean Water Act and NPDES program.

Local Policies and Regulations

*2017 Sanitary Sewer System Master Plan (SSSMP).* The primary purpose of this planning document is to evaluate the capacity of the City's sanitary sewer system under current conditions and plan for any necessary improvements in capacity to accommodate anticipated future developments coincident with the LUCE and DCP planning horizons of year 2030. The analysis found that the City's sanitary sewer system performs well, and there are very limited areas where the hydraulic capacity of the existing sewer system may fall short of the applicable evaluation criteria. The plan also recommends capacity improvement projects based on hydraulic modeling to meet existing and future conditions.

*Santa Monica Municipal Code.* The SMMC includes several provisions regarding the City's sewer system and wastewater.

- *Section 7.04.460 – Wastewater Capital Facility Fee.* Requires developers to pay the City a wastewater capital fee prior to obtaining a building permit or a Certificate of Occupancy.
- ~~*Section 7.08.050 – Sewer Allocation Permit*. States that sewer allocation permits shall only be issued if the City Department of Public Works determines the City sewer system has sufficient capacity to accommodate the net increase in wastewater generated by a project.~~
- *Section 7.16.050 – Wastewater Collection and Treatment*. Provides guidance regarding allowable discharges into the City's wastewater collection system. This section addresses the need to preserve hydraulic capacity and to preserve the health, safety, and general welfare of the public through the continued maintenance and provision of an adequate wastewater collection system. This section also describes permitting requirements, such as industrial wastewater permits, that would be required for various uses within the City.

### 3.15.2.3 Impact Assessment Methodology – Wastewater Collection, Conveyance, and Treatment

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines and local City sustainability policies. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not mandatory, it is routinely sanctioned by the courts. For the purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on wastewater infrastructure if:

a) The project would require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; and/or

b) The project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Methodology

The proposed Project has been evaluated to determine its effects on water collection, conveyance, and treatment. This analysis utilizes existing and projected City-wide wastewater sewer system capacity data from the City's 2017 SSSMP and supporting technical studies that were also referenced in the DCP Program EIR (City of Santa Monica 2017a; KPFF 2014; V&A Consulting Engineers 2015).

For the purposes of the EIR, KPFF (2020) conducted Project-specific Sanitary Sewer Study to estimate wastewater generation associated with the proposed Project (see Appendix L). Existing wastewater flows were monitored at three public sewer manholes – adjacent to the Project site on Ocean Avenue, and 2nd Street north of Santa Monica Boulevard – over a ~~7~~14-day period in July 2018. The estimated wastewater generation for the proposed Project was compared to the existing capacity of the sewer mains to assess wastewater flows.

### 3.15.2.4 Applicable Mitigation Measures from the DCP Program EIR

The DCP Program EIR does not include any mitigation measures related to wastewater collection, distribution, and treatment that would be applicable to the proposed Project. However, as required by DCP MM U-1, the City conducts ongoing evaluations to ensure its wastewater infrastructure system is adequate to meet service needs and that infrastructure system improvements are implemented as needed as part of the City's Capital Improvement Program.

### 3.15.2.5 Project Impacts and Mitigation Measures

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

**UT-3 Implementation of the proposed Project would increase operational wastewater generation at the Project site for hotel, residential, restaurant and retail uses, and cultural uses. Environmental effects associated with the construction of wastewater facilities would be *less than significant with mitigation*.**

Impact Description (UT-3)

*Construction*

During construction of the proposed Project, existing uses would be removed, which would cease existing wastewater generation. It is anticipated that portable toilets would be provided by a private waste management company and the waste would be disposed of offsite. Construction activities would not generate wastewater flows and would not, along with existing and projected wastewater flows, approach the existing capacity of the HWRP.

The proposed Project would connect to the City's sewer system with new connections to the 18-inch sewer mains along Ocean Avenue and 2nd Street. The existing 8-inch sewer main in 1st Court, would remain protected in place ~~within an enclosed concrete utility box~~ during construction. Construction impacts would primarily involve ~~minor~~ trenching onsite to place the new sewer line and connections. The existing water main in 1st Court could potentially experience tremendous stress due to the temporary excavation of 1st Court. Accordingly, prior to approval an offsite improvement permit by the City's Public Works Department, the City Engineer would review final design plans (including the final excavation plans and potential impacts on the 8-inch water main) and shall confirm in his or her sole discretion whether the design plans and their impact on the water main would reasonably require replacement by the Applicant. If such replacement is

required, it would be completed as part of the proposed Project and prior to issuance of a Certificate of Occupancy. Prior to ground disturbance, all proposed work associated with the sewer connections and/or new sewer main would be subject to review and approval by the City Department of Public Works. All appropriate permits (e.g., public right-of-way permits) would be obtained as necessary. In addition, pipeline construction within the public right-of-way would be conducted in accordance with a City-required Construction Impact Mitigation Plan to address on-street parking, pedestrian and bicycle safety, and heavy truck traffic. The construction contractor would be required to notify the City Public Works Department in advance of ground disturbance activities to existing avoid disruption of sewer service to offsite properties. Project impacts on wastewater infrastructure from construction activities would be *less than significant.*

*Operation*

The Sanitary Sewer Study determined that the existing buildings on the Project site generate a daily average demand of 19,386 GPD, which flows into the 8-inch sewer main in 1st Court and away from the Project site to the southeast (KPFF 2020). Based on a conservative peaking factor of 2.5 used by KPFF (2020), the peak demand for the existing Project site is 48,467 GPD. The 1st Court sewer main currently operates with a d/D ratio at or below 0.5 under both average and peak wastewater flow conditions, and therefore complies with City sewer design criteria that require a d/D equal to or greater than 0.5 for sewer lines less than 15 inches in diameter (KPFF 2020; see Appendix L).

The hotel, residential, restaurant and retail uses, and cultural uses associated with the proposed Project would increase wastewater generation at the Project site. Using Project-specific wastewater generation factors, KPFF (2020) calculated a projected daily average demand of approximately 59,074 GPD and a peak demand of 147,687 GPD. Therefore, the proposed Project would increase the amount of wastewater transported by the sewer system by approximately 39,688 GPD and peak flow by 102,172 GPD (see Table 3.15-9).

**Table 3.15-9. Projected Wastewater Generation for the Proposed Project**

| Existing Use | Size | Wastewater Generation Factor | Wastewater Generation (GPD) |
|---|---|---|---|
| **Hotel** | | | |
| Rooms | 120 rooms | 120 GPD per room | 14,400 |
| Spa | 4,400 sf | 250 GPD per 1,000 sf | 1,100 |
| Meeting/Banquet Space | 8,700 sf | 350 GPD per 1,000 sf | 3,045 |
| Kitchen | 4,949 sf | 300 GPD per 1,000 sf | 1,485 |
| Lobbies/Lounges | 15,510 sf | 50 GPD per 1,000 sf | 776 |
| **Residential** | | | |
| 3-bedroom | 10 per unit | 190 per unit | 1,900 |
| 2-bedroom | 23 per unit | 150 per unit | 3,450 |
| 1-bedroom | 55 per unit | 110 per unit | 6,050 |
| Studio | 12 per unit | 75 per unit | 900 |
| **Retail and Restaurants** | | | |
| Restaurant Full Service | 802 seats | 30 per seat | 24,070 |
| Retail | 12,040 sf | 25 GPD per 1,000 sf | 301 |
| **Other Uses** | | | |
| Cultural Building | 35,500 sf | 30 GPD per 1,000 sf | 1,065 |
| Observation Deck | 240 sf | 50 GPD per 1,000 sf | 12 |
| Shared Services (Trash Room, Storage, Plumbing) | 15,820 sf | 30 GPD per 1,000 sf | 520 |
| | | **Total** | **59,074 GPD** |
| | | **Peak/Max Flow (Peaking Factor = 2.5)** | **147,687 GPD** |

Note: The wastewater generation factors are based on City of Los Angeles "Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories"
Source: KPFF 2020; see Appendix L.

The Sanitary Sewer Study prepared by KPFF (2020) analyzed two sewer flow scenarios to convey the increased wastewater flow associated with the proposed Project on the locally monitored sewer mains on Ocean Avenue and 2nd Street:

- Scenario 1: Routing 100 percent of the proposed wastewater flow to the 18-inch sewer main along Ocean Avenue.
- Scenario 2: Routing 100 percent of the proposed wastewater flow to the 18-inch sewer main along 2nd Street.

The Project-specific Sanitary Sewer Study concluded, after conducting sewer flow monitoring and calculating the proposed sewer flow, the 1st Court main cannot adequately accommodate the proposed sewer flow without upgrades to the main. The main upgrades would need to extend well

beyond the Project site. Therefore, it was determined that all of the projected sewage flow would be diverted to either the Ocean Avenue main or the 2nd Street main (see Appendix L).

Under Scenario 1, the proposed Project would increase the flow depth along Ocean Avenue sewer main from 18.7 percent full to 28 percent full during peak flow conditions north of Santa Monica Boulevard. Under Scenario 2, the flow depth on the 2nd Street main would increase from 21.3 percent full to 30 percent full during peak flow conditions north of Santa Monica Boulevard. This increase in flow from the proposed Project would result in a d/D ratio of 0.28 and 0.30 for the sewer mains along Ocean Avenue and 2nd Street north of Santa Monica Boulevard, respectively, which would be below the City's design criteria of 0.5 d/D and operational criteria of 0.75 d/D (KPFF 2020). Therefore, based on the monitored flows conducted at the time, the increase in sewage flow associated with the proposed Project would not exceed the City of Santa Monica sewer design criteria for the locally monitored sewer mains on 2nd Street and Ocean Avenue north of Santa Monica Boulevard. None of the wastewater from the Project site would flow through the existing 1st Court main, which ~~would remain in place~~ may be replaced in kind. ~~Therefore, implementation of the proposed Project would result in minor beneficial impacts to the capacity within the 1st Court main.~~

Based on existing conditions and the estimated increase in sewer flow as shown in Table 3.15-10, under both scenarios ~~satisfy,~~ the 2nd Street and Ocean Avenue mains north of Santa Monica Boulevard would be below the City's sewer design criteria. In addition, the proposed Project may split the sewer flow between the Ocean Avenue and 2nd Street mains, which would reduce the relative sewer flows in each of the mains and would also ~~satisfy~~ be below the City's sewer design criteria north of Santa Monica Boulevard. However, given that the flows in the City's sewer system ~~upstream or~~ downstream of the proposed Project~~,~~ are currently impacted, including the mains in Ocean Avenue and 2nd Street between Santa Monica Boulevard and Broadway, ~~could change over time,~~ the proposed Project flows ~~could~~ would contribute or result in flows exceeding 50 percent, thus necessitating the construction of new or expanded wastewater lines on 2nd Street and/or Ocean Avenue between Santa Monica Boulevard and Broadway. As a result, a mitigation measure is required by the City to require an updated sewer study to be submitted to and approved by the City's Water Resources Manager prior to issuance of the building permit. The sewer study would verify that, based on then-existing conditions (documented by sewer monitoring and the City's hydraulic model), the City's sewer system can accommodate the entire development consistent with the City of Santa Monica sewer design criteria (i.e., not exceed d/D of 0.5). Construction activities associated with any potential required offsite wastewater infrastructure improvements could potentially temporarily interfere with traffic and circulation, and generate some temporary noise during the construction period. However, all construction work within or encroaching into

the public right-of-way would be subject to a permit by the City's Public Works Department. Issuance of a permit would avoid or minimize disruptions of water service to nearby properties. As a result, ~~the proposed Project would not require~~ construction of any new or expanded wastewater facilities ~~that~~ would not ~~could~~ cause significant environmental effects and impacts would be *less than significant with mitigation*.

**Table 3.15-10. Wastewater Conveyance for the Proposed Project (Scenario 1 and Scenario 2)**

| Sewer Main Location | Diameter Size (inches) | Existing Percent Full | Existing Flow from Buildings to be Removed (GPD) | Gross Flow from Proposed Development (GPD) | Net Additional Flow (GPD) | Proposed Percent Full | Net Percent Full |
|---|---|---|---|---|---|---|---|
| Ocean Avenue (Scenario 1) | 18-inch | 18.7% | 0 | 147,687 | 147,687 | 28.0% | + 9.3% |
| 2nd Street (Scenario 2) | 18-inch | 21.3% | 0 | 147,687 | 146,687 | 30.0% | +8.7% |

Source: KPFF 2020; see Appendix L.

Mitigation Measures

*MM WW-1* ***Sewer Study and Monitoring.*** *Prior to the issuance of the first building permit, the Applicant shall submit a sewer study to the City's Water Resources Manager that shows that the City's sewer system can accommodate the entire development (i.e., would not result in d/D over 0.5). If the study does not show to the satisfaction of the City that the City's sewer system can accommodate the entire development, prior to issuance of the first building permit, the Applicant shall be responsible to upgrade any downstream deficiencies~~,~~ on 2nd Street and Ocean Avenue (between Santa Monica Boulevard and Broadway) to the satisfaction of the Water Resources Manager. Improvement plans shall be submitted to the Engineering Division. All reports and plans shall also be approved by the Water Resources Engineer.*

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

**UT-4** **Implementation of the proposed Project would generate an increase in wastewater generation at the Project site; however, this increase would not exceed the HWRP's wastewater treatment capacity. Impacts would be *less than significant.***

Impact Description (UT-4)

As described in Section 3.15.2.1, *Environmental Setting – Wastewater Collection, Conveyance, and Treatment* wastewater is collected through the City's sewer system, flows into the City's CIS connection, and is ultimately conveyed to the HWRP (City of Santa Monica 2017a). The HWRP receives approximately 340 MGD of wastewater, and has a dry weather capacity of approximately 450 MGD processed through full secondary treatment and a wet weather capacity of approximately 850 MGD (LASAN 2019). As described in Impact UT-3, the proposed Project would generate an increase in the average daily amount of wastewater by approximately 59,074 GPD and increase peak flow by 147,687 GPD (refer to Table 3.15-9). Given that the HWRP has approximately 110 MGD of additional dry weather capacity, the increased wastewater flow from the proposed Project operation would be nominal, far less than 1 percent of the additional dry weather capacity. As a result, the HWRP could sufficiently accommodate the demand increases resulting from the Project and would not require any upgrades under implementation of the proposed Project. Therefore, impacts related to wastewater treatment capacity would be *less than significant*.

### 3.15.2.6 Cumulative Impacts

A cumulative impact related to wastewater infrastructure would result if the potential impacts associated with the proposed Project, when combined with other past, present, and future projects (refer to Table 3.0-1), would require construction of new or expanded wastewater infrastructure. The construction of which infrastructure would cause significant environmental effects or if there is inadequate capacity to serve the projected demand in addition to the wastewater treatment provider's existing commitments.

*Wastewater Conveyance System*

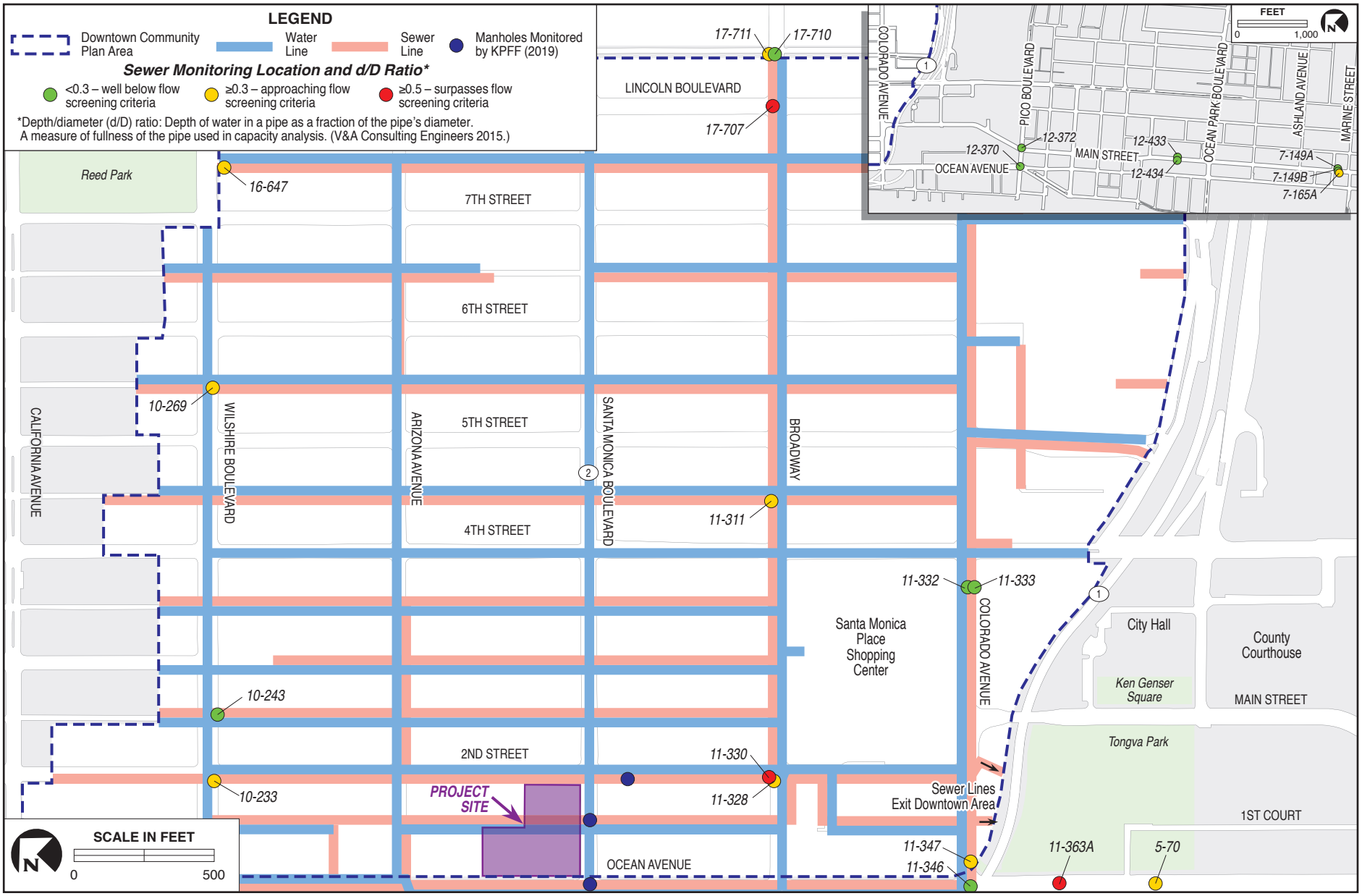
As described in Impact UT-3, the implementation of the proposed Project would result in a minor increase to the existing wastewater flows in the 18-inch sewer mains along Ocean Avenue and 2nd Street and a minor reduction in flow through the existing 8-inch sewer main along 1st Court (refer to Table 3.15-10). This increase in wastewater flow from the proposed Project would result in a d/D ratio of 0.28 and 0.30 for the locally monitored sewer mains along Ocean Avenue and 2nd Street north of Santa Monica Boulevard, respectively, which is below the City's design criteria of 0.5 d/D and operational criteria of 0.75 d/D (KPFF 2020; see Appendix L).

Wastewater flows from the Project site would flow along Ocean Avenue and 2nd Street to Colorado Avenue. As with all wastewater in the Downtown, the wastewater flows from the Project site would ultimately be conveyed downstream to the Colorado Ocean Relief Sewer. Cumulative projects within the City could create additional wastewater flows. As part of the DCP Program

EIR, V&A Consulting Engineers (2015) conducted flow monitoring of 25 manholes that receive wastewater flows from the Downtown. Four sewer monitoring locations had peak d/D ratios greater than 0.5, with no segments over 0.75. One of these locations (i.e., 11-363A at Ocean Avenue at Moomat Ahiko Way) captures flows into the inverted siphon at the Colorado Ocean Relief. In order for this segment of sewer line to operate properly, it is designed to be maintained in a surcharged condition; therefore, the surcharged condition does not indicate a deficiency in this particular section of the sewer lines. Additionally, V&A Consulting Engineers (2015) identified 10 sewer main locations in the Downtown that are nearing the design screening criteria of 0.5 d/D (i.e., operating at ≥ 0.3 d/D).

Development under the DCP – including development of the proposed Project – would generate increased wastewater flows within the existing sewer system in the Downtown. As a result, with the exception of the Colorado Ocean Relief, these sewer lines may approach or exceed the operational criteria of d/D of 0.5 and could require expansion or replacement to increase capacity. The proposed Project would result in the addition of wastewater flow in the 10-inch sewer main along 2nd Street, the 27-inch sewer main along Colorado Avenue, and the 54-inch sewer main along Ocean Avenue. As such, implementation of the proposed Project, along with other development under the DCP, would result in a potentially considerable cumulative impact to existing wastewater infrastructure.

As specified in DCP MMs U-1 and U-4, the City is responsible for ensuring adequate financing for funding of infrastructure improvements to serve the Downtown through the City's Capital Improvement Program or alternatively through a Downtown Public Infrastructure Financing Program. All new development within the Downtown – including the proposed Project shall be conditioned to be subject to payment of its fair share of any impact fees identified under this program. Therefore, with the implementation of MM WW-1 and the ~~Downtown~~ DCP MM U-1 the proposed Project would not result in a considerable contribution to the cumulative impacts associated with the relocation, construction, or expansion of new wastewater facilities.




wood.

**Potentially Deficient Sewer and Water Infrastructure with Implementation of Downtown Community Plan**

**FIGURE 3.15-2**

**Table 3.15-11. Existing Sewer Locations with d/D Exceeding or Approaching 0.5**

| Manhole ID | Measured Pipe Diameter (inches) | d/D Ratio | Location |
|---|---|---|---|
| **d/D Ratio Exceeding 0.5** | | | |
| 11-330 (N) | 27 | 0.52 | 2nd Street at Broadway |
| **11-330 (S)** | **10** | **0.54** | **2nd Street at Broadway** |
| 11-363A | 36 | 0.59 | Ocean Avenue at Moomat Ahiko Way[1] |
| 17-707 | 12 | 0.54 | Broadway at Lincoln Court |
| **d/D Ratio Approaching 0.5** | | | |
| **5-70** | **54** | **0.36** | **Ocean Avenue at Acadia Terrace** |
| 7-165A | 54 | 0.44 | Main Street between Pier Avenue and Marine Street |
| 10-233 | 12 | 0.38 | 2nd Street, South of Wilshire Boulevard |
| 10-269 | 8 | 0.36 | Wilshire Boulevard at 5th Court |
| 11-311 | 24 | 0.45 | Broadway at 4th Court |
| 11-328 (West) | 15.5 | 0.30 | Broadway at 2nd Street |
| 11-328 (North) | 8 | 0.41 | Broadway at 2nd Street |
| **11-347** | **27** | **0.41** | **Colorado Avenue, east of Ocean Avenue** |
| 16-647 | 8 | 0.34 | Wilshire Boulevard at 7th Court |
| 17-711 | 29 | 0.39 | Colorado Avenue at Lincoln Court, North Lane |

Note: [1] This manhole location measures from the Colorado Ocean Relief Sewer. Consequently, this location is expected to consistent operation at a d/D ≥ 0.5 and is not considered deficient.
Source: City of Santa Monica 2017b; V&A Consulting Engineers, Inc. 2015.

Cumulative development may necessitate future upgrades to maintain adequate service capacity for existing and future development within the City. Replacement of sewer mains could also create secondary short-term periodic construction impacts. Construction of new sewer mains would require excavation, removal of older mains, removal of existing manholes, and installation of the new manholes and lines located within existing paved roads and public rights of way. This would involve typical short-term construction impacts, such as air emissions, noise, and disruption of pedestrian, bicycle, and vehicle traffic flows. However, such impacts would occur incrementally depending on the affected sewer line, and the scope (e.g., duration and grading) of such construction activities.

*Wastewater Treatment*

LASAN manages the HWRP, which serves the City and portions of the greater Los Angeles area. LASAN's One Water LA 2040 Plan addresses wastewater disposal in the service area, including the Downtown, through the year 2040. The HWRP receives approximately 340 MGD of wastewater, and has a dry weather capacity of approximately 450 MGD processed through full

secondary treatment and a wet weather capacity of approximately 850 MGD (City of Los Angeles Bureau of Sanitation 2019). Based on current long-term estimates of population density and sewer demand at maximum buildout, the City estimates adequate capacity to meet anticipated wastewater flows through 2090 (City of Santa Monica 2015). Therefore, the proposed Project would not have a considerable contribution to cumulative impacts on regional wastewater ~~management~~treatment.

#### 3.15.2.7 Residual Impacts

Project impacts to wastewater ~~treatment capacity and~~ infrastructure would be *less than significant with mitigation*. Cumulative impacts to considerable cumulative impacts to the City's sewer system would be mitigated through the City's implementation of MM WW-1 and DCP MM U-1, ~~requiring contribution of a fair share fee payment to improve/expand sewer capacity~~. Therefore, cumulative impacts associated with the relocation, construction, or expansion of new wastewater facilities would be *less than significant with mitigation*.

Project and cumulative impacts to wastewater treatment capacity would be *less than significant*.

### 3.15.3 Solid Waste Management Services

#### 3.15.3.1 Environmental Setting – Solid Waste Management Services

Solid Waste Management System

The City Department of Public Works Resource Recovery & Recycling Division (Resource Recovery & Recycling Division) provides solid waste management and collection services to all City residents and approximately 50 percent of commercial and industrial establishments (City of Santa Monica 2017b). The City collects, transfers, and disposes of trash, processes green waste and food scraps for compost, recycles single-stream commingled recyclables, and provides a state-authorized e-waste and hazardous materials collection facility. The City sorts and sends disposed items to reuse and recycling facilities instead of landfills whenever possible, which is a solid waste management approach known as diversion. The City's 2013 Zero Waste Strategic Operations Plan provides a roadmap to achieve 95 percent diversion by 2030 (City of Santa Monica 2013). As identified in the City's Zero Waste Strategic Operations Plan, the City's landfill waste stream is comprised of approximately 50 percent commercial waste, 25 percent multi-family residential waste, 8 percent single-family residential waste, and 17 percent self-haul construction and demolition debris and additional materials disposed by private companies or individuals (City of Santa Monica 2013).

## Table 3.15-12. Solid Waste Facilities Serving the City

| Solid Waste Facility[a] | Remaining Life (years) | Remaining Capacity (million tons) | Maximum Permitted Daily Capacity (tons per day) | 2016 Average Daily Disposal (tons per day)[b] | 2016 Total City Contribution (tons)[b] |
|---|---|---|---|---|---|
| Antelope Valley Public Landfill | 22 | 12 | 1,635 | 1,582 | 2,827 |
| Azusa Land Reclamation Co. Landfill | 28 | 57 | 6,500 | 1,193 | 2,315 |
| Chiquita Canyon Sanitary Landfill | 39 | 59 | 4,560 | 4,544 | 56,775 |
| Commerce Refuse-To-Energy Facility | N/A | N/A | 124 | 370 | 7,868 |
| El Sobrante Landfill | 43 | 148 | 10,854 | 8,503 | 395 |
| Frank Bowerman Sanitary Landfill | 34 | 104 | 6,171 | 6,865 | 2,516 |
| Lancaster Landfill and Recycling Center | 23 | 10 | 367 | 550 | 783 |
| Mid-Valley Sanitary Landfill | 14 | 37 | 7,500 | 3,061 | 212 |
| Olinda Alpha Sanitary Landfill | 7 | 16 | 5,909 | 6,891 | 745 |
| Prima Deshecha Sanitary Landfill | 83 | 80 | 1,410 | 867 | 8 |
| San Timoteo Sanitary Landfill | 24 | 7 | 884 | 878 | 21 |
| Simi Valley Landfill & Recycling Center | 54 | 50 | 4,087 | 2,933 | 2,054 |
| Southeast Resource Recovery Facility | N/A | N/A | 2,240 | 1,345 | 5,137 |
| Sunshine Canyon City/County Landfill | 19 | 65 | 12,100 | 7,496 | 9,092 |
| Victorville Sanitary Landfill[b] | 22 | 29 | 3,000 | 931 | 1 |
| **Total** | | **674** | **67,341** | **48,009** | **90,749** |
| **Total Tons Disposed in Landfill** | | | | | **77,744** |
| **Total Tons Converted to Energy** | | | | | **13,005*** |

Notes: *Consists of the Southeast Resource Recovery Facility and Commerce Refuse-To-Energy Facility's total City contribution. These facilities are permitted to destroy solid waste through incineration, so they are not subject to remaining capacity or lifetime limits.
[a] The County of Los Angeles currently utilizes the Burbank Landfill, Calabasas Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, and Scholl Canyon Landfill. The City of Santa Monica does not currently utilize these listed landfills for solid waste disposal and given the remaining capacity of these facilities estimated at less than 10 million tons, the City does not project future use; therefore, these are excluded from solid waste facility analysis.
[b] County of San Bernardino, Countywide Integrated Waste Management Plan, Amendment 6: 2018, April 2018.
[c] Based on CalRecycle (2017) Jurisdictional Disposal by Facility, the most recently publicly available data.
Sources: County of Los Angeles 2018; CalRecycle 2017.

In 2018, 91,425 tons of municipal solid waste was generated in the City with 81 percent of solid waste being diverted from landfills through recycling and organics collection (City of Santa Monica 2019a). The City's current 81 percent diversion rate already exceeds the State's policy goal of at least 75 percent diversion by 2020 as established in Assembly Bill (AB) 939 (see Section 3.15.3.2, *Regulatory Setting – Solid Waste Management Services*). Further, Southern California Disposal Transfer Station, located in the City, accepts recycled goods and refuse to be transferred to other area landfills.

### 3.15.3.2 Regulatory Setting – Solid Waste Management Services

State Policies and Regulations

*California Integrated Waste Management Act* (1989). The California Integrated Waste Management Act of 1989 (AB 939; California Public Resources Code, Section 40000 et seq.) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (Board) and local agencies in implementation, in order of priority: (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. The Act required each county to establish a task force to coordinate the development of city source reduction and recycling elements and a countywide siting element. The Act also required each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan.

Additionally, waste diversion mandates were set in AB 939. The law required each city or county plan to include an implementation schedule which shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and, diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities. A city or county may be deemed exempt from these goals or to reduce the requirements if the city or county demonstrates that attainment of the goals is not feasible due to the small geographic size of the jurisdiction and the small quantity of waste generated. After January 1, 1995, the Act authorized the Board to establish an alternative goal to the 50 percent requirement, if the Board finds that the local agency is effectively implementing all source reduction, recycling, and composting measures to the maximum extent feasible.

*Senate Bill 1016.* SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing the measurement of waste reduction from a diversion rate to a disposal-based indicator – the per capita disposal rate. The purpose of the per capita disposal measurement system is to make the process

of goal measurement as established by AB 939 simpler, timelier, and more accurate. Beginning with reporting year 2007 jurisdiction annual reports, diversion rates will no longer be measured. With the passage of SB 1016, only per capita disposal rates are measured. For 2007 and subsequent years, CalRecycle compares reported disposal tons to population to calculate per capita disposal expressed in pounds/person/day.

*Short Lived Climate Pollutants Bill of 2016 (Senate Bill 1383).* SB 1383 requires the California Air Resources Board (CARB) to approve and begin implementing a comprehensive strategy no later than January 1, 2018 to reduce emissions of short lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. It also establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle, in consultation with CARB, is responsible for implementation of regulations to achieve these targets. SB 1383 authorizes local jurisdictions to charge and collect fees to recover the local jurisdiction's costs incurred in complying with the regulations. It also requires CalRecycle, in consultation with CARB, to analyze the progress that the waste sector, State government, and local governments have made in achieving the specified targets for reducing organic waste in landfills no later than July 1, 2020. Depending on the outcome of that analysis, CalRecycle is authorized to amend the regulations to include incentives or additional requirements.

*Assembly Bill 341.* AB 341 established a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020. Additionally, this law required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 builds on the existing AB 939 requirement that every jurisdiction divert at least 50 percent of its waste. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012. AB 341 requires any business (including schools and government facilities) that generates 4 cubic yards or more of waste per week, and multifamily buildings with five or more units, to arrange for recycling services.

Local Policies and Regulations

*2010 Santa Monica General Plan Land Use and Circulation Element.* Below are the Santa Monica LUCE policies that relate to solid waste.

Policy S8.1. Expand solid waste diversion strategies such as increased commercial recycling collection and outreach, expanded food waste collection, and waste to energy conversion programs.

Policy S8.2. Develop a Zero-Waste Strategic Plan with an aggressive target for waste diversion by 2030.

Policy S8.3. Continue to implement the ban on non-recyclable plastic food containers and continue to pursue a ban on plastic bags.

*Santa Monica Municipal Code.* The SMMC includes several provisions regarding the City's solid waste generation and disposal.

*Section 5.08.400 – Solid Waste Diversion.* Establishes direction for characterizing and reducing the solid waste production within the City. The requirements in this section are a furtherance of State-mandated diversion criteria, and are based, in large part, on the Waste Characterization Study and Source Reduction and Recycling Element (SRRE) that the City completed in 1992.

*Section 5.108 – Green Building, Landscape Design, Resources Conservation, and Construction and Demolition Waste Management Standard.* Requires applicants for demolition permits and building permits complete and submit a waste management plan as part of their application packet.

*Section 8.108 – Landscape and Water Conservation*. Contains the Water Efficient Landscape and Irrigation Standards, which ensure efficient water use, elimination of urban runoff, and promotion of health and diverse habitats. Standards include requirements for new landscapes, modifications to existing landscapes, and ongoing maintenance. Requirements are in alignment with the state's Water Efficient Landscape Ordinance.

*Section 8.108.010, Subpart C (Construction and Demolition Ordinance)*. Requires that demolition and/or construction projects costing $50,000 or more, projects 1,000 sf or more, or all demolition-only projects divert at least 70 percent of construction and demolition debris from landfills. Applicants for construction or demolition permits involving these covered projects shall complete and submit a waste management plan as part of the application packet. The completed waste management plan shall indicate all of the following:

- The estimated volume or weight of the project construction and demolition debris, by material type, to be generated;

- The maximum volume or weight of such materials that can feasibly be diverted via reuse or recycling;
- The vendor or facility where the applicant proposes to use to collect or receive that material;
- The estimated volume or weight of construction and demolition debris that will be landfilled in Class III landfills and inert disposal facilities;
- A commitment that only City-permitted waste haulers would be used.

*Sustainable City Plan.* The Sustainable City Plan was updated in 2014 to include a range of new targets and goals for City-wide sustainability, including the goal to become a zero waste City for solid waste management. The Resource Conservation section of the Sustainable City Plan establishes a target for diverting the amount of solid waste that is disposed of at landfills. By the year 2030, 85 percent of solid waste is required to be diverted, per capita solid waste generation must be reduced to 1.1 pounds per person per day, and total solid waste generated should not exceed year 2000 levels.

*Zero Waste Strategic Operations Plan.* In 2014, the City adopted the Zero Waste Strategic Operations Plan, providing a roadmap for achieving a 96 percent diversion of waste by 2030. This plan is organized around six goal areas: waste reduction, environmental benefits, economic benefits, City leadership, producer responsibility, and zero waste culture change. Specific goals and indicators have been identified for each of these goal areas, including quantitative targets to measure accomplishment. The City's Zero Waste Strategic Operations Plan also includes tasks for reviewing existing programs, compiling waste generation data, identifying program and infrastructure options, and analyzing program impacts. The plan allows the City to strengthen its solid waste diversion successes and to address some of the significant challenges that remain in terms of solid waste generation.

#### 3.15.3.3 Impact Assessment Methodology – Solid Waste Management Services

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. Appendix G of the CEQA Guidelines provides screening questions that address potential impacts related to a number of environmental issues. The City uses these questions as thresholds for determining the significance of impacts in its EIRs. The CEQA Guidelines provide that a Lead Agency may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects. Although the use of Appendix G as a significance threshold is not

mandatory, it is routinely sanctioned by the courts. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on solid waste if:

a) The project would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or

b) The project would not comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

Methodology

This section builds upon and updates the solid waste analysis provided in the City's Zero Waste Strategic Operations Plan. Additional data is included from the Los Angeles County Integrated Waste Management Plan Annual Report of 2018 as well as facility information provided by the CalRecycle and local agencies. Based on these resources, this section assesses the existing capacity of landfills that serve the City, any planned improvements to or changes to landfill capacity and projected increases in solid waste generation associated with land use changes anticipated to occur by 2030.

Impacts to solid waste disposal would be considered a significant impact if solid waste generated by the Project exceeds the capacity of landfills and other solid waste facilities where such waste would be disposed or if the proposed Project would adversely affect the City's ability to meet State or local diversion requirements.

#### 3.15.3.4 Applicable Mitigation Measures from the DCP Program EIR – Solid Waste Management Services

The DCP Program EIR does not include any applicable mitigation measures for potential impacts to solid waste management services associated with the proposed Project.

#### 3.15.3.5 Project Impacts and Mitigation Measures – Solid Waste Management Services

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

**UT-5** **The implementation of the proposed Project would not result in the generation of solid waste during construction or operation that would exceed the existing capacity of existing landfills serving the City. Therefore, impacts would be *less than significant.***

Impact Description (UT-5)

*Construction*

As described in Section 2.7.3, *Demolition,* the proposed Project would involve the demolition of existing buildings and surface parking lots on the Project site. Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The Project would comply with the City's Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 70 percent of materials generated during construction and demolition from landfills. The construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the Countywide Integrated Management Plan 2016 Annual Report concludes that there is current capacity of 56.34 million tons available throughout the County for the disposal of inert waste. The project-generated D&D waste of 2,964 tons (i.e., asphalt and construction debris) would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, the Project would not create a need for additional solid waste disposal facilities to adequately handle Project construction-generated inert waste and impacts would be *less than significant.*

*Operations*

The proposed Project would generate municipal solid waste that would be typical of those generated by a mixed-use project. The proposed Project would result in a minor increase in municipal solid waste generation relative to existing conditions. To determine if there would be sufficient landfill capacity to accommodate solid waste generated by the proposed Project, solid waste generation was estimated based on the number of residential units and projected employees for each land use type. The estimated potential increase in solid waste generation is approximately 861 tons per year (see Table 3.15-13) (CalRecycle 2015). Assuming the existing City diversion rate of 81 percent, this would result in up to 163.59 tons per year of waste that would need to be disposed in one or more landfills serving the City.

**Table 3.15-13. Estimated Solid Waste Generated by the Proposed Project**

| Proposed Uses | Solid Waste Generation Unit | Solid Waste Generation Rate | Solid Waste (tons/year) |
|---|---|---|---|
| Hotel | 93 employees | 2.14 tons/employee /year | 199 |
| Residential [a] | 100 units | 0.87 tons/unit/year | 87 |
| Retail/Restaurant [b] | 81 employees | 6.64 tons/employee/year | 538 |
| Cultural Building | 12 employees | 3.08 tons/employee/year | 37 |
| **Total** | | | **861** |

Notes: [a]
[b] Retail and restaurant uses were combined and waste generation rates were calculated using the most conservative food and beverage retail generation rate of 6.64 tons/employee/year. Non-food and beverage retail uses generate 2.41 tons/employee/year of solid waste. Restaurant uses generate 2.92 tons/employee/year of solid waste.
CalRecycle solid waste generation rates are more conservative than those established in Table 4.13-11 of the LUCE EIR.
Source: CalRecycle 2015.

As described in Section 3.15.3.1, *Environmental Setting – Solid Waste Management Services*, a total of 15 solid waste disposal facilities currently serve the City, including 13 landfills and 2 refuse-to-energy facilities (refer to Table 3.15-12). The combined remaining capacity of the landfills is 674 million tons (refer to Table 3.15-12). The combined maximum permitted daily capacity of these facilities is 67,341 tons, although only 48,009 tons are disposed in these facilities daily (71 percent of capacity). Therefore, the projected 163.59 tons per year of solid waste (approximately 0.44 tons per day) would comprise a nominal portion of excess capacity of existing solid waste facilities, far less than 1 percent.

In addition, the City has achieved significant waste reduction targets and strives for additional reductions in solid waste. The City exceeded its goals for waste diversion as defined in the City's Sustainable City Plan, attaining a diversion rate of 81 percent by end of 2018. The City plans to reach its zero waste goal of 95 percent diversion by 2030 as identified in the City's Zero Waste Strategic Operations Plan. These efforts will further reduce per capita waste generation, thereby reducing existing waste generation in the City as well as expected waste generation from the proposed Project. Given the existing sufficient capacity of solid waste facilities and the City's continued efforts to reduce waste generation, this impact would be *less than significant*.

*Would the project comply with Federal, State, and local statutes and regulations related to solid waste?*

**UT-6 The proposed Project would not result in generation of solid waste that would conflict with Federal, State, and local statutes and regulations related to solid waste. Due to existing City programs implementing State laws for diversion, would be *no impact*.**

Impact Description (UT-6)

As described in Impact U-5, the proposed Project would not conflict with the goals or requirements of AB 939, AB 341, City's Zero Waste Strategic Operations Plan, or the SMMC. As discussed in UT-5, the City has already achieved a diversion rate of 81 percent that is in excess of the requirements of AB 939 and AB 341 to achieve a 95 percent diversion by 2030. The City remains committed to continuing its existing waste reduction programs and minimization efforts with the programs with goals, targets, and programs to achieve 85 percent diversion rates by 2020 and 95 percent diversion by 2030.

The Applicant would comply with the Construction and Demolition Ordinance (SMMC Section 8.108.010 Subpart C) by submitting a waste management plan to the City and diverting at least 70 percent of construction and demolition debris from landfills. Additionally, proposed Project operations would include recyclable containers/bins that would be provided onsite to ensure that solid waste associated with the proposed Project would be recycled or reused to the greatest extent possible. Therefore, the proposed Project would comply with Federal, State, and local statutes and regulations related to solid waste, and there would be *no impact*.

### 3.15.3.6 Cumulative Impacts

The operation of the proposed Project would contribute to cumulative solid waste generation impacts to regional landfills and waste disposal facilities associated with future growth within the City and the region. As shown in Table 3.15-12, the combined maximum solid waste accepted daily throughput of the 15 solid waste facilities serving the City is 90,749 tons of solid waste per day, while the average daily amount disposed is 48,009 tons per day, resulting in an excess daily capacity of 19,332 tons of solid waste per day (refer to Table 3.15-12). The City's contribution to the waste stream would be further limited when the City reaches its goal of a 95 percent diversion rate by 2030, which would substantially reduce projected waste generation per capita across the City.

The additional 0.44 tons of solid waste per day (163.59 tons per year; refer to Table 3.15-13) that would be generated by the proposed Project would represent a nominal percent of the total daily permitted capacity of the 15 solid waste facilities expected to serve the City in 2040. Therefore, this additional waste would not result in a considerable contribution to cumulative impacts associated with landfill capacity. Additionally, the County continually addresses landfill capacity through the preparation of Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity.

#### 3.15.3.7 Residual Impacts – Solid Waste Management Services

The Sustainable City Plan and Zero Waste Strategic Operations Plans set comprehensive goals and standards for diverting solid waste landfills to improve solid waste diversion success and minimize environmental and community impacts from waste generation. The Project's projected 163.59 tons of solid waste per year (approximately 0.44 tons per day) would comprise a nominal portion, less than one percent, of excess capacity of existing solid waste facilities. With the implementation of all applicable State and City regulations, residual impacts to solid waste management services would be *less than significant.*

# 4.0 OTHER CEQA CONSIDERATIONS

This chapter of the Environmental Impact Report (EIR) presents the evaluation of additional environmental impacts analyses required by the California Environmental Quality Act (CEQA) that are not discussed in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, including significant unavoidable effects, irreversible environmental changes, growth inducing impacts (including removal of obstacles to growth), and environmental resource areas that would experience negligible or no environmental impacts. CEQA Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation.

## 4.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. Where there are significant impacts, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

### 4.1.1 Construction Effects

As discussed in Section 3.3, *Construction Effects*, construction activities adjacent to the Gussie Moran House, located at 1323 Ocean Avenue, could result in significant and unavoidable offsite vibration impacts. The Gussie Moran House is a City-designated Landmark and as such, is considered a historic resource. Construction activities along the northern boundary of the Project site would exceed the California Department of Transportation (Caltrans) vibration damage potential threshold criteria for “Fragile” and “Fragile Historic” buildings. Therefore, these construction activities could result in structural damage to the building – particularly the decorative shingles, steeple, tower, and chimney. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House.

### 4.1.2 Cultural Resources

As described in Section 3.4, *Cultural Resources*, the Gussie Moran House, located at 1323 Ocean Avenue, immediately north of the Project site is a City-designated Landmark and as such, is

considered a historic resource. Construction activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold criteria for "Fragile" and "Fragile Historic" buildings. Therefore, these construction activities could result in structural damage to the building – particularly the decorative shingles, steeple, tower, and chimney. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House.

### 4.1.3 Neighborhood Effects

As described in Section 3.11, *Neighborhood Effects* none of the intersection impacts identified in Section 3.13, *Transportation* could be fully mitigated without potential secondary impacts to pedestrian safety goals and policies outlined in the City's Land Use and Circulation Element (LUCE) and the Downtown Community Plan (DCP). Therefore, under both the Approval Year (2020) and Future Year (2025) conditions, the proposed Project would result in significant and unavoidable impacts and operational traffic-related neighborhood effects would be significant and unavoidable.

### 4.1.4 Noise

As described in Section 3.12, *Noise* onsite vibration impacts would be reduced to less than significant through the implementation of MM NOI-2. However, construction activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold criteria for "Fragile" and "Fragile Historic" buildings. Therefore, these construction activities could result in structural damage to the Gussie Moran House – particularly the decorative shingles, steeple, tower, and chimney. MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House.

### 4.1.5 Transportation

As described in Section 3.13 *Transportation*, implementation of the proposed Ocean Avenue Project (Project) would create significant and unavoidable impacts to intersections based on the City's adopted level of service (LOS) thresholds. The Project would increase the number of trips, the volume-to-capacity (V/C) ratio, and the delay per vehicle to a level that would be considered significant under these LOS thresholds. The transportation study prepared by Fehr & Peers found that under the Approval Year (2020), the proposed Project would generate significant impacts to the LOS at four intersections: Palisades Beach Road & California Incline, Ocean Avenue & California Avenue, 2nd Street & Wilshire Boulevard, and Main Street & Olympic Drive (see Appendix K). These intersections were projected to operate at LOS E or LOS F during one or more analyzed peak hours. Under future year (2025) conditions, the proposed Project would generate impacts to the LOS at six intersections: Palisades Beach Road & California Incline, Ocean Avenue & California Avenue, 2nd Street & Arizona Avenue, 2nd Street & Santa Monica Boulevard, Main Street & Olympic Drive, and 4th Street & Arizona Avenue (see Appendix K). The following intersections were projected to operate at LOS E or LOS F during one or more analyzed peak hours: Palisades Beach Road & California Incline, Ocean Avenue & California Avenue, 2nd Street & Arizona Avenue, 2nd Street & Santa Monica Boulevard, Main Street & Olympic Drive, and 4th Street & Santa Monica Boulevard (see Appendix K). None of these impacts could be fully mitigated without potential secondary impacts to pedestrian safety goals and policies outlined in the City's Land Use and Circulation Element (LUCE) and the Downtown Community Plan (DCP). Therefore, under both the Approval Year (2020) and Future Year (2025) conditions, the proposed Project would result in significant and unavoidable impacts based on LOS thresholds. Refer to Section 3.13, *Transportation*, for more detailed information.

## 4.2 REASONS THE PROJECT IS BEING PROPOSED NOTWITHSTANDING ITS SIGNIFICANT AND UNAVOIDABLE IMPACTS

In addition to identification of the significant and unavoidable impacts associated with the proposed Project, CEQA Guidelines Section 15126.2(c) requires a description of the reasons why a project is being proposed, notwithstanding significant and unavoidable impacts.

As previously described in Section 4.1, *Significant and Unavoidable Effects*, the proposed Project would result in significant and unavoidable offsite construction vibration impacts to the Gussie Moran House, a City-designated Landmark located adjacent to the north of the Project site. MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of the mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of this mitigation measure by the

property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House.

With respect to significant and unavoidable impacts to construction, neighborhood effects, and transportation, the significant and unavoidable intersection impacts associated with the proposed Project were anticipated in association with implementation of the Downtown Community Plan (DCP) and future development of the Downtown. As with the Project, the Final EIR for the DCP predicted significant effects related to intersection and street segment LOS. However, as discussed in Section 3.13, *Transportation*, a key provision of Senate Bill (SB) 743, passed in September 2013, is the elimination of LOS as a CEQA significance criterion in urban areas. The basic reason for this change in the CEQA statute is the recognition that there can be conflicts between improvements that benefit automobiles versus those that benefit other modes of transportation in urban areas (e.g., widening streets to improve automobile LOS can often be to the detriment of pedestrians), that continued reliance on automobiles is at odds with State objectives to reduce greenhouse gas (GHG) emissions (through reductions in vehicle miles of travel [VMT]), and that mitigation for increased vehicle delay often involves measures that may increase automobile use and discourage alternative forms of transportation. When employed in isolation, LOS can lead to ad hoc roadway expansions that deteriorate conditions on the roadway network or discourage transportation improvements that improve street function overall by providing better service for transit pedestrians or bicycles, but decreasing LOS for vehicles. Among the issues with vehicle LOS identified by the Governor's Office of Planning and Research (OPR) are the following:

- LOS is biased against "last in" development;
- LOS scale of analysis is too small;
- LOS mitigation is problematic and often infeasible (e.g., physical constraints limit roadway capacity upgrades);
- LOS mischaracterizes transit, bicycle and pedestrian improvements as detrimental to transportation (i.e., improvements for pedestrians may result in degraded vehicle LOS);
- Use of LOS thresholds implies false precision; and
- As a measurement of delay, LOS measures motorist convenience, but not a physical impact to the environment.

According to the legislative intent contained in SB 743, changes to the current practice of using LOS for CEQA analysis are necessary to, *"More appropriately balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."* Therefore, while the

proposed Project would result in significant traffic LOS impacts, implementation of the proposed Project would support a land use pattern that would have the beneficial effect of reducing regional wide VMT per capita.

Notwithstanding the significant impacts related to offsite vibration and intersection impacts, the proposed Project has been put forth by the Applicant to achieve the objectives described in Section 2.4, *Project Objectives*. The proposed Project would implement the goals and policies of the DCP. The DCP vision includes centering and increasing human activity in the Downtown; preserving the Downtown's historic landmarks and unique urban character; enlivening the City's pedestrian environment through wider sidewalks and street-oriented retail uses; and providing affordable housing. The proposed Project would develop active ground floor restaurant and retail uses, provide a modern hotel, and increase housing supply by providing 100 residential units and sustaining the City's affordable housing stock through the development of 19 rent-controlled units and additional deed-restricted affordable units. The proposed Project would also rehabilitate and incorporate two existing City-designated Landmarks into a Cultural Use Campus fronting Ocean Avenue, thereby preserving the existing historic landmarks and the character they impose on Ocean Avenue. Further, the proposed Project would provide active public open space, including landscaped pedestrian-only paseos with seating and outdoor dining, a public courtyard fronting Ocean Avenue, and a publicly-accessible rooftop observation deck with sweeping views of the Downtown, Santa Monica Pier, Pacific Ocean, and Santa Monica Mountains. These improvements would align with the DCP's adopted vision. The proposed Project would also comply with the development standards contained in the DCP in terms of height and scale, including compatibility with the surrounding area (refer to Section 3.1, *Aesthetics and Shade/Shadow Effects* and Section 3.10, *Land Use and Planning*).

The Project would also implement the DCP, along with related goals and policies, which, in turn, would fulfill the LUCE vision for the Downtown and the Project site. The Project site is located within the Ocean Transition (OT) and Bayside Conservation (BC) Districts and is identified as one of three Established Large Sites (ELS) Overlay sites. The ELS Overlay sites are properties that have the potential to accommodate significant new development and provide significant community benefits. The ELS Overlay Zone designation allows development on the Project site to have a maximum of 130 feet in height and a 4.0 FAR subject to the entitlement approval being processed through a Development Agreement, as well as compliance with other specified requirements (City of Santa Monica 2017d). In accordance with Table 2A.4 of the DCP, the redevelopment of the Project site would provide all three of the preferred community benefits, including affordable housing, public open space and historic preservation. The proposed Project would provide up to 100 residential units, including affordable housing units, within the

Downtown and near public transit, a mix of uses such as retail, service, office and entertainment, as well as regional destinations such as Palisades Park, Third Street Promenade, Santa Monica State Beach, and the Santa Monica Pier. In addition, the Project would include sustainability features such as a minimum 125-kilowatt (kWh) solar photovoltaic (PV) system, and energy-efficient heating, ventilation, and air conditioning (HVAC) systems.

The proposed Project would also contribute to the City's efforts to integrate land use and transportation as well as reduce regional VMT per capita through the incorporation of an enhanced Transportation Demand Management (TDM) plan consistent with transportation policies within the DCP (e.g., Policies LU1.5 and LU5.1), LUCE (i.e., Policies LU2.1, LU2.4, and LU3.2), and Goals 2, 5, and 8 of the Southern California Association of Government's (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project's TDM Program would include various components such as unbundled parking, onsite bicycle facilities (i.e., shower, racks, and lockers), transit pass subsidies, participation in a Transportation Management Association, guaranteed ride home program, a TDM coordinator, ridesharing, flexible work hours, transportation information center, wayfinding signage, and a commuter club (provides various incentives to employees who commit to using non-single occupancy vehicle modes). A period of annual monitoring and reporting would be undertaken for the proposed Project to summarize the results of trip reduction measures, including their ability to achieve City required Average Vehicle Ridership (AVR) targets, and describe the TDM efforts currently in place to reduce vehicular trips.

In addition, the proposed Project would improve the pedestrian environment along Ocean Avenue, Santa Monica Boulevard, and 2nd Street through the reduction in curb cuts, removal of the perimeter walls/hedges and other visual and physical barriers into and through the Project site, incorporation of ground floor and pedestrian-oriented retail uses, and provision of public open space interfacing the Palisades Park along Ocean Avenue. The proposed pedestrian only paseos and courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. The proposed Project would also locate higher-density residential units within the Downtown neighborhood, which is a Transit Priority Area (TPA), near public transportation, including Big Blue Bus and Los Angeles County Metropolitan Transportation Authority (Metro) service routes as well as the Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line. Thus, the proposed Project would support the City's multi-modal transportation objectives.

The proposed Project would fulfill the goals and policies of the Local Coastal Program (LCP) Land Use Plan (LUP), including historic preservation, the provision of visitor-serving uses and housing,

the provisions of open space (including publicly-accessible open space), the reduction of mid-block driveways on major thoroughfares, the provision of pedestrian access and orientation, an increase in employment opportunities, the incorporation of sustainability features, and the provision of community benefits. The Project would develop a hotel with 120 guestrooms and would add ground floor commercial space in the Downtown and, thus, would be consistent with the objectives of the LCP LUP to protect areas of the City that are unique visitor destination locations and provide overnight visitor accommodations. In addition, the proposed Project would be consistent with LCP LUP objectives to provide support facilities such as shops, restaurants, and cultural uses that serve visitors and the local community at the east side of Ocean Avenue between California Avenue and Colorado Avenue. The proposed Project would also be consistent with LUCE, DCP, and LUP policies to provide for new plazas and open space in the Downtown available for public use.

The proposed Project would be consistent with applicable plans for the Project site that support sustainability, including SCAG's RTP/SCS, the LUCE, the Housing Element, the DCP, and the Zoning Ordinance. In addition to locating both visitors and residents within walking distance to a variety of uses and regional destination points near public transit, the proposed Project would incorporate Green building design features into the new construction thereby replacing aging systems and updating with sustainable features. All new buildings on the site would meet or exceed the California Title 24 Building Energy Efficiency Standards (Part 6), CALGreen (Part 11), the City's Green Building Code and Energy Code, the City's Water Neutrality Ordinance, and Runoff Conservation and Sustainable Management Ordinance requirements. The design of the proposed Project would optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind, etc.) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would also incorporate conservation features such as PV panels; energy-efficient HVAC systems; operable windows; high-performance building envelope usage to maximize insulation; lighting systems designed with occupancy sensors and dimmers to minimize energy use; secure parking for bicycles at the ground level and in the subterranean basement; and electric vehicle (EV) chargers for use by residents, guests and employees. The proposed buildings would also include water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.) and a low-water drought tolerant landscape plant palette.

Additionally, the DCP Program EIR also found that the DCP's circulation strategy to create an effective multi-modal transportation system within the Downtown would shift some automobile trips to other modes of transportation, which would improve transportation connections. Because the proposed Project would comply with the objectives of the LUCE, DCP and LCP LUP to provide high density development that includes affordable housing, visitor accommodations, and

visitor-serving and pedestrian-oriented ground floor uses; historic preservation and adaptive reuse of landmark buildings; pedestrian-oriented design; publicly-accessible open space; sustainability; high quality architectural design; TDM measures; and to implement SCAG and the City's sustainability objectives, the proposed Project would result in greater benefit to the community than the continuation of the Project site in its existing condition.

## 4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) requires a discussion of "*significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified*."

Development of the proposed Project would result in the irreversible alteration of the built environment and the irreversible consumption of limited slowly renewable resources and non-renewable resources from construction and operation. Construction associated with the proposed Project would involve the consumption of building materials and energy, including lumber and other forest products; raw materials such as steel; aggregate materials used in concrete and asphalt, such as sand and stone; water; petrochemical construction materials, such as plastic; and petroleum-based construction materials. In addition, fossil fuels would be consumed for construction of the proposed Project. The consumption of limited slowly renewable resources and nonrenewable resources would continue throughout the operational lifetime of the proposed Project as the proposed 100 residential units, 122,400 square feet (sf) of hotel space, and 71,610 sf of commercial space (e.g., retail, restaurant, and cultural uses) would require resources such as water, petroleum, and natural gas.

Although the proposed Project would necessarily result in the consumption of such resources, the proposed Project would contribute to a land use pattern that would promote an overall reduction in resource consumption per capita. The proposed Project would provide a mix of compatible uses to activate the proposed expanded sidewalks, pedestrian paseos, and courtyard to encourage walking by future residents, employees, and patrons of the site. The proposed public paseos and courtyard would connect to existing sidewalks and help expand the pedestrian network in the Downtown. Additionally, bicycle amenities would include lockers and showers for commercial

employees who bike to work, ground level short-term visitor bicycle parking, long-term parking for employees, secured parking for residents, and residential elevators to facilitate convenient transport of bicycles within the Project site.

The Project site is located within the City's urban Downtown in an infill site, which includes a broad mix of retail, restaurant, entertainment, hotel, office, and residential uses within the immediate vicinity. By virtue of its location within the Downtown and other land uses, the proposed Project would be consistent with transportation policies in the City's LUCE, DCP, and the RTP/SCS. For example, the proposed Project would provide hotel, residential, commercial, and cultural uses in close proximity (within approximately 0.5 miles) of the Downtown Santa Monica Station for the Metro E (Expo) LRT line and several Big Blue Bus and Metro service routes (refer to Section 3.13, *Transportation*) consistent with transportation policies within the DCP (e.g., Policies LU1.5 and LU5.1), LUCE (i.e., Policies LU2.1, LU2.4, and LU3.2), and Goals 2, 5, and 8 of the RTP/SCS. Refer to Section 3.10, *Land Use and Planning*, for further discussion of the Project's consistency with these plans.

As required by Santa Monica Municipal Code (SMMC), all new buildings on the site would conform to the California Title 24 Building Energy Efficiency Standards (Part 6) CALGreen (Part 11) the City's Green Building Code and Energy Code, and the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The proposed Project would include a variety of conservation features, which would be finalized in a Development Agreement, including PV panels and other renewable energy resources; LED lighting in hotel and residences; solar swimming pool heating; retention and potential reuse of onsite stormwater pollution; water efficiency features; and a TDM plan. Approximately six EV charging stations are proposed within the subterranean parking garage to promote the use of alternatively fueled vehicles. The proposed Project would also reduce waste with onsite recycling containers to support the City's recycling efforts and the City's goal of Zero Waste (achieving 95 percent diversion by 2030). These additional sustainability features could further reduce new energy demand and the consumption of water and non-renewable fossil fuels. Further, the existing uses at this location (e.g., residential and commercial uses) would be removed, so their existing non-renewable energy consumption would no longer occur (refer to Section 3.5, *Energy*).

Consumption of these resources would be relatively small in scale in comparison to the region and are not unique to the Project. Further, the consumption of resources would be consistent with regional and local growth forecasts in the area, and would occur in accordance with State and local goals and requirements. Additionally, because the Project site does not contain these resources,

the Project would not directly impact or interrupt the production or delivery of such resources. The Project's irreversible changes to the environment would be *less than significant*.

## 4.4 GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires a discussion of ways in which a project could foster economic or population growth, including ways in which a project could remove an obstacle to growth that could result in potential significant irreversible changes. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project may induce growth if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, taxes community service facilities to the extent that the construction of new facilities would be necessary, or encourages or facilitates other activities that cause significant environmental effects. In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development)
- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth inducing projects are in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encourage premature or unplanned growth. However, in urban areas such as the Downtown, growth inducing projects typically involve proposed plans or policies that alleviate barriers to growth or increase opportunities for development.

To comply with CEQA, an EIR must discuss the ways in which the proposed project could promote economic or population growth near the project area and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[e]). Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it affects (directly or indirectly) the ability of

agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

Population, Employment, and Housing Growth

The proposed Project would develop 100 residential units, including replacement of 19 existing rent-controlled units. The proposed Project is anticipated to increase the City population by approximately 153 residents (refer to Section 3.13, *Transportation*). Relative to the City's existing population of 90,824, the expected net increase in residential population resulting from the proposed Project would be less than 1 percent and would not be considered substantially growth inducing (U.S. Census Bureau 2017a).

The provision of new housing is a primary objective of the proposed Project, consistent with the guiding principle of the DCP to promote new housing opportunities for Downtown residents and DCP policies such as Policies LU4.1, LU4.2 and CCP1.2 (refer to Section 3.10, *Land Use and Planning*). Further, the 100 residential units that would be provided under the proposed Project would contribute to 4.3 percent of the 2,326 multifamily housing units envisioned and approved for the Downtown area, as analyzed in the DCP Program EIR (City of Santa Monica 2017c). As the proposed Project would replace the 19 rent-controlled units onsite, no existing housing or population would be displaced.

The proposed Project would generate short-term employment opportunities during construction, which would draw workers from the existing regional work force. Additionally, the hotel, restaurant, retail, and Cultural Use Campus are expected to employ approximately 212 full-time equivalent (FTE) employees consisting of 103 employees for the hotel, 24 employees for the cultural uses, and 85 employees for the restaurant/retail. The residential component of the proposed Project is expected to employee one onsite resident manager and one offsite property manager. The proposed Project is expected to draw most workers from the existing regional workforce. Therefore, the proposed Project would not be considered growth inducing as it would not substantially affect long-term employment opportunities.

Potential impacts associated with population, employment, and housing anticipated to result from implementation of the proposed Project are further addressed in Section 4.4, *Effects Found Not to Be Significant*.

### 4.4.1 Removal of Obstacles to Growth

The proposed Project would be located within a fully urbanized area of the City – the Downtown District, which is well-served by existing infrastructure including streets, water system, sewer

system, and electricity/natural gas service. Because the proposed Project constitutes redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, Project implementation would not remove an obstacle to growth.

The proposed Project would implement the policies of the DCP and is identified as one of the three sites with an ELS Overlay. These sites are identified because they can provide significant community benefits for circulation, open space, and cultural facilities that would not be possible for smaller projects (City of Santa Monica 2017d). The siting of 100 new housing units within 0.5 miles of the Downtown Santa Monica Station for the Metro E (Expo) LRT line would be consistent with DCP (e.g., Policy LU5.1) and LUCE (e.g., LU4.3) goals and policies (refer to Section 3.10, *Land Use and Planning*) to increase housing opportunities near existing transit. The proposed Project would also assist in meeting the City's Regional Housing Needs Assessment for the construction of new housing, including affordable housing. Therefore, the Project would not induce additional growth other than what was already anticipated in the DCP and would not foster growth inducing impacts.

## 4.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a Project were determined not to be significant and were therefore not discussed in detail in the EIR. Through the scoping process, the City determined that the proposed Project would have *no impact* on the following resources: Agriculture and Forestry Resources; Biological Resources; Mineral Resources; Population, Employment, and Housing; Public Services; Recreation; and Wildfire. Project impacts associated with these issue areas would be unsubstantial because the Project would be developed in a highly urbanized Downtown. The Project site is already fully developed with buildings and parking lot that would be replaced, and as such, would not disturb agricultural or forest areas, mineral resource sites, or biological resources. Additionally, the Project would not result in impacts to population, employment, housing, public service, recreation greater than those already assessed in the DCP Program EIR.

<u>Agriculture and Forestry Resources</u>

The proposed Project would not have the potential for significant impacts associated with important agricultural or forestry resources. The Project site and surrounding areas are entirely urbanized and do not contain any developed agricultural or forestry resources. The proposed Project would not change any land use designations affecting such resources, and would not indirectly affect such resources. Therefore, there would be *no impacts* to these resource areas.

Biological Resources

The proposed Project would not have the potential for significant impacts associated with biological resources. The Project site is fully developed and located in the Downtown, a highly urbanized area of the City. No special status or sensitive species occur on the Project site or surrounding area. Given the urbanized nature of the Project site and considering that the Project site has previously been disturbed by development of the existing onsite structures and surface parking lots, the presence of any sensitive or special status species onsite is unlikely. Species expected to occur onsite would be limited to animals that are commonly found in urban environments (e.g. squirrels, gulls, etc.).

Existing vegetation onsite includes landscaped trees and hedges. No wetlands, riparian habitat, sensitive natural community, or wildlife corridor/nursery site exists on the Project site or in the surrounding area. The proposed Project would not interfere with any migratory route for terrestrial or avian species. Additionally, the proposed Project would not remove any existing mature tree that may serve as roosting habitat for avian species. Construction associated with the proposed Project would comply with the Santa Monica Tree Code (SMMC Chapter 7.40) and the goals and strategies of the City's Urban Forest Master Plan (City of Santa Monica 2017b). The proposed Project would not have a substantial adverse effect on any sensitive or special status species or habitat, and *no impacts* would occur. As a result, further analysis of this issue is not required.

Mineral Resources

The proposed Project would not have the potential for significant impacts associated with important mineral resources. No mineral extraction operations occur on the site or in the nearby vicinity. Additionally, the Project site is not designated as an existing mineral resource extraction area by the State of California. Given that the Project site is located within a highly urbanized area of the City and has been previously disturbed by development, the potential for mineral resources to occur onsite is low (City of Santa Monica 2017c). Therefore, construction and operation of the proposed Project would not result in the loss of availability of a mineral resource or mineral resource recovery site and *no impacts* would be expected.

Population, Employment, and Housing

The proposed Project would not have the potential for significant impacts associated with population, employment, and housing. The U.S. Census Bureau estimates approximately 4,623 people live within the Downtown District of the City, with a total of 3,474 housing units (U.S. Census Bureau 2017c; 2017e). The proposed Project would develop 100 residential units, including replacement of 19 rent-controlled units (see Table 4-1). The proposed Project is

anticipated to increase the City population by approximately 153 residents (refer to Section 3.13, *Transportation*). Relative to the City's existing population of 90,824, the expected net increase in residential population resulting from the proposed Project would be less than 1 percent and would not be considered substantially growth inducing (U.S. Census Bureau 2017a). The proposed Project would also construct 120 hotel guestrooms on the Project site, increasing temporary population in a manner consistent with existing commercial hotel uses in the City.

**Table 4-1. Summary of Residential Unit Types**

| Unit Type | Number of Total Units | Number of Rent-Controlled Units |
|---|---|---|
| Studio | 12 | 12 |
| One-Bedroom | 55 | 7 |
| Two-Bedroom | 23 | 0 |
| Three-Bedroom | 10 | 0 |
| **Total** | **100** | **19** |

The population increase associated with the proposed Project is consistent with SCAG's growth projections for the period between 2016 and 2020 and between 2016 and 2040, the RTP/SCS horizon year, for the City and the County as a whole. The proposed Project would not induce substantial unplanned population growth. In terms of the provision of housing within the Downtown, as indicated in the DCP Program EIR, the City has a high demand for housing. The proposed Project would provide a mix of unit size, affordability, and new housing opportunities within the transit-rich Downtown area of the City. The proposed 100 residential units (which would include 19 rent-controlled units and additional affordable housing units) would represent 4.3 percent of the 2,326 multifamily housing units anticipated in the Downtown area, as analyzed in the DCP Program EIR (City of Santa Monica 2017c). Further, the Project site is located within the urbanized City of Santa Monica, which is served by existing roads and other supporting infrastructure. Accordingly, the Project would not require new roads or other infrastructure that would induce new development and population growth beyond the Project itself. Therefore, there would be *no impacts* relative to unplanned population growth.

As described in Section 2, *Project Description*, the proposed Project would provide 19 rent-controlled units to replace the existing 19 rent-controlled apartment units located in 101 Santa Monica Boulevard. Therefore, the proposed Project would not displace people or existing housing, nor necessitate the construction of replacement housing elsewhere. *No impacts* would occur regarding displacement of existing housing.

The proposed Project 100 residential units, which would achieve one the primary objectives of the Project (refer to Section 2.4, *Project Objectives*) to create new housing opportunities in the Downtown, including affordable housing units. The proposed increase in housing units is consistent with one of the DCP's guiding principles to promote new housing opportunities for Downtown residents as well as several applicable policies in the City's LUCE (e.g. LU2.4, LU10.3) and Housing Element (e.g., H1.3, H1.6, H1.7, H3.1, H4.5, H6.1, H6.2). Further discussion of the proposed housing opportunities and applicability to land use plans is included in Section 3.10, *Land Use and Planning*.

The proposed Project would generate short-term employment opportunities during construction, which would draw workers from the existing regional work force. An estimated 80 workers would be onsite at any time during construction of the proposed Project. Additionally, the hotel, restaurant, retail, and Cultural Use Campus are expected to employ approximately 212 FTE employees consisting of 103 employees for the hotel, 24 employees for the cultural uses, and 85 employees for the restaurant/retail. The residential component of the proposed Project is expected to employee one onsite resident manager and one offsite property manager. The proposed Project is expected to draw most workers from the existing regional workforce. Therefore, the proposed Project would not be considered growth inducing as it would not substantially affect long-term employment opportunities.

Further, the proposed Project would not have economic or social effects that would result in adverse physical changes or deterioration of the surrounding area. As the proposed Project would replace the 19 rent-controlled units onsite on a 1:1 basis, no existing housing or population would be displaced. Therefore, potential impacts of the proposed Project associated with population, employment, and housing would be considered *less than significant*. Further analysis of this issue is not required.

<u>Public Services</u>

*Fire Protection*

The Santa Monica Fire Department (SMFD) provides fire prevention, firefighting, emergency medical care (i.e., paramedic), technical rescue, hazardous materials mitigation, disaster response, public education, and community service within the City. The City has four fire stations that provide emergency response services to the Santa Monica community. The 2018–2019 SMFD staffing level provides for 136 FTE employees, which includes 14 administration staff members, 105 providers of fire suppression and rescue services, 14 fire prevention staff, and 3 staff members involved in training activities (City of Santa Monica 2017a).

The SMFD Station No. 1 located approximately 0.38 miles east of the Project site at 1444 7th Street is the first-response station for the Project site. Although this station in considered to have surpassed its expected useful life span, a new 25,000-sf fire station is currently under construction at 1337-45 7th Street to replace this station. The new station, anticipated to be completed in early 2020, would be located approximately 0.4 miles east of the Project site. Staffing for the new station is expected to increase from 14 firefighters per 24-hour or 48-hour shift at the existing fire station to up to 24 firefighters per 24-hour or 48-hour shift. This anticipated service demand would be within the capacity of the proposed new Fire Station No. 1 of up to nine apparatus as indicated in the pre-design test (City of Santa Monica 2017c).

SMFD Fire Station Nos. 2, 3, and 5 are available to provide backup services for Fire Station No. 1. Fire Station No. 2 is located at 222 Hollister Avenue, approximately 1.02 miles south of the Project site; Fire Station No. 3 is located at 1302 Nineteenth Street approximately 1.28 miles northeast of the Project site; and Fire Station No. 5 is located at 2450 Ashland Avenue, approximately 2.35 miles southeast of the Project site. Backup service can also be provided by the City of Los Angeles Fire Department on an as-needed basis, through a Mutual Aid Agreement.

Based on response metrics from January through December 2018, SMFD had an average response time of 4 minutes and 48 seconds for emergency calls and 5 minutes for non-emergency calls. Within the service district of Fire Station No. 1 SMFD had an average response time of 5 minutes for emergency medical service (EMS) calls and 5 minutes and 20 seconds for fire calls. Under national standards set forth by the National Fire Protection Association (NFPA), the response time objective is 6 minutes to nearly all medical emergencies. The SMFD average response times for medical emergencies of 5 minutes are below the 6-minute objective. Further, SMFD utilizes Opticom signal control, which allows fire trucks to change signals at intersections to green to clear a path of travel on roadways for emergency response vehicles and reduces response time to incidents.

As discussed in Section 3.13, *Transportation*, emergency access to the Project site would be maintained for emergency responders and emergency vehicles during Project construction activities. The vacated portion of 1st Court that would serve as the Santa Monica Boulevard Paseo would be closed with removable bollards for emergency vehicle access. Additionally, the SMFD strictly enforces the City's current Fire Code (SMMC Section 8.40.020), which provides strict requirements for fire suppression systems, use of fire resistant building materials, and visible address signage (SMFD 2019). The spacing between the existing fire hydrants in the vicinity of the Project site does not exceed 300 feet. The proposed Project would be designed in accordance with all applicable provisions of the SMMC pertaining to fire protection. This includes preparation

of a high-rise pre-fire plan in compliance with mitigation measures adopted as part of the DCP Program EIR, and will address at a minimum the types and capabilities of fire protection systems, the layout of the building, locations of stairwells and elevators, and how evacuation would be handled (City of Santa Monica 2017c). City and State regulations require that developers demonstrate that there is adequate water flow and pressure for fire protection of the property, including sufficient pressure to reach fires on the top floor of buildings proposed under the project. The 2019 Fire and Domestic Water Study prepared by KPFF Consulting Engineers (KPFF) for the proposed Project indicates there is sufficient water pressure in the vicinity of the Project site to support the proposed Project (see Appendix L). Further discussion of water flow and pressure for nearby fire hydrants is contained in Section 3.15, *Utilities*, and no significant impacts relating to emergency water flows were identified.

Due to the proposed height of the 12-story Hotel Building (130 feet) and the 9-story 2nd Street Building (106 feet), the proposed Project would be subject to the following mitigation measure from the adopted Mitigation Monitoring and Reporting Program (MMRP) from the DCP Program EIR:

> **DCP MM PS-1:** The City shall require applicants of development projects with buildings that are seven stories and higher in the Downtown to prepare a high-rise pre-fire plan. At a minimum, the pre-fire plan shall address the types and capabilities of fire protection systems, the layout of the building, locations of stairwells and elevators, and how evacuation will be handled. A copy of the plan shall be kept in the fire control room and a copy shall be filed with the SMFD fire marshal. The plan shall be revised every 5 years.

The Insurance Service Office (ISO) provides rating and statistical information for the insurance industry in the U.S. In determining its community rating, the ISO evaluates a community's fire protection needs and services. It then assigns each community a Public Protection Classification (PPC) rating. The rating is derived from a cumulative point scoring system, which grades the community's fire-suppression delivery system, including fire dispatch (i.e., operators, alarm dispatch circuits, telephone lines available); fire department (i.e., equipment available, personnel, training, distribution of companies, etc.); and water supply (i.e., adequacy, condition, number and installation of fire hydrants). Some insurance rates are based upon this rating. The ratings range in descending rank from Class 1 to Class 10. Santa Monica has the highest Class 1 ISO rating.

The proposed commercial and residential uses would result in a minimal increase in demand for fire protection services, and expansion of existing SMFD facilities or personnel would not be necessary to accommodate additional demand associated with the Project. Existing fire response staff, equipment, and facilities are considered sufficient to provide similar level of service after

implementation of the proposed Project, and impacts to fire protection services would be *less than significant.*

*Police Protection*

The Santa Monica Police Department (SMPD) provides police protection services within the City. SMPD headquarters are located approximately 0.6 miles east of the Project site at 333 Olympic Drive. The SMPD has 211 sworn enforcement personnel and 254 non-sworn administrative and support staff (SMPD 2018). The SMPD divides the City into four beats and operates these beats on a 24-hour basis. The Project site is located within Beat 1, which includes development along the coast as well as within the City. SMPD's maximum allowable response time to emergency calls is 5 minutes or less and there are 63 officers deployed across the City at all times (City of Santa Monica 2016). Response times for calls are based on the type and priority of the call. Calls are prioritized on a scale of 0-5, with 0 being the highest priority. In the last quarter of 2018, the average response time for a Priority 0 call was 4.37 minutes, which is less than then SMPD's maximum allowable response time (City of Santa Monica 2018). Additional needs for personnel, equipment, or infrastructure are identified and addressed within the SMPD 5-year plan (City of Santa Monica 2017c). SMPD also works with private security staff and other groups to further ensure the safety and security of residents, employees, and visitors.

Due to the size (316,750 sf) of the proposed mixed-use development, the following mitigation measure from the adopted MMRP from the DCP Program EIR would be applicable to the proposed Project:

> **DCP MM PS-2:** The City shall require applicants of development projects over a specified square footage in the Downtown to prepare and implement a security plan for common or public spaces, including parking structures/lots, courtyards, other open areas, public or common area walkways stairways and elevators as a condition of their development agreement. The security plan will identify the locations of 911-capable phones in parking garages and other public area, will establish rules and regulations for public use of the courtyard areas, and establish private security patrols for the property. Private security patrols shall work in coordination with the SMPD. The plan shall be subject to review and approval by the SMPD.

Although increased hotel, residential, and commercial development on the Project site would increase demand for SMPD services, the resultant population increase would be negligible compared to anticipated increases in the DCP and would not require construction of a new facility or alteration of an existing facility. Additionally, the Project would develop a security plan to be

reviewed and approved by the SMPD in accordance with mitigation measure PS-2 from the DCP Program EIR. Therefore, impacts to police protection services would be *less than significant.*

*Schools*

The Santa Monica-Malibu Unified School District (SMMUSD) provides education to the City and Project site. The SMMUSD serves 10,625 students in the City, including nine (K-5) elementary schools, one (K-8) alternative school, three (6-8) middle schools, two comprehensive (9-12) high schools, and one continuation high school, as well as programs including preschool, childcare, and adult education within the City (SMMUSD 2019). Given approximately four school-aged students per 100 residential units within the Downtown, the proposed Project would result in an increase of approximately three students (U.S. Census Bureau 2017b; 2017d).[1] Schools that serve the Downtown may currently experience capacity constraints; however, the Applicant would pay applicable developer fees to offset potential impacts of increased enrollment on City facilities through improvements to school facilities, as required by Government Code Section 65996. Further, direct and indirect population growth resulting from the Project would not be anticipated to substantially increase demand on SMMUSD. Therefore, impacts to school facilities would be *less than significant.*

*Other Public Facilities*

The City of Santa Monica Public Works Department (PWD) operates and maintains 32 City parks encompassing more than 130 acres, from small neighborhood parks and gardens to larger community parks (City of Santa Monica 2019). Additionally, 245 acres of Santa Monica State Beach are located along the City's southwestern edge, west of the Project site. The City also provides five public libraries and additional public services including public plazas, regional areas, and school facilities with joint-use agreements. As discussed under *Population, Employment, and Housing* above, the increase of employees and services resulting from Project implementation would not generate an increase in residential population that would substantially increase demand for parks, libraries, or other public facilities. As discussed further in *Recreation* below, the proposed Project would not introduce a new population that would substantially increase demands on existing or planned park facilities, and would comply with all applicable development fees to support acquisition, improvement, and expansion of park and recreation facilities. The proposed public courtyard, publicly-accessible rooftop observation deck, and other proposed open spaces would contribute to park and recreation improvements in the City, and would help meet the

[1] The addition of 81 new residential units (100 proposed residential units – 19 existing residential units) would result in 3.24 students or approximately 3 students.

recreational needs of Project guests and residents. Therefore, the proposed Project would not substantially increase demand on these facilities, and impacts would be *less than significant*.

Potential impacts to fire protection, police protection, schools, parks, and other public facilities would all be *less than significant*. Therefore, further analysis of potential impacts to these resources is not required.

Recreation

The Project site is in the Downtown, a highly urbanized area of the City. The City has 32 parks that total over 130 acres and range in size from 0.16 acres (i.e., Schader Park) to 26.41 acres (i.e., Palisades Park) (City of Santa Monica 2019). The City also provides and maintains stretches of sandy beach, off-leash dog parks, bike and walking paths, lawn areas, and other recreational opportunities for the City's residents, employees, and visitors. Recreational areas near the Project site include the Palisades Park (west of Ocean Avenue), Tongva Park (approximately 1,600 feet south), and the Santa Monica State Beach (approximately 500 feet west). In addition to public parks and beaches, the City provides public grounds, including three community gardens locations, the Annenberg Beach House, Civic Auditorium, the Cove skatepark, and the Community Center (City of Santa Monica 2016).

The City's park inventory of more than 130 acres currently provides 1.4 acres of parkland per 1,000 residents, well below the Los Angeles County average of 3.3 acres per 1,000 residents (County of Los Angeles and County of Los Angeles Department of Parks & Recreation 2016). Although the City does not establish minimum recreation acreage provisions for new development, the Project would be subject to fee mechanisms within the SMMC that support the acquisition, improvement, and expansion of park and recreation facilities. The proposed Project would provide approximately 40,920 sf of open space, including a ground floor public courtyard, landscaped public paseos with outdoor seating, and a publicly-accessible rooftop observation deck. Landscaped private open space is also included on the podium deck of the Second Street Building. The Project also includes construction of a 35,500-sf Cultural Use Campus that could support uses including art galleries, museum exhibits, or conservatories. Although this would not be considered a formal recreational amenity, public enjoyment of these facilities may substitute for some of the recreational demand for other recreational facilities throughout the City.

The proposed subterranean parking garage would create an additional 127 parking spaces that would increase accessibility of the Project site to nearby recreational facilities. Discussion of impacts to parking as it relates to coastal access and recreation opportunities are discussed further in Section 3.10, *Land Use and Planning*.

Because the proposed Project would not substantially increase demand on recreational facilities and would be consistent with applicable development fee requirements, potential impacts to recreational resources would be considered *less than significant.* Therefore, further analysis of this issue is not required.

Wildfire

The Project site is in a highly urbanized area within the Downtown District and entirely within a Local Responsibility Area (LRA), approximately 1.58 miles from the nearest designated High or Very High Fire Hazard Severity Zone (FHSZ) associated with the Santa Monica Mountains. Redevelopment of the Project site would not exacerbate wildfire risks. The proposed Project would not involve installation of any infrastructure such as high-tension electricity lines that would exacerbate wildfire risk and would not increase public exposure to wildfires (i.e., placing residential uses in areas of high wildfire risk). The Project site is not located on a significant slope and would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations. The Project site is highly accessible from multiple emergency response routes and would not change or block an existing evacuation route since it is proposed within an established roadway grid in Downtown.

As previously described under *Fire Protection*, the SMFD average response times for medical emergencies of 5 minutes are below the 6-minute objective established by the NFPA. The proposed Project would comply with all applicable Fire Code requirements (SMMC Section 8.40.020) and the 300-foot maximum distance between existing fire hydrants would remain. Due to the maximum height of the proposed Hotel Building and Second Street Building, the proposed Project would be required to prepare a high-rise pre-fire plan in compliance with DCP MM PS-1. Further, the 2019 Fire and Domestic Water Study prepared by KPFF for the Project indicates there is sufficient water pressure in the Project vicinity to support the Project (see Appendix L). Therefore, there would be *no impacts* and issues involving wildfires are not analyzed further in this EIR.

# 5.0 ALTERNATIVES

## 5.1 INTRODUCTION

This section of the Environmental Impact Report (EIR) evaluates alternatives to the proposed Ocean Avenue Project (Project) and analyzes the comparative environmental impacts associated with each alternative.

The California Environmental Quality Act (CEQA) Guidelines state that an "*EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*" (CEQA Guidelines Section 15126.6).

The CEQA Guidelines further state that "*the range of alternatives required in an EIR is governed by a rule of reason*" that requires the EIR to set forth only those alternatives necessary to permit fully informed decision making. The alternatives shall be limited to those that would avoid or substantially reduce any of the significant and unavoidable effects of the proposed Project. Of those alternatives, the EIR needs to examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic project objectives (CEQA Guidelines Section 15126.6).

Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6[a]). In defining feasibility of alternatives, the CEQA Guidelines state that "*among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acqu*ire*, control or otherwise have access to the alternative site*" (CEQA Guidelines Section 15126.6).

The alternatives selected for review must adequately represent the spectrum of environmental concerns to permit a reasonable choice of alternatives. The CEQA Guidelines also require the analysis of a No Project Alternative. The EIR must also provide the rationale for selecting or defining the alternatives to be evaluated, including the identification of any alternatives that were considered by the Lead Agency, but rejected as infeasible during the scoping process. Based on the alternatives analyzed, the Lead Agency must identify an environmentally superior alternative.

The EIR should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. The alternatives analyzed in this EIR have been described to a sufficient level of detail necessary to permit their consideration for adoption by the City of Santa Monica (City). When considered with the information contained in the EIR, the analysis of these alternatives adequately characterizes the potential associated impacts. However, depending upon the degree of design changes associated with any given alternative, an additional administrative level of environmental review may be required to refine mitigation measures and assess detailed changes in Section 2, *Project Description* associated with the potential adoption of one of these alternatives.

The alternatives analysis for this EIR is presented in four major parts. Section 5.2, *Project Objectives* below describes the objectives of the proposed Project. Section 1, *Summary of Potentially Significant and Unavoidable Impacts* summarizes the potentially significant and unavoidable short- and long-term impacts of the proposed Project from information presented in Section 3, *Environmental Impact Analysis and Mitigation Measures*. Section 5.4, *Alternatives Considered but Discarded* identifies alternatives considered but discarded from further evaluation. Section 5, *Alternatives Analysis* describes the alternatives selected for full evaluation, and discusses potential impacts under each of these alternatives. Section 5.6, *Identification of the Environmentally Superior Alternative* concludes with the selection of an environmentally superior alternative, based on the alternative with the fewest significant impacts while meeting the greatest number of Project objectives.

## 5.2 PROJECT OBJECTIVES

The Project objectives are discussed in Section 2.4, *Project Objectives* and are summarized below:

1. **LUCE and DCP Consistency and Implementation**: Develop a project through the Development Agreement process as contemplated in the Downtown Community Plan (DCP) for this Established Large Site (ELS) Overlay site that is consistent with and implements the City's Land Use and Circulation Element (LUCE) and DCP, including with respect to development standards, visitor-serving, residential, and pedestrian-oriented ground floor uses, historic preservation and adaptive reuse of two City-designated Landmarks, pedestrian-oriented design, publicly accessible open space, sustainability, high quality architectural design, transportation demand management (TDM), and community benefits.

2. **Coastal Act Consistency and Implementation:** Develop a project with a substantial lodging/hotel component, culturally-rich uses, publicly accessible open space, including a

rooftop observation deck and other visitor-serving uses consistent with the California Coastal Act's policies favoring visitor-serving uses in the Coastal Zone.

3. **Historic Preservation**: Rehabilitate the two City-designated Landmarks at 1333 and 1337 Ocean Avenue and adaptively reuse and incorporate them into the project in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, the Historic Preservation Element, and the Landmarks Ordinance.

4. **Enhance Downtown**: Enhance the Downtown by adding culturally-rich uses, publicly accessible open space, including a rooftop observation deck, affordable and market rate housing, retail, restaurant and entertainment uses, and a full-service hotel that does not displace any existing lodging facilities, each located in the Downtown urban environment near public transit options and within convenient walking distance of a wide variety of complementary uses, including shopping, dining, entertainment, employment, housing, recreation, parks, and places of worship.

5. **Affordable and Market-Rate Housing**: Replace existing rent-controlled housing units and provide additional rental housing units, including deed-restricted affordable rental housing and market-rate housing, in a transit-rich location consistent with the City's Housing Element, LUCE, and DCP.

6. **Architectural Design**: Ensure that the new buildings achieve excellence in their architectural and urban design, incorporate an urban form and building character that enhance the existing Downtown fabric, and are well-integrated and compatible with the two City-designated Landmarks.

7. **Pedestrian-Orientation**: Prioritize the pedestrian experience within and adjacent to the Project site including adding pedestrian-oriented uses along 2nd Street, Santa Monica Boulevard, and Ocean Avenue, minimizing vehicle-pedestrian conflicts by reducing the existing curb cuts to one entry from the 1st Court and one exit on 2nd Street, and adding inviting pedestrian-only paseos and open space.

8. **Arts and Culture**: Add culturally rich uses in the Downtown including adding a Cultural Use Campus which incorporates two City-designated Landmarks that would be relocated, rehabilitated, and adaptively reused for cultural uses.

9. **Minimize Traffic Impacts**: Develop a hotel which is an off peak hour trip generator in the Downtown, with convenient access to public transit and a wide variety of complementary uses within easy walking distance. Minimize vehicle miles traveled (VMT) by

implementing a comprehensive TDM strategy that includes incentives for alternative transportation (e.g., public transportation, bicycling, and walking), ride-sharing, and flexible work hours.

10. **Parking**: Remove surface parking and provide parking for the project in a new subterranean parking garage.

11. **Sustainability**: Retain and ensure the longevity of the two City-designated Landmarks and incorporate Green Building design features in the project that prioritize water and energy conservation.

12. **Economic Viability**: Make rehabilitation, repair, restoration, and upgrade of the two City-designated Landmarks and establishment of new cultural uses within a new Cultural Use Campus economically feasible through pursuit of a financially-viable mixed-use project that includes a hotel, replacement rent-controlled units, additional affordable and market-rate rental housing units, and other pedestrian-oriented uses (including restaurant and retail and other similar uses) that complement the hotel and residential uses.

13. **Employment, Economic, and Fiscal Benefits**: Contribute to the economic health of the City by developing a project that generates significant new local tax revenues, provides new jobs including a labor union-friendly hotel, and generates new visitor spending to support local businesses, including dining, shopping, and entertainment venues.

14. **Community Benefits**: Provide the "preferred" community benefits for this ELS Overlay site as envisioned in the DCP including affordable housing, a cultural institution and historic preservation, as well as a range of additional benefits including publicly accessible open space, iconic architecture, TDM measures, and sustainability.

## 5.3 SUMMARY OF POTENTIALLY SIGNIFICANT AND UNAVOIDABLE IMPACTS

Based on the City's adopted thresholds for intersection levels of service (LOS), the proposed Project would result in significant and unavoidable impacts related to neighborhood traffic effects and transportation (refer to Section 3.11, *Neighborhood Effects* and Section 3.13, *Transportation*). Additionally, the proposed Project would result in significant and unavoidable impacts related to offsite groundborne vibration that could affect the adjacent Gussie Moran House, which is a City-designated Landmark (refer to Section 3.4, *Cultural Resources* and Section 3.12, *Noise*).

Cultural Resources

As described in Section 3.4, *Cultural Resources*, the Gussie Moran House, located at 1323 Ocean Avenue, immediately north of the Project site is a City-designated Landmark as it helps illustrate the historic context of Ocean Avenue. Construction activities along the northern boundary of the Project site would exceed the California Department of Transportation (Caltrans) vibration damage potential threshold criteria for "Fragile" and "Fragile Historic" buildings. Therefore, these construction activities could result in structural damage to the building – particularly the decorative shingles, steeple, tower, and chimney. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the off-site property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

Neighborhood Effects

As described further in Section 3.11, *Neighborhood Effects* and Section 3.13, *Transportation* based on the City's *Traffic Study Guidelines* and the City's currently adopted significance criteria for intersection LOS, the proposed Project would result in significant and unavoidable intersection impacts at four study intersections under the Approval Year (2020) and six study intersection during the Future Year (2025). As described in Section 3.13, *Transportation*, there are no feasible mitigation measures to avoid or reduce the impacts at any of these intersections. Therefore, based on the City's previously adopted LOS significance thresholds, neighborhood effects related to intersection operations would remain *significant and unavoidable*.

Noise

As described in Section 3.12, *Noise* onsite vibration impacts would be reduced to less than significant through the implementation of MM NOI-2. However, construction activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold criteria for "Fragile" and "Fragile Historic" buildings. Therefore, these construction activities could result in structural damage to the Gussie Moran House – particularly the decorative shingles, steeple, tower, and chimney. MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the

consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

Transportation

As described further in Section 3.13, *Transportation*, operation of the proposed Project would generate up to an estimated 146 net new AM peak hour trips, 146 net new PM peak hour trips, and 168 net new weekend midday peak hour trips. Based on the City's previously adopted significance criteria of LOS, the addition of these Project-generated trips would result in *significant and unavoidable* impacts at the following four study intersections under the Approval Year (2020) traffic conditions:

- Study Intersection No. 1: Palisades Beach Road (PCH) & California Incline (weekend midday hour);
- Study Intersection No. 2: Ocean Avenue & California Avenue (PM and weekend midday peak hours);
- Study Intersection No. 11: 2nd Street & Wilshire Boulevard (PM and weekend midday peak hours); and
- Study Intersection No. 16: Main Street & Olympic Drive (AM and weekend midday peak hours).

In addition, the proposed Project would result in *significant and unavoidable* impacts at the following six study intersections under the Future Year (2025) traffic conditions:

- Study Intersection No. 1: Palisades Beach Road (PCH) & the California Incline (AM peak hour);
- Study Intersection No. 2: Ocean Avenue & California Avenue (all peak hours);
- Study Intersection No. 12: 2nd Street & Arizona Avenue (weekend midday peak hour);
- Study Intersection No. 13: 2nd Street & Santa Monica Boulevard (PM and weekend midday peak hours);
- Study Intersection No. 16: Main Street & Olympic Drive (AM and weekend midday peak hours); and
- Study Intersection No. 19: 4th Street & Santa Monica Boulevard (all peak hours)

As described in Section 3.13, *Transportation*, there are no feasible mitigation measures to avoid or reduce the impacts at any of these intersections. Potential mitigations (e.g., re-timing signals, removing on-street parking, removing bicycle lanes, etc.) would be inconsistent with the policies of the City's LUCE and DCP, which are intended to encourage multi-modal transportation. Such

mitigations would also be inconsistent with the intent of SB 743. Therefore, the proposed Project would result in a *significant and unavoidable* impacts to transportation.

## 5.4 ALTERNATIVES CONSIDERED BUT DISCARDED

As previously described, CEQA Guidelines Section 15126.6(c) requires that an EIR disclose alternatives that were considered and discarded and provide a brief explanation as to why such alternatives were not fully analyzed in the EIR. As required by the CEQA Guidelines, the selection of alternatives for the proposed Project included a screening process to determine which alternatives could avoid or reduce significant effects and also feasibly meet the Project objectives. Because of the *significant and unavoidable* impacts to transportation, these screening criteria were particularly important for determining the feasibility of alternatives. The following alternatives were considered but eliminated from further analysis by the City due to infeasibility or inconsistency with primary Project objectives.

Maximum 84-Foot Building Height Alternative (Same Floor Area Ratio [FAR])

This alternative would include a reduced height of 84 feet for the hotel and mixed-use residential project with ground floor commercial uses. However, to accommodate all the hotel guestrooms, residential units, and commercial uses described for the proposed Project, this alternative would have the same total floor area (above and below grade) of 316,750 and 2.95 FAR as the proposed Project.

Although exact design specifications for such an alternative are not available, developing an alternative with the same total floor area and FAR within an 84-foot height limit would require major redesign that would result in spreading out the mass of the development across the Project site. The reduction in the height of the proposed Hotel Building from 130 feet under the proposed Project to 84 feet under this alternative would result in an eight-story tower (i.e., a loss of 4 stories and 55 guestrooms as compared to the proposed Project) and would eliminate the publicly accessible rooftop observation deck described for the proposed Project. Similarly, this alternative would reduce the height of Structure A and Structure C of the 2nd Street Building to 84 feet (originally proposed at 111 feet and 109 feet, respectively). To achieve the same development programs as described for the proposed Project, the height of other proposed buildings (e.g., Santa Monica Boulevard Building, which would be a maximum of 62 feet tall under the proposed Project) would be increased and ground floor open space would be decreased. Such a redesign could require combining hotel and/or residential uses with the Cultural Use Campus, increasing the height of the that proposed addition in the rear of the City-designated Landmarks from 50 to 84 feet. Increasing the height of the Cultural Use Campus to 84 feet would increase the potential

visual contrast of this building with the two relocated City-designated Landmarks and the Gussie Moran House, another City-designated Landmark located adjacent to the north of the Project site. Increases in building bulk and massing along the Ocean Avenue frontage would also eliminate the building height transition that has been incorporated into the proposed Project (e.g., with the taller buildings proposed along 2nd Street).

This alternative was determined not to be feasible because the redesign would result in an overall reduction in ground floor open space and would eliminate the publicly accessible rooftop observation deck. These reductions in publicly accessible open space would not meet the primary Project objective of developing a pedestrian-oriented mixed-use project activated by ground floor commercial and public open space. This alternative would also be less consistent with the City's LUCE and DCP goals and policies to create active pedestrian street frontages in Downtown with ground-floor commercial uses that contribute to a complete neighborhood within Downtown (e.g., DCP Policy LU1.1; refer to Section 3.10, *Land Use and Planning*). Further, the ELS Overlay has been designated in the DCP specifically because the three identified ELS Overlay sites are able to provide significant community benefits, including open space, that would otherwise not be possible for smaller projects (refer to Section 2.3.2, *Downtown Community Plan*). Additionally, the potential increase in height of the Cultural Use Campus may adversely contrast with the two relocated City-designated Landmarks and the Gussie Moran House to the north. As such, this alternative may not meet the requirements of *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, the Historic Preservation Element, and the Landmarks Ordinance. Therefore, this alternative has been discarded from further consideration.

Retention of Existing City-Designated Landmarks with Separate AA Commercial Projects

Under this alternative, the two City-designated Landmarks at 1333 Ocean Avenue (4,875 sf) and 1337 Ocean Avenue (4,075 sf) would be retained in their current location, all other existing development onsite would be demolished, and three separate Administrative Approval (AA) commercial projects – each approximately 30,000 sf in size covering 41 percent of the developable Project site – would be constructed. The first AA development would involve the demolition of the rear structures connected to the City-designated Landmarks at 1333 and 1337 Ocean Avenue and would include the construction of a 9,999-sf commercial building in the rear of the two landmarks. The second AA development would include the demolition of the existing building at 1327 Ocean Avenue and the construction of a second 9,999 sf commercial building. The third AA development would include the construction two 9,999 sf commercial buildings on the existing surface parking lots located on 101 Santa Monica Boulevard and 129 Santa Monica Boulevard. The threshold for a Administrative Approval development project in the Downtown is 10,000 sf

or less, per DCP Section 9.10.050. This alternative would entail substantially less development and as a by-right Administrative Approval project, would result in a streamlined and expedited entitlement process.

This alternative was determined not to be feasible because it would not meet primary Project objectives of developing a mixed-use project with a hotel, ground floor commercial uses, and upper floor residential uses. This alternative would not include a lodging/hotel component, which is a key Coastal Act priority identified in the City's Local Coastal Plan (LCP) Land Use Plan (LUP) and encouraged by DCP policies (e.g., DCP Policy LU3.2, refer to Section 3.10, *Land Use and Planning*). Additionally, it would not provide a Cultural Use Campus or public open space, which is also encouraged in the DCP (e.g., DCP Policy CCP7.1; refer to Section 3.10, *Land Use and Planning*). As previously described, the ELS Overlay has been designated in the DCP specifically because these sites were selected to provide significant community benefits, including affordable housing, open space, and cultural institutions that would otherwise not be possible for smaller projects. Therefore, this alternative has been discarded from further consideration.

No Hotel Alternative

Under the No Hotel Alternative, the lodging/hotel component of the proposed Project would be eliminated. This alternative would redesign and repurpose the 12-story, 130-foot tall hotel tower as a mixed-use commercial and residential building, using the same (or similar) configuration as the proposed Project. This alternative would include three mixed-use buildings, one of which would be 12 stories, that would offer ground floor restaurant and retail uses and increased square footage for upper floor residential uses with 200 units. Although this alternative would increase housing, this alternative would not provide a major visitor-serving use (i.e., overnight visitor accommodations) in the Coastal Zone, which is a key California Coastal Act priority identified in the City's LCP LUP and one of the primary Project objectives. As previously described, DCP policies (e.g., DCP Policy LU3.2, which encourages a range of accommodation types and affordability levels to provide overnight visitor accommodations to the broadest spectrum of visitors). Further, this alternative would not provide an estimated hotel room tax revenue to the City which would help offset increased costs of City services to support new development in the Downtown. As compared to the proposed Project, this alternative would also lack the broad mix of uses envisioned in the DCP for ESL Overlay sites – including ancillary hotel uses like meeting and banquet space. Therefore, this alternative has been discarded from further consideration.

Alternative Site within Downtown

Alternate sites within the Downtown were considered for development of the proposed Project; but there are no other 1.89-acre sites in the Downtown that have similar attributes to the Project site. Such sites would need to be large enough to accommodate the proposed mixed-use development (1.89 acres or greater), be undeveloped or underdeveloped (e.g., one- and two-story structures, surface parking lots, etc.), and be within walking distance of the Downtown Santa Monica Station and other transit, bicycle, and pedestrian facilities. Very few sites within the Downtown are large enough to accommodate the proposed mixed-use development and are not included with the ELS Overlay identified in the DCP.

The proposed Project includes 1.89 acres and is identified as one of three ELS Overlay sites. The other two ELS Overlay sites are undergoing separate entitlement processes and, therefore, it would not be feasible to relocate the proposed Project to an alternative ELS Overlay site. The other two ELS Overlay sites – 4th/5th and Arizona and Miramar Hotel – already have proposals for development. A Draft EIR was released for The Plaza at Santa Monica Project in December 2018 and a Draft EIR was released for the Miramar Hotel in February 2020. As such, planning and environmental impact analysis pursuant to CEQA is already underway. No onsite historic structures are located on the 4th/5th and Colorado ELS Overlay site; however, based on the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria using LOS, the addition of Project-generated vehicle trips at an alternative location would still likely result in *significant and unavoidable* impacts to intersection operations, due to the number of trips associated with the proposed uses. Therefore, alternative sites within the Downtown were determined not to be feasible and this alternative was eliminated from further consideration.

Alternative Site Outside of Downtown

Locations outside of Downtown were also considered as an alternative for the proposed Project. Such sites would need to be large enough to accommodate the same total floor area. This alternative site would also need to be undeveloped or underutilized (e.g., less than maximum FAR potential, surface parking lots, etc.), and within walking distance of a Metro E (Expo) LRT line station, as well as other transit, bicycle, and pedestrian facilities to ensure comparable or lessened transportation impacts. Potential locations that were evaluated as alternative sites outside of Downtown included the property at 17th Street & Santa Monica College Station and the property at 26th Street & Bergamot Station. At each of these potential sites, the proposed mixed-use development would need to conform to existing land use designation and the most recent Zoning Ordinance Update, which would likely be infeasible due to the proposed total floor area and FAR.

For example, the 26th Street and Bergamot Station site is designated as Bergamot Transit Village (BTV) with a maximum height of 75 feet and a maximum 2.5 FAR. Further, the Applicant does not control or have real estate interests in any suitable sites outside of Downtown. Because of these factors, alternative sites located outside of the Downtown were eliminated from further consideration.

Revised Circulation and Pedestrian Access Alternative

Under the Revised Circulation and Pedestrian Access Alternative, the City would not vacate 1st Court. Under this alternative, 1st Court would not be re-routed to provide vehicle exit from the subterranean parking garage onto 2nd Street. Instead, vehicle and informal bicycle and pedestrian access through the site would be maintained from Arizona Avenue to Santa Monica Boulevard. The area originally proposed for the re-routed alleyway would be developed as an additional pedestrian-only paseo. This would require a substantial re-design of the vehicle circulation scheme for the proposed Project and could require either: (1) maintaining one-way circulation along 1st Court; or (2) converting 1st Court into a two-way vehicle entrance/exit onto either Arizona Avenue or Santa Monica Boulevard. The Project site would be developed as two parcels separated by 1st Court, with the Second Street Building and Santa Monica Boulevard Building connected by a pedestrian bridge(s) on the upper stories. The conversion of 1st Court into a two-way vehicle entrance/exit may require reduced building footprints that would affect the area of ground floor open space, total floor area, and FAR. Further, maintaining one-way circulation or two-way circulation through the Project site would result in safety conflicts between vehicles and pedestrians within the adjacent courtyards and pedestrian paseos. Either of these scenarios would carry additional vehicle trips, including potential truck trips, through the Project site. Given the Project objectives to prioritize the pedestrian experience within and adjacent to the Project site and the DCP's goal to maintain and enhance a pedestrian-oriented environment, maintaining vehicle through movements for vehicles across this ELS Overlay would not achieve preferred community benefits to the same extent as the proposed Project (e.g., publicly accessible open space). Because of these factors, this alternative was eliminated from further consideration.

No Residential Alternative

This alternative would eliminate the 100 residential units included in the proposed Project (including deed-restricted affordable units, replacement rent-controlled units, and market rate units). Instead, the proposed Project would be redesigned to include additional hotel, restaurant, and retail uses. Increased public open space or pedestrian-oriented paseos could also be included. The elimination of residential uses would not meet the housing-related planning principles

included in the City's Housing Element or the DCP. Further, it would not meet the policy objectives and preferred community benefits (e.g., affordable housing) established in the DCP. Because this alternative would raise substantial conflicts with the City's adopted goals and policies for housing as well as Project objectives, it has been eliminated from further consideration.

Alternative Mix of Uses (Office/Office Space)

This alternative would convert all or a portion of the proposed hotel and/or residential uses to commercial office space. Increased commercial office space may increase jobs and economic activity in the Downtown but would not meet the DCP's preferred community benefits to the same extent as the proposed Project. For example, while this alternative would continue to meet cultural institution and historic preservation goals, it would not provide affordable housing to meet local and regional housing needs. Further, the ELS Overlay is intended to support a much broader mix of land use types under the DCP. Therefore, this alternative has been discarded from further consideration.

## 5.5 ALTERNATIVES ANALYSIS

This section discusses alternatives to the proposed Project, including the No Project Alternative, in compliance with CEQA Guidelines Section 15126.6(e). Each of these considers the ability of a particular alternative to substantially reduce or eliminate the significant environmental impacts associated with the proposed Project (refer to Section 5.3, *Summary of Potentially Significant and Unavoidable Impacts*), while still meeting the primary Project objectives. These alternatives include:

- Alternative 1 – No Project Alternative
- Alternative 2 – DCP Tier II Mixed-Use Housing Projects Compliant with Ocean Transition (OT) and Bayside Conservation (BC) Districts
- Alternative 3 – Maximum 84-Foot Building Height (Reduced FAR/Development)
- Alternative 4 – Retention of Existing City-Designated Landmarks and 101 Santa Monica Boulevard
- Alternative 5 – Revised Circulation

### 5.5.1 Alternative 1 – No Project Alternative

Per CEQA Guidelines Section 15126.6(e)(2), the No Project Alternative analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published (December 21, 2018) and compare impacts of the No Project Alternative to those of the proposed Project. Under the No Project Alternative, the existing one- to three-story commercial buildings with the associated

surface parking lots would remain. The existing buildings would continue to operate with 19 residential units, 14,005 sf of commercial office uses, 4,875 sf of medical office uses, 725 sf of medical spa, 1,175-sf of salon, 690 sf of storage, and 11,100 sf of restaurant uses with 1,290 sf of outdoor dining patios (refer to Section 2.2.2, *Existing Project Site*). Additionally, the two surface parking lots located at 101 Santa Monica Boulevard (47 spaces) and at 129 Santa Monica Boulevard (93 spaces) would continue to be operated in support of these existing uses. Vehicle ingress to the 101 Santa Monica Boulevard surface parking lot would continue to be provided via a curb cut on Ocean Avenue. Vehicle ingress to the 129 Santa Monica Boulevard surface parking lot would continue to be provided by a curb cut along Santa Monica Boulevard.

Under the No Project Alternative, there would be no construction activities at the Project site that would result in temporary impacts to aesthetics (e.g., construction fencing, scaffolding, etc.). Further, there would be no construction-related increases in criteria pollutant or greenhouse gas (GHG) emissions or temporary changes in the ambient noise environment within the immediate vicinity of the Project site. Since there would be no excavation, trenching, or grading associated with the No Project Alternative, there would also be no potential for impacts related to erosion, buried archaeological resources, exposure of potential existing soil contaminants, or temporary increases in the use of petroleum, oils, and lubricants associated with heavy construction equipment.

The No Project Alternative would not result in any long-term impacts associated with the redevelopment of the Project site. For example, there would be no changes to visual character, view corridors, light and glare, or shade/shadows associated with the proposed Project. Additionally, the No Project Alternative would preserve in place the two City-designated Landmarks located at 1333 Ocean Avenue and 1337 Ocean Avenue and would avoid any potential impacts associated with building relocation and construction.

No increases in vehicle trips would occur as no new land uses would be developed on the Project site. There would also be no measurable change in VMT associated with the operation of the uses on site. Therefore, the significant and unavoidable impacts related to traffic congestion at Downtown intersections – including four intersections during the Approval Year (2020) and six intersections during the Future Year (2025) – would be avoided. Further, the No Project Alternative would not generate population growth or an increase in demand for public services or utilities and associated increases in criteria pollutant and GHG emissions.

Regarding land use and planning, the No Project Alternative would not achieve the goals of the LUCE and the DCP to maximize and broaden the mix of uses Downtown, to increase housing

opportunities, to provide local and visitor-serving uses within the transit-rich Downtown District, and to enhance the public realm and street life. Also, the No Project Alternative would not provide increased housing and overnight visitor accommodations in proximity to mass transit within the City or contribute to a development pattern that supports reduced VMT per capita, both called for by the SCAG's 2016-2040 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) and the LUCE. As described in Section 2.3.1, *Land Use and Circulation Element*, the Project site is specifically identified in the LUCE as a site on which to focus new investment given its accessibility to transit and ability to accommodate mixed-use development, contribute to the pedestrian-oriented environment, and support substantial community benefits (LUCE Policy D1.5). As described in Section 2.3.2, *Downtown Community Plan*, the Project site is one of three sites identified in the DCP with an ELS Overlay. The No Project Alternative would not require a Development Agreement and would not achieve any of the potential significant community benefits identified for the Project site in the DCP, including affordable housing, publicly accessible open space, and cultural uses. Further, as described in Section 2.3.3, *Local Coastal Program*, the Project site is located in 2018 LUP's Subarea 5 (Downtown). The LUP provides that the purpose of Subarea 5 is *"to maintain a thriving, culturally-rich, mixed-use environment that is the heart of the City and its economic engine."* The LUP indicates that *"overnight visitor accommodations and related support facilities such as shops, restaurants and cultural uses that serve visitors and the local community alike shall be priority uses"* along the east side of Ocean Avenue between Colorado Avenue and California Avenue, which includes the Project site (Policy 199). The No Project Alternative would not include a hotel and, therefore, would not achieve these City land use and coastal priority uses.

Achievement of Project Objectives

Alternative 1 would not attain any of the Project objectives. By leaving the site as is, the No Project Alternative would not implement LUCE and DCP goals of providing a mixed-use redevelopment project in the Downtown with a variety of visitor-serving, residential, and pedestrian-oriented ground floor uses, open space, and community benefits. (Project Objectives 1). This alternative would not meet the Project objectives related to the provision of overnight visitor accommodations which are encouraged in the DCP and Coastal Act (Project Objectives 1, 2, 4, 12, 13). The No Project Alternative would retain the existing Landmarks but would not adaptively reuse and restore these Landmarks, and therefore, would partially meet the objective to preserve historic resources (Project Objective 3). Additionally, as there would be no Cultural Use Campus, this alternative would not meet the objectives related to cultural institutions envisioned for the Project site and the Downtown (Project Objectives 1, 4, 8, 14). Without the development of new residential units, this

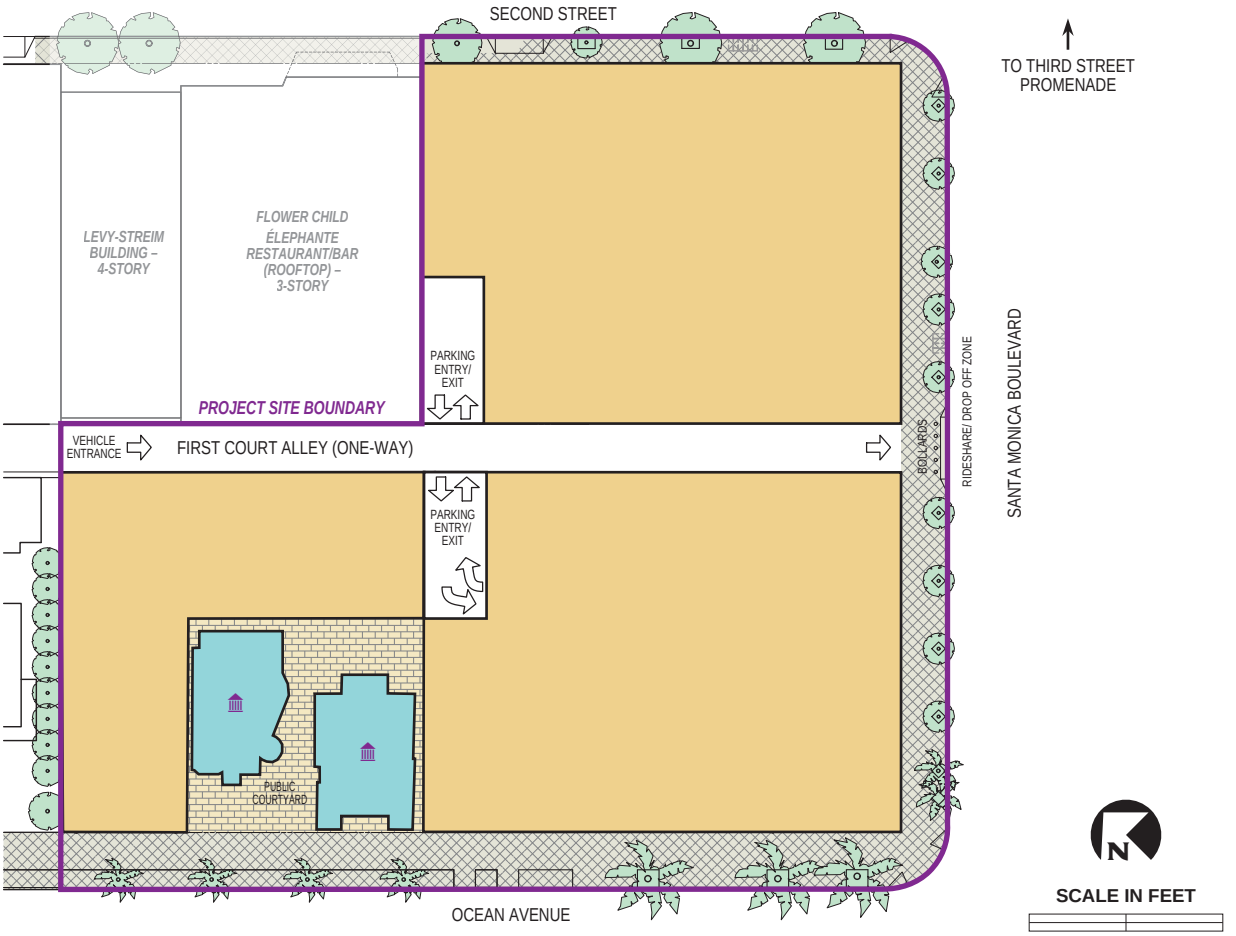
alternative would not be consistent with the City's Housing Element, LUCE, and DCP goals and policies and would not meet the current and future housing demand in the City, including the demand for affordable housing (Project Objective 5). Since the existing site would remain in its existing conditions, the No Project Alternative would not achieve the iconic architectural and urban design as encouraged in the DCP (Project Objective 6). Creating pedestrian orientation would also not be achieved (Project Objective 7). Without the development of new mix of uses, this alternative would not support the use of public transit and promote overall reductions in Citywide VMT and associated GHG emissions (Project Objective 9). The No Project Alternative would also not meet the project objective to remove surface parking (Project Objective 10). Additionally, objectives to develop an economically viable project (Project Objective 12), provide fiscal and economic benefits to the City (Project Objective 13), and provide significant community benefits (Project Objective 14) not be achieved. Overall, the No Project Alternative would not meet any Project objectives.

### 5.5.2 Alternative 2 – DCP Tier II Mixed-Use Housing Projects Compliant with Ocean Transition (OT) and Bayside Conservation (BC) Districts

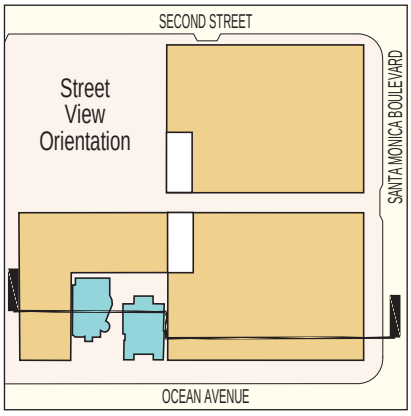
Alternative 2 assumes that the proposed Project would not be developed and instead, the parcels within the Project site would be sold and independently developed by separate developers. The DCP Tier II Mixed-Use Housing Projects Compliant with OT and BC Districts Alternative (Alternative 2) would develop three individual mixed-use housing projects with ground floor commercial uses and upper floor residential uses, consistent with the DCP's Tier II development standards for the OT and BC Districts (DCP Section 9.10.060). The DCP allows a Tier 2 maximum of 50 feet, 2.75 FAR for the OT District (i.e., the portion of the Project site located to the west of 1st Court) and a maximum of 60 feet, 3.5 FAR for the BCD District (i.e., the portion of the Project site located to the east of 1st Court). Consistent with these standards, this alternative assumes that the Project site would be developed independently with three individual Tier II mixed-use housing projects as described below (see also Figure 5-1):

<u>1333 and 1337 Ocean Avenue</u>

Under this alternative, the existing City-designated Landmarks located at 1333 and 1337 Ocean Avenue would be retained in their current locations and the existing uses (i.e., commercial office, salon, and medical office) would not change. The existing two-story commercial building located at 1327 Ocean Avenue at the corner of Santa Monica Boulevard and Ocean Avenue and the rear



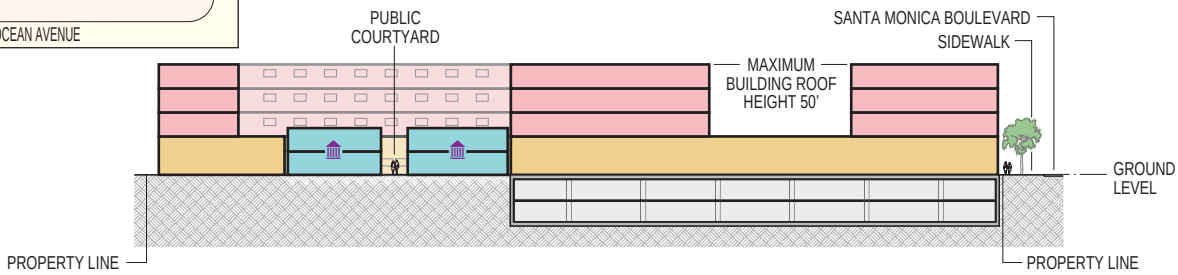

**Ground Floor Site Plan – Alternative 2**




**LEGEND**

- Rental Housing
- Retail and Restaurant
- Commercial/Medical Office and Salon
- Ground Floor Open Space – Courtyards and Paseos (Pedestrian Only)
- Parking
- Landmark Building
- Vehicle Circulation

*Note:* All three new commercial buildings would be a maximum of four stories (50 feet).




**Conceptual Cross-Section from Ocean Avenue – Alternative 2**

wood.

**Conceptual Overview – Alternative 2**

**FIGURE 5-1**

structures east of the historic landmarks at 1333 and 1337 Ocean Avenue, which are not City-designated Landmarks, would be demolished. Within the general footprint of the demolished buildings, a new 47,237-sf "L"-shaped mixed-use building would be constructed around the existing City-designated Landmarks (see Figure 5-1). This new four-story mixed-use building would support approximately 12,957 sf of restaurant and retail uses on the ground floor and approximately 34,280 sf of residential uses (34 units) on Floors 2 through 4. At the podium level of this building, an open-air private courtyard would face south towards the City-designated Landmarks and surrounding courtyard (see Figure 5-1). The total FAR for the mixed-use housing project on Ocean Avenue (including the existing City-designated Landmarks) would be 2.51. The full Tier II 2.75 FAR would not be achieved due to the location of the existing City-designated Landmarks and requirements to: (1) not build above the City-designated Landmarks; and (2) provide necessary separation between the City-designated Landmarks and the residential portions of the new building. No parking would be provided beneath the mixed-use building due to the retention of the existing City-designated Landmarks in their current locations (see Figure 5-1). (The DCP does not require new development to provide onsite parking [DCP Chapter 9.28].)

101 Santa Monica Boulevard

At 101 Santa Monica Boulevard, the existing two-story, 23,670-sf building and associated 47-space surface parking lot would be demolished and replaced with a new four-story Tier II mixed-use housing and retail project with an associated subterranean parking garage. The new mixed-use building would have a 2.75 FAR consistent with the DCP's OT District development standards. The ground floor would support 28,440 sf of commercial uses, including restaurant, retail, and potentially a gym. Floors 2 through 4 of the building would provide 54,060 sf of residential uses (55 units), including 19 rent-controlled apartment units to replace the existing rent-controlled units currently located at 101 Santa Monica Boulevard and 11 deed-restricted affordable units. The building would also feature a 7,570-sf open-air private courtyard in the center of the structure at the podium level (see Figure 5-1). A two-level subterranean parking garage beneath the mixed-use building would provide 126 parking spaces with access via 1st Court (see Figure 5-1).

129 Santa Monica Boulevard

At 129 Santa Monica Boulevard, Alternative 2 would require demolition of the existing 96-space surface parking lot and development of a four-story, 88,310-sf mixed-use building with commercial uses on the ground floor and residential uses on Floors 2 through 4. This building would be consistent with the DCP's Tier II BC development standards (i.e., 60 feet maximum

height and 3.5 FAR) with a 2.94 FAR and 50 feet in height.[1] (The DCP's Tier II maximum height of 60 feet is not being analyzed for this alternative because at this height the DCP would require 25-percent deed-restricted affordable housing, which has not yet been constructed in the Downtown.) The mixed-use building would include 59,870 sf of residential uses (61 units). In addition to 28,440 sf restaurant and retail uses, the ground floor would also include residential uses such as a lobby, mailroom, and other common areas (e.g., laundry room). The building would also feature a 7,560-sf open-air private courtyard in the center of the structure at the podium level (see Figure 5-1). Below the mixed-use building, a two-level subterranean parking garage (separate from the subterranean garage below 101 Santa Monica Boulevard) would provide 129 parking spaces, with access via 1st Court (see Figure 5-1).

Under Alternative 2, 1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access – including emergency access – from Arizona Avenue to Santa Monica Boulevard.

The architectural styling and ground floor frontages of the three projects for Alternative 2 would be designed to accommodate active commercial uses and pedestrian amenities as described for the proposed Project. The landscaping for this alternative would also be similar to that described for the proposed Project.

Although the three sites would be developed separately, the totality of the development at all three sites are analyzed in comparison with the proposed Project for EIR purposes. In total, Alternative 2 would reduce the overall height and total floor area of new development relative to the proposed Project as detailed below.

Alternative 2 would consist of three individual four-story mixed-use housing projects totaling 227,347 sf with 69,837 sf of ground floor restaurant and retail uses and 148,210 sf of upper floor residential uses. Alternative 2 would include a total of 150 residential units with a mix of 14 studios, 82 one-bedroom, 35 two-bedroom, and 19 three-bedroom units (see Table 5-2). This alternative would result in an approximately 50 percent increase (50 units) in residential units from 100 units under the proposed Project. This alternative would also increase restaurant and retail floor area by approximately 93 percent (33,727 sf) from 36,110 sf under the proposed Project, and would eliminate the hotel and Cultural Use Campus.

[1] Based on preliminary massing studies, a courtyard building with a 2.94 FAR (rather than the Tier II maximum 3.5 FAR) is attainable for a 50-foot project on this site. The 2.94 FAR results from the combination of the 50-foot height limit, the need to provide light and air for residential units, and the minimum courtyard width dimensions in the DCP.

**Table 5-1. Summary of Alternative 2 – DCP Tier II Mixed-Use Housing Projects Compliant with OT and BC District**

| Alternative 2 | | |
|---|---|---|
| **Use** | **Units** | **Above Ground Floor Area (sf)** |
| *1333 and 1337 Ocean Avenue* | | |
| Retail/Restaurant | - | 12,957 |
| Residential | 34 | 34,280 |
| Existing Commercial Office to Remain | - | 4,075 |
| Existing Medical Office to Remain | - | 4,875 |
| Existing Salon to Remain | - | 350 |
| *101 Santa Monica Boulevard* | | |
| Retail/Restaurant | - | 28,440 |
| Residential | 55 | 54,060 |
| *129 Santa Monica Boulevard* | | |
| Retail/Restaurant | - | 28,440 |
| Residential | 61 | 59,870 |
| **Total of All Sites** | | |
| Residential | 150 residential units | 148,210 |
| Restaurant/Retail | - | 69,837 |
| Existing Commercial Office | - | 4,075 |
| Existing Medical Office | - | 4,875 |
| Existing Salon | - | 350 |
| Open Space (Ground and Podium Level) | - | 21,070 |
| Subterranean Parking Spaces | 255 parking spaces (two subterranean parking garages / two subterranean levels) | - |
| **Floor Area** | **-** | **227,347** |

Under Alternative 2, there would be an approximately 94 percent decrease (19,850 sf) in open space from 40,920 sf under the proposed Project due to the reduction in building heights and the associated increase in building footprints. Additionally, under this alternative, there would be two separate subterranean parking garages located at 129 Santa Monica Boulevard (129 spaces) and 101 Santa Monica Boulevard (129 spaces). As such, the number of parking spaces would be reduced from 285 spaces under the proposed Project to 255 spaces under Alternative 2.

**Table 5-2. Summary of Alternative 2 Residential Unit Mix**

| Unit Type | Total Units | Replacement Rent-Controlled Units | Deed-Restricted Affordable Units | Market-Rate Units |
|---|---|---|---|---|
| Studio | 14 | 12 | 2 | - |
| One-Bedroom | 82 | 7 | 11 | 64 |
| Two-Bedroom | 35 | - | 11 | 24 |
| Three-Bedroom | 19 | - | 3 | 16 |
| **Total** | **150** | **19** | **27** | **104** |

In comparison with the proposed Project, there would be 50 more residential units, no hotel, no Cultural Use Campus, no publicly accessible observation deck, and substantially less publicly accessible open space.

Tier II housing projects with a total floor area greater than 75,000 sf require a Development Review Permit (DCP Section 9.10.050). Therefore, each of the three individual projects under Alternative 2 would require a Development Review Permit. Presumably the three mixed-use projects would each be developed separately, with its own construction schedule – though overlapping construction could occur.

Aesthetics and Shade/Shadow Effects

The Project site is located in the Downtown, which is considered a Transit Priority Area (TPA) due to its accessibility to high quality transit service provided by Metro and Big Blue Bus (SCAG 2016; City of Santa Monica 2017). Therefore, potential changes to aesthetics and visual resources under this alternative are considered less than significant. Nevertheless, aesthetic effects are disclosed for informational purposes, but are not considered as significant impacts to the environment pursuant to CEQA Guidelines Section 21099.

*Would the project have a substantial effect on a scenic vista?*

*Would the project have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally designated scenic corridor?*

Construction Effects

Under Alternative 2, with the exception of the two City-designated Landmarks, the existing buildings and associated surface parking lots on the Project site would be demolished and replaced with three individual mixed-use buildings. Views of the Project site would include construction fencing, construction staging areas and construction equipment onsite, demolition debris,

excavation for the subterranean parking garage, and scaffolding and new construction. Similar to the proposed Project, this alternative would adhere to all standard City construction practices during construction (e.g., fencing, lighting, etc.) to shield construction activities from public view to the maximum extent practicable.

Operation Effects

Relative to the proposed Project, this alternative would substantially reduce the overall amount and height of development. This alternative's three Tier II projects in the OT and BC Districts would be developed to a maximum height of 50 feet and 60 feet, respectively. A conceptual layout of Alternative 2 is shown in Figure 5-1 for illustrative purposes for this EIR. Alternative 2 would adhere to all development and design standards (e.g., building frontage standards) for increased building setbacks and maximum access to light and air.

Similar to the proposed Project's effects as described under Impact VIS-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, the proposed development under Alternative 2 would also be visible along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. While the proposed four-story buildings would be only marginally taller than the existing two- to three-story commercial buildings currently located onsite, the size, bulk and scale of these potential structures would be larger than existing buildings. Under Alternative 2, each of the proposed buildings would reach a maximum height of four stories. While larger than existing onsite structures, the buildings would be substantially smaller than the existing nearby high-rise development located along Ocean Avenue, including the 300-foot-tall 100 Wilshire Office Building, 180-foot-tall Pacific Plaza Apartments, and other high-rise development (refer to Table 3.1-1 in Section 3.1, *Aesthetics and Shade/Shadow*). Although less visible than the proposed Project, the proposed development under Alternative 2 would also be visible from Ocean Avenue, which is a City-designated scenic corridor as established in the City's General Plan Scenic Corridors Element (1975). Similar to the proposed Project, this alternative would not adversely affect scenic vistas or scenic resources within a locally designated scenic corridor as development permitted this alternative would be generally consistent with surrounding uses. However, unlike the proposed Project, this alternative would not include a rooftop observation deck and therefore would not create a new publicly available scenic vista with views of Santa Monica Bay, Santa Monica Pier, and Downtown, as well as distant views of the Santa Monica Mountains.

*If the project is located in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

As described for the proposed Project under Impact VIS-3 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, Alternative 2 would also be consistent with regulations that govern scenic quality, including the development standards and policies of the LUCE, DCP, and SMMC. Alternative 2 would not conflict with the LUCE but would not achieve certain LUCE goals and policies to the same extent as the Project. Alternative 2 would be designed to be compatible with adjacent uses (Goal LU15), be context sensitive (Policy LU15.3), provide step backs and articulation (Policies LU15.11, LU15.8, D8.5), provide pedestrian scale active retail space adjacent to sidewalk (Policies D8.1 and D9.4), and remove open surface parking (Policy D9.3). Further, the reduced height under this alternative would also achieve greater consistency with policies LU15.1 and LU16.1, which encourage consideration of size and bulk, potential shade, and shadow effects of proposed development on adjacent residential or habitable structures. However, because the 50-foot and 60 foot height limits would result in larger building footprints and less ground floor open space, Alternative 2 would not provide the same level of building roofline variation (Policy LU15.10), varied building heights and architectural elements (Policy B1.5 and D8.3, D8.4), public plaza and lively streetscape (Policy B2.2), open space (Goal LU17 and Policy LU17.1), preservation or opening of views into the Project site or of the Santa Monica Bay as under the Project (Policy D10.2).

Alternative 2 would be consistent with the Tier II height limitations and FAR established for the Project site under the DCP, and would be reduced in scale and height as compared to the proposed Project. Similar to the Project, Alternative 2 would be expected to meet the design guidelines of the DCP to maximize architectural integrity, create human scaled buildings, create visual interest and variety in building design, animate building frontages, create safe and active streetscape, and create enjoyable open space. As with the proposed Project, development under this alternative would be subject to discretionary review by the Planning Commission and architectural design review by the City, which would ensure that height and massing would not detract from or conflict with the visual character within the immediate vicinity of the Project site.

*Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

Similar to the Project, development of this alternative would create new sources of light and glare that could adversely affect nighttime and daytime views in the area (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). These effects would be slightly reduced compared to those described for the proposed Project given the reduction in development and the associated reduction in lighting, glazing (windows), and other reflective materials used in the façade. As with the proposed Project, unless otherwise permitted by the Development Agreement,

new light sources would be shielded and restricted to 0.5-foot candles of light in compliance with the SMMC Section 9.21.080. Building materials would also be required to comply with SMMC Section 9.21.120, which states that reflective materials may not exceed more than 25 percent of the façade surface area and prohibits the use of black or mirrored glass. Therefore, this alternative would not substantially affect offsite light-sensitive receptors, including StepUp on Second, the Luxury Apartments building across 1st Court to the east, the Pacific Plaza Apartments mixed-use building south of the Project site, the Christian Institute of Spiritual Sciences building across 2nd Street to the north, Palisades Park across Ocean Avenue to the west, or the Santa Monica Pier. Because of reduced building heights under Alternative 2, lighting as seen from a distance, may be reduced.

*Would shadow-sensitive uses be shaded by project-related structures?*

Development under Alternative 2 would result in additional shade and shadows that would affect sensitive receptors adjacent to the Project site. However, as compared to the shadow effect described for the proposed Project under Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, the reduction in maximum building height for Alternative 2 would also reduce the footprint and duration of shade and shadow effects on nearby residential uses on 2nd Street, including the Luxury Apartments, Step up on Second, Chelsea Santa Monica, the Mayfair Residences, and the Westside Villas (refer to Table 3.1-2 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). While the mixed-use buildings proposed under Alternative 2 are reduced in height when compared to the proposed Project, the increased bulk of these buildings would permit less natural light through the site.

Air Quality

Alternative 2 consists of the development of three independent Tier II mixed use housing projects. Presumably the three mixed-use projects for Alternative 2 would each be developed separately, with its own construction schedule – though overlapping construction, while unlikely, could occur. For the purposes of this EIR, construction and operational criteria pollutant emissions were estimated and summed for Alternative 2 using the California Emission Estimator Model (CalEEMod) Version 2016.3.2 conservatively assuming concurrent construction of the three development sites. These emissions were compared to the South Coast Air Quality Management District (SCAQMD) significance thresholds and the construction emissions and operational emissions described for the proposed Project under Impact AQ-3 and Impact AQ-4, respectively (see Table 5-8 and Table 5-9).

*Would the project conflict with or obstruct implementation of the applicable air quality plan?*

*Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard?*

*Construction Emissions*

Under Alternative 2, the number of residential units and the retail/restaurant floor area would be increased relative to the proposed Project, while the proposed hotel and Cultural Use Campus would be eliminated. The total floor area for the three developments under Alternative 2 would be approximately 28 percent (89,403 sf) less than the total floor area under the proposed Project. Additionally, only the 101 Santa Monica Boulevard and 129 Santa Monica Boulevard developments would provide proposed subterranean parking with two levels (as compared to three levels under the proposed Project). As such, subterranean excavation would be reduced as the depth of excavation reduced from 35 feet below ground surface (bgs) to 22 feet bgs. This would substantially decrease the duration and extent of construction activities, including excavation, building construction, and architectural finishing. As the scope of construction activities would be substantially reduced as compared to the proposed Project, construction emissions for carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides ($NO_x$), particulate matter ($PM_{10}$ and $PM_{2.5}$), and sulfur dioxide ($SO_x$) would also be reduced. Therefore, as with the proposed Project, emissions from construction activities under Alternative 2 would be below the SCAQMD construction significance thresholds (mass daily) and Localized Significance Thresholds (LSTs). This alternative would reduce construction-related air quality impacts from the proposed Project and impacts would be *less than significant* (see Table 5-9).

*Operational Emissions*

Under Alternative 2, the total number of residential units and retail/restaurant floor area would increase relative to the proposed Project. Even with the elimination of the proposed hotel and Cultural Use Campus, this alternative would generate 35 to 65 percent more vehicle trips relative to the proposed Project due to the substantial increase in residential units and commercial land use (see Table 5-10). As a result, long-term criteria pollutant emissions and impacts to regional air quality would be slightly increased as compared to the proposed Project. However, as shown in Table 5-10, the operational criteria pollutant emissions generated by Alternative 2 – including energy/natural gas demand, landscaping maintenance, and vehicle trips – would remain below the SCAQMD significance thresholds. As with the proposed Project, this alternative would not conflict with the 2016 Air Quality Management Plan (AQMP) as this alternative would not

contribute to population growth in excess of the AQMP's population forecast and impacts would be *less than significant*.

*Would the project expose sensitive receptors to substantial pollutant concentrations?*

Alternative 2 would contribute to cumulative traffic in the area and would increase CO emissions at nearby intersections. As described for the proposed Project in Impact AQ-5 in Section 3.2, *Air Quality*, the most heavily trafficked intersection within the vicinity of the Project site is Palisades Beach Road (PCH) & California Incline, which currently experiences approximately 85,900 vehicle trips per day, or approximately 86 percent of the 100,000 vehicles per day experienced at the Wilshire Boulevard & Veteran Avenue intersection evaluated in the *CO Plan* for the SCAQMD's 2003 *Air Quality Management Plan*. While trip generation would be increased under this alternative from 3,479 vehicle trips per day to 5,063 vehicle trips (Fehr & Peers 2020), these additional vehicle trips would not produce CO hot spots. With the conservative assumption that all 5,063 vehicle trips per day generated by the proposed Project would pass through the Palisades Beach Road (PCH) & California Incline intersection, this intersection would experience approximately 90,963 vehicle trips per day. As a result, CO concentrations would continue to be far less than those estimated in the 2003 AQMP for the most congested intersection in Los Angeles at the Wilshire Boulevard & Veteran Avenue, and would not create a CO hot spot or exceed the California Ambient Air Quality Standard (CAAQS) for CO emissions.

Due to the decrease in the duration and extent of construction activities under Alternative 2, this alternative would not generate significant amounts of toxic air contaminants (TACs). Further, as with the proposed Project, this alternative would not place sensitive receptors within close proximity to significant sources of TACs (i.e., within 500 feet of I-10) (refer to Section 3.2, *Air Quality*). Therefore, similar to the proposed Project, impacts related to TACs would continue to be *less than significant.*

*Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?*

As described for the proposed Project under Impact AQ-6 in Section 3.2, *Air Quality*, this alternative would result in similar temporary, construction-related emissions including odors as those described for the proposed Project; however, the duration of exposure to these odors would be slightly reduced. As described for the proposed Project, operational odors that would be expected from this alternative would be typically associated with food smells (e.g., from the outdoor dining areas) and solid waste (refuse) storage typical of urban uses. All refuse and recycling bins would be covered in designated storage areas and properly maintained to prevent

adverse odors, and proper housekeeping practices would be implemented to promote odor control. These odors would not be a substantially perceptible by nearby sensitive receptors and impacts associated with generation of objectionable odors would be *less than significant*.

Construction Effects

*Would the project result in considerable construction-period impacts due to the scope, or location of construction activities?*

Alternative 2 consists of the development of three independent Tier II mixed use housing projects. Presumably the three mixed-use projects for Alternative 2 would each be developed separately, with its own construction schedule – though overlapping construction could occur.

Similar to the proposed Project, construction activities under Alternative 2 would create potential aesthetic, air quality, noise, and transportation impacts through site disturbance and the generation of temporary construction-related traffic (e.g., heavy haul trucks, construction worker commutes, etc.). Alternative 2 would result in less development than the proposed Project, and thus would generate a reduced level of total construction activities and associated aesthetics effects, air emissions, noise, and construction-related vehicle trips than the Project. Additionally, given that no subterranean parking would be provided beneath the proposed mixed-use building at 1333 and 1337 Ocean Avenue the potential for ground-borne vibration impacts at the Gussie Moran House would be substantially reduced. Nevertheless, given the demolition of the rear structures at 1333 and 1337 Ocean Avenue and construction of the mixed-use building implementation of MM CR-1 and MM NOI-2 would still be required to mitigate potential impacts to City-designated Landmarks. As described for the proposed Project, construction activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold criteria for “Fragile” and “Fragile Historic” buildings. Therefore, these construction activities could result in structural damage to the Gussie Moran House – particularly the decorative shingles, steeple, tower, and chimney. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House.

Cultural Resources

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

Alternative 2 would result in reduced impacts to historic built resources as compared to the proposed Project (refer to Impact CR-1 in Section 3.4, *Cultural Resources*). The Project site contains two City-designated Landmarks located at 1333 Ocean Avenue (i.e., 1906 Queen Anne Landmark) and 1337 Ocean Avenue (i.e., 1926 Spanish Colonial Revival Landmark). While the proposed Project would relocate, rehabilitate, and repurpose the City-designated Landmarks onsite, redevelopment of 1333 and 1337 Ocean Avenue sites under Alternative 2 would retain these buildings at their current locations. As described in Section 3.4, *Cultural Resources*, the existing commercial building at 1327 Ocean Avenue, the rear structures at 1333 and 1337 Ocean Avenue, and the mixed-use building at 101 Santa Monica Boulevard are not considered a historic resource under CEQA. Therefore, removal of these rear structures for Alternative 2 would not result in significant impacts.

Nevertheless, due to the development of multi-story structures in proximity to the on-site City-designated Landmarks the Applicant would be required to follow the applicable measures described in MM CR-1 – particularly those related to compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, the California Historic Building Code, and compatible new construction.

Given that no subterranean parking would be provided beneath the proposed mixed-use building at 1333 and 1337 Ocean Avenue, the potential for ground-borne vibration impacts at the Gussie Moran House would be substantially reduced. Nevertheless, given the demolition of the rear structures at 1333 and 1337 Ocean Avenue and construction of the mixed-use building implementation of MM CR-1 and NOI-2 would still be required to mitigate potential impacts to City-designated Landmarks. As described for the proposed Project, construction activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold criteria for "Fragile" and "Fragile Historic" buildings. Therefore, these construction activities could result in structural damage to the Gussie Moran House – particularly the decorative shingles, steeple, tower, and chimney. MM CR-1 and NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded

that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines?*

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

The potential to encounter previously unknown buried archaeological resources or human remains under this alternative would be slightly reduced relative to the proposed Project as the extent and depth of excavation associated with the subterranean parking garage would be reduced (refer to Impact CR-2 and Impact CR-3, respectively). Nevertheless, DCP MM CR-3a and CR-3b and as well as Project-specific MM CR-2 would continue to be implemented and would require standard protocols for evaluation and recovery in the event of inadvertent discoveries of archaeological resources or human remains. These protocols would ensure that impacts to archaeological resources would remain *less than significant with mitigation*.

Energy

*Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

Due to the decrease in the duration and extent of construction activities under Alternative 2, temporary, construction-related energy impacts would be slightly reduced as compared to the proposed Project (refer to Impact EN-1 in Section 3.5, *Energy*). The total floor area under Alternative 2 would be reduced by approximately 28 percent (89,403 sf) from the total floor area under the proposed Project; however, this alternative would support 50 additional residential units and 93 percent more restaurant and retail space as compared to the proposed Project. As such, with this increase in energy intensive uses, the proposed mixed-use development under Alternative 2 may slightly increase overall operational energy demand, even with the elimination of the hotel and Cultural Use Campus (see the *Greenhouse Gas Emissions* discussion). This alternative would incorporate energy efficiency measures into the design of the buildings and service systems including energy efficient heating, ventilation, and air conditioning (HVAC) systems, operable windows to increase air flow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and water-efficient equipment and plumbing infrastructure, and an onsite PV system in compliance with the City's Green Building Code. As

required by the City's Energy Code, Alternative 2 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code. Therefore, similar to the Project, Alternative 2 would not result in wasteful, inefficient, or unnecessary consumption of energy sources and the impact would be *less than significant*.

*Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As described for the proposed Project in Impact EN-2 in Section 3.5, *Energy*, Alternative 2 would be designed to comply with standard regulations of the City's Energy Code and Green Building Standards Code. As with the proposed Project, the mixed-use development under this alternative would include sustainability features, such as a solar photovoltaic (PV) array. Green building elements would also increase energy efficiency through use of energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use. As discussed for the proposed Project in Section 3.5, *Energy* and Section 3.10, *Land Use and Planning*, both the proposed Project and Alternative 2 would increase urban density in a transit-rich area thereby minimizing vehicle trips consistent with the LUCE, DCP, and Sustainable City Plan. Alternative 2 would be consistent with local, regional, and State goals and policies related to energy efficiency and would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, as with the proposed Project, impacts to energy under Alternative 2 would be *less than significant*.

Geology and Soils

*Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

*i) Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

*ii) Strong seismic ground shaking?*

*iii) Seismic-related ground failure including liquefaction?*

*iv) Landslides?*

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

*Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

*Would the project be located on expansive soil, as defined in Table 18-1-B of the uniform Building Code (1194), creating substantial direct or indirect risks to life or property?*

Impacts related to geology and soils under Alternative 2 would be similar to those described for the proposed Project in Impact GEO-1 and Impact GEO-2 as the existing geology and soil conditions would be the same as those described for the Project site in Section 3.6, *Geology and Soils*. However, impacts related to excavation (e.g., failure of engineered slopes, erosion, etc.) would be slightly reduced as the subterranean parking garages would be limited to 101 Santa Monica Boulevard and 129 Santa Monica Boulevard. No subterranean parking garage would be located on the 1333 and 1337 Ocean Avenue site below the City-designated Landmarks. Additionally, the depth to excavation would be reduced from 35 to 22 feet bgs. Similar to the Project, standard regulatory conditions requiring compliance with the Santa Monica Building Code (SMBC), and the site specific recommendations of final geotechnical reports as required by the City would address geologic hazards under this alternative. Impacts would be similar to the proposed Project and *less than significant*.

*Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

As with the proposed Project, there is a potential for disturbance of paleontological resources on-site and the Applicant would be required to implement DCP MM CR-4a and MM CR-4b, which would require paleontological monitoring during grading and excavation and proper handling of potential paleontological resources if encountered during construction activities. As with the proposed Project, compliance with standard regulatory conditions and required mitigation measures would reduce impacts to *less than significant with mitigation*.

<u>Greenhouse Gas Emissions</u>

*Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

*Would the project be inconsistent with any of the GHG reduction strategies set forth by the City's LUCE, Sustainable City Plan, and Climate Action Plan, AB/SB 32 and SB 375; and the State Attorney General, Office of Planning and Research and Climate Action Team recommendations?*

Alternative 2 consists of the development of three independent Tier II mixed use housing projects. Presumably the three mixed-use projects for Alternative 2 would each be developed separately, with its own construction schedule – though overlapping construction, while unlikely, could occur. Construction and operational GHG emissions were conservatively estimated using CalEEMod Version 2016.3.2 and assuming overlapping construction. The majority of construction-related GHG emissions would occur during site preparation and excavation for the subterranean parking garages. As the duration and extent of construction activities under Alternative 2 would be reduced related to the proposed Project, GHG emissions from construction would also be reduced.

While the total floor area would be reduced under Alternative 2, this alternative would support 50 additional residential units and 93 percent more restaurant and retail space as compared to the proposed Project. As such, this alternative would generate slightly more operational GHG emissions due to the increase in energy use for building operations and the increase in vehicle trip generation. Operational GHG emissions under this alternative are estimated at 3,609 metric tons of carbon dioxide equivalent per year (MT $CO_2e$/year) relative to 3,185 $CO_2e$/year under the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions*). As such, GHG emissions under Alternative 2 would be greater than those described for the proposed Project.

Potential impacts related to conflicts with plans, policies, and regulations related to reduction in GHG emissions would be similar to those identified in Impact GHG-1 and Impact GHG-2 for the proposed Project and would be *less than significant*. As with the proposed Project, this alternative would continue to support the state and local GHG reduction goals and policies as it would focus new development near transit to create sustainable, active pedestrian-friendly development that decreases reliance on vehicles and increases the use of transit, bicycle, and pedestrian facilities. As with the proposed Project, this alternative would represent mixed-use infill redevelopment within the Downtown, which is served by high quality transit, bicycle, and pedestrian facilities. Directing growth to existing transit-rich urbanized areas is an important strategy to reduce GHG emissions, largely due to reduced vehicle use. Alternative 2 would be required to comply with CBC Title 24 (CALGreen), SCAQMD Rule 403, City of Santa Monica Sustainable City Plan, City of Santa Monica Climate Action and Adaptation Plan (CAAP), and other applicable regulations. Thus, similar to the Project, Alternative 2 would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., LUCE, Sustainable City Plan, CAAP, Green Building Ordinance, AB 32, SB 375, etc.) and impacts would be *less than significant*.

Hazards and Hazardous Materials

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

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

As described for the proposed Project under Impact HAZ-1 and Impact HAZ-2, construction of the three projects under Alternative 2 would require site preparation activities, including demolition and excavation activities. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential asbestos-containing materials (ACMs), lead-based paints (LBPs), and mold that could be released during demolition of the existing buildings at 101 Santa Monica Boulevard, 1327 Ocean Avenue, and the rear structures at 1333 and 1337 Ocean Avenue. Due to the reduction in the extent and depth of the subterranean parking garages (i.e., no new parking garage under 1333 and 1337 Ocean Avenue), the potential for exposure to contaminated soils (e.g., associated with a historical onsite dry-cleaning facility, residential uses, and a historical offsite gas station) would be slightly reduced. However, a majority of the Project site would still be excavated and the overall impacts with regard to hazards and hazardous materials under this alternative would be similar to those described for the proposed Project. As such, DCP MM HAZ-2a through -2d, which would require hazardous materials surveys, standard protocols following discovery of contamination, and preparation of a soils management plan, would be required. Compliance with standard regulatory conditions and applicable DCP Program EIR mitigation measures would reduce construction impacts related accidental release of hazardous materials to *less than significant with mitigation*.

As with the proposed Project, Alternative 2 would include retail, restaurant, office, and residential uses, which require the routine use of materials such as those used for household cleaning and maintenance products, pesticides and herbicides, paints, solvents, degreasers, and chemicals associated with swimming pools. These materials would be used in compliance with existing California Environmental Protection Agency (CalEPA) regulations and the Certified Unified Program Agency (CUPA). Through compliance with regulatory measures, operational impacts of the proposed Project and Alternative 2 due to routine use of hazardous materials and accidental release of such materials would be similar and less than significant.

Hydrology and Water Quality

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

*Construction*

As described for the proposed Project under Impact HYD-1 in Section 3.9, *Hydrology and Water Quality*, implementation of the Applicant-prepared Stormwater Pollution Prevention Plan (SWPPP) would be required to address surface water quality impacts from erosion, sedimentation, and polluted runoff during construction activities. Standard regulatory conditions requiring compliance with the Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10) would address impacts to surface water quality and groundwater quality. Similar to the proposed Project, with implementation of these standard regulatory compliance measures, which include a SWPPP with best management practices (BMPs) prepared for each site, short-term construction impacts to surface water quality under Alternative 2 would be *less than significant*.

*Operations*

With regard to operation, implementation of Alternative 2 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., buildings, driveways, pedestrian walkways, etc.). In accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would be incorporated into an Urban Runoff Mitigation Plan to be approved by the City and would be implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 2 to *less than significant*.

*Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Under Alternative 2, development at 101 Santa Monica Boulevard and 129 Santa Monica Boulevard would include the construction of two subterranean parking garages. The depth of excavation would be reduced from a maximum depth of 35 feet bgs under the proposed Project to 22 feet bgs under this alternative. Based on the depth to groundwater at the Project site (between 47 and 62.5 feet bgs), dewatering activities would not be anticipated, and groundwater supplies would not be affected by construction. While not anticipated, if dewatering is required, a

Construction Dewatering General Permit would be obtained in accordance with the Los Angeles Regional Water Quality Control Board's (RWQCB's) Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (refer to Section 3.9, *Hydrology and Water Quality*). Additionally, construction activities associated with Alternative 2 (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal.

As with the proposed Project, implementation of this alternative would incrementally increase demand for groundwater supplies from the Santa Monica Groundwater Basin. However, similar to the proposed Project, this alternative would not substantially deplete groundwater supplies since the City's Sustainable Water Master Plan (SWMP) – which account for development and associated population growth under the LUCE and the DCP – has determined that the City's water supply is adequate to meet City-wide demand through 2040.

With regard to groundwater recharge, existing groundwater recharge is negligible due to the nature of existing developed nature of the Project site (i.e., paved surfaces, building structures, etc.). Therefore, implementation of Alternative 2, which would include the construction of impervious surfaces including new buildings and subterranean parking structures, would not measurably affect groundwater infiltration at the Project site. Additionally, the City Department of Public Works prohibits infiltration of runoff for properties located west of 4$^{th}$ Street ranging from northerly City limits to the north to I-10 freeway to the south, including the Project site. Similar to the Project, impacts on groundwater supplies and groundwater recharge would be *less than significant*.

*Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:*

*i) result in substantial erosion or siltation onsite or offsite;*

*ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or*

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

Site preparation activities, including demolition, excavation, and grading, for Alternative 2 would result in exposure of soils and would cause minor alterations to onsite drainage, including the potential for temporary ponding during storm events (refer to Impact HYD-3 in Section 3.9,

*Hydrology and Water Quality*). However, all stormwater generated during construction would continue to be directed to existing the City storm drain inlets and storm drain lines. During construction of each site, a SWPPP outlining associated BMPs would be implemented in accordance with applicable Los Angles RWQCB and City regulations to provide for temporary stormwater management and maintain the overall existing drainage pattern during construction.

With regard to operation, implementation of Alternative 2 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., buildings, driveways, pedestrian walkways, etc.). Additionally, stormwater runoff would continue to follow the same drainage pathways to the existing storm drain system. Further, in accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would incorporated into an Urban Runoff Mitigation Plan to be approved by the City and implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 2 to *less than significant*.

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described for the proposed Project under Impact HYD-4 in Section 3.9, *Hydrology and Water Quality*, development under Alternative 2 would be implemented in a manner consistent with, and supportive of the SWMP. As with the Project, Alternative 2 would comply with National Pollutant Discharge Elimination System (NPDES) and City requirements, where BMPs would be implemented to address water quality and groundwater issues during both construction and operational activities. This alternative would not adversely affect the ability of the City to meet its goal for water self-sufficiency or maintaining groundwater quality under the SWMP. Therefore, the impact of Alternative 2 on sustainable groundwater management would be *less than significant.*

<u>Land Use and Planning</u>

*Would the project physically divide an established community?*

As described for the proposed Project under Impact LU-1 in Section 3.10, *Land Use and Planning*, Alternative 2 would represent mixed-use infill redevelopment within the Downtown. The continuation of existing retail, restaurant uses would not affect land use patterns. Further, the introduction of residential uses at the three sites would provide infill housing within the Downtown District that would be consistent with the mix of uses in the Project vicinity. Similar to the proposed

Project, the Downtown area would continue to function as it currently does with implementation of this alternative.

Under Alternative 2, 1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access – including emergency access – from Arizona Avenue to Santa Monica Boulevard. Overall, the transportation network in the vicinity of the Project site area would continue to function as it currently does with implementation of this alternative. Implementation of Alternative 2 would not physically divide any established communities within the City. Similar to the Project, impacts would be *less than significant*.

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

As described for the proposed Project under Impact LU-2 in Section 3.10, *Land Use and Planning*, this alternative would be consistent with the goals and policies stated in the 2016-2040 RTP/SCS, LUCE, and DCP. To achieve the GHG reduction targets mandated under SB 375, 2016-2040 RTP/SCS encourages new growth to occur in urban areas with high quality transit and facilities for active transportation (e.g. bicycle and pedestrian facilities). Alternative 2 consists of three individual mixed-use projects in the transit-rich Downtown. Future residents, employees, and visitors would have the opportunity to use the Expo LRT to travel to and from the Downtown, with the Downtown Santa Monica Station located approximately 0.5 miles from the Project site. The Project site is also easily accessed by several Big Blue Bus and Metro transit lines located within 0.25 miles of the Project site.

Under Alternative 2, three independent housing projects with ground-floor retail/restaurant uses would be constructed in compliance with DCP's Tier II development standards for the OT and BC Districts. As compared to the proposed Project, Alternative 2 would have a total reduction of the overall height and total floor area for the entirety of the Project site. This alternative would also be consistent with the overall LUCE and DCP vision of the Downtown District as a mixed-use, vibrant district with opportunities to live, work, and be entertained. Alternative 2 would incorporate pedestrian-scale ground floor restaurant and retail uses and new housing opportunities. These elements are consistent with LUCE and DCP goals and policies for the Downtown, including locating new residential uses near transit corridors, encouraging active ground floor uses, encouraging locally serving uses, and providing a range of housing options. Further, reduced height and total floor area under this alternative would also achieve greater consistency with

policies LU15.1 and LU16.1, which encourage consideration of size and bulk, potential shade, and shadow effects of proposed development on adjacent residential or habitable structures.

However, Alternative 2 would not provide a diverse mix of land uses to the same extent as the proposed Project. The elimination of the Cultural Use Campus, elimination or substantial reduction of pedestrian-oriented paseos, and the reduction of publicly accessible open space would substantially reduce the community benefits provided by the proposed Project and envisioned for the Project site in the DCP (refer to Section 2.3.2, *Downtown Community Plan*). Therefore, Alternative 2 would not meet the policies of the LUCE, DCP, LUP and Open Space Element to foster creativity and the arts through cultural space, to increase accessibility of public open space, and to provide significant community benefits.

Alternative 2 would also not achieve certain objectives of the City's LCP LUP, which states that allowable uses in LUP Subarea 5 (Downtown) include cultural uses and lodging in addition to commercial and residential uses. Policy 199 of the LCP LUP provides that *"overnight visitor accommodations and related support facilities such as shops, restaurants and cultural uses that serve visitors and the local community alike shall be priority uses"* along the east side of Ocean Avenue between Colorado Avenue and California Avenue, which includes the Project site. Unlike the proposed Project, Alternative 2 does not include a lodging/hotel component or the Cultural Use Campus. Therefore, this alternative would only be partially consistent with the LCP LUP's vision for the Downtown.

As described in Section 3.10, *Land Use and Planning*, the Regional Housing Needs Assessment (RHNA), mandated by State Housing Law quantifies the needs for very low income, low income, moderate income, and above moderate income housing within a jurisdiction and identified planning period. The most recent RHNA allocation, the 5$^{th}$ Cycle RHNA Allocation Plan, identifies the City's allocation (2014-2021) for the provision of 1,674 units of which 42 percent would be above moderate rate units, and 58 percent would be affordable/moderate rate units. The City is currently anticipating a large RHNA allocation – an estimated 9,000 units – in the upcoming 6$^{th}$ Cycle RHNA Allocation Plan (October 2021 to October 2029). Alternative 2 would provide a greater number of units, with a more robust unit mix, and an increased number of deed-restricted affordable units as compared to the proposed Project. Therefore, this alternative would help the City to further achieve the existing and pending RHNA allocations.

Noise

*Would the proposed project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Alternative 2 consists of the development of three independent Tier II mixed use housing projects. Presumably, the three mixed-use projects for Alternative 2 would each be developed separately, with its own construction schedule – though overlapping construction could occur. For the purposes of this EIR, while unlikely, it is conservatively assumed that the projects would be simultaneously constructed, and their combined impacts are analyzed herein.

*Construction Noise*

Under Alternative 2, the total floor area of proposed mixed-use development would be reduced relative to the proposed Project. As such, the duration and extent of construction activities – including excavation, building construction, and architectural finishing – would be reduced. While the duration of construction-related noise impacts under Alternative 2 would be reduced as compared to those described for the proposed Project, peak noise levels would be similar on a daily basis. As discussed for the proposed Project in Section 3.12, *Noise*, impacts to existing sensitive receptors under this alternative would be potentially significant but would be reduced to *less than significant with mitigation* due to the requirement for a Construction Noise Management Plan under MM NOI-1. Overall, combined construction noise impacts would be reduced relative to the proposed Project due to the reduced duration of construction activities under this alternative. Similar to the Project, construction noise impacts under this alternative would be *less than significant with mitigation*.

*Operational Noise*

Long-term operational noise levels as a result of this alternative would be slightly increased as compared to the proposed Project due to the increase in associated vehicle trip generation due to increased retail/restaurant and residential uses (refer to Impact NOI-3 in Section 3.12, *Noise*). However, as discussed for the proposed Project in Section 3.12, *Noise* ambient roadway noise increases from vehicle trips would be incremental (e.g., less than 1 decibel [dB]) and would be barely perceptible to existing sensitive receptors. Stationary noise sources would be reduced as compared to the proposed Project due to the elimination of the proposed hotel and Cultural Use Campus as well as the decrease in the publicly accessible open space on the Project site. Similar to the Project, operational noise impacts under this alternative would be *less than significant*.

*Would the proposed project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

*Construction Vibration*

Given that no subterranean parking would be provided beneath the proposed mixed-use building at 1333 and 1337 Ocean Avenue the potential for ground-borne vibration impacts at the Gussie Moran House would be substantially reduced. Nevertheless, given the demolition of the rear structures at 1333 and 1337 Ocean Avenue and construction of the mixed-use building implementation of MM CR-1 and MM NOI-2 would still be required to mitigate potential impacts to City-designated Landmarks. As described for the proposed Project, construction activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold criteria for "Fragile" and "Fragile Historic" buildings. Therefore, these construction activities could result in structural damage to the Gussie Moran House – particularly the decorative shingles, steeple, tower, and chimney. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Operational Vibration*

As described for the proposed Project, operations under Alternative 2 would not be anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur as a result of truck travel to and from the Project site for periodic deliveries. However, such incidences would be temporary in nature and would not be expected to exceed 0.1 inches per second (in/sec), which is below the level for potential damage to fragile structures. No substantial sources of ground-borne vibration would be introduced as part of the proposed Project; therefore, operation of the proposed Project would not expose sensitive receptors onsite or offsite to excessive ground-borne vibration or ground-borne noise levels.

<u>Transportation (including Neighborhood Effects related to Intersection Operations)</u>

*Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

SCAG's 2016 RTP/SCS, LUCE, and the DCP establish alternative transportation and circulation goals for the City that focus on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. Similar to the proposed Project, Alternative 2 would be served by numerous public transit facilities, including the Downtown Santa Monica Station. The location of the Project site would create maximum opportunities for public transit use by future residents, hotel guests, restaurant and retail customers, and Cultural Use Campus visitors consistent with LUCE goals and objectives. Additionally, by developing a mix of land uses on a single site in the Downtown, this alternative like the proposed Project would increase accessibility to multiple other destinations including restaurants, retail, office, entertainment, and residential uses. As a result of increased destination accessibility, the proposed Project would support the Citywide goal of reducing overall vehicle trips and VMT. Further, Alternative 2 would encourage employees, residents, and visitors to use existing bicycle facilities throughout the City through implementation of a TDM plan and the provision of onsite bicycle amenities such as secure bicycle parking, including short-term and long-term bicycle racks and lockers, showers, and personal locker facilities. As compared to the proposed Project, Alternative 2 would not improve walkability through and around the Project site since it would not develop the publicly accessible paseos, courtyard, and breezeway described for the proposed Project. Even so, impacts would be *less than significant*.

*Would the project conflict or be inconsistent with CEQA Guidelines15064.3, subdivision (b)?*

*Vehicles Miles Traveled (VMT)*

Following Section 15064.3, subdivision (b)(1) and OPR's Technical Advisory, the proposed Project and Alternative 2 would be presumed to have a *less than significant* transportation impact, based on the accessibility of the Project site to public transit. Therefore, no further VMT analysis is required. Nevertheless, a quantitative VMT analysis has been prepared for informational purposes following the guidance in OPR's Technical Advisory. Since the City has not yet adopted VMT thresholds and because the EIR analysis predates the applicability of Section 15064.3, no determination of significance has been made.

As presented in Section 3.13, *Transportation*, a quantitative VMT analysis of the Project estimates that the Project would result in 11.5 VMT per employee, which approximately 60 percent of the citywide average of 19.2 VMT per employee. In comparison to the regional average for Los Angeles County, the proposed Project's 11.5 VMT per employee is more than 15 percent below existing regional average of 18.41 VMT per employee. The proposed Project's residential VMT rate of 10.8 VMT per capita is slightly greater than the citywide average of 9.0 VMT per capita.

In comparison to the regional average for Los Angeles County, the proposed Project's 10.8 VMT per capita is more than 15 percent below existing regional average of 13.44 VMT per capita. The weekday daily trip generation associated with Alternative 2 would be approximately 75 percent more than that described for the proposed Project (see Appendix K). As such, Alternative 2 would result in 37,008 daily VMT compared to 25,933 daily VMT for the proposed Project. While Alternative 2 would generate more daily VMT than the Project, the VMT per employee and VMT per capita would remain similar to those described for the proposed Project.

*Intersection LOS*

Operational vehicle trips would be increased under Alternative 2 due to the substantial increase in residential units and restaurant and retail space. The Transportation Study found that Alternative 2 would generate a net increase of 198 AM peak hour trips, 240 PM peak hour trips, and 252 weekend midday peak hour trips (Fehr & Peers 2020; see Table 5-10 and Appendix K). Compared to the proposed Project, Alternative 2 would result in 52 more AM peak hour trips, 94 more PM peak hour trips, and 84 more weekend midday peak hour trips (Fehr & Peers 2020; see Appendix K).

Based on the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria using LOS, delay-based impacts on intersection operations would be increased as compared to the proposed Project. During the Approval Year (2020), the four study intersections that would be impacted by the proposed Project would also be impacted under this alternative; however, the severity of those impacts (i.e., the increase in vehicle delay) would be greater than that described for the proposed Project. There would also be one additional intersection – 2nd Street & Santa Monica Boulevard – with a significant impact during the Approval Year (2020) and Future Year (2025). Therefore, Alternative 2 would result in an increase in the number of significantly impacted intersections identified for the proposed Project. Feasible mitigation is not available (refer to Section 3.13, *Transportation*), and impacts associated with this alternative would be *significant and unavoidable*.

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

Under Alternative 2, 1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access – including emergency access – from Arizona Avenue to Santa Monica Boulevard. Vehicular access to the new buildings at 101 Santa Monica Boulevard and 129 Santa Monica Boulevard would be provided via 1st Court. No parking would be provided at the 1333 and 1337 Ocean Avenue site due to the retention of the existing City-

designated Landmarks in their current locations (see Figure 5-1). Overall, the transportation network in the vicinity of the Project site area would continue to function as it currently does with implementation of this alternative. No new hazardous design features would be introduced by Alternative 2. Further, Alternative 2 would include the development of residential, and retail/restaurant uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment traffic that is hazardous or incompatible with existing traffic. Similar to the proposed Project, impacts related to hazardous design features and incompatible uses would be less than significant.

*Would the project result in inadequate emergency access?*

In contrast with the proposed Project, Alternative 2 would not convert the southern portion of 1st Court into a pedestrian paseo. The transportation network would function the same as it does currently. Neither the proposed Project nor Alternative 2 proposes the closure or major modification of adjacent access streets. As with the proposed Project, emergency access would continue to be available on adjacent streets including Ocean Avenue, 2nd Street, and Santa Monica Boulevard. Therefore, impacts on emergency access would be similar to those described for the proposed Project and *less than significant*.

Tribal Cultural Resources

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is at least one of the following:*

*- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or*

*- A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the Lead Agency shall consider the significance of the resources to a California Native American tribe?*

The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the Project site is sensitive for tribal cultural resources given its location along the coast and within an area of historic use by Gabrieleño/Tongva villages, such as Suangna and Comicrabit, and trade routes and waterways, which are considered cultural landscapes pursuant to CEQA Section 21074. The potential for impacts related to tribal cultural resources under this alternative would be slightly reduced as compared to the proposed Project because the extent and the depth of excavation would be reduced

(refer to Impact TCR-1 in Section 3.14, *Tribal Cultural Resources*). Accordingly, there would be a reduced potential to encounter tribal cultural resources during excavation. As with the proposed Project, a Native American monitor from Kizh Nation shall be present during construction excavation activities, as required by MM TCR-1. Impacts to tribal cultural resources under this alternative would be *less than significant with mitigation*.

Utilities

Similar to the proposed Project, the residential and commercial uses associated with Alternative 2 would incrementally increase demand for utility services, including water supply (refer to Impact UT-1 and Impact UT-2), wastewater disposal (refer to Impact UT-3 and Impact UT-4), and solid waste disposal (refer to Impact UT-5 and UT-6). However, this demand would be adequately met by existing and planned future energy and water supplies, and remaining capacities within the wastewater treatment facility and landfills serving the City.

*Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

*Would the water supply available to serve the project from existing entitlements and resources be insufficient, or would new or expanded entitlements be needed?*

The total floor area under Alternative 2 would be reduced by approximately 28 percent (89,403 sf) from the total floor area under the proposed Project; however, this alternative would support 50 additional residential units and 93 percent more restaurant and retail space as compared to the proposed Project. As such, even with the elimination of the hotel and Cultural Use, the proposed mixed-use development under Alternative 2 may slightly increase water consumption. With the exception of minor onsite trenching for new connections, Alternative 2 would not require or result in the substantial construction or expansion of existing water facilities. Similar to the proposed Project, Alternative 2 would be required to comply with the City's Green Building Ordinance, which requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction (SMMC Section 8.106). Alternative 2 would also be required to comply with the Water Neutrality Ordinance, which requires all development within the City to offset all net new water use onsite or offsite. No unplanned new or expanded entitlements would be required to implement Alternative 2 and this alternative would not adversely affect the City's ability to meet its goal for water self-sufficiency under the SWMP. Therefore, as described for the proposed Project, impacts would be considered *less than significant*.

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

Construction activities would generate minimal wastewater flows from construction workers and would not, along with existing wastewater flows, result in capacity issues on the City's existing sewer system (since such temporary wastewater generation would be less than those generated by existing uses). Therefore, construction impacts on wastewater facilities would be less than significant and similar to the proposed project.

As described for domestic water, the proposed mixed-use development under Alternative 2 may slightly increase wastewater flows as compared to the proposed Project, due to the substantial increase in residential as well as restaurant and retail space. Similar to the proposed Project, operation of Alternative 2 would direct the proposed wastewater flow to either the 18-inch Ocean Avenue main or the 18-inch 2nd Street main, or both. Both local sewer mains are sufficiently sized to accommodate increased wastewater flows under Alternative 2 and would not require upgrades based on the current monitored flows. Therefore, with the preparation of a sewer study and monitoring prior to the issuance of the first building permit impacts would be *less than significant with mitigation*.

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

As previously described, the proposed mixed-use development under Alternative 2 may slightly increase wastewater flows as compared to the proposed Project, due to the substantial increase in residential as well as restaurant and retail space. Therefore, development under this alternative would generate an increase in wastewater generation as compared to the proposed Project. However, this increase would not exceed the HWRP's wastewater treatment capacity. Therefore, impacts to wastewater generation would be *less than significant*.

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

*Would the project comply with Federal, State, and local statutes and regulations related to solid waste?*

The proposed mixed-use development under Alternative 2 may increase solid waste generation as compared to the proposed Project, due to the substantial increase in residential as well as restaurant

and retail space. Nevertheless, given the existing sufficient capacity of solid waste facilities and the City's continued efforts to reduce waste generation, this impact would be *less than significant*.

Relationship of Alternative to Project Objectives

Alternative 2 would attain some of the Project objectives. By providing a mix of residential, shopping, and dining opportunities, Alternative 2 would enhance the overall balance and mix of uses in Downtown consistent with the LUCE and DCP, although to a lesser extent than the proposed Project (Project Objectives 1 and 4). Alternative 2 would retain the existing City-Designated Landmarks and therefore, would meet the objective to preserve historic resources (Project Objective 3). Development of the Project site under Alternative 2 would also meet the project objective to remove surface parking (Project Objective 10). Provision of additional residential units in the Downtown under this alternative would be consistent with the City's Housing Element, LUCE, and DCP goals and policies and would help meet the current and future housing demand in the City, including the demand for affordable housing (Project Objective 5). By virtue of its location in the transit-rich and pedestrian-oriented Downtown, this alternative would support the use of public transit and promote overall reductions in VMT and associated GHG emissions consistent with the intent of Senate Bill (SB) 743 (Project Objective 9).

However, a number of project objectives would not be achieved under Alternative 2. For example, this alternative would not meet or fully the Project objectives related to the provision of overnight visitor accommodations which are encouraged in the DCP and Coastal Act (Project Objectives 1, 2, 4, 12, 13). With the limitation in building height, this Alternative would not achieve the iconic architectural and urban design as encouraged in the DCP (Project Objective 6). Pedestrian orientation would also be compromised with the significant reduction in ground floor publicly accessible open space (Project Objective 7). Additionally, as the Project site would be developed with three mixed-use housing projects, this alternative would not meet the objectives related to cultural institutions envisioned for the Project site and the Downtown (Project Objectives 1, 4, 8, 14). With the elimination of the hotel and cultural uses, Alternative 2 may not be economically viable as the proposed Project (Project Objective 12) and would not provide as much fiscal and economic benefits to the City (Project Objective 13). Further, Alternative 2 would result in the development of three Tier II projects, and as such, would result in the loss opportunity of significant community benefits (Project Objective 14).

Overall, with the significant reduction in development, Alternative 2 would not meet the majority of Project objectives.

### 5.5.3 Alternative 3 – Maximum 84-Foot Building Height (Reduced FAR/Development)

The Maximum 84-Foot Building Height Alternative (Alternative 3) would develop the proposed Project's land uses with a reduced height of 84 feet and a corresponding reduction in total floor area. Similar to the proposed Project, Alternative 3 would include a hotel, mixed-use buildings with ground floor commercial uses and upper floor residential uses, and a Cultural Use Campus that would incorporate the two relocated City-designated Landmarks. However, the height of the proposed buildings, including the Hotel Building, would not exceed a maximum height of 84 feet.

Due to the decrease in building height as compared to the proposed Project, there would be a corresponding reduction in the number of hotel guestrooms and residential units resulting in an overall reduction in FAR.[2] Alternative 3 would consist of a mixed-use project totaling 270,570 sf with 36,110 sf of ground floor restaurant and retail uses, 100,291 sf of upper floor residential uses, 88,929 sf of hotel uses, and 35,500 sf of cultural uses (refer to Table 5-3). This alternative's total floor area (above and below grade) would be approximately 15 percent less as compared to the proposed Project's total of 316,750 sf with 36,110 sf of ground floor restaurant and retail uses and 117,700 sf of upper floor residential uses. Alternative 3 would include a total of 91 residential units, with a mix of 13 studios, 44 one-bedroom, 22 two-bedroom, and 12 three-bedroom units (see Table 5-4). This alternative would result in an approximately 9 percent decrease (9 units) in residential units from 100 units under the proposed Project. This alternative would also decrease the number of hotel guestrooms by approximately 46 percent (55 guestrooms) and the total hotel floor area by approximately 28 percent (33,471 sf), from 120 guestrooms and 122,400 sf under the proposed Project. There would be no change in total floor area of the restaurant and retail uses or Cultural Use Campus as compared to the proposed Project. Overall, the combined FAR would be reduced from 2.95 under the proposed Project to 2.36 under this alternative.

[2] Because the DCP requires 50 percent open space for development with the ELS Overlay, with at least 25 percent of the open space required to be on the ground floor, the resulting FAR for this alternative would be less than the FAR allowed and achievable for a Tier II project.

**Table 5-3. Summary of Alternative 3 – Maximum 84-Foot Building Height (Reduced FAR/Development)**

| Alternative 3 | | | | |
|---|---|---|---|---|
| **Use** | **Units** | **Floor Area (sf)** | **Above Ground Floor Area (sf)** | **Below Ground Floor Area (sf)** |
| Residential | 91 residential units | 100,291 | 88,834 | 13,800 |
| Restaurant/Retail | | 36,110 | 28,130 | 7,980 |
| Outdoor Dining | | 4,940 | | |
| Hotel | 65 guestrooms | 88,929 | 60,929 | 28,000 |
| Hotel Spa | | 4,400 | | |
| Hotel Meeting & Banquet | | 8,700 | | |
| Hotel Guestrooms/ Circ/Lobby/Kitchen | | 75,829 | | |
| Cultural Use Campus | | 35,500 | 17,100 | 18,400 |
| Ground Floor Open Space | | 22,407 | | |
| Non-Ground Floor Open Space (Private) | | 23,500 | | |
| Subterranean Parking | 238 parking spaces (three subterranean levels) | | | |
| Mechanical/Shared Services Above Ground (e.g., trash and storage) | | 4,800 | 4,800 | |
| **Totals** | | **270,570** | **199,793** | **68,180** |
| **Floor Area for FAR*** | | | **194,853** | |
| **FAR** | | | **2.36** | |

Note: *Per the SMMC the total development area used to calculate the FAR includes above ground floor area only. Neither open space nor below ground (i.e., subterranean) floor area is included in the FAR calculation.

**Table 5-4. Summary of Alternative 3 Residential Unit Mix**

| Unit Type | Total Units | Replacement Rent-Controlled Units | Deed-Restricted Affordable Units | Market-Rate Units |
|---|---|---|---|---|
| Studio | 13 | 12 | 1 | - |
| One-Bedroom | 44 | 7 | 4 | 33 |
| Two-Bedroom | 22 | - | 9 | 13 |
| Three-Bedroom | 21 | - | 1 | 11 |
| **Total** | **91** | **19** | **15** | **57** |

The height of the proposed Hotel Building would be reduced from 130 feet under the proposed Project to 84 feet under this alternative, which would result in an eight-story tower (i.e., a loss of 4 stories as compared to the proposed Project). Alternative 3 would also eliminate the publicly accessible rooftop observation deck described for the proposed Project. Similarly, this alternative

would reduce the height of Structure A and Structure C of the Second Street Building to 84 feet (originally proposed at 111 feet and 109 feet, respectively), while the Santa Monica Boulevard Building would have a maximum height of 62 feet to provide a "step back" from Ocean Avenue to this alternative's taller structures, consistent with general goals of the DCP related to building height transitions. The Cultural Use Campus would be developed as a 60-foot tall structure with roof top deck and subterranean uses as described for the proposed Project, incorporating the two relocated City-designated Landmarks located at 1333 and 1337 Ocean Avenue. Similar to the proposed Project, the Cultural Use Campus would remain an independent structure from the hotel and residential buildings under this alternative.

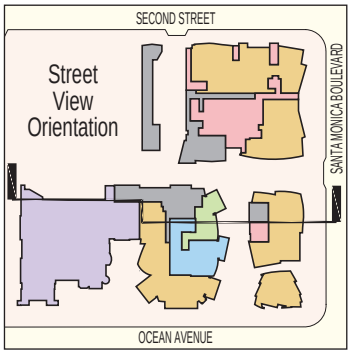
As with the proposed Project, Alternative 3 would reconfigure 1st Court into an "L" shape, with one-way access from Arizona Avenue exiting onto 2nd Street on the northern side of the Second Street Building. The southern portion of 1st Court would be converted into a pedestrian paseo providing emergency vehicle access only.

As with the proposed Project, vehicle access ramps from 1st Court would provide entry/exit for the proposed subterranean parking garage (see Figure 5-2). Due to the reduction in residential units and hotel, the number of parking spaces would be reduced from 285 spaces under the proposed Project to 238 spaces under Alternative 3.

The architectural styling and ground floor frontages would be designated to accommodate active commercial uses and pedestrian amenities as for the proposed Project. The new landscaping of this alternative would also be similar to that described for the proposed Project. Additionally, this alternative would include similar sustainability features as the proposed Project, including implementation of TDM measures, EV charging stations, and a solar electric PV system.

With the maximum building heights at 84 feet, Alternative 3 would exceed the maximum limits for the OT and BC Districts. However, the Project site is one of three sites in the Downtown with an ELS Overlay allowing a maximum height of 130 feet with the provision of significant community benefits to be established in a Development Agreement. As with the proposed Project, Alternative 3 would require a Development Agreement as well as similar discretionary and administrative approvals, including a Coastal Development Permit.

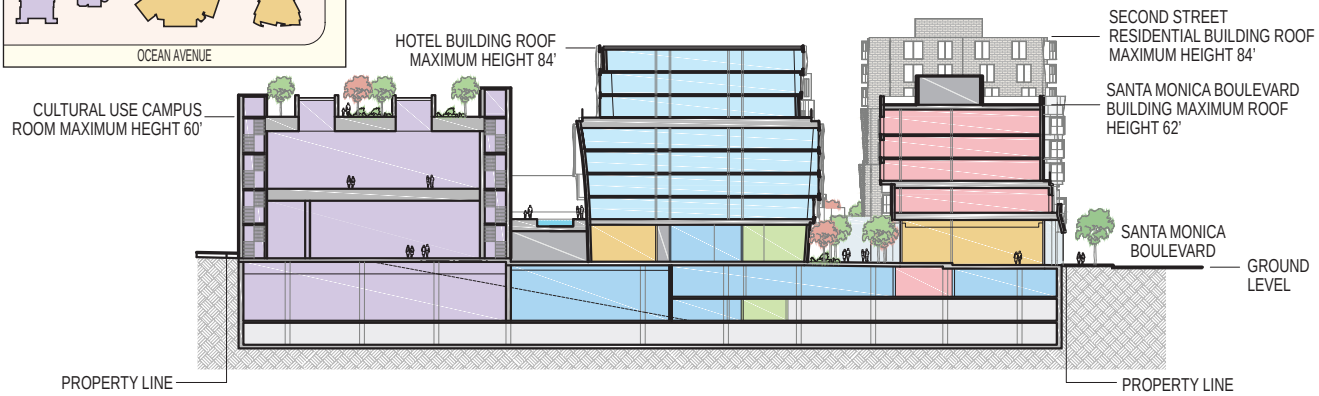

**Ground Floor Site Plan – Alternative 3**




**LEGEND**

- Hotel Amenity and Support
- Hotel Guest Room
- Rental Housing
- Retail and Restaurant
- Cultural Use Campus
- Public Space
- Service and Mechanical
- Parking
- Landmark Building
- Vehicle Circulation

*Note:* Alternative 3 would eliminate the rooftop observation deck.




**Conceptual Cross-Section from Ocean Avenue – Alternative 3**

wood.

**Conceptual Overview – Alternative 3**

**FIGURE 5-2**

Aesthetics and Shade/Shadow Effects

The Project site is located in the Downtown, which is considered a TPA due to its accessibility to high quality transit service provided by Metro and the Big Blue Bus (SCAG 2016; City of Santa Monica 2017). Therefore, potential changes to aesthetics and visual resources are considered less than significant. Nevertheless, aesthetic effects due to this alternative are disclosed for informational purposes, but are not considered as significant impacts to the environment pursuant to CEQA Guidelines Section 21099.

*Would the project have a substantial effect on a scenic vista?*

*Would the project have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally designated scenic corridor?*

*Construction Effects*

Similar to the proposed Project, Alternative 3 would require demolition of the existing surface parking lots and all buildings except for two City-designated landmarks, which would be relocated on the Project site. Views of the Project site would include construction fencing, construction staging areas and construction equipment onsite, demolition debris, excavation for the subterranean parking garage, and scaffolding and new construction. This alternative would adhere to all standard City construction practices during construction area (e.g., fencing, lighting, etc.) to shield construction activities from public view to the maximum extent practicable. Impacts would be similar to those described for the proposed Project and would be *less than significant*.

*Operation Effects*

Similar to the proposed Project, Alternative 3 would develop a hotel, mixed-use buildings with ground floor commercial uses and upper floor commercial uses, and a Cultural Use Campus that would incorporate the two relocated City-designated Landmarks. However, the height of the proposed buildings, including the Hotel Building, would not exceed a maximum height of 84 feet. A conceptual layout of Alternative 3 is shown in Figure 5-2 for illustrative purposes for this EIR.

As described for the proposed Project under Impact VIS-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, the proposed development under Alternative 3 would be visible along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. The existing one- to three-story buildings and associated surface parking lots would be replaced with mixed-use buildings up to 84 feet in height. These buildings would be smaller than those described for the proposed Project and small

than the nearby 300-foot-tall 100 Wilshire Office Building, 180-foot-tall Pacific Plaza Apartments, and other high-rise development located along Ocean Avenue (refer to Table 3.1-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). Similar to that described for the proposed Project under Impact VIS-2, the proposed development under Alternative 3 would also be visible from Ocean Avenue, which is a City-designated scenic corridor as established in the City's General Plan Scenic Corridors Element (1975). However, similar to the proposed Project, this alternative would not adversely affect scenic vistas or scenic resources within a locally designated scenic corridor. Unlike the proposed Project, this alternative would not include a rooftop observation deck and therefore would not create a new publicly available scenic vista with views of Santa Monica Bay, Santa Monica Pier, and Downtown, as well as distant views of the Santa Monica Mountains.

*If the project is located in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Similar to that described for the proposed Project under Impact VIS-3 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, Alternative 3 would also be consistent with regulations that govern scenic quality including the development standards and policies of the LUCE, DCP, and SMMC. Alternative 3 would not conflict with the LUCE but would not achieve certain LUCE goals and policies to the same extent as the Project. Alternative 3 would be designed to be compatible with adjacent uses (Goal LU15), be context sensitive (Policy LU15.3), provide step backs and articulation such as limiting the Santa Monica Boulevard Building to 62 feet (Policies LU15.11, LU15.8, D8.5), provide pedestrian scale active retail space adjacent to sidewalk (Policies D8.1 and D9.4) and remove open on-grade parking (Policy D9.3). Further, the reduced height under this alternative would also achieve greater consistency with policies LU15.1 and LU16.1, which encourage consideration of size and bulk, potential shade, and shadow effects of proposed development on adjacent residential or habitable structures.

As with the proposed Project, Alternative 3 would be consistent with the ELS Overlay height limitations and FAR established for the Project site under the DCP. Additionally, similar to the Project, Alternative 3 would be expected to meet the design guidelines of the DCP to maximize architectural integrity, create human scaled buildings, create visual interest and variety in building design, animate building frontages, create safe and active streetscape, and create enjoyable open space. As with the proposed Project, development under this alternative would be subject to discretionary review by the Planning Commission and City Council and architectural design review by the City, which would ensure that height and massing would not detract from or conflict with the visual character within the immediate vicinity of the Project site.

*Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

Similar to the proposed Project, development of this alternative would create new sources of light and glare that could adversely affect nighttime or daytime views in the area (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). However, effects would be slightly reduced compared to those described for the proposed Project given the reduction in development and associated reduction in lighting, glazing (windows), and other reflective materials used in the façade. As with the proposed Project, unless otherwise permitted by the Development Agreement, new light sources would be shielded and restricted to 0.5-foot candles of light in compliance with the SMMC Section 9.21.080. Building materials would also be required to comply with SMMC Section 9.21.120, which states that reflective materials may not exceed more than 25 percent of the façade surface area and prohibits the use of black or mirrored glass. Because of reduced building heights under Alternative 3, lighting as seen from a distance would be reduced. Therefore, this alternative would not substantially affect offsite light-sensitive receptors.

*Would shadow-sensitive uses be shaded by project-related structures?*

As described for the proposed Project under Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, development under Alternative 3 would result in additional shade and shadows that could affect sensitive receptors adjacent to the Project site. However, under Alternative 3, the reduction in maximum building height to 84 feet would also slightly reduce the footprint and duration of shade and shadow effects on nearby residential uses on 2nd Street, including the Luxury Apartments, StepUp on Second, Chelsea Santa Monica, the Mayfair Residences, and the Westside Villas (refer to Table 3.1-2 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). Impacts would be less than those described for the proposed Project.

Air Quality

Construction and operational criteria pollutant emissions were estimated for Alternative 3 using CalEEMod Version 2016.3.2. These emissions were compared to the SCAQMD significance thresholds and the construction emissions and operational emissions described for the proposed Project under Impact AQ-3 and Impact AQ-4, respectively (see Table 5-8 and Table 5-9).

*Would the project conflict with or obstruct implementation of the applicable air quality plan?*

*Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?*

*Construction Emissions*

Under Alternative 3, the number of residential units and the number of hotel guestrooms would be reduced as compared to the proposed Project. The total floor area under Alternative 3 would be reduced by approximately 15 percent (46,180 sf) from the total floor area under the proposed Project. Together, these reductions in the scope of development would slightly decrease the duration and extent of construction activities, including building construction and architectural finishing. As the scope of construction activities would be reduced from the proposed Project, construction emissions for CO, VOCs, $NO_x$, particulate matter ($PM_{10}$ and $PM_{2.5}$), and $SO_x$ would be slightly reduced compared to the proposed Project. Assuming similar implementation of MM AQ-1 requiring "super compliant" architectural coatings to address VOC emissions, impacts under this alternative would be decreased compared to the proposed Project. As with the proposed Project, emissions from construction activities under Alternative 3 would remain below the SCAQMD construction significance thresholds (mass daily) and LSTs. This alternative would reduce construction-related air quality impacts from the proposed Project and impacts would be *less than significant* (see Table 5-8).

*Operational Emissions*

Under Alternative 3, there would be a reduction in the number of residential units and a reduction in the number of hotel guestrooms. This alternative would generate 12 to 16 percent fewer vehicle trips relative to the proposed Project (see Table 5-10). As a result, long-term criteria pollutant emissions and impacts to regional air quality would be slightly reduced and the operational criteria pollutant emissions generated by Alternative 3 – including energy/natural gas demand, landscaping maintenance, and vehicle trips – would remain below the SCAQMD significance thresholds. As with the proposed Project, this alternative would not conflict with the 2016 AQMP as this alternative would not contribute to population growth in excess of the AQMP's population forecast and impacts would be *less than significant*.

*Would the project expose sensitive receptors to substantial pollutant concentrations?*

*Construction*

As described for the proposed Project in Impact AQ-4 in Section 3.2, *Air Quality*, the construction emissions associated with the proposed Project would not exceed LSTs that would adversely affect local air quality and public health. Due to the reduction in scope, construction emissions for CO, VOCs, NOx, particulate matter ($PM_{10}$ and $PM_{2.5}$), and $SO_x$ under Alternative 3 would be slightly reduced compared to the proposed Project. Therefore, impacts on sensitive receptors would be *less than significant* and less than the proposed Project.

*Operation*

Similar to that described for the proposed Project in Impact AQ-5 in Section 3.2, *Air Quality*, this alternative would contribute to cumulative traffic in the area and would increase CO emissions at nearby intersections. However, given that Alternative 3 would result in a reduction in vehicle trips relative to the proposed Project, this alternative would similarly not create a CO hot spot or exceed the CAAQS for CO emissions.

Due to the slight decrease in the duration and extent of construction activities under Alternative 3, this alternative would not generate significant amounts of TACs. Further, as with the proposed Project, this alternative would not place sensitive receptors within close proximity to significant sources of TACs (i.e., within 500 feet of I-10) (refer to Section 3.2, *Air Quality*); therefore, similar to the proposed Project, impacts related to TACs would continue to be *less than significant.*

*Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?*

As described for the proposed Project under Impact AQ-6 in Section 3.2, *Air Quality*, this alternative would result in similar temporary, construction-related emissions, including odors as those described for the proposed Project. However, the duration of exposure to these emissions would be slightly reduced. As described for the proposed Project, operational odors that would be expected from this alternative would be typically associated with food smells (e.g., from the outdoor dining areas) and solid waste (refuse) storage typical of urban uses. All refuse and recycling bins would be covered in designated storage areas and properly maintained to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. These odors would not be a substantially perceptible by nearby sensitive receptors and impacts associated with generation of objectionable odors would be *less than significant*.

Construction Effects

*Would the project result in considerable construction-period impacts due to the scope, or location of construction activities?*

Similar to the proposed Project, construction activities under Alternative 3 would create potential aesthetic, air quality, noise, and transportation impacts through site disturbance and the generation of temporary construction-related traffic (e.g., heavy haul trucks, construction worker commutes, etc.). Alternative 3 would develop 15 percent less floor area than the proposed Project, and thus would generate a reduced level of construction activity and associated aesthetics effects, air emissions, noise/vibration, and vehicle trips than the Project.

Cultural Resources

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

Similar to the proposed Project, Alternative 3 would include a hotel, mixed-use residential buildings with ground floor commercial uses, and a Cultural Use Campus that would incorporate the two relocated City-designated Landmark structures. However, under this alternative the maximum building height would be limited to 84 feet. Alternative 3 would result in similar impacts to historic resources as those identified for the proposed Project under Impact CR-1 in Section 3.4, *Cultural Resources*. All work would be performed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the California Historical Building Code. Further, as with the proposed Project, MM CR-1, which would require implementation of the measures from the Historic Resources Technical Report – Ocean Avenue Project (2020) prepared by Ostashay & Associates Consulting (see Appendix E). Therefore, Alternative 3 would not adversely affect the City-designated Landmarks.

As described for the proposed Project, construction activities, including demolition, excavation and grading would have the potential to generate ground-borne noise that would exceed the Caltrans vibration damage potential threshold for onsite City-designated Landmarks at 1333 and 1337 Ocean Avenue. Additionally, as described for the proposed Project, demolition and excavation activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold at the Gussie Moran House, an offsite City-designated Landmark at 1323 Ocean Avenue. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to

mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines?*

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

The potential to encounter previously unknown buried archaeological resources or human remains under this alternative would be similar to that described for the proposed Project under Impact CR-2 and Impact CR-3. However, as with the proposed Project, DCP MM CR-3a and -3b and Project-specific MM CR-2, would require standard protocols for evaluation and recovery in the event of inadvertent discoveries of archaeological resources or human remains, and would reduce potential impacts to archaeological resources under Alternative 3. Therefore, potential impacts to cultural resources under Alternative 3 would also be *less than significant with mitigation*.

Energy

*Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

The total floor area under Alternative 3 would be reduced by approximately 15 percent (46,180 sf) from the total floor area under the proposed Project. Due to the slight reduction in the duration and scale of construction activities under Alternative 3, temporary, construction-related energy impacts could be slightly reduced, but would likely be substantially similar with those described for the proposed Project (refer to Impact EN-1 in Section 3.5, *Energy*).

Due to the reduction of 9 residential units and 55 hotel guestrooms under Alternative 3, long-term operational energy impacts may be slightly reduced relative to the proposed Project. The proposed mixed-use development under Alternative 3 may result in a reduced overall energy demand, including electricity, natural gas, and transportation as compared to the proposed Project (see the *Greenhouse Gas Emissions* discussion). This alternative would also incorporate similar energy efficiency measures into the design of the buildings and service systems, including energy efficient HVAC systems, operable windows to increase air flow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and water-efficient

equipment and plumbing infrastructure, and an onsite PV system in compliance with the City's Green Building Code. Additionally, as required by the City's Energy Code, Alternative 3 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code. Therefore, similar to the Project, Alternative 3 would not result in wasteful, inefficient, or unnecessary consumption of energy sources and the impact would be *less than significant*.

*Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As described for the proposed Project in Impact EN-2 in Section 3.5, *Energy*, Alternative 3 would be designed to comply with the City's Energy Code and Green Building Standards Code. Under this alternative, the mixed-use development would include sustainability features, such as a solar PV array. Green building elements would also increase energy efficiency through use of energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use. As required by the City's Energy Code, Alternative 3 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code. Further, the Project site is in a TPA, given the proximity of the Downtown Santa Monica station (within approximately 0.5 miles of the Project site) and the high number of bus routes in the Project area. As a result, similar to the proposed Project, Alternative 3 would support State, regional, and City efforts to improve transportation energy efficiency and reduce wasteful or inefficient transportation energy consumption. As discussed for the proposed Project in Section 3.5, *Energy* and Section 3.10, *Land Use and Planning*, Alternative 3 would be consistent with local, regional, and state goals and policies related to energy efficiency and would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, as with the proposed Project, impacts to energy under Alternative 3 would be *less than significant*.

<u>Geology and Soils</u>

*Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

> *i) Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*
>
> *ii) Strong seismic ground shaking?*

*iii) Seismic-related ground failure including liquefaction?*

*iv) Landslides?*

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

*Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

*Would the project be located on expansive soil, as defined in Table 18-1-B of the uniform Building Code (1194), creating substantial direct or indirect risks to life or property?*

Impacts related to geology and soils under Alternative 3 would be similar to those described for the proposed Project as the existing geology and soil conditions would be the same as those described for the Project site in Section 3.6, *Geology and Soils*. Compliance with the regulations set forth in the SBMC and the site-specific recommendations of a Final Geotechnical Report, would address geologic hazards under this alternative. As such, impacts would be similar and *less than significant*.

*Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

As with the proposed Project, the Applicant would be required to implement DCP MM CR-4a and MM CR-4b, which would require paleontological monitoring during grading and excavation and proper handling of potential paleontological resources if encountered during construction activities. As with the proposed Project, compliance with standard regulatory conditions and required mitigation measures would reduce impacts to *less than significant with mitigation*.

<u>Greenhouse Gas Emissions</u>

*Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

*Would the project be inconsistent with any of the GHG reduction strategies set forth by the City's LUCE, Sustainable City Plan, and Climate Action Plan, AB/SB 32 and SB 375; and the State Attorney General, Office of Planning and Research and Climate Action Team recommendations?*

GHG emissions were estimated for both construction and operation of Alternative 3 using CalEEMod Version 2016.3.2. The majority of construction-related emissions would occur during

site preparation and excavation of subterranean parking garage. As the extent and depth of excavation under Alternative 3 would be similar to that described for the proposed Project, the total GHG emissions from construction would also be similar to or slightly reduced from the proposed Project.

Since the number of residential units and hotel guestrooms would be reduced relative to the proposed Project, this alternative would also generate fewer operational GHG emissions due to the reduction in energy use for building operations and the reduction in vehicle trips. Operational GHG emissions under this alternative are estimated at 2,817 MT $CO_2e$/year relative to 3,185 $CO_2e$/year under the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions*). GHG emissions impacts would be less than the proposed Project and *less than significant*.

Potential impacts related to conflicts with plans, policies, and regulations related to reduction in GHG emissions would be similar to those identified in Impact GHG-1 and Impact GHG-2 for the proposed Project and would be *less than significant*.

As with the proposed Project, this alternative would continue to support the state and local GHG reduction goals and policies as it would focus new development near transit to create sustainable, active pedestrian-friendly development that decreases reliance on vehicles and increases the use of transit, bicycle, and pedestrian facilities. Additionally, this alternative would provide mixed-use infill development within the Downtown, which is served by high quality transit, bicycle, and pedestrian facilities. Directing growth to existing urbanized areas is an important strategy to reduce GHG emissions, largely due to reduced building energy and vehicle use. Alternative 3 would be required to comply with SCAQMD Rule 403, City of Santa Monica Green Building Code, Energy Code, and other applicable regulations. Thus, similar to the Project, Alternative 3 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., LUCE, Sustainable City Plan, CAAP, Green Building Ordinance, AB 32, SB 375, etc.). Therefore, impacts would be *less than significant.*

Hazards and Hazardous Materials

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

*Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

*Construction*

Similar to that described for the proposed Project under Impact HAZ-1 and Impact HAZ-2, Alternative 3 would require site preparation activities, including demolition and excavation activities. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACMs, LBPs, and mold that could be released during demolition of the existing buildings at 101 Santa Monica Boulevard, 1327 Ocean Avenue, and the rear structures at 1333 and 1337 Ocean Avenue. Similar to the proposed Project, this alternative would provide subterranean parking below the Project site, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (e.g., associated with a historical onsite dry-cleaning facility, residential uses, and a historical offsite gas station) would be similar. Overall, this alternative's impacts with regard to hazards and hazardous materials would be similar to those described for the proposed Project. DCP Program EIR MM HAZ-2a through -2d, which would require hazardous materials surveys, standard protocols following discovery of contamination, and preparation of a soils management plan, would be required. Compliance with standard regulatory conditions and applicable DCP Program EIR mitigation measures would reduce construction-related hazards impacts to *less than significant with mitigation*.

*Operation*

As with the Project, Alternative 3 would include retail, restaurant, hotel, cultural, and residential uses, which require the routine use of materials such as those used for household cleaning and maintenance products, pesticides and herbicides, paints, solvents, degreasers, and chemicals associated with swimming pools. These materials would be used in compliance with existing CalEPA regulations and the CUPA. Through compliance with regulatory measures, operational impacts of the proposed Project and Alternative 3 due to routine use of hazardous materials and accidental release of such materials would be similar and *less than significant*.

<u>Hydrology and Water Quality</u>

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

*Construction*

Similar to that described for the proposed Project under Impact HYD-1 in Section 3.9, *Hydrology and Water Quality*, implementation of the Applicant-prepared SWPPP would be required to address surface water quality impacts from erosion, sedimentation, and polluted runoff during

construction activities. Standard regulatory conditions requiring compliance with the Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10) would address impacts to surface water quality under this alternative. With implementation of the SWPPP prepared for the Project site, short-term construction impacts to surface water quality under Alternative 3 would be *less than significant*.

*Operation*

With regard to operation, implementation of Alternative 3 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., buildings, driveways, pedestrian walkways, etc.). In accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would be incorporated into an Urban Runoff Mitigation Plan to be approved by the City and would be implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 3 to *less than significant*.

*Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

As described for the proposed Project under Impact HYD-2 in Section 3.9, *Hydrology and Water Quality*, Alternative 3 would include the construction of a three-level subterranean parking garage, which would require excavation to a maximum depth of 35 feet bgs. However, based on the depth to groundwater at the Project site between 47 and 62.5 feet bgs, dewatering activities would not be anticipated, and groundwater supplies would not be affected by construction (refer to Section 3.9, *Hydrology and Water Quality*). While not expected, if groundwater is encountered and dewatering of groundwater is required, a Construction Dewatering General Permit would be obtained in accordance with Los Angles RWQCB's Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Additionally, construction activities associated with the Alternative 3 (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal.

As with the proposed Project, implementation of this alternative would incrementally increase demand for groundwater supplies from the Santa Monica Groundwater Basin. However, similar to the proposed Project, this alternative would not substantially deplete the City's groundwater supplies since the City's Sustainable Water Master Plan (SWMP) – which account for development and associated population growth under the LUCE and the DCP – has determined that the City's water supply is adequate to meet City-wide demand through 2040.

With regard to groundwater recharge, existing groundwater recharge is negligible due to the existing developed nature of the Project site, (i.e., paved surfaces, buildings, driveways, etc). Therefore, implementation of Alternative 3, which would include the construction of impervious surfaces including new buildings and subterranean parking structures, would not measurably affect groundwater infiltration at the Project site. Additionally, the City Department of Public Works prohibits infiltration of runoff for properties located west of 4th Street ranging from northerly City limits to the north to I-10 freeway to the south, including the Project site. Similar to the Project, impacts would be *less than significant*.

*Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:*

*i) result in substantial erosion or siltation onsite or offsite;*

*ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or*

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

*Construction*

Site preparation activities, including demolition, excavation, grading, and trenching within areas that are currently developed with impervious surfaces, would result in exposure of soils and would cause minor alterations to onsite drainage, including the potential for temporary ponding during storm events (refer to Section 3.9, *Hydrology and Water Quality*). However, all stormwater generated during construction would continue to be directed to existing the City storm drain inlets and storm drain lines that currently serve the Project site. During construction, a SWPPP outlining associated BMPs would be implemented in accordance with applicable Los Angles RWQCB and City regulations to provide for temporary stormwater management and maintain the overall existing drainage pattern during construction. Similar to the proposed Project, impacts would be *less than significan*t.

*Operation*

Implementation of Alternative 3 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian

walkways, etc.). Additionally, stormwater runoff would continue to follow the same drainage pathways to the existing storm drain system. Furthermore, in accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would incorporated into an Urban Runoff Mitigation Plan to be approved by the City and implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 3 to *less than significant*.

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described for the proposed Project under Impact HYD-4 in Section 3.9, *Hydrology and Water Quality*, development under Alternative 3 would be implemented in a manner consistent with the requirements of NPDES and City's Runoff Conservation and Sustainable Management Pollution Ordinance (SMMC Chapter 7.10) , where BMPs would be implemented to address water quality and groundwater issues during both construction and operational activities. Further, this alternative's water demand would be less than the proposed Project, and as such, would not adversely affect the ability of the City to meet its goal for water self-sufficiency or maintaining groundwater quality under the SWMP. Therefore, the impact of Alternative 3 on sustainable groundwater management would be *less than significant.*

Land Use and Planning

*Would the project physically divide an established community?*

Under Alternative 3, impacts to land use would be similar to those described under the proposed Project under Impact LU-1 in Section 3.10, *Land Use and Planning*. As with the proposed Project, Alternative 3 would include a hotel, mixed-use residential buildings with ground floor commercial uses, and a Cultural Use Campus that would incorporate the two relocated City-designated Landmarks. These uses would be consistent with the use and character of the surrounding urban environment and would be consistent with the existing land use patterns within the Downtown District. Similar to the proposed Project, the Downtown would continue to function as it currently does with implementation of this alternative.

Similar to the proposed Project, Alternative 3 would realign 1st Court to provide connectivity from Arizona Avenue to 2nd Street. Alternative 3 would also provide pedestrian-oriented paseos to enhance pedestrian connectivity throughout the Project site. As described in Impact LU-1 for the proposed Project, this alternative would remove north-south access along 1st Court; however, the

proposed paseos and courtyards would expand ground level open space and increase overall pedestrian connectivity. Thus, implementation of Alternative 3 would not physically divide any established communities within the City. Similar to the Project, impacts would be *less than significant*.

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

As described for the proposed Project under Impact LU-2 in Section 3.10, *Land Use and Planning*, this alternative would be consistent with the goals and policies stated in the 2016-2040 RTP/SCS, LUCE, and DCP. By providing a mix of residential, shopping, and dining opportunities, and overnight visitor accommodations this alternative would continue to enhance the overall balance and mix of uses in Downtown, although to a lesser extent than the proposed Project. Additionally, by virtue of its location in the transit-rich and pedestrian-oriented Downtown, this alternative would support public transit use and promote limited growth in VMT and associated GHG emissions consistent with the intent of SB 743. Provision of residential units in Downtown under this alternative would be consistent with the City's Housing Element, LUCE, and DCP goals and policies. This alternative would continue to help meet current and future housing demand in the City, including the demand for affordable housing units; however, as the number of units would be reduced, it would do so to a lesser extent as compared to the proposed Project.

To achieve the GHG reduction targets mandated under SB 375, 2016-2040 RTP/SCS encourages new growth to occur in urban areas with high quality transit and facilities for active transportation (e.g. bicycle and pedestrian facilities). Under this alternative, future residents, employees, and visitors would have the opportunity to use the Metro E (Expo) LRT line to travel to and from the Downtown, with the Downtown Santa Monica Station located within approximately 0.5 miles of the Project site. The Project site is also easily accessed by a number of Big Blue Bus and Metro transit lines located within 0.25 miles of the Project site.

Alternative 3, which is 15 percent smaller than the proposed Project, would incorporate hotel amenities, new housing opportunities, pedestrian-scale ground floor restaurant and retail uses, cultural uses, sidewalk enhancements and pedestrian-only paseos, and publicly accessible ground floor open space. These elements are consistent with DCP land use policies, including locating new residential uses near transit corridors, encouraging active ground floor uses, creating pedestrian-oriented spaces, encouraging local-serving uses, and providing a range of housing options. As such, this alternative would be consistent with the overall DCP vision of the Downtown

as a vibrant mixed-use urban district with opportunities to live, work, and be entertained. Further, the reduction in height and total floor area under this alternative would also achieve greater consistency with policies LU15.1 and LU16.1, which encourage consideration of size and bulk, potential shade, and shadow effects of proposed development on adjacent residential or habitable structures. However, the reduction of publicly accessible open space (e.g., publicly accessible rooftop observation deck) would reduce the community benefits provided by the proposed Project and envisioned for the Project site in the DCP (refer to Section 2.3.2, *Downtown Community Plan*).

Further, as described in Section 3.10, *Land Use and Planning*, the RHNA, mandated by State Housing Law quantifies the needs for very low income, low income, moderate income, and above moderate-income housing within a jurisdiction and identified planning period. The most recent RHNA allocation, the 5th Cycle RHNA Allocation Plan, identifies the City's allocation (2014-2021) for the provision of 1,674 units of which 42 percent would be above moderate rate units, and 58 percent would be affordable/moderate rate units. The City is currently anticipating a large RHNA allocation – an estimated 9,000 units – in the upcoming 6th Cycle RHNA Allocation Plan (October 2021 to October 2029). Alternative 3 would provide 9 fewer residential units as compared to the proposed Project. With the small reduction of 9 units, this alternative would not help the City to further achieve its RHNA allocation to the same extent as the proposed Project.

<u>Noise</u>

*Would the proposed project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

*Construction Noise*

Under Alternative 3, the height and total floor area of the proposed mixed-use development would be reduced relative to proposed Project. As such, the duration and extent of construction activities – including building construction and architectural finishing – would be reduced. Therefore, the duration of construction-related noise impacts under Alternative 3 would also be slightly reduced as compared to those described for the proposed Project. As discussed for the proposed Project in Section 3.12, *Noise*, impacts to existing sensitive receptors under this alternative would be potentially significant but would be reduced to *less than significant with mitigation* due to the requirement for a Construction Noise Management Plan under MM NOI-1. This impact would be slightly reduced relative to the proposed Project due to the reduced duration of construction activities under this alternative. Similar to the Project, construction noise impacts under this alternative would be *less than significant with mitigation*.

*Operational Noise*

Long-term operational increases in noise levels as a result of this alternative would be slightly reduced compared to the proposed Project due to the reduction in number of residential units and hotel guestrooms and the associated reduction in the number of vehicle trip generation (see Table 5-10). As discussed in Section 3.12, *Noise* ambient roadway noise increases from project trip generation would be incremental (e.g., less than 1 dB) and would be barely perceptible to existing sensitive receptors. Although there would be reduction of publicly accessible open space (e.g., publicly accessible rooftop observation deck), under this alternative, stationary noise sources would generally be similar to those described for the proposed Project reduced as compared to the proposed Project due to the similar types of uses (e.g., hotel, Cultural Use Campus, etc.). Therefore, as described for the proposed Project, operational noise impacts would be *less than significant*.

*Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

*Construction Vibration*

As described for the proposed Project, construction activities, including demolition, excavation and grading would have the potential to generate ground-borne noise that would exceed the Caltrans vibration damage potential threshold for onsite City-designated Landmarks at 1333 and 1337 Ocean Avenue. Additionally, as described for the proposed Project, demolition and excavation activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold at the Gussie Moran House, an offsite City-designated Landmark at 1323 Ocean Avenue. MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Operational Vibration*

As described for the proposed Project, operations under Alternative 3 would not be anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur as a result of truck travel to and from the Project site for periodic deliveries. However, such incidences would

be temporary in nature and would not be expected to exceed 0.1 in/sec, which is below the level for potential damage to fragile structures. No substantial sources of ground-borne vibration would be introduced as part of the proposed Project; therefore, operation of the proposed Project would not expose sensitive receptors onsite or offsite to excessive ground-borne vibration or ground-borne noise levels.

Transportation (including Neighborhood Effects related to Intersection Operations)

*Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

SCAG's 2016 RTP/SCS, the City's LUCE, and the DCP establish transportation and circulation goals that focus on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. Similar to the proposed Project, Alternative 3 would be served by numerous public transit facilities, including the Downtown Santa Monica Station. The location of the Project site would create maximum opportunities for public transit use by future residents, hotel guests, restaurant and retail customers, and Cultural Use Campus visitors consistent with LUCE goals and objectives. Additionally, by developing a mix of land uses on a single site in the Downtown, this alternative like the proposed Project would increase accessibility to multiple other destinations including restaurants, retail, office, entertainment, and residential uses. As a result of increased destination accessibility, Alternative 3 would support the Citywide goal of reducing overall vehicle trips and VMT. Further, Alternative 3 would encourage employees, residents, and visitors to use existing bicycle facilities throughout the City through implementation of a TDM plan and the provision of onsite bicycle amenities such as secure bicycle parking, including short-term and long-term bicycle racks and lockers, showers, and personal locker facilities. Similar to the proposed Project, Alternative 3 would improve walkability through and around the Project site since it would not develop the proposed Project's publicly accessible paseos, courtyard, and breezeway through the Project site. As such, impacts would be *less than significant*.

*Would the project conflict or be inconsistent with CEQA Guidelines15064.3, subdivision (b)?*

Operational transportation impacts under Alternative 3 would be slightly reduced as compared to the proposed Project due to the reduction in residential units and hotel guestrooms and the associated reduction in vehicle trip generation. The Transportation Study found that Alternative 3 would generate a net increase of 127 AM peak hour trips, 123 PM peak hour trips, and 148 weekend midday peak hour trips (Fehr & Peers 2020; see Table 5-10 and Appendix K). Compared

to the proposed Project, Alternative 3 would result in 19 fewer AM peak hour, 23 fewer PM peak hour trips, and 20 fewer weekend midday peak hour trips (Fehr & Peers 2020; see Appendix K).

Based on the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria using LOS, delay-based impacts on intersection operations would be reduced as compared to the proposed Project. During the Approval Year (2020), the four study intersections that would be impacted by the proposed Project would also be impacted under this alternative. However, due to the reduction in peak hour trips 2nd Street & Arizona Avenue would not have a significant and unavoidable impact during the Future Year (2025). All of the other intersections with significant and unavoidable impacts under the Approval Year (2020) and Future Year (2025) for the proposed Project would also be impacted under this alternative; however, the severity of those impacts (i.e., the increase in delay) would be less than that described for the proposed Project. Feasible mitigation is not available (refer to Section 3.13, *Transportation*), and impacts associated with this alternative would be *significant and unavoidable*.

Following Section 15064.3, subdivision (b)(1) and OPR's Technical Advisory, the proposed Project and Alternative 3 would be presumed to have a *less than significant* transportation impact, based on the accessibility of the Project site to public transit as well as the proposed FAR and parking provisions. Therefore, no further VMT analysis is required. Nevertheless, a quantitative VMT analysis has been prepared for informational purposes following the guidance in OPR's Technical Advisory. Since the City has not yet adopted VMT thresholds and because the EIR analysis predates the applicability of Section 15064.3, no determination of significance has been made.

As presented in Section 3.13, *Transportation*, a quantitative VMT analysis of the Project estimates that the Project would result in 11.5 VMT per employee, which approximately 60 percent of the Citywide average of 19.2 VMT per employee. In comparison to the regional average for Los Angeles County, the proposed Project's 11.5 VMT per employee is more than 15 percent below existing regional average of 18.41 VMT per employee. The proposed Project's residential VMT rate of 10.8 VMT per capita is slightly greater than the citywide average of 9.0 VMT per capita. In comparison to the regional average for Los Angeles County, the proposed Project's 10.8 VMT per capita is more than 15 percent below existing regional average of 13.44 VMT per capita. The weekday daily trip generation associated with Alternative 3 would be approximately 14 percent less than that described for the proposed Project (see Appendix K). As such, Alternative 3 would result in 23,553 daily VMT compared to 25,933 daily VMT for the proposed Project. While Alternative 3 would generate slightly less daily VMT than the Project, the VMT per employee and VMT per capita would remain similar to those described for the proposed Project.

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

The site design for the Alternative 3 would be similar to the proposed Project, with the reconfiguration of 1st Court into an "L"-shape. As with the proposed Project, this alternative would include safety design features such as the installation of mirrors at the exit driveway onto 2nd Street to minimize hazards. As with the proposed Project, this alternative would avoid the inclusion of hazardous design features such as sharp curves or dangerous intersections and would be compliant with City Code street improvement requirements. Further, Alternative 3 would include the development of hotel, residential, and retail uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment traffic that is hazardous or incompatible with existing traffic. Therefore, impacts of Alternative 3 would be similar to the proposed Project and would be *less than significant*.

*Would the project result in inadequate emergency access?*

Neither the proposed Project or Alternative 3 proposes the closure or major modification of adjacent access streets. As with the proposed Project, emergency access would continue to be available on adjacent streets including Ocean Avenue, 2nd Street, and Santa Monica Boulevard. Therefore, impacts on emergency access would be similar and *less than significant*.

Tribal Cultural Resources

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is at least one of the following:*

*- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or*

*- A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the Lead Agency shall consider the significance of the resources to a California Native American tribe?*

The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the Project site is sensitive for tribal cultural resources given its location along the coast and within an area of historic use by Gabrieleño/Tongva villages, such as Suangna and Comicrabit, and trade routes and waterways, which are considered cultural landscapes pursuant to CEQA Section 21074. Alternative 3 would

result in similar impacts to tribal cultural resources as those described for the proposed Project under Impact TCR-1 in Section 3.14, *Tribal Cultural Resources*. Similar to the proposed Project, construction of Alternative 3 – including excavation for the proposed subterranean parking garage – would result in the potential to encounter tribal cultural resources. As with the proposed Project, a Native American monitor from Kizh Nation shall be present during construction excavation activities as required by MM TCR-1. Therefore, impacts to tribal cultural resources under this alternative would be *less than significant with mitigation*.

Utilities

Similar to the proposed Project, the new residential and commercial uses associated with Alternative 3 would incrementally increase demand for utility service, including water supply (refer to Impact UT-1 and Impact UT-2), wastewater disposal (refer to Impact UT-3 and Impact UT-4), and solid waste disposal (refer to Impact UT-5 and UT-6). However, this demand would be adequately met by existing and planned future energy and water supplies, and remaining capacities within the wastewater treatment facility and landfills serving the City.

*Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

*Would the water supply available to serve the project from existing entitlements and resources be insufficient, or would new or expanded entitlements be needed?*

With the exception of minor onsite trenching for new connections, Alternative 3 would not require or result in the substantial construction or expansion of existing water facilities. Similar to the proposed Project, Alternative 3 would be required to comply with the City's Green Building Ordinance, which requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction (SMMC Section 8.106). Alternative 3 would also be required to comply with the Water Neutrality Ordinance, which requires all development within the City to offset all net new water use onsite or offsite. Due to the reduced scope of development under Alternative 3, this alternative would generate less water demand than the proposed Project. No unplanned new or expanded entitlements would be required to implement Alternative 3 and this alternative would not adversely affect the City's ability to meet its goal for water self-sufficiency under the SWMP. Therefore, impacts would be considered *less than significant*.

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

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

Construction activities would generate minimal wastewater flows from construction workers and would not, along with existing wastewater flows, result in capacity issues on the City's existing sewer system (since such temporary wastewater generation would be less than those generated by existing uses). Therefore, construction impacts on wastewater facilities would be less than significant and similar to the proposed Project.

Alternative 3 would generate less wastewater flows as compared to the proposed Project, due to the reduction in proposed development. Similar to the proposed Project, operation of Alternative 3 would direct the proposed wastewater flow to either the 18-inch Ocean Avenue main or the 18-inch 2nd Street main, or both. Both of local sewer mains are sufficiently sized to accommodate increased wastewater flows from the reduced development under Alternative 3 and would not require upgrades based on the current monitored flows. Therefore, with the preparation of a sewer study and monitoring prior to the issuance of the first building permit impacts would be *less than significant with mitigation*.

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

Development under this alternative would generate an increase in wastewater generation at the Project site; however, this increase would be less than the proposed Project and as such, would not exceed the HWRP's wastewater treatment capacity. Therefore, impacts to wastewater generation would be less than the proposed Project and *less than significant*.

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

*Would the project comply with Federal, State, and local statutes and regulations related to solid waste?*

Due to the reduced scope of the development under Alternative 3, this alternative would result in reduced generation of solid waste during construction and operation. Therefore, implementation of Alternative 3 would not result in the generation of solid waste during construction or operation

that would exceed the existing capacity of existing landfills serving the City. Impacts to solid waste under Alternative 3 would be *less than significant*.

Relationship of Alternative to Project Objectives

Alternative 3 would attain most of the Project objectives. By providing a mix of residential, shopping, and dining opportunities, Alternative 3 would enhance the overall balance and mix of uses in Downtown consistent with the LUCE and DCP, although to a lesser extent than the proposed Project (Project Objectives 1 and 4). With the inclusion of cultural space, this alternative would meet the objectives related to cultural institutions envisioned for the Project site and the Downtown (Project Objectives 1, 4, 8, 14). Alternative 3 would retain the existing City-designated Landmarks and therefore, would meet the objective to preserve historic resources (Project Objective 3). Development of the Project site under Alternative 3 would also meet the project objective to remove surface parking (Project Objective 10). Provision of additional residential units in the Downtown under this alternative would be consistent with the City's Housing Element, LUCE, and DCP goals and policies and would help meet the current and future housing demand in the City, including the demand for affordable housing (Project Objective 5). By virtue of its location in the transit-rich and pedestrian-oriented Downtown, this alternative would support the use of public transit and promote overall reductions in VMT and associated GHG emissions consistent with the intent of SB 743 (Project Objective 9). As a Development Agreement project, Alternative 3 would result in the provision of community benefits (Project Objective 14).

However, a number of project objectives would not be achieved to the same extent as the proposed Project. With the reduction in hotel rooms, this alternative would not fully the Project objectives related to the provision of overnight visitor accommodations which are encouraged in the DCP and Coastal Act (Project Objectives 1, 2, 4, 12, 13). Additionally, with the reduction in building height to 84 feet, this alternative would not achieve the iconic architectural and urban design as encouraged in the DCP (Project Objective 6). Pedestrian orientation would also be compromised with the significant reduction in ground floor publicly accessible open space (Project Objective 7). With the reduction of the hotel rooms, Alternative 3 may not be economically viable as the proposed Project (Project Objective 12) and would not provide as much fiscal and economic benefits to the City (Project Objective 13).

Overall, while Alternative 3 would meet the majority of Project objectives, some of the Project objectives would not be fully achieved to the same extent as the proposed Project.

### 5.5.4 Alternative 4 – Retention of Existing City-Designated Landmarks and 101 Santa Monica Boulevard

The Retention of Existing City-Designated Landmarks and 101 Santa Monica Boulevard Alternative (Alternative 4) would develop a 50-foot-tall mixed-use commercial, residential, office, and museum project consistent with the height limits in the DCP for the BC and OT Districts. The existing City-designated Landmarks and the existing building at 101 Santa Monica Boulevard would be retained in place and three new mixed-use buildings would be constructed around the existing buildings. Alternative 4 would comprise three 50-foot-tall mixed-use buildings totaling 169,717 sf with 60,526 sf of ground floor restaurant and retail uses, 70,460 sf of upper floor residential uses, 12,000 sf of commercial office, 26,041 sf of museum space, and 690 sf of storage resulting in a 2.04 FAR (see Table 5-4).

**Table 5-4. Summary of Alternative 4 – Retention of Existing City-Designated Landmarks and 101 Santa Monica Boulevard**

| Alternative 4 | | | | |
|---|---|---|---|---|
| **Use** | **Units** | **Floor Area (sf)** | **Above Ground Floor Area (sf)** | **Below Ground Floor Area (sf)** |
| Residential | 80 residential units | 70,460 | 70,460 | |
| Commercial Office | | 12,000 | 12,000 | |
| Restaurant/Retail | | 60,526 | 60,526 | |
| Outdoor Dining | | 1,290 | | |
| Museum | | 26,041 | 24,481 | 1,560 |
| Storage | | 690 | | |
| Open Space (Ground and Podium Level) | | 15,060 | | |
| Subterranean Parking Spaces | 253 parking space (six subterranean levels) | | | |
| **Totals** | | **169,717** | **168,157** | **1,560** |
| **Floor Area for FAR*** | | | **168,157** | |
| **FAR** | | | **2.04** | |

Note: *Per the SMMC the total development area used to calculate the FAR includes above ground floor area only. Neither open space nor below ground (i.e., subterranean) floor area is included in the FAR calculation.

Under this alternative, the existing City-designated Landmarks located at 1333 and 1337 Ocean Avenue would remain in their current locations, minimizing changes to their existing context and landscape. The existing building located at 1327 Ocean Avenue and the rear structures at 1333 and 1337 Ocean Avenue, which are not City-designated Landmarks, would be demolished. Within the general footprint of the demolished buildings, a new two-story "L"-shaped building would be constructed around the existing City-designated Landmarks (see Figure 5-3). This 27,736-sf

building, together with the existing City-designated Landmarks, would support 26,041 sf of museum uses and 6,256 sf of restaurant and retail uses (see Figure 5-3).[3] The total FAR of the museum and City-designated Landmarks would be 1.44. No parking would be provided beneath the museum due to the retention of the existing City-designated Landmarks in their current locations (i.e., these City-designated Landmarks would not be temporarily relocated to facilitate excavation below).

*101 Santa Monica Boulevard*

The existing 23,670-sf mixed-use building located at 101 Santa Monica Boulevard would also remain in place. Accordingly, the existing 11,100 sf of ground floor restaurant uses with 1,290 sf of outdoor dining, 690 sf of ground floor storage space, and the 19 rent-controlled apartment units (10,590 sf) on the upper floors would not change. However, the existing 47-space surface parking lot associated with 101 Santa Monica Boulevard would be demolished and redeveloped with a new 25,440-sf Tier I commercial building with 13,440 sf of ground floor restaurant and retail uses and 12,000 sf of commercial office uses on the second floor.[2] Approximately 3,000 sf of open space would be provided on the ground level and podium level. Alternative 4 would also provide a six-level subterranean parking garage with 116 spaces below this new building. The combined FAR for the existing and proposed buildings at 101 Santa Monica Boulevard would be 1.59.

*129 Santa Monica Boulevard*

Alternative 4 would also demolish the existing 96-space surface parking lot at 129 Santa Monica Boulevard and would develop an 88,310-sf mixed-use building on this property with 28,440 sf of ground floor restaurant and retail uses and 59,870 sf upper floor residential uses. This new mixed-use residential building would be developed within the DCP's Tier II development standards with a 2.94 FAR and 50 feet in height.[4] The four-story building would include a total of 61 residential units located on Floors 2 through 4, including 1 studio, 35 one-bedroom, 16 two-bedroom, and 9 three-bedroom units. In addition to restaurant and retail uses, the ground floor would also include

[3] The new development would be less than 30,000 sf in order to avoid triggering a requirement for a Development Agreement.

[4] Based on preliminary massing studies, a courtyard building with a 2.94 FAR (rather than the Tier II maximum 3.5 FAR) is attainable for a 50-foot project on this site. The 2.94 FAR results from the combination of the 50-foot height limit, the need to provide light and air for residential units and the minimum courtyard width dimensions in the DCP. The DCP's Tier II maximum height of 60 feet is not being studied for this alternative because such a project would require 25 percent affordable housing, which has not yet been developed in the Downtown and may present challenges in terms of economic feasibility

residential uses such as a lobby, mailroom, and other common areas (e.g., laundry room). Approximately 7,560 sf of open space would be provided on the ground level and podium level.

Alternative 4 would include a total of 80 residential units with a mix of 13 studios, 42 one-bedroom, 16 two-bedroom, and 9 three-bedroom units (see Table 5-5). This alternative would result in an approximately 20 percent decrease (20 units) in residential units, from 100 units under the proposed Project. This alternative would increase restaurant and retail floor area by approximately 68 percent (24,416 sf) from 36,110 sf under the proposed Project. However, there would be an approximately 27 percent decrease (9,459 sf) in the size of the Cultural Use Campus (i.e., museum), from 35,500 sf under the proposed Project. Additionally, there would be an approximately 64 percent decrease in open space (25,860 sf) from 40,920 sf under the proposed Project.

Overall, the combined FAR would be reduced from 2.95 under the proposed Project to 2.04 under this alternative. In comparison with the proposed Project, there would be 20 fewer residential units, no hotel, no publicly accessible observation deck, and substantially less open space.

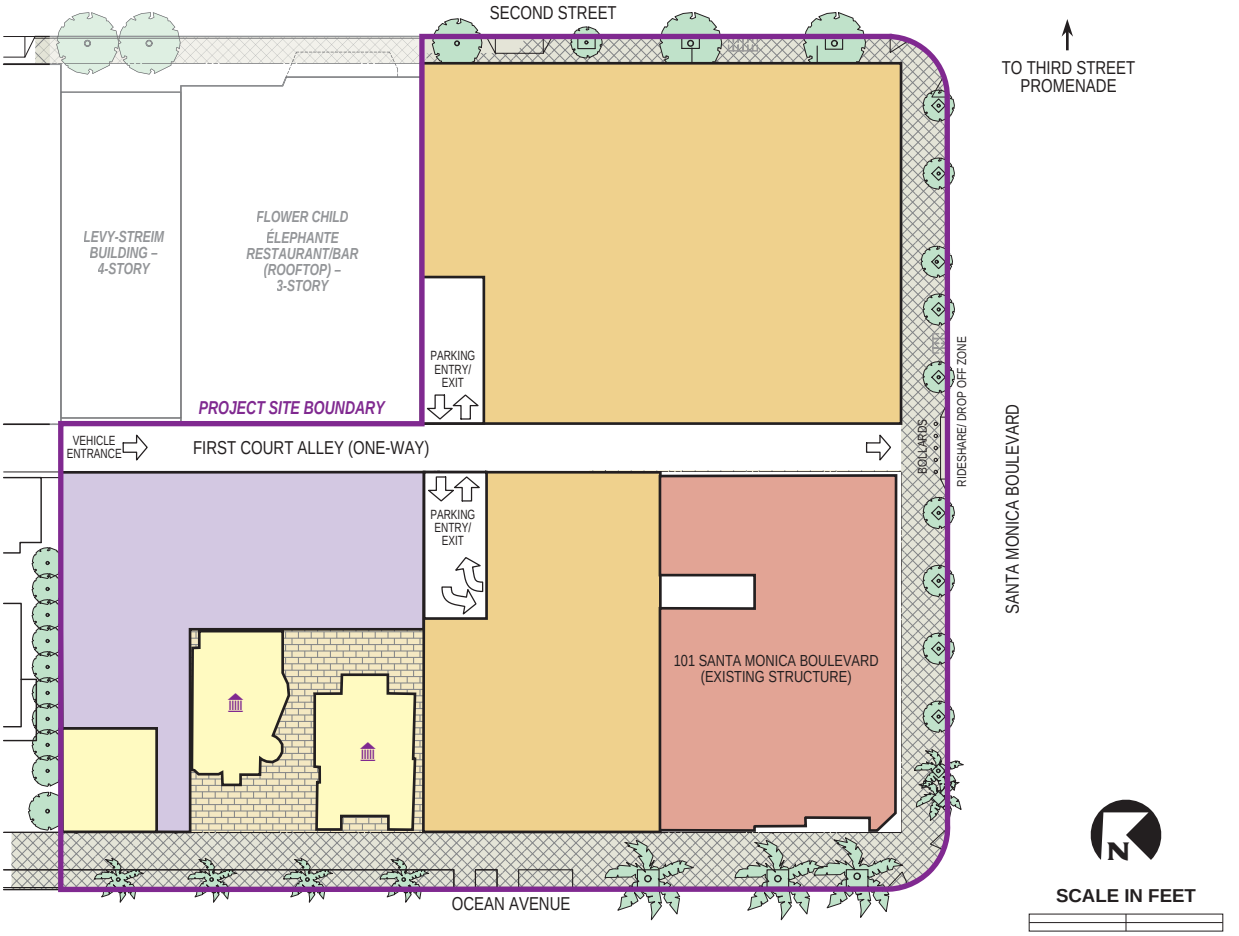
**Table 5-5. Summary of Alternative 4 Residential Unit Mix**

| Unit Type | Total Units | Rent-Controlled Units | Deed-Restricted Affordable Units | Market-Rate Units |
|---|---|---|---|---|
| Studio | 13 | 12 | 1 | |
| One-Bedroom | 42 | 7 | 5 | 30 |
| Two-Bedroom | 16 | | 6 | 10 |
| Three-Bedroom | 9 | | 1 | 8 |
| **Total** | **80** | **19** | **13** | **48** |

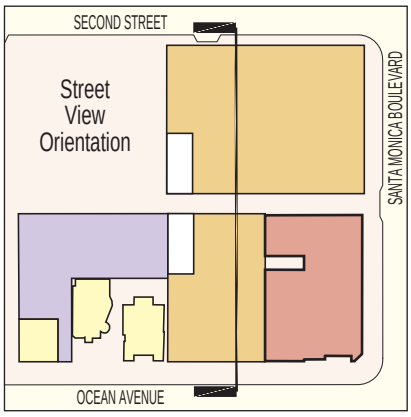
Note: The 19 rent-controlled units would be located entirely within the existing mixed-use building at 101 Santa Monica Boulevard.

1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access from Arizona Avenue to Santa Monica Boulevard. Alternative 4 would also provide a two-level subterranean parking garage with 137 spaces below this new building. Vehicle access ramps to the subterranean parking garages below 101 and 129 Santa Monica Boulevard would be provided on either side of 1st Court (see Figure 5-3).

The architectural styling and ground floor frontages would be designated to accommodate active commercial uses and pedestrian amenities as described for the proposed Project. The new landscaping of this alternative would also be similar to that described for the proposed Project.



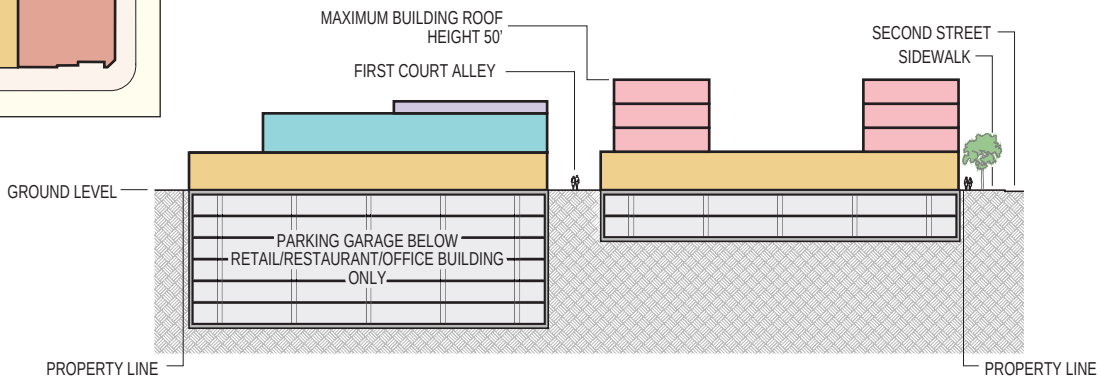

**Ground Floor Site Plan – Alternative 4**




**LEGEND**

- Rental Housing
- Retail and Restaurant
- Retail
- Restaurant
- Museum
- Office
- Ground Floor Open Space – Courtyards and Paseos (Pedestrian Only)
- Landmark Building
- Vehicle Circulation

*Note:* This cross-section is positioned parallel to Santa Monica Boulevard to show the 6-level and 2-level parking garages proposed under Alternative 4. The cross-section parallel to Ocean Avenue would be similar to Alternative 2.




**Conceptual Cross-Section from Santa Monica Boulevard – Alternative 4**

wood.

**Conceptual Overview – Alternative 4**

**FIGURE 5-3**

Aesthetics and Shade/Shadow Effects

The Project site is located in the Downtown, which is considered a TPA due to its accessibility to high quality transit service (SCAG 2016; City of Santa Monica 2017). Therefore, potential changes to aesthetics and visual resources are considered less than significant under this alternative. Nevertheless, aesthetic effects for this alternative are disclosed for informational purposes, but are not considered as significant impacts on the environment pursuant to CEQA Guidelines Section 21099.

*Would the project have a substantial effect on a scenic vista?*

*Would the project have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally designated scenic corridor?*

*Construction Effects*

Alternative 4 would retain the two City-designated landmarks and the 101 Santa Monica Building on the Project site and demolish the existing remaining buildings and surface parking lot. During construction, views of the Project site would include construction fencing, construction staging areas and construction equipment onsite, demolition debris, excavation for the subterranean parking garage, and scaffolding and new construction. This alternative would adhere to all standard City construction practices during construction area (e.g., fencing, lighting, etc.) to shield construction activities from public view to the maximum extent practicable. Impacts would be similar to those described for the proposed Project and *less than significant*.

*Operation*

Under Alternative 4, the existing City-designated Landmarks and the existing building at 101 Santa Monica Boulevard would be retained in place and three new mixed-use buildings would be constructed around the existing buildings. A conceptual layout of Alternative 4 is shown in Figure 5-3 is shown for illustrative purposes for this EIR.

As described for the proposed Project under Impact VIS-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, the proposed development under Alternative 4 would be visible along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. However, similar to Alternative 2, under Alternative 4, each of the buildings would reach a maximum height of 50 feet and would continue to be substantially smaller than the existing high-rise development located along Ocean Avenue (refer to Table 3.1-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). As described for the

proposed Project under Impact VIS-2, the proposed development under Alternative 4 would also be visible from Ocean Avenue, which is a City-designated scenic corridor as established in the City's General Plan Scenic Corridors Element (1975). However, similar to the proposed Project, this alternative would not adversely affect scenic vistas or scenic resources within a locally designated scenic corridor. This alternative would adhere to all standard City construction practices during construction area (e.g., fencing, lighting, etc.) to shield construction activities from public view to the maximum extent practicable. Additionally, Alternative 4 would adhere to all development and design standards (e.g., building frontage standards) for increased building setbacks and maximum access to light and air to avoid adverse effects on scenic vistas and views. However, unlike the proposed Project, this alternative would not include a rooftop observation deck and therefore would not create a new publicly available scenic vista with views of Santa Monica Bay, Santa Monica Pier, and Downtown, with distant views of the Santa Monica Mountains.

*If the project is located in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

As described for the proposed Project under Impact VIS-3 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, Alternative 4 would also be consistent with regulations that govern scenic quality including the development standards and policies of the LUCE, DCP, and SMMC. Alternative 4 would not conflict with the LUCE, but would not achieve certain LUCE goals and policies to the same extent as the Project. Alternative 4 would be designed to be compatible with adjacent uses (Goal LU15), be context sensitive (Policy LU15.3), provide step backs and articulation (Policies LU15.11, LU15.8, D8.5), provide pedestrian scale active retail space adjacent to sidewalk (Policies D8.1 and D9.4) and remove open on-grade parking (Policy D9.3). However, because the 50-foot height limit would result in larger building footprints and less ground floor open space, Alternative 4 would not provide the same level of building roofline variation (Policy LU15.10), varied building heights and architectural elements (Policy B1.5 and D8.3, D8.4), public plaza and lively streetscape (Policy B2.2), open space (Goal LU17 and Policy LU17.1), preservation or opening of views into the Project site or of the Santa Monica Bay as under the Project (Policy D10.2).

As with the proposed Project, Alternative 4 would be consistent with the height limitations and FAR established for the Project site under the DCP. Additionally, similar to the Project, Alternative 4 would be expected to meet the design guidelines of the DCP to maximize architectural integrity, create human scaled buildings, create visual interest and variety in building design, animate building frontages, create safe and active streetscape, and create enjoyable open space. As with the

proposed Project, development under this alternative would be subject to discretionary review by the Planning Commission and City Council and architectural design review, which would ensure that height and massing would not detract from or conflict with the visual character within the immediate vicinity of the Project site.

*Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

Similar to the Project, development of this alternative would create a new source of light and glare that could adversely affect nighttime or daytime views in the area (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). However, effects would be slightly reduced compared to those described for the proposed Project given the reduction in development and associated reduction in lighting, glazing (windows), and other reflective materials used in the façade. As with the proposed Project, unless otherwise permitted by the Development Agreement, new light sources would be shielded and restricted to 0.5-foot candles of light in compliance with the SMMC Section 9.21.080. Building materials would also be required to comply with SMMC Section 9.21.120, which states that reflective materials may not exceed more than 25 percent of the façade surface area and prohibits the use of black or mirrored glass. Therefore, this alternative would not substantially affect offsite light-sensitive receptors.

*Would shadow-sensitive uses be shaded by project-related structures?*

Similar to that described for the proposed Project under Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, development under Alternative 4 would result in additional shade and shadows adjacent to the Project site. However, under Alternative 4, the reduction in maximum building height would also reduce the footprint and duration of shade and shadow effects on nearby residential uses on 2nd Street, including the Luxury Apartments, StepUp on Second, Chelsea Santa Monica, the Mayfair Residences, and the Westside Villas (refer to Table 3.1-2 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). While the buildings proposed under Alternative 4 are reduced in height when compared to the proposed Project, these buildings would have limited access to natural light due to the decrease in ground-floor open space. Nevertheless, the proposed Project design comprises several distinct building forms separated by pedestrian pathways and open-air breaks to allow ocean breeze and natural sunlight to infiltrate the interior portions of the Project site. Unlike the proposed Project, the open space provided by Alternative 4 would be located within the interior of the mixed-use residential buildings along Santa Monica Boulevard.

Air Quality

Construction and operational criteria pollutant emissions were estimated for Alternative 4 using CalEEMod Version 2016.3.2. These emissions were compared to the SCAQMD significance thresholds as well as the construction emissions and operational emissions described for the proposed Project under Impact AQ-3 and Impact AQ-4, respectively (see Table 5-8 and Table 5-9).

*Would the project conflict with or obstruct implementation of the applicable air quality plan?*

*Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?*

*Construction Emissions*

The total floor area under Alternative 4 would be reduced by approximately 47 percent (148,493 sf) from the total floor area under the proposed Project. Additionally, the total extent of the subterranean parking garage would be reduced. Together, this would substantially decrease the duration and extent of construction activities, including excavation, building construction, and architectural finishing. As described for the proposed Project, the majority of construction-related emissions would occur during grading and excavation for the subterranean parking garage. Alternative 4 would include a two-level subterranean parking garage at 129 Santa Monica Boulevard and a six-level subterranean parking garage beneath the existing surface parking lot at 101 Santa Monica Boulevard. While the depth of excavation would be increased at 101 Santa Monica Boulevard under this alternative, the total volume of excavation would be substantially reduced from 108,000 cubic yards (cy) to approximately 46,500 cy

As the overall scope of construction activities would be reduced from the proposed Project, construction emissions for CO, VOC, $NO_x$, particulate matter ($PM_{10}$ and $PM_{2.5}$) and $SO_x$ would be reduced compared to the proposed Project. Therefore, emissions from this construction activities under Alternative 4 would be below the SCAQMD construction significance thresholds (mass daily) and LSTs. This alternative would reduce construction-related air quality impacts from the proposed Project and impacts would be *less than significant*.

*Operational Emissions*

Under Alternative 4, there would be an increase in the number of residential units and the size of the Cultural Use Campus (i.e., museum). Additionally, the proposed hotel described for the

proposed Project would be eliminated. However, the increase in restaurant and retail floor area and the addition of 12,000 sf of commercial office would result in 15 to 36 percent more vehicle trips relative to the proposed Project (see Table 5-10). As a result, long-term criteria pollutant emissions and impacts to regional air quality would be slightly increase. However, as shown in Table 5-10 the operational criteria pollutant emissions generated by Alternative 4 – including energy/natural gas demand, landscaping maintenance, and vehicle trips – would remain below the SCAQMD significance thresholds. As with the proposed Project, this alternative would not conflict with the 2016 AQMP as this alternative would not contribute to population growth in excess of the AQMP's population forecast and impacts would be *less than significant*.

*Would the project expose sensitive receptors to substantial pollutant concentrations?*

*Construction*

As described for the proposed Project in Impact AQ-4 in Section 3.2, *Air Quality*, construction emissions would not exceed LSTs that would adversely affect local air quality and public health. Due to the reduction in scope, construction emissions for CO, VOCs, $NO_x$, particulate matter ($PM_{10}$ and $PM_{2.5}$), and $SO_x$ would be slightly reduced compared to the proposed Project. Therefore, impacts on sensitive receptors would be *less than significant* and less than those described for the proposed Project.

*Operation*

As described for the proposed Project in Impact AQ-5 in Section 3.2, *Air Quality*, this alternative would contribute to cumulative traffic in the area and would increase CO emissions at nearby intersections. As described for Alternative 2, which would have an even greater increase in vehicle trips related to the proposed Project, CO concentrations under Alternative 4 would continue to be far less than those estimated in the 2003 AQMP for the most congested intersection in Los Angeles, and would not create a CO hot spot or exceed the CAAQS for CO emissions.

Due to the decrease in the duration and extent of construction activities under Alternative 4, this alternative would not generate significant amounts of TACs. Further, as with the proposed Project, this alternative would not place sensitive receptors within close proximity to significant sources of TACs (i.e., within 500 feet of I-10) (refer to Section 3.2, *Air Quality*); therefore, similar to the proposed Project, impacts related to TACs would continue to be *less than significant.*

*Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?*

Similar to that described for the proposed Project under Impact AQ-6 in Section 3.2, *Air Quality*, this alternative would result in temporary, construction-related emissions such as odors; however, the duration of exposure to these odors would be slightly reduced. As described for the proposed Project, operational odors that would be expected from this alternative would be typically associated with food smells (e.g., from the outdoor dining areas) and solid waste (refuse) storage typical of urban uses. All refuse and recycling bins would be covered in designated storage areas and properly maintained to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. These odors would not be a substantially perceptible by nearby sensitive receptors and impacts associated with generation of objectionable odors would be *less than significant*.

Cultural Resources

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

Alternative 4 would result in reduced impacts to historic resources as compared to the proposed Project (refer to Impact CR-1 in Section 3.4, *Cultural Resources*). In contrast to the proposed Project which would relocate the existing City-designated Landmarks, Alternative 4 would retain the existing City-designated Landmarks at their current locations, preserving their historic context and landscape. As with the proposed Project, development of multiple story structures in proximity to City-designated Landmarks would potentially alter the existing visual and historic context of these structures. As described in Section 3.4, *Cultural Resources*, the existing commercial building at 1327 Ocean Avenue, the rear structures at 1333 and 1337 Ocean Avenue, and the mixed-use building at 101 Santa Monica Boulevard are not considered a historic resource under CEQA. Therefore, removal of these rear structures for Alternative 4 would not result in significant impacts. Nevertheless, due to the development of multi-story structures in proximity to the onsite City-designated Landmarks, the Applicant would be required to follow the applicable measures described in MM CR-1 – particularly those related to compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, the California Historic Building Code, and compatible new construction.

Alternative 4 would also retain the 101 Santa Monica Boulevard building, which has been identified in the City's Historic Resources Inventory as a potential historic resource. However, as described in Section 3.4, *Cultural Resources*, this building was reassessed in the Historic Assessment Report prepared by Ostashay & Associates Consulting (2020) for integrity and potential historical significance. The assessment found, while the improvement at 101 Santa

Monica Boulevard does retain some decorative elements on the exterior, the building has been extensively altered since it was constructed in 1925. All the significant alterations made to the building over the years have drastically diminished the important historical characteristics that define it as a mixed-use Spanish Colonial Revival style commercial building. Based on this analysis, the 1925 mixed-use commercial building does not appear to be eligible for listing in the National Register, California Register, or as a City-designated Landmark or Structure of Merit.

As described in Section 3.4, *Cultural Resources*, the existing commercial building at 1327 Ocean Avenue and the rear structures at 1333 and 1337 Ocean Avenue are not considered a historic resource under CEQA. Therefore, demolition of the other existing buildings on the Project site under this alternative would not result in adverse effects on historic resources.

As described for the proposed Project, construction activities, including demolition, excavation and grading would have the potential to generate ground-borne noise that would exceed the Caltrans vibration damage potential threshold for onsite City-designated Landmarks at 1333 and 1337 Ocean Avenue. Additionally, as described for the proposed Project, demolition and excavation activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold at the Gussie Moran House, an offsite City-designated Landmark at 1323 Ocean Avenue. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines?*

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

The potential to encounter previously unknown buried archaeological resources or human remains under this alternative would be slightly reduced relative to the proposed Project as the extent and depth of excavation associated with the subterranean parking garage would be reduced (refer to Impact CR-2 and Impact CR-3, respectively). Nevertheless, DCP MM CR-3a and CR-3b as well as MM CR-2 would continue to be implemented and would require standard protocols for evaluation and recovery in the event of inadvertent discoveries of archaeological resources or

human remains. These protocols would ensure that impacts to archaeological resources would remain *less than significant with mitigation*.

Energy

*Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

Due to the decrease in the duration and extent of construction activities under Alternative 4, temporary, construction-related energy impacts would be reduced as compared to the proposed Project (refer to Impact EN-1 in Section 3.5, *Energy*).

The total floor area under Alternative 4 would be reduced by approximately 147,033 sf from the total floor area under the proposed Project; however, this alternative would support a 68 percent increase in restaurant and retail use as compared to the proposed Project as well as 12,000 sf of commercial office. As such, with this increase in energy intensive uses, the proposed mixed-use development under Alternative 4 may slightly increase overall energy demand, including electricity, natural gas, and transportation as compared to the proposed Project (see the *Greenhouse Gas Emissions* discussion). This alternative would also incorporate similar efficiency measures into the design of the buildings and service systems, including energy efficient HVAC systems, operable windows to increase air flow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and water-efficient equipment and plumbing infrastructure, and an onsite PV system in compliance with the City's Green Building Code. Additionally, as required by the City's Energy Code, Alternative 4 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code. Therefore, similar to the Project, Alternative 4 would not result in wasteful, inefficient, or unnecessary consumption of energy sources and the impact would be *less than significant*.

*Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As described for the proposed Project in Impact EN-2 in Section 3.5, *Energy*, Alternative 4 would be designed to comply with standard regulations, as well as the policies of the City's LUCE, Sustainable City Plan, Energy Code, and Green Building Standards Code. Under this alternative, the mixed-use project would include sustainability features, such as a solar PV array. Green building elements would also increase energy efficiency through use of energy-efficient HVAC

systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use (refer to Section 2.6.10, *Sustainability Features*). As required by the City's Energy Code, Alternative 4 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code.

Further, the Project site is in a TPA, given the proximity of the Downtown Santa Monica Station (within approximately 0.5 miles of the Project site) and the high number of bus routes in the Project area. As a result, similar to the proposed Project, Alternative 4 would support State, regional and City efforts to improve transportation energy efficiency and reduce wasteful or inefficient transportation energy consumption. As discussed in Section 3.5, *Energy* and Section 3.10, *Land Use and Planning*, Alternative 4 would be consistent with local, regional, and state goals and policies related to energy efficiency and would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, as with the proposed Project, impacts to energy under Alternative 4 would be *less than significant*.

Geology and Soils

*Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

*i) Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

*ii) Strong seismic ground shaking?*

*iii) Seismic-related ground failure including liquefaction?*

*iv) Landslides?*

*Would the Project result in substantial soil erosion or the loss of topsoil?*

*Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

*Would the Project be located on expansive soil, as defined in Table 18-1-B of the uniform Building Code (1194), creating substantial direct or indirect risks to life or property?*

Impacts related to geology and soils under Alternative 4 would be similar to those described for the proposed Project as the existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 and Impact GEO-2 in Section 3.6, *Geology and Soils*. While the total volume of excavation would be substantially reduced, the six-level subterranean parking garage proposed under this alternative may require an excavation of up to 66 feet bgs.[5] Further, as described in Section 3.6, *Geology and Soils*, the depth to groundwater at the Project site is between 47 and 62.5 feet bgs. Therefore, implementation of Alternative 4 could potentially require groundwater dewatering (see *Hydrology and Water Quality* discussion). Compliance with the SMBC, and the site-specific recommendations of a Final Geotechnical Report would address geologic hazards under this alternative and impacts would be *less than significant*.

*Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

As with the proposed Project, the Applicant would be required to implement mitigation measures DCP MM CR-4a and MM CR-4b, which require paleontological monitoring during grading and excavation and proper handling of potential paleontological resources if encountered during construction activities. As with the proposed Project, compliance with standard regulatory conditions and required mitigation measures would reduce impacts to *less than significant with mitigation*.

Greenhouse Gas Emissions

*Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

*Would the project be inconsistent with any of the GHG reduction strategies set forth by the City's LUCE, Sustainable City Plan, and Climate Action Plan, AB/SB 32 and SB 375; and the State Attorney General, Office of Planning and Research and Climate Action Team recommendations?*

GHG emissions were estimated for both construction and operation of this alternative using CalEEMod Version 2016.3.2. The majority of construction-related GHG emissions would occur during site preparation and excavation for the subterranean parking garages. As the duration and

[5] While the depth of the subterranean parking garage would be greater than that described for the proposed Project, the footprint of the subterranean parking garage would be much smaller. Therefore, even with an increased depth of excavation, the total volume of the subterranean parking garage would be reduced relative to the proposed Proejct.

extent of construction activities under Alternative 4 – including excavation – would be reduced relative to the proposed Project, GHG emissions from construction would also be reduced.

While the total floor area would be reduced under Alternative 4, this alternative would support a 68 percent increase in restaurant and retail uses as compared to the proposed Project as well as 12,000 sf of commercial office. As such, this alternative would generate slightly more operational GHG emissions due to the increase in energy use for building operations and the increase in Project-generated trips generation. Operational GHG emissions under this alternative are estimated at 3,508 MT $CO_2e$/year relative to 3,185 $CO_2e$/year under the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions*).

Nevertheless, potential impacts related to conflicts with plans, policies, and regulations related to reduction in GHG emissions would be similar to those identified in Impact GHG-1 and Impact GHG-2 for the proposed Project and would be *less than significant*. As with the proposed Project, this alternative would continue to support the state and local GHG reduction goals and policies as it would focus new development near transit to create sustainable, active pedestrian-friendly development that decreases reliance on vehicles and increases the use of transit, bicycle, and pedestrian facilities. As with the proposed Project, this alternative would represent mixed-use infill redevelopment within the Downtown, which is served by high quality transit, bicycle, and pedestrian facilities. Directing growth to existing urbanized areas is an important strategy to reduce GHG emissions, largely due to reduced building energy and vehicle use. Alternative 4 would be required to comply with City of Santa Monica Green Building Code, Energy Code, and other applicable regulations. Thus, similar to the Project, Alternative 4 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., LUCE, Sustainable City Plan, CAAP, Green Building Ordinance, AB 32, SB 375, etc.).

<u>Hazards and Hazardous Materials</u>

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

*Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

*Construction*

Similar to that described for the proposed Project under Impact HAZ-1 and Impact HAZ-2, Alternative 4 would require site preparation activities, including demolition and excavation

activities. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACMs, LBPs, and mold that could be released during demolition of the existing buildings at 1327 Ocean Avenue and the rear structures at 1333 and 1337 Ocean Avenue. Due to the reduction in the extent of the subterranean parking garage under this alternative, the potential for exposure to contaminated soils (e.g., associated with a historical onsite dry-cleaning facility, residential uses, and a historical offsite gas station) would be slightly reduced. However, the overall impacts with regard to hazards and hazardous materials under this alternative would remain similar to those described for the proposed Project. As such, DCP MM HAZ-2a through MM HAZ-2d, which would require hazardous materials surveys, standard protocols following discovery of contamination, and preparation of a soils management plan, would be required. Compliance with standard regulatory conditions and applicable DCP Program EIR mitigation measures would reduce impacts to a *less than significant with mitigation*.

*Operations*

As with the proposed Project, Alternative 4 would include retail, restaurant, cultural, and residential uses, which require the routine use of materials such as those used for household cleaning and maintenance products, pesticides and herbicides, paints, solvents, degreasers, and chemicals associated with swimming pools. These materials would be used in compliance with existing CalEPA regulations and the CUPA. Through compliance with regulatory measures, operational impacts of the proposed Project and Alternative 4 due to routine use of hazardous materials and accidental release of such materials would be similar and *less than significant*.

Hydrology and Water Quality

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

*Construction*

As described for the proposed Project under Impact HYD-1 in Section 3.9, *Hydrology and Water Quality*, implementation of the Applicant-prepared SWPPP would be required to address surface water quality impacts from erosion, sedimentation, and polluted runoff during construction activities. Standard regulatory conditions requiring compliance with the Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10) including development of a SWPPP would address impacts to surface water quality under this alternative. With implementation of the SWPPP prepared for the Project site, short-term construction impacts to surface water quality under Alternative 4 would be *less than significant*.

*Operation*

With regard to operation, implementation of Alternative 4 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., buildings, driveways, pedestrian walkways, etc.). In accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would be incorporated into an Urban Runoff Mitigation Plan to be approved by the City and would be implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 4 to *less than significant*.

*Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Implementation of Alternative 4 would result in the construction of two subterranean parking garages. While the total area of the parking garages would be reduced relative to the proposed Project, the depth to excavation would be increased from a maximum depth of 35 feet bgs under the proposed Project to approximately 66 feet bgs under this alternative. Based on the depth to groundwater at the Project site between 47 and 62.5 feet bgs (refer to Section 3.6, *Geology and Soils*), dewatering activities and a Construction Dewatering General Permit may be required. If dewatering of groundwater is required based on onsite groundwater depth, it would be accomplished in accordance with Los Angles RWQCB's Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Additionally, construction activities associated with Alternative 4 (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal.

As with the proposed Project, implementation of this alternative would incrementally increase demand for groundwater supplies from the Santa Monica Groundwater Basin. However, similar to the proposed Project, this alternative would not substantially deplete the City's groundwater supplies since the City's Sustainable Water Master Plan (SWMP) – which account for development and associated population growth under the LUCE and the DCP – has determined that the City's water supply is adequate to meet Citywide demand through 2040.

With regard to groundwater recharge, existing groundwater recharge on the site is negligible due to the existing developed (i.e., paved) nature of the Project site (i.e., paved surfaces, buildings, etc.). Therefore, implementation of Alternative 4, which would include the construction of impervious surfaces including new buildings and subterranean parking structures, would not measurably affect groundwater infiltration at the Project site. Additionally, the City's Department

of Public Works prohibits infiltration of runoff for properties located west of 4th Street ranging from northerly City limits to the north to I-10 freeway to the south, including the Project site. Impacts would be similar to the proposed Project and *less than significant*.

*Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:*

*i) result in substantial erosion or siltation onsite or offsite;*

*ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or*

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

*Construction*

Site preparation activities, including excavation and grading for Alternative 4 would result in exposure of soils and would cause minor alterations to onsite drainage, including the potential for temporary ponding during storm events (refer to Section 3.9, *Hydrology and Water Quality*). However, all stormwater generated during construction would continue to be directed to existing the City storm drain inlets and storm drain lines that currently serve the Project site. During construction, a SWPPP outlining associated BMPs would be implemented in accordance with applicable Los Angles RWQCB and City regulations to provide for temporary stormwater management and maintain the overall existing drainage pattern during construction.

*Operation*

Implementation of Alternative 4 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). Additionally, stormwater runoff would continue to follow the same drainage pathways to the existing storm drain system. Further, in accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would incorporated into an Urban Runoff Mitigation Plan to be approved by the City and implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 4 to *less than significant*.

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described for the proposed Project under Impact HYD-4 in Section 3.9, *Hydrology and Water Quality*, development under Alternative 4 would be implemented in a manner consistent with, and supportive of the SWMP. As with the Project, Alternative 4 would comply with NPDES and City requirements, where BMPs would be implemented to address water quality and groundwater issues during both construction and operational activities. As with the proposed Project, Alternative 4 would not adversely affect the ability of the City to meet its goal for water self-sufficiency or maintaining groundwater quality under the SWMP. Therefore, the impact of Alternative 4 on sustainable groundwater management would be *less than significant.*

Land Use and Planning

*Would the project physically divide an established community?*

Similar to the proposed Project, Alternative 4 would represent mixed-use infill redevelopment within the Downtown, which is served by high quality transit, bicycle, and pedestrian facilities. Alternative 4 would develop restaurant and retail uses, upper floor residential uses, commercial office, and cultural space. These uses would be consistent with the use and character of the surrounding urban environment and would be consistent with the existing land use patterns within the Downtown. Similar to the proposed Project, the Downtown would continue to function as it currently does with implementation of this alternative.

Under Alternative 4, 1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access from Arizona Avenue to Santa Monica Boulevard. Unlike the proposed Project, no pedestrian-oriented paseos would be provided under this alternative, which would limit pedestrian connectivity through the Project site. Overall, the transportation network in the vicinity of the Project site area would continue to function as it currently does with implementation of this alternative. Thus, while the implementation of Alternative 4 would not substantially improve pedestrian connectivity, it would not physically divide any established communities within the City. Similar to the proposed Project, impacts would be *less than significant*.

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

As described for the proposed Project under Impact LU-2 in Section 3.10, *Land Use and Planning*, this alternative would be consistent with the goals and policies stated in the 2016-2040 RTP/SCS, LUCE, and DCP. To achieve the GHG reduction targets mandated under SB 375, 2016-2040 RTP/SCS encourages new growth to occur in urban areas with high quality transit and facilities for active transportation (e.g. bicycle and pedestrian facilities). Alternative 4 consists of mixed-use development in the transit-rich Downtown. Future residents, employees, and visitors would have the opportunity to use the Metro E (Expo) LRT line to travel to and from the Downtown, with the Downtown Santa Monica Station located within approximately 0.5 miles of the Project site. The Project site is also easily accessed by a number of Big Blue Bus and Metro transit lines located within 0.25 miles of the Project site.

This alternative would also be consistent with the overall LUCE and DCP vision of the Downtown District as a mixed use, vibrant district with opportunities to live, work, and be entertained. Alternative 4 would incorporate pedestrian-scale ground floor restaurant and retail uses, sidewalk enhancements, open space, and new housing opportunities. These elements are consistent with DCP and LUCE land use policies for the Downtown, including locating new residential uses near transit corridors, encouraging active ground floor uses, creating pedestrian-oriented spaces, encouraging local-serving uses, and providing a range of housing options. Further, the reduced height, total floor area, and overall density under this alternative would also achieve greater consistency with policies LU15.1 and LU16.1, which encourage consideration of size and bulk, potential shade, and shadow effects of proposed development on adjacent residential or habitable structures. However, the elimination of pedestrian-oriented paseos and the reduction the Cultural Use Campus (i.e., museum) floor area would substantially reduce the community benefits provided by the proposed Project.

Alternative 4 would be less consistent with the City's LCP LUP, which states that allowable uses in LUP Subarea 5 (Downtown) include cultural uses and lodging in addition to commercial and residential uses. Policy 199 of the LCP LUP provides that *"overnight visitor accommodations and related support facilities such as shops, restaurants and cultural uses that serve visitors and the local community alike shall be priority uses"* along the east side of Ocean Avenue between Colorado Avenue and California Avenue, which includes the Project site. Unlike the proposed Project, Alternative 4 does not include a lodging/hotel component. Therefore, this alternative would only be partially consistent with the LCP LUP's vision of the Downtown.

As described in Section 3.10, *Land Use and Planning*, the RHNA, mandated by State Housing Law quantifies the needs for very low income, low income, moderate income, and above moderate-income housing within a jurisdiction and identified planning period. The most recent RHNA

allocation, the 5th Cycle RHNA Allocation Plan, identifies the City's allocation (2014-2021) for the provision of 1,674 units of which 42 percent would be above moderate rate units, and 58 percent would be affordable/moderate rate units. The City is currently anticipating a large RHNA allocation – an estimated 9,000 units – in the upcoming 6th Cycle RHNA Allocation Plan (October 2021 to October 2029). Alternative 4 would provide 20 fewer residential units as compared to the proposed Project. Therefore, this alternative would not help the City to further achieve its RHNA allocation to the same extent as the proposed Project. Nevertheless, impacts would be *less than significant*.

Noise

*Would the proposed project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

*Would the proposed project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

*Construction Noise*

Under Alternative 4, the scale of the proposed mixed-use development would be reduced in terms of height and total floor area relative to proposed Project. Additionally, the total extent of the subterranean parking garage would be reduced. Together, this would substantially decrease the duration and extent of construction activities. As such, the duration and extent of construction activities – including excavation, building construction, and architectural finishing – would be substantially reduced. Therefore, the duration of construction-related noise impacts under Alternative 4 would also be substantially reduced as compared to those described for the proposed Project. As discussed for the proposed Project in Section 3.12, *Noise*, impacts to existing sensitive receptors under this alternative would be potentially significant but would be reduced to *less than significant with mitigation* due to the requirement for a Construction Noise Management Plan under MM NOI-1. This impact would be reduced relative to the proposed Project due to the reduced duration of construction activities under this alternative. Similar to the Project, construction noise impacts under this alternative would be *less than significant with mitigation*.

*Operational Noise*

Long-term operational noise levels as a result of this alternative would be slightly increased as compared to the proposed Project due to the increase in associated vehicle trip generation (see Table 5-10). However, as discussed in Section 3.12, *Noise* ambient roadway noise increases from

vehicle trips would be incremental (e.g., less than 1 dB) and would be barely perceptible to existing sensitive receptors. Stationary noise sources would be reduced as compared to the proposed Project due to the elimination of the proposed hotel as well as the decrease in size of the Cultural Use Campus (i.e., museum) and the reduction in public open space on the Project site. Similar to the Project, operational noise impacts of this alternative would be *less than significant*.

*Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

*Construction Vibration*

As described for the proposed Project, construction activities, including demolition, excavation and grading would have the potential to generate ground-borne noise that would exceed the Caltrans vibration damage potential threshold for onsite City-designated Landmarks at 1333 and 1337 Ocean Avenue. Additionally, as described for the proposed Project, demolition and excavation activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold at the Gussie Moran House, an offsite City-designated Landmark at 1323 Ocean Avenue. MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Operational Vibration*

As described for the proposed Project, operations under Alternative 4 would not be anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur as a result of truck travel to and from the Project site for periodic deliveries. However, such incidences would be temporary in nature and would not be expected to exceed 0.1 in/sec, which is below the level for potential damage to fragile structures. No substantial sources of ground-borne vibration would be introduced as part of the proposed Project; therefore, operation of the proposed Project would not expose sensitive receptors onsite or offsite to excessive ground-borne vibration or ground-borne noise levels.

Transportation (including Neighborhood Effects related to Intersection Operations)

*Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

SCAG's 2016 RTP/SCS, the City's LUCE, and the DCP establish transportation and circulation goals that focus on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. Similar to the proposed Project, Alternative 4 would be served by numerous public transit facilities, including the Downtown Santa Monica Station. The location of the Project site would create maximum opportunities for public transit use by future residents, hotel guests, restaurant and retail customers, and Cultural Use Campus visitors consistent with LUCE goals and objectives. Additionally, by developing a mix of land uses on a single site in the Downtown, this alternative like the proposed Project would increase accessibility to multiple other destinations including restaurants, retail, office, entertainment, and residential uses. As a result of increased destination accessibility, Alternative 4 would support the Citywide goal of reducing overall vehicle trips and VMT. Further, Alternative 4 would encourage employees, residents, and visitors to use existing bicycle facilities throughout the City through implementation of a TDM plan and the provision of onsite bicycle amenities such as secure bicycle parking, including short-term and long-term bicycle racks and lockers and showers facilities. As compared to the proposed Project, Alternative 4 would not improve walkability through and around the Project site since it would not develop the proposed Project's publicly accessible paseos, courtyard, and breezeway. Even so, impacts would be *less than significant*.

*Would the project conflict or be inconsistent with CEQA Guidelines15064.3, subdivision (b)?*

*Vehicle Miles Traveled*

Following Section 15064.3, subdivision (b)(1) and OPR's Technical Advisory, the proposed Project and Alternative 4 would be presumed to have a *less than significant* transportation impact, based on the accessibility of the Project site to public transit as well as the proposed FAR and parking provisions. Therefore, no further VMT analysis is required. Nevertheless, a quantitative VMT analysis has been prepared for informational purposes following the guidance in OPR's Technical Advisory. Since the City has not yet adopted VMT thresholds and because the EIR analysis predates the applicability of Section 15064.3, no determination of significance has been made.

As presented in Section 3.13, *Transportation*, a quantitative VMT analysis of the Project estimates that the Project would result in 11.5 VMT per employee, which approximately 60 percent of the

citywide average of 19.2 VMT per employee. In comparison to the regional average for Los Angeles County, the proposed Project's 11.5 VMT per employee is more than 15 percent below existing regional average of 18.41 VMT per employee. The proposed Project's residential VMT rate of 10.8 VMT per capita is slightly greater than the citywide average of 9.0 VMT per capita. In comparison to the regional average for Los Angeles County, the proposed Project's 10.8 VMT per capita is more than 15 percent below existing regional average of 13.44 VMT per capita. The weekday daily trip generation associated with Alternative 4 would be approximately 40 percent more than that described for the proposed Project (see Appendix K). As such, Alternative 4 would result in 37,008 daily VMT compared to 31,981 daily VMT for the proposed Project. While Alternative 4 would generate more daily VMT than the Project, the VMT per employee and VMT per capita would remain similar to those described for the proposed Project.

*Intersection LOS*

Operational vehicle trips would be increased under Alternative 4 due to the substantial increase restaurant and retail uses and the addition of 12,000 sf of commercial office. The Transportation Study found that Alternative 4 would generate a net increase of 170 AM peak hour trips, 199 PM peak hour trips, and 222 weekend midday peak hour trips (Fehr & Peers 2020; see Table 5-10 and Appendix K). Compared to the proposed Project, Alternative 4 would result in 24 more AM peak hour trips, 53 more PM peak hour trips, and 54 more weekend midday peak hour trips (Fehr & Peers 2020; see Appendix K).

Based on the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria using LOS, delay-based impacts on intersection operations would be increased as compared to the proposed Project. During the Approval Year (2020), the four study intersections that would be impacted by the proposed Project would also be impacted under this alternative; however, the severity of those impacts (i.e., the increase in vehicle delay) would be greater than that described for the proposed Project. Additionally, there would be a significant impact at 2nd Street & Santa Monica Boulevard during the weekend midday peak hour. During the Future Year (2025), the severity of impacts that would also occur would be slightly greater than that described for the proposed Project. Additionally, there would be a significant impact at the intersection of Lincoln Boulevard & Colorado Avenue during the AM peak hour. Therefore, Alternative 4 would result in an increase in the number of significantly impacted intersections identified for the proposed Project. Feasible mitigation is not available (refer to Section 3.13, *Transportation*), and impacts associated with this alternative would be *significant and unavoidable*.

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

Under Alternative 4, 1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access – including emergency access – from Arizona Avenue to Santa Monica Boulevard. Vehicular access to the new buildings at and 129 Santa Monica Boulevard would be provided via 1st Court. No parking would be provided at the 1333 and 1337 Ocean Avenue site due to the retention of the existing City-designated Landmarks in their current locations. Overall, the transportation network in the vicinity of the Project site area would continue to function as it currently does with implementation of this alternative. No new hazardous design features would be introduced by Alternative 4. Further, Alternative 4 would include the development of residential, museum, office, and retail/restaurant uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment traffic that is hazardous or incompatible with existing traffic. Similar to the proposed Project, impacts related to hazardous design features and incompatible uses would be *less than significant*.

*Would the project result in inadequate emergency access?*

In contrast with the proposed Project, Alternative 4 would not convert the southern portion of 1st Court into a pedestrian paseo. The transportation network would function the same as it does currently. Neither the proposed Project or Alternative 4 proposes the closure or major modification of adjacent access streets. As with the proposed Project, emergency access would continue to be available on adjacent streets including Ocean Avenue, 2nd Street, and Santa Monica Boulevard. Therefore, impacts on emergency access would be similar and *less than significant*.

Tribal Cultural Resources

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is at least one of the following:*

*- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or*

*- A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the Lead Agency shall consider the significance of the resources to a California Native American tribe?*

The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the Project site is sensitive for tribal cultural resources given its location along the coast and within an area of historic use by Gabrieleño/Tongva villages, such as Suangna and Comicrabit, and trade routes and waterways, which are considered cultural landscapes pursuant to CEQA Section 21074 (refer to Impact TCR-1 in Section 3.14, *Tribal Cultural Resources*). The potential for impacts related to tribal cultural resources under this alternative would be slightly reduced as compared to the proposed Project because the extent and the depth of excavation would be reduced (refer to Impact TCR-1 in Section 3.14, *Tribal Cultural Resources*). Accordingly, there would be a reduced potential to encounter tribal cultural resources during excavation. Nevertheless, as with the proposed Project, a Native American monitor from Kizh Nation shall be present during construction excavation activities as required by MM TCR-1. Impacts to tribal cultural resources under this alternative would be *less than significant with mitigation*.

Utilities

Similar to the proposed Project, the new residential, commercial, and office uses associated with Alternative 4 would incrementally increase demand for utility service, including water supply (refer to Impact UT-1 and Impact UT-2), wastewater disposal (refer to Impact UT-3 and Impact UT-4), and solid waste disposal (refer to Impact UT-5 and UT-6). However, this demand would be adequately met by existing and planned future energy and water supplies, and remaining capacities within the wastewater treatment facility and landfills serving the City.

*Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

*Would the water supply available to serve the project from existing entitlements and resources be insufficient, or would new or expanded entitlements be needed?*

With the exception of minor onsite trenching for new connections, Alternative 4 would not require or result in the substantial construction or expansion of existing water facilities. Similar to the proposed Project, Alternative 4 would be required to comply with the City's Green Building Ordinance, which requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction (SMMC Section 8.106). Alternative 4 would also be required to comply with the Water Neutrality Ordinance, which requires all development within the City to offset all net new water use onsite or offsite. Due to the reduced scope of development under Alternative 4, this alternative would generate less water demand than the proposed Project. No unplanned new or expanded entitlements would be required to implement Alternative 4 and this alternative would

not adversely affect the City's ability to meet its goal for water self-sufficiency under the SWMP. Therefore, impacts would be considered *less than significant*.

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

Construction activities would generate minimal wastewater flows from construction workers and would not, along with existing wastewater flows, result in capacity issues on the City's existing sewer system (since such temporary wastewater generation would be less than those generated by existing uses on the site). Therefore, construction impacts on wastewater facilities would be *less than significant* and similar to the proposed Project.

Alternative 4 would generate less wastewater flows as compared to the proposed Project, due to the reduction in proposed development. Similar to the proposed Project, operation of Alternative 4 would direct the proposed wastewater flow to either the 18-inch Ocean Avenue main or the 18-inch 2nd Street main or both. Both of these local sewer mains are sufficiently sized to accommodate increased wastewater flows under Alternative 4 and would not require upgrades based on the current monitored flows. Therefore, with the preparation of a sewer study and monitoring prior to the issuance of the first building permit impacts would be *less than significant with mitigation*.

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

Development under this alternative would generate an increase in wastewater generation at the Project site; however, this increase would be less than the proposed Project and as such, would not exceed the HWRP's wastewater treatment capacity. Therefore, impacts to wastewater generation would be less than the proposed Project and *less than significant*.

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

*Would the project comply with Federal, State, and local statutes and regulations related to solid waste?*

Due to the reduced scope of the development under Alternative 4, this alternative would result in reduced generation of solid waste during construction and operation. Therefore, implementation of Alternative 4 would not result in the generation of solid waste during construction or operation

that would exceed the existing capacity of existing landfills serving the City. Impacts to solid waste under Alternative 4 would be *less than significant*.

Relationship of Alternative to Project Objectives

Alternative 4 would attain some of the Project objectives. By providing a mix of residential, shopping, and dining opportunities, Alternative 4 would enhance the overall balance and mix of uses in Downtown consistent with the LUCE and DCP, although to a lesser extent than the proposed Project (Project Objectives 1 and 4). With the inclusion of cultural space, this alternative would meet the objectives related to cultural institutions envisioned for the Project site and the Downtown (Project Objectives 1, 4, 8, 14). Alternative 4 would retain the existing Landmarks and therefore, would meet the objective to preserve historic resources (Project Objective 3). Development of the Project site under Alternative 4 would also meet the project objective to remove surface parking (Project Objective 10). By virtue of its location in the transit-rich and pedestrian-oriented Downtown, this alternative would support the use of public transit and promote overall reductions in VMT and associated GHG emissions consistent with the intent of SB 743 (Project Objective 9). As a Development Agreement project, Alternative 4 would result in the provision of community benefits (Project Objective 14).

However, a number of project objectives would not be achieved to the same extent as the proposed Project. For example, this alternative would not meet or fully the Project objectives related to the provision of overnight visitor accommodations which are encouraged in the DCP and Coastal Act (Project Objectives 1, 2, 4, 12, 13). With less residential units proposed under this alternative, the objectives to help meet the current and future housing demand in the City, including the demand for affordable housing would not be achieved to the same extent as the proposed Project (Project Objective 5). Under this alternative, the 101 Santa Monica Boulevard building would remain in place, making it difficult to achieve the iconic architectural and urban design as encouraged in the DCP (Project Objective 6). Pedestrian orientation would also be compromised with the significant reduction in ground floor publicly accessible open space (Project Objective 7). Additionally, as the Project site would be developed with less land uses, this alternative would not meet the objectives related to a mix of use. With the elimination of the hotel uses, Alternative 4 may not be economically viable as the proposed Project (Project Objective 12) and would not provide as much fiscal and economic benefits to the City (Project Objective 13).

Overall, while Alternative 5 would majority of Project objectives, but to a lesser extent than the proposed Project.

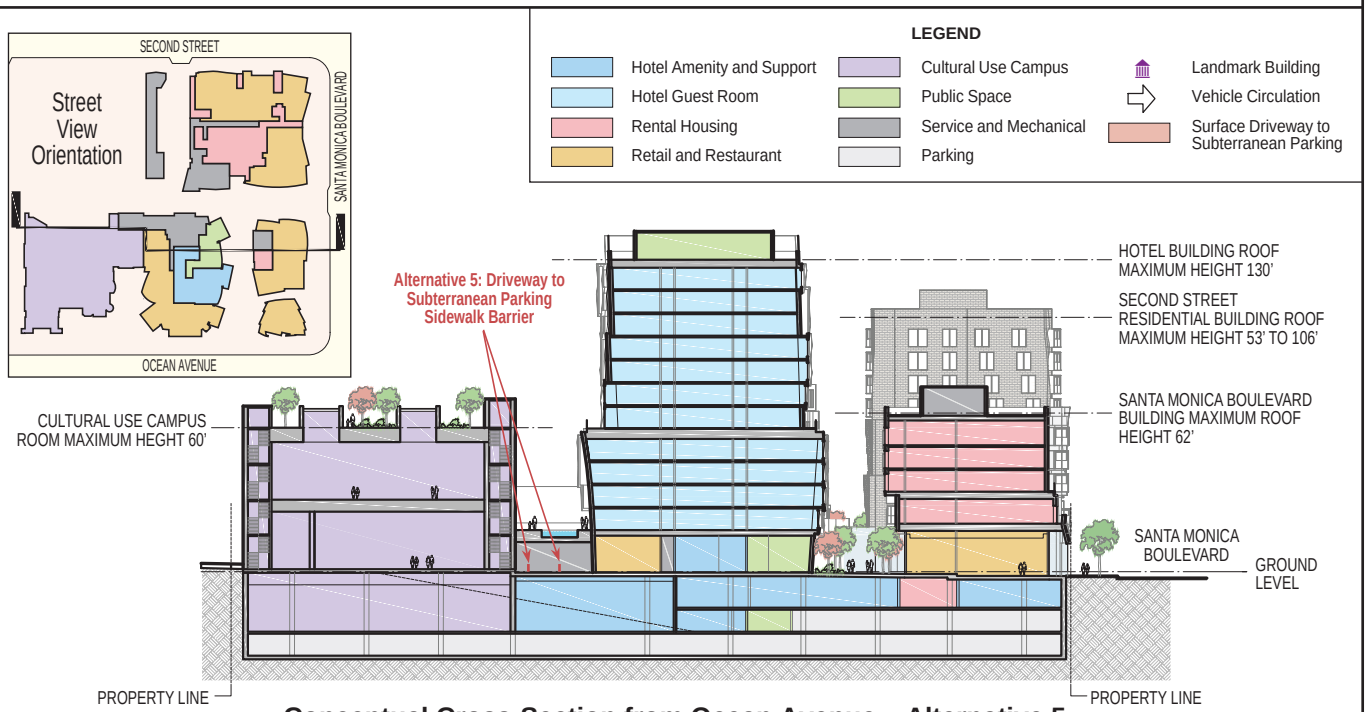
### 5.5.5 Alternative 5 – Revised Circulation Alternative

The Revised Circulation Alternative (Alternative 5) would involve development of a mixed-use hotel, residential, commercial, and Cultural Use Campus as generally described for the proposed Project. However, this alternative would include a revised circulation plan to address City concerns related to potential drop-off location along Santa Monica Boulevard. Under the proposed Project the drop-off location along Santa Monica Boulevard would be located between a dedicated right-turn lane on on-street parking located east of the existing 1st Court exit. This location could present potential constraints that have been identified by the City's Mobility Group. Under this alternative, an additional entrance to the Project site would be provided via a vehicle access ramp to the subterranean parking garage along Ocean Avenue.

As described for the proposed Project, Alternative 5 would include 36,110 sf of ground floor restaurant and retail uses, 117,700 sf of upper floor residential uses (100 residential units), and 121,400 sf of hotel uses (120 guestrooms). However, due to the configuration of the additional vehicle access ramp, this alternative would result in a reduction of ground level open space and a 2,000-sf reduction of below ground area for museum gallery space, hotel ballroom space, and back-of-house (BOH) uses. In total, Alternative 5 would have a total development area of 314,750 sf and a 2.95 FAR (see Table 5-6). This would compare to the proposed Project's total floor area (above and below grade) of 316,750 sf with 36,110 sf of ground floor restaurant and retail uses and 117,700 sf of upper floor residential uses with a 2.95 FAR.

As with the proposed Project, Alternative 5 would reconfigure 1st Court into an "L"-shape with one-way access from Arizona Avenue east to 2nd Street. A vehicle access ramp from 1st Court would provide entry to the proposed subterranean parking garage. However, Alternative 5 would also provide an additional entrance to the Project site via a 16-foot wide curb cut along Ocean Avenue with a 13-foot wide vehicle access ramp into the proposed subterranean parking garage. This ramp would be similar in design and at construction to similar grade as compared to the other ramps on the Project site. This additional vehicle access ramp would be positioned between the proposed Cultural Use Campus and Hotel Building and extend above grade for approximately 100 feet through the heart of the public courtyard fronting the Cultural Use Campus (see Figure 5-4).


Ground Floor Site Plan – Alternative 5




Conceptual Cross-Section from Ocean Avenue – Alternative 5

wood.

**Conceptual Overview – Alternative 5**

**FIGURE 5-4**

## Table 5-6. Summary of Alternative 5 – Revised Circulation Alternative

| Alternative 5 | | | | |
|---|---|---|---|---|
| **Use** | **Units** | **Floor Area (sf)** | **Above Ground Floor Area (sf)** | **Below Ground Floor Area (sf)** |
| Residential | 100 residential units | 117,700 | 103,900 | 13,800 |
| Restaurant/Retail | | 36,110 | 28,130 | 7,980 |
| Outdoor Dining | | 4,940 | | |
| Hotel | 120 guestrooms | 121,400 | 94,400 | 27,000 |
| Hotel Spa | | 4,400 | | |
| Hotel Meeting & Banquet | | 8,700 | | |
| Hotel Guestrooms/ Circ/Lobby/Kitchen | | 109,300 | | |
| Observation Deck | | 240 | | |
| Cultural Use Campus | | 34,500 | 17,100 | 17,400 |
| Ground Floor Open Space | | 21,427 | | |
| Non-Ground Floor Open Space (Private) | | 23,500 | | |
| Subterranean Parking Spaces | 285 (three subterranean levels) | | | |
| Mechanical/Shared Services Above Ground (e.g., trash and storage) | | 4,800 | 4,800 | |
| **Totals** | | **314,750** | **248,570** | **66,180** |
| **Floor Area for FAR*** | | | **243,630** | |
| **FAR** | | | **2.95** | |

Note: *Per the SMMC the total development area used to calculate the FAR includes above ground floor area only. Neither open space nor below ground (i.e., subterranean) floor area is included in the FAR calculation.

The vehicle access ramp off Ocean Avenue would disrupt the continuity of the major ocean view public courtyard that would front the Cultural Use Campus and landmark structures included in the proposed Project, and displace approximately 50 percent of this courtyard. Additionally, due to the associated concrete walls associated with the vehicle access ramp, necessary to prevent pedestrian-vehicle conflicts and other safety issues, would block views of the southern façade of the adjacent City-designated Landmark from the ground floor of the adjacent hotel building.

The reduction of subterranean gallery space required by the vehicle access ramp would result in a decrease in the functionality of the gallery. The hotel ballroom, which would be located under the gallery space, would also be affected. The ramp would sever connection of the ballroom BOH uses (i.e., the kitchen) to the ballroom service corridor as well as the gallery area, for support of events. Shifting the ballroom to the south in order to avoid the vehicle access ramp would sever connection

to BOH uses by moving the ballroom against the hotel core. If the hotel core was moved, the entire Hotel Building would need to be moved as well, which would be infeasible due to its central location within the Project site.

The architectural styling, landscaping, and sustainability features under this alternative would be similar to that of the proposed Project. This alternative would also be subject to a Development Agreement, which would include the provision of community benefits. However, this alternative would not provide a publicly accessible courtyard.

Aesthetics and Shade/Shadow Effects

The Project site is located in the Downtown, which is considered a TPA due to its accessibility to high quality transit service (SCAG 2016; City of Santa Monica 2017). Therefore, potential changes to aesthetics and visual resources under this alternative are considered less than significant. Nevertheless, aesthetic effects for this alternative are disclosed for informational purposes, but are not considered as significant impacts on the environment pursuant to CEQA Guidelines Section 21099.

*Would the project have a substantial effect on a scenic vista?*

*Would the project have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally designated scenic corridor?*

*Construction Effects*

Under Alternative 5, with the exception of the two City-designated Landmarks, the existing buildings and associated surface parking lots on the Project site would be demolished and replaced with the three individual mixed-use buildings. Views of the Project site would include construction fencing, construction staging areas and construction equipment onsite, demolition debris, excavation for the subterranean parking garage, and scaffolding and new construction. As with the proposed Project, this alternative would adhere to all standard City construction practices during construction area (e.g., fencing, lighting, etc.) to shield construction activities from public view to the maximum extent practicable. Therefore, impacts would be *less than significant*.

*Operation*

The proposed mixed-use development under Alternative 5 would be substantially similar to that described for the proposed Project. The overall building heights and floor areas would be the same, with the Hotel Building reaching a maximum height of 130 feet. As described for the proposed

Project under Impact VIS-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, development under Alternative 5 would be visible along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. As with the proposed Project, development under Alternative 5 would alter the existing visual character of the Project site with the demolition of the existing one- to three-story buildings and associated surface parking lots, and construction of a new modern, mixed-use project with the Hotel Building reaching a maximum height of 130 feet; however, the mixed-use hotel would be generally comparable in size to the proximate 300-foot-tall 100 Wilshire Office Building, 180-foot-tall Pacific Plaza Apartments, and other high-rise development located along Ocean Avenue (refer to Table 3.1-1 in Section 3.1, *Aesthetics and Shade/Shadow Effects*). Similar to that described for the proposed Project under Impact VIS-2, the proposed development under Alternative 5 would also be visible from Ocean Avenue, which is a City-designated scenic corridor as established in the City's General Plan Scenic Corridors Element (1975). Similar to the proposed Project, this alternative would not adversely affect scenic vistas or scenic resources within a locally designated scenic corridor.

*If the project is located in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Alternative 5 would involve development of a mixed-use hotel, residential, commercial, and Cultural Use Campus as generally described for the proposed Project. However, this alternative would include a vehicle access ramp along Ocean Avenue between the proposed Cultural Use Campus and Hotel Building (refer Figure 5-4). Due to the configuration of this additional vehicle access ramp, this alternative would result in a reduction of ground level open space. The vehicle access ramp off Ocean Avenue would eliminate the publicly accessible courtyard described for the proposed Project. Additionally, the vehicle access ramp would block views of the southern façade of the adjacent City-designated Landmark from the ground floor of the adjacent hotel building.

Similar to that described for the proposed Project under Impact VIS-3 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, Alternative 5 would be consistent with regulations that govern scenic quality including the development standards and policies of the LUCE, DCP, and SMMC. Alternative 5 would not conflict with the LUCE but would not achieve certain LUCE goals and policies to the same extent as the Project. For example, Alternative 5 would not provide the same amount of public plaza and lively streetscape (Policy B2.2), open space (Goal LU17 and Policy LU17.1). Additionally, Alternative 5 would not preserve or open views into the Project site or of the Santa Monica Bay to the same extent as the proposed Project (Policy D10.2).

As with the proposed Project, Alternative 5 would be consistent with the height limitations and FAR established for the Project site under the DCP. Additionally, similar to the proposed Project, Alternative 5 would be expected to meet the design guidelines of the DCP to maximize architectural integrity, create human scaled buildings, create visual interest and variety in building design, animate building frontages, create safe and active streetscape, and create enjoyable open space. As with the proposed Project, development under this alternative would be subject to discretionary review by the Planning Commission and City Council and architectural design review, which would ensure that height and massing would not detract from or conflict with the visual character within the immediate vicinity of the Project site.

*Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

As with the proposed Project under Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, development of this alternative would create new sources of light and glare that could adversely affect daytime or nighttime views in the area. However, compliance with SMMC regulations, which limit the use of reflective materials to no more than 25 percent of the façade surface area and prohibits the use of black or mirrored glass, would minimize the lighting and glare effects of the proposed mixed-use buildings on neighboring properties, pedestrians, bicyclists, and other light-sensitive receptors. Therefore, impacts related to substantial new sources of light and glare from development of this alternative would be *less than significant*.

*Would shadow-sensitive uses be shaded by project-related structures?*

Similar to that described for the proposed Project under Impact VIS-4 in Section 3.1, *Aesthetics and Shade/Shadow Effects*, development of this alternative would increase shadows over existing adjacent sensitive uses, particularly during the winter when shadows are longest and most extensive, due to the proximity of existing residential uses to the Project site. The proposed buildings would also shade portions of the proposed onsite open spaces, including the pedestrian paseos and landscaped podium deck for greater than three hours during the winter. However, similar to the proposed Project, Alternative 5 would provide open-air breaks between the five distinct buildings, allowing ocean breeze and natural sunlight to infiltrate the interior portions of the Project site. The extent of solar access would vary throughout the day. Shadows cast from this alternative may also impact future solar energy development opportunities within properties surrounding the Project site, as the shadows may be cast on to rooftops or other surface that currently have access to solar energy. However, development surrounding the Project site consists

of mostly five- to six-story buildings. Therefore, Alternative 5 would not unduly block solar access to these potential solar energy collector sites.

Air Quality

Construction and operational criteria pollutant emissions were estimated for Alternative 5 using CalEEMod Version 2016.3.2. These emissions were compared to the SCAQMD significance thresholds as well as the construction emissions and operational emissions described for the proposed Project under Impact AQ-3 and Impact AQ-4, respectively (see Table 5-8 and Table 5-9).

*Would the project conflict with or obstruct implementation of the applicable air quality plan?*

*Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?*

*Construction Emissions*

Under Alternative 5, the proposed mixed-use development would be nearly similar in height and total floor area as compared to proposed Project. Therefore, the duration and extent of construction activities – including excavation, building construction, and architectural finishing – would also be nearly similar as compared to the proposed Project. Construction emissions for CO, VOCs, $NO_x$, particulate matter ($PM_{10}$ and $PM_{2.5}$), and $SO_x$ would be similar to those described in Impact AQ-2 within Section 3.2, *Air Quality*. As with the proposed Project, unmitigated VOC emissions associated with Alternative 5 would be close to the SCAQMD construction significance threshold. However, with implementation of MM AQ-1, which would require the use of "super compliant" architectural coatings, all criteria pollutant emissions would be substantially below the thresholds of significance including both SCAQMD construction emissions thresholds and LSTs. Impacts would be *less than significant with mitigation*.

*Operational Emissions*

Under Alternative 5, the proposed land uses would be similar to those described for the proposed Project. Therefore, operational emissions generated by Alternative 5 – including energy/natural gas demand, landscaping maintenance, and vehicle trips – would remain below the SCAQMD significance thresholds as described for the proposed Project. As with the proposed Project, this alternative would not conflict with the 2016 AQMP as this alternative would not contribute to

population growth in excess of the AQMP's population forecast and impacts would be *less than significant*.

*Would the project expose sensitive receptors to substantial pollutant concentrations?*

As described for the proposed Project in Impact AQ-5 in Section 3.2, *Air Quality*, this alternative would contribute to cumulative traffic in the area and would increase CO emissions at nearby intersections. However, as trip generation would be the same as the proposed Project under this alternative, the increase of CO emissions associated with this alternative would not cause an exceedance of the state or Federal CO standards, and CO hotspot impacts would be *less than significant*.

As described for the proposed Project, this alternative would not generate significant amounts of TACs and would not place sensitive receptors within close proximity to significant sources of TACs (i.e., within 500 feet of I-10) (refer to Section 3.2, *Air Quality*); therefore, similar to the proposed Project, impacts related to TACs would continue to be *less than significant.*

*Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?*

As described for the proposed Project under Impact AQ-6 in Section 3.2, *Air Quality*, this alternative would result in similar temporary, construction-related emissions such as odors as those described for the proposed Project; however, the duration of exposure to these odors would be slightly reduced. As described for the proposed Project, operational odors that would be expected from this alternative would be typically associated with food smells (e.g., from the outdoor dining areas) and solid waste (refuse) storage typical of urban uses. All refuse and recycling bins would be covered in designated storage areas and properly maintained to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. These odors would not be a substantially perceptible by nearby sensitive receptors and impacts associated with generation of objectionable odors would be *less than significant*.

Cultural Resources

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

Alternative 5 would develop the same mix of uses as the proposed Project but would provide a different circulation scheme. In contrast to the proposed Project, this alternative would provide an additional vehicle access ramp along Ocean Avenue. As such, Alternative 5 would result in similar

impacts to historic resources as those identified for the proposed Project in Impact CR-1 within Section 3.4, *Cultural Resources*. Similar to the proposed Project, Alternative 5 would relocate, rehabilitate, and repurpose the two existing City-designated Landmarks onsite, by incorporating them into the proposed Cultural Use Campus. All work would be performed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the California Historical Building Code. Further, as with the proposed Project, MM CR-1, which would require implementation of the measures from the Historic Resources Technical Report – Ocean Avenue Project (2020) prepared by Ostashay & Associates Consulting (see Appendix E). Therefore, Alternative 3 would not adversely affect the City-designated Landmarks.

As described for the proposed Project, construction activities, including demolition, excavation and grading would have the potential to generate ground-borne noise that would exceed the Caltrans vibration damage potential threshold for onsite City-designated Landmarks at 1333 and 1337 Ocean Avenue. Additionally, as described for the proposed Project, demolition and excavation activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold for the offsite City-designated Landmark at 1323 Ocean Avenue. MM CR-1 and MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of these mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House.

*Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines?*

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

The potential to encounter previously unknown buried archaeological resources or human remains under this alternative would be similar to that described for the proposed Project under Impact CR-2 and Impact CR-3 in Section 3.4, *Cultural Resources*. Nevertheless, MM CR-3a and CR-3b as well as MM CR-2 would continue to be implemented and would require standard protocols for evaluation and recovery in the event of inadvertent discoveries of archaeological resources or human remains. These protocols would ensure that impacts to archaeological resources would remain *less than significant with mitigation*.

Energy

*Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

Under Alternative 5, the proposed mixed-use development would be nearly similar in height and total floor area as compared to proposed Project. Therefore, the duration and extent of construction activities would also be similar and construction-related energy impacts would be similar as compared to the proposed Project (refer to Impact EN-1 in Section 3.5, *Energy*). Under Alternative 5, the proposed land uses would also be nearly similar to those described for the proposed Project. Therefore, Alternative 5 would result in a similar increase in energy demand, including electricity, natural gas, and transportation relative to existing conditions. However, as described under Impact EN-1 in Section 3.5, *Energy*, this minor increase demand would be adequately met by existing and planned future energy supplies. This alternative would also incorporate similar efficiency measures into the design of the buildings and service systems, including energy efficient HVAC systems, operable windows to increase air flow, high-performance building envelope to maximize insulation, lighting systems with occupancy sensors and dimmers, and water-efficient equipment and plumbing infrastructure, and an onsite PV system in compliance with the City's Green Building Code. Additionally, as required by the City's Energy Code, Alternative 5 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code. Therefore, similar to the Project, Alternative 5 would not result in wasteful, inefficient, or unnecessary consumption of energy sources and the impact would be *less than significant*.

*Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As described for the proposed Project in Impact EN-2 in Section 3.5, *Energy*, Alternative 5 would be designed to comply with standard regulations addressing energy efficiency including the City's Energy Code, and Green Building Standards Code. Under this alternative, the mixed-use development would include sustainability features, such as a solar PV array. Green building elements would also increase energy efficiency through use of energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use. As required by the City's Energy Code, Alternative 5 would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code.

Further, the Project site is in a TPA, given the proximity of the Downtown Santa Monica Station (within approximately 0.5 miles of the Project site) and the high number of bus routes in the Project area. As a result, similar to the proposed Project, Alternative 5 would support State, regional and City efforts to improve transportation energy efficiency and reduce wasteful or inefficient transportation energy consumption. As discussed for the proposed Project in Section 3.5, *Energy* and Section 3.10, *Land Use and Planning*, Alternative 5 would be consistent with local, regional, and state goals and policies related to energy efficiency and would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, as with the proposed Project, impacts to energy under Alternative 5 would be *less than significant*.

Geology and Soils

*Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

*i) Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

*ii) Strong seismic ground shaking?*

*iii) Seismic-related ground failure including liquefaction?*

*iv) Landslides?*

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

*Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

*Would the project be located on expansive soil, as defined in Table 18-1-B of the uniform Building Code (1194), creating substantial direct or indirect risks to life or property?*

Impacts related to geology and soils under Alternative 5 would be similar to those described for the proposed Project as the existing geology and soil conditions would be the same as those described for the Project site in Section 3.6, *Geology and Soils*. Compliance with the SMBC and the site specific recommendations of a Final Geotechnical Report would address geologic hazards under this alternative and impacts would be *less than significant*.

*Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

As with the proposed Project, the Applicant would be required to implement DCP MM CR-4a and MM CR-4b, which require paleontological monitoring during grading and excavation and proper handling of potential paleontological resources if encountered during construction activities. As with the proposed Project, compliance with standard regulatory conditions and required mitigation measures would reduce impacts to *less than significant with mitigation*.

Greenhouse Gas Emissions

*Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

*Would the project be inconsistent with any of the GHG reduction strategies set forth by the City's LUCE, Sustainable City Plan, and Climate Action Plan, AB/SB 32 and SB 375; and the State Attorney General, Office of Planning and Research and Climate Action Team recommendations?*

GHG emissions were estimated for both construction and operation of this alternative using CalEEMod Version 2016.3.2. Under Alternative 5, the proposed mixed-use development would be nearly similar in height and total floor area as compared to proposed Project. Therefore, the duration and extent of construction activities – including excavation, building construction, and architectural finishing – would also be nearly similar as compared to the proposed Project.

Under Alternative 5, the proposed land uses would be nearly similar to those described for the proposed Project. Therefore, operational GHG emissions generated by Alternative 5 would also be similar. Operational GHG emissions under this alternative are estimated at 3,096 MT $CO_2e$ per year relative to 3,185 $CO_2e$/year under the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions*).

Potential impacts related to conflicts with plans, policies, and regulations related to reduction in GHG emissions would be similar to those identified in Impact GHG-1 and Impact GHG-2 for the proposed Project and would be *less than significant*. As with the proposed Project, this alternative would continue to support the state and local GHG reduction goals and policies as it would focus new development near transit to create sustainable, active pedestrian-friendly development that decreases reliance on vehicles and increases the use of transit, bicycle, and pedestrian facilities. As with the proposed Project, this alternative would represent mixed-use infill redevelopment within the Downtown, which is served by high quality transit, bicycle, and pedestrian facilities. Directing growth to existing urbanized areas is an important strategy to reduce GHG emissions,

largely due to reduced building energy and vehicle use. Alternative 5 would be required to comply with the sustainability requirements established in the City of Santa Monica Green Building Standards Code, the City's Energy Code, and other applicable regulations. Thus, similar to the Project, Alternative 5 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., LUCE, Sustainable City Plan, CAAP, Green Building Ordinance, AB 32, SB 375, etc.).

Hazards and Hazardous Materials

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

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

*Construction*

Impacts related to hazards and hazardous materials under Alternative 5 would be similar to those described for the proposed Project under Impact HAZ-1 and Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACMs, LBPs, and mold that could be released during renovation of the City-designated Landmarks and demolition of the existing buildings at 101 Santa Monica Boulevard, 1327 Ocean Avenue, and the non-historic rear structures at 1333 and 1337 Ocean Avenue. Similar to the proposed Project, this alternative would provide subterranean parking below the Project site, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (e.g., associated with a historical onsite dry-cleaning facility, residential uses, and a historical offsite gas station) would be similar. Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed Project. As such, DCP MM HAZ-2a through MM HAZ-2d, which would require hazardous materials surveys, standard protocols following discovery of contamination, and preparation of a soils management plan, would be required. Compliance with standard regulatory conditions and applicable DCP Program EIR mitigation measures would reduce impacts to *less than significant with mitigation*.

*Operations*

As with the Project, Alternative 5 would include retail, restaurant, hotel, cultural, and residential uses, which require the routine use of materials such as those used for household cleaning and maintenance products, pesticides and herbicides, paints, solvents, degreasers, and chemicals associated with swimming pools. These materials would be used in compliance with existing CalEPA regulations and the CUPA. Through compliance with regulatory measures, operational impacts of the Project and Alternative 5 due to routine use of hazardous materials and accidental release of such materials would be similar and *less than significant*.

Hydrology and Water Quality

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

*Construction*

As described for the proposed Project under Impact HYD-1 in Section 3.9, *Hydrology and Water Quality*, implementation of the Applicant-prepared SWPPP would be required to address surface water quality impacts from erosion, sedimentation, and polluted runoff during construction activities. Compliance with the Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance (SMMC Chapter 7.10), which includes the preparation of a SWPPP, would address impacts to surface water quality under this alternative. With implementation of the SWPPP prepared for the Project site, short-term construction impacts to surface water quality under Alternative 5 would remain *less than significant*.

*Operation*

With regard to operation, implementation of Alternative 5 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., buildings, driveways, pedestrian walkways, etc.). In accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would be incorporated into an Urban Runoff Mitigation Plan to be approved by the City and would be implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 5 to *less than significant*.

*Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

As described for the proposed Project under Impact HYD-2 in Section 3.9, *Hydrology and Water Quality*, Alternative 5 would construct a three-level subterranean parking garage, which would require excavation to a maximum depth of 35 feet bgs. Based on the depth to groundwater at the Project site between 47 and 62.5 feet bgs (refer to Section 3.6, *Geology and Soils*), dewatering activities would not be anticipated and groundwater supplies would not be affected by construction. While not expected, if dewatering of groundwater is required, a Construction Dewatering General Permit would be obtained in accordance with Los Angles RWQCB's Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Additionally, construction activities associated with Alternative 5 (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal.

As with the proposed Project, implementation of this alternative would incrementally increase demand for groundwater supplies from the Santa Monica Groundwater Basin since the City's Sustainable Water Master Plan (SWMP) – which account for development and associated population growth under the LUCE and the DCP – has determined that the City's water supply is adequate to meet City-wide demand through 2040.

With regard to groundwater recharge, existing groundwater recharge is negligible due to the existing developed (i.e., paved surface buildings, etc.) nature of the Project site. Therefore, implementation of Alternative 5 which would include the construction of impervious surfaces including new buildings and subterranean parking structures would not measurably affect groundwater infiltration at the Project site. Additionally, the City Department of Public Works prohibits infiltration of runoff for properties located west of 4th Street ranging from northerly City limits to the north to I-10 freeway to the south, including the Project site. Similar to the proposed Project, impacts on groundwater supplies and groundwater recharge would be *less than significant*.

*Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:*

*i) result in substantial erosion or siltation onsite or offsite;*

*ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or*

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

*Construction*

Site preparation activities, including demolition, excavation, and grading for Alternative 5 would result in exposure of soils and would cause minor alterations to onsite drainage, including the potential for temporary ponding during storm events (refer to Impact HYD-3 in Section 3.9, *Hydrology and Water Quality*). However, all stormwater generated during construction would continue to be directed to existing the City storm drain inlets and storm drain lines that currently serve the Project site. During construction, a SWPPP outlining associated BMPs would be implemented in accordance with applicable Los Angles RWQCB and City regulations to provide for temporary stormwater management and maintain the overall existing drainage pattern during construction.

*Operation*

With regard to operation, implementation of Alternative 5 would develop impervious surface areas that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). Additionally, stormwater runoff would continue to follow the same discharge pathways and drain to the existing storm drain system during operation of Alternative 5. Furthermore, in accordance with the City's Runoff Conservation and Sustainable Management Ordinance, BMPs would be incorporated into an Urban Runoff Mitigation Plan to be approved by the City and implemented throughout the life of the alternative. As with the proposed Project, compliance with Federal, State, and local regulations would reduce potential impacts related to hydrology and water quality under Alternative 5 to *less than significant*.

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described for the proposed Project under Impact HYD-4 in Section 3.9, *Hydrology and Water Quality*, development under Alternative 5 would be implemented in a manner consistent with, and supportive of the City's Sustainable Water Master Plan (SWMP). As with the Project, Alternative 5 would comply with NPDES and City requirements, where BMPs would be implemented to address water quality and groundwater issues during both construction and operational activities. As with the proposed Project, Alternative 5 would not adversely affect the ability of the City to meet its goal for water self-sufficiency or maintaining groundwater quality

under the SWMP. Therefore, the impact of Alternative 5 on sustainable groundwater management would be *less than significant.*

Land Use and Planning

*Would the project physically divide an established community?*

As described for the proposed Project under Impact LU-1 in Section 3.10, *Land Use and Planning*, Alternative 5 would realign 1st Court to provide connectivity from Arizona Avenue to 2nd Street. Alternative 5 would also provide pedestrian-oriented paseos to enhance pedestrian connectivity throughout the Project site. The vehicle access ramp off Ocean Avenue would substantially reduce the size of the public courtyard described for the proposed Project. Nevertheless, the proposed paseos and courtyards would expand ground level open space and still increase overall pedestrian connectivity relative to existing conditions at the Project site. Thus, implementation of Alternative 5 would not physically divide any established communities within the City. Similar to the Project, impacts would be *less than significant*.

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

As described for the proposed Project under Impact LU-2 in Section 3.10, *Land Use and Planning*, this alternative would be consistent with the goals and policies stated in the 2016-2040 2016-2040 RTP/SCS, LUCE, and DCP. This alternative would also be consistent with the overall DCP vision of the Downtown as a vibrant mixed-use urban district with opportunities to live, work, and be entertained. As with the proposed Project, Alternative 5 would incorporate hotel amenities, new housing opportunities, pedestrian-scale ground floor restaurant and retail uses, cultural uses, sidewalk enhancements and pedestrian-only paseos, and publicly accessible ground floor and rooftop open space. These elements are consistent with LUCE and DCP goals and policies for the Downtown, including locating new residential uses near transit corridors, encouraging active ground floor uses, creating pedestrian-oriented spaces, encouraging local-serving uses, and providing a range of housing options. However, due to the additional vehicle access ramp on Ocean Avenue, this alternative would substantially reduce the size of the public courtyard proposed under the Project and would support less ground floor open space, a reduction of 890 sf when compared to the Project. Therefore, Alternative 5 would be less consistent with Policy LU 4.6 from the LUCE and Policy D10.2 from the DCP, as compared to the proposed Project. The additional vehicle entrance on Ocean Avenue would also result in greater potential for bicycle and pedestrian conflicts along Ocean Avenue and within the public courtyard, thereby achieving less consistency

with Policy LU15.5 from the LUCE, which encourages easy pedestrian-oriented connections and minimizing the separation created by parking lots and driveways.

To achieve the GHG reduction targets mandated under SB 375, 2016-2040 RTP/SCS encourages new growth to occur in urban areas with high quality transit. Alternative 5, similar to the proposed Project, consists of a mixed-use development in the transit-rich Downtown. The Project site is easily accessed by the Expo LRT and a number of Big Blue Bus and Metro transit lines, and therefore, this alternative would be fully supportive of 2016-2040 RTP/SCS.

As described in Section 3.10, *Land Use and Planning*, the RHNA, mandated by State Housing Law quantifies the needs for very low income, low income, moderate income, and above moderate-income housing within a jurisdiction and identified planning period. The most recent RHNA allocation, the 5th Cycle RHNA Allocation Plan, identifies the City's allocation (2014-2021) for the provision of 1,674 units of which 42 percent would be above moderate rate units, and 58 percent would be affordable/moderate rate units. The City is currently anticipating a large RHNA allocation – an estimated 9,000 units – in the upcoming 6th Cycle RHNA Allocation Plan (October 2021 to October 2029). Alternative 5 would provide the same number of residential units as the proposed Project. Therefore, this alternative would help the City to further achieve its RHNA allocation to the same extent that the proposed Project would.

Noise

*Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

*Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

*Construction Noise*

Under Alternative 5, the proposed mixed-use development would be nearly similar in height and total floor area as compared to proposed Project. Therefore, the duration of construction-related noise impacts under Alternative 5 would also be similar as compared to those described for the proposed Project. As discussed for the proposed Project in Section 3.12, *Noise*, impacts to existing sensitive receptors under this alternative would be potentially significant but would be reduced to *less than significant with mitigation* due to the requirement for a Construction Noise Management Plan under MM NOI-1. This impact would be reduced relative to the proposed Project due to the

reduced duration of construction activities under this alternative. Similar to the Project, construction noise impacts under this alternative would be *less than significant with mitigation*.

*Operational Noise*

Under Alternative 5, the proposed land uses would be nearly similar to those described for the proposed Project. As discussed in Section 3.12, *Noise* ambient roadway noise increases from vehicle trips would be incremental (e.g., less than 1 dB) and would be barely perceptible to existing sensitive receptors. Similar to the Project, operational noise impacts of this alternative would be *less than significant*.

*Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

*Construction Vibration*

As described for the proposed Project, construction activities, including demolition, excavation and grading would have the potential to generate ground-borne noise that would exceed the Caltrans vibration damage potential threshold for onsite City-designated Landmarks at 1333 and 1337 Ocean Avenue. Additionally, as described for the proposed Project, demolition and excavation activities along the northern boundary of the Project site would exceed the Caltrans vibration damage potential threshold at the Gussie Moran House, an offsite City-designated Landmark at 1323 Ocean Avenue. MM NOI-2 could reduce potential impacts to less than significant; however, that would require voluntary acceptance of the mitigation measure requirements by the property owner. The City does not have the jurisdiction or control to mandate implementation of these mitigation measures by the property owner. Therefore, because the consent of the offsite property owner cannot be guaranteed, it has been conservatively concluded that unless mitigated, construction activities could have potentially *significant and unavoidable* construction vibration impacts to the Gussie Moran House.

*Operational Vibration*

As described for the proposed Project, operations under Alternative 5 would not be anticipated to generate excessive levels of ground-borne vibration. Occasionally, vibration could occur as a result of truck travel to and from the Project site for periodic deliveries. However, such incidences would be temporary in nature and would not be expected to exceed 0.1 in/sec, which is below the level for potential damage to fragile structures. No substantial sources of ground-borne vibration would be introduced as part of the proposed Project; therefore, operation of the proposed Project would

not expose sensitive receptors onsite or offsite to excessive ground-borne vibration or ground-borne noise levels.

Transportation (including Neighborhood Effects related to Intersection Operations)

*Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

SCAG's 2016 RTP/SCS, the City's LUCE, and the DCP establish transportation and circulation goals that focus on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. Similar to the proposed Project, Alternative 5 would be served by numerous public transit facilities, including the Downtown Santa Monica Station. The location of the Project site would create maximum opportunities for public transit use by future residents, hotel guests, restaurant and retail customers, and Cultural Use Campus visitors consistent with LUCE goals and objectives. Additionally, by developing a mix of land uses on a single site in the Downtown, this alternative like the proposed Project would increase accessibility to multiple other destinations including restaurants, retail, office, entertainment, and residential uses. As a result of increased destination accessibility, Alternative 5 would support the Citywide goal of reducing overall vehicle trips and VMT. Further, Alternative 5 would encourage employees, residents, and visitors to use existing bicycle facilities throughout the City through implementation of a TDM plan and the provision of onsite bicycle amenities such as secure bicycle parking, including short-term and long-term bicycle racks, lockers, and showers facilities.

Alternative 5 would include a revised circulation plan to address City concerns related to potential vehicle drop-off along Ocean Avenue. Under this alternative, an additional entrance to the Project site would be provided via a vehicle access ramp to the subterranean parking garage along Ocean Avenue. As depicted in Figure 5-4 this vehicle access ramp would be located within the pedestrian courtyard along Ocean Avenue and could result in impacts related to geometric design features. In order to limit these potential issues, the vehicle access ramp would be lined with mid-height concrete walls (e.g., 3 to 4 feet high), necessary to prevent pedestrian-vehicle conflicts and other safety concerns. However, the vehicle access ramp would interrupt pedestrian flows within this area of the Project site and would limit the functionality of the pedestrian-oriented design fronting the Cultural Use Campus. Therefore, pedestrian orientation would be somewhat compromised under this alternative as compared to the proposed Project. Even so, impacts would be l*ess than significant* since implementation of this alternative would still support alternative mobility choices and develop a mix of diverse land uses in proximity to transit.

*Would the project conflict or be inconsistent with CEQA Guidelines15064.3, subdivision (b)?*

Operational transportation and circulation impacts under Alternative 5 would be similar due to the size and type of mixed-use development, and associated vehicle trip generation. This alternative would generate the same daily VMT as that described for the proposed Project. Additionally, the Transportation Study found that Alternative 5 would generate a net increase of 146 AM peak hour trips, 146 PM peak hour trips, and 168 weekend midday peak hour trips (Fehr & Peers 2020; see Table 5-10 and Appendix K). Compared to the proposed Project, Alternative 5 would result in the same number of trips for the AM, PM, and weekend midday peak hours (Fehr & Peers 2020; see Appendix K). Based on the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria using LOS, delay-based impacts on intersection operations would be similar to those described for the proposed Project.

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

Under Alternative 5, 1st Court would not be vacated for use as a pedestrian-only paseo and would continue to provide one-way southbound access – including emergency access – from Arizona Avenue to Santa Monica Boulevard. Overall, the transportation network in the vicinity of the Project site area would continue to function as it currently does with implementation of this alternative. No new hazardous design features would be introduced by Alternative 5. Further, Alternative 5 would include the development of hotel, residential, and retail uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment traffic that is hazardous or incompatible with existing traffic. Similar to the proposed Project, impacts related to hazardous design features and incompatible uses would be less than significant.

*Would the project result in inadequate emergency access?*

In contrast with the proposed Project, Alternative 5 would not convert the southern portion of 1st Court into a pedestrian paseo. The transportation network would function the same as it does currently. Neither the proposed Project or Alternative 5 proposes the closure or major modification of adjacent access streets. As with the proposed Project, emergency access would continue to be available on adjacent streets including Ocean Avenue, 2nd Street, and Santa Monica Boulevard. Therefore, impacts on emergency access would be similar and *less than significant*.

Tribal Cultural Resources

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that*

*is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is at least one of the following:*

*- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or*

*- A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the Lead Agency shall consider the significance of the resources to a California Native American tribe?*

The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the Project site is sensitive for tribal cultural resources given its location along the coast and within an area of historic use by Gabrieleño/Tongva villages, such as Suangna and Comicrabit, and trade routes and waterways, which are considered cultural landscapes pursuant to CEQA Section 21074 (refer to Impact TCR-1 in Section 3.14, *Tribal Cultural Resources*). Impacts related to tribal cultural resources under this alternative would be similar to those described for the proposed Project because the extent and the depth of excavation would be similar (refer to Impact TCR-1 in Section 3.14, *Tribal Cultural Resources*). As with the proposed Project, a Native American monitor from Kizh Nation shall be present during construction excavation activities, as required by MM TCR-1. Impacts to tribal cultural resources under this alternative would be *less than significant with mitigation*.

<u>Utilities</u>

Under Alternative 5, impacts to utilities and service systems would be similar to those described for the proposed Project. The proposed mixed-use development would incrementally increase demand for utility services, including water supply (refer to Impact UT-1 and Impact UT-2), wastewater disposal (refer to Impact UT-3 and Impact UT-4), and solid waste disposal (refer to Impact UT-5 and UT-6). However, this demand would be adequately met by existing and planned future energy and water supplies, and remaining capacities within the wastewater treatment facility and landfills serving the City.

*Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

*Would the water supply available to serve the project from existing entitlements and resources be insufficient, or would new or expanded entitlements be needed?*

With the exception of minor onsite trenching for new connections, Alternative 5 would not require or result in the substantial construction or expansion of existing water facilities. Similar to the

proposed Project, Alternative 5 would be required to comply with the City's Green Building Ordinance, which requires the use of highly efficient plumbing fixtures, irrigation, and landscaping for new construction (SMMC Section 8.106). Alternative 5 would also be required to comply with the Water Neutrality Ordinance, which requires all development within the City to offset all net new water use. No unplanned new or expanded entitlements would be required to implement Alternative 5 and this alternative would not adversely affect the City's ability to meet its goal for water self-sufficiency under the SWMP. Therefore, impacts would be considered *less than significant*.

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

Construction activities would not generate wastewater flows and would not, along with existing and projected wastewater flows, approach the existing capacity of the HWRP. As described for the proposed Project, operation of Alternative 5 would direct the proposed wastewater flow to either the 18-inch Ocean Avenue main or the 18-inch 2nd Street main or both. Both of these sewer mains are sufficiently sized to accommodate increased wastewater flows under Alternative 5 and would not require upgrades based on the current monitored flows. Therefore, with the preparation of a sewer study and monitoring prior to the issuance of the first building permit impacts would be *less than significant with mitigation*.

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

Development under this alternative would generate an increase in wastewater generation at the Project site; however, this increase would be less than the proposed Project and as such, would not exceed the HWRP's wastewater treatment capacity. Therefore, impacts to wastewater generation would be less than the proposed Project and *less than significant*.

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

*Would the project comply with Federal, State, and local statutes and regulations related to solid waste?*

Due to the similar scope of the development under Alternative 5, this alternative would result in a similar amount of solid waste generation during construction and operation. Therefore,

implementation of Alternative 5 would not result in the generation of solid waste during construction or operation that would exceed the existing capacity of existing landfills serving the City. Impacts to solid waste under Alternative 5 would be *less than significant*.

Relationship of Alternative to Project Objectives

Alternative 5 would attain most of the Project objectives. By providing a mix of residential, shopping, and dining opportunities, Alternative 5 would enhance the overall balance and mix of uses in Downtown consistent with the LUCE and DCP, although to a lesser extent than the proposed Project (Project Objectives 1 and 4). Alternative 5 would achieve the Project objectives related to the provision of overnight visitor accommodations which are encouraged in the DCP and Coastal Act (Project Objectives 1, 2, 4, 12, 13). Alternative 5 would retain the existing Landmarks and therefore, would meet the objective to preserve historic resources (Project Objective 3). Development of the Project site under Alternative 5 would also meet the project objective to remove surface parking (Project Objective 10). Provision of additional residential units in the Downtown under this alternative would be consistent with the City's Housing Element, LUCE, and DCP goals and policies and would help meet the current and future housing demand in the City, including the demand for affordable housing (Project Objective 5). By virtue of its location in the transit-rich and pedestrian-oriented Downtown, this alternative would support the use of public transit and promote overall reductions in VMT and associated GHG emissions consistent with the intent of SB 743 (Project Objective 9). With a similar development program as the proposed project, Alternative 3 would be similarly economically viable as the proposed Project (Project Objective 12) and would provide similar fiscal and economic benefits to the City (Project Objective 13). As a Development Agreement project, Alternative 5 would result in the provision of community benefits (Project Objective 14).

However, a number of project objectives would not be achieved to the same extent as the proposed Project. With the reduction of museum gallery space, this alternative would not meet the objectives related to cultural institutions to the same extent as the proposed Project (Project Objectives 1, 4, 8, 14). Further, with the inclusion of a new driveway on Ocean Avenue that would disrupt pedestrian flow in the Cultural Use Campus, this alternative would not achieve the iconic architectural and urban design as encouraged in the DCP (Project Objective 6). Pedestrian orientation would also be compromised with this driveway and the reduction in publicly accessible open space (Project Objective 7).

Overall, Alternative 5 would meet the majority of Project objectives though some objectives may be achieved to a slightly lesser extent than the proposed Project.

## 5.6 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment.

Table 5-7 summarizes the environmental advantages and disadvantages associated with the proposed Project and the analyzed alternatives. In evaluating alternatives, different weights may be assigned to the relative importance of specific environmental impacts. For example, in comparing alternatives for the proposed Project, "more weight" was given to transportation impacts and cultural resources impacts as well as temporary construction-related impacts to air quality, noise, and hazards and hazardous materials, than impacts to other resource areas, primarily considering the importance of these issue areas to have the most significant and irreversible impacts.

Of the alternatives considered, the No Project Alternative does not create new impacts; therefore, it is generally environmentally superior to any project that proposes to change existing conditions through the addition of increased development with associated impacts. However, the No Project Alternative would not contribute to City efforts to implement the goals and objectives of the DCP, provide additional visitor serving uses in Coastal Zone, help meet regional housing demand, or meet the primary Project objectives. CEQA Guidelines Section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

## Table 5-7. Impact Comparison of Alternatives to the Proposed Project

| Issue Area | Project | Comparison to Project | | | | |
|---|---|---|---|---|---|---|
| | | No Project | Alternative 2 | Alternative 3 | Alternative 4 | Alternative 5 |
| Aesthetics and Shade/Shadow | Less than Significant | No Impact | Slightly Less | Slightly Less | Slightly Less | Similar |
| Air Quality | Less Than Significant | No Impact | Less | Slightly Less | Less | Similar |
| Cultural Resources | Significant and Unavoidable | No Impact | Less | Similar | Less | Similar |
| Energy | Less Than Significant | No Impact | Slightly Greater | Similar | Slightly Greater | Similar |
| Geology and Soils | Less Than Significant with Mitigation | No Impact | Slightly Less | Similar | Greater | Similar |
| Greenhouse Gas Emissions | Less Than Significant | No Impact | Slightly Greater | Slightly Less | Slightly Greater | Similar |
| Hazards and Hazardous Materials | Less Than Significant with Mitigation | No Impact | Slightly Less | Similar | Slightly Less | Similar |
| Hydrology and Water Quality | Less Than Significant | No Impact | Less | Slightly Less | Less | Similar |
| Land Use and Planning | Less Than Significant with Mitigation | Greater | Similar | Slightly Less | Less | Slightly Less |
| Neighborhood Effects | Significant and Unavoidable | No Impact | Greater | Less | Greater | Similar |
| Noise | Significant and Unavoidable | No Impact | Slightly Greater | Slightly Less | Less | Similar |
| Transportation | Significant and Unavoidable | No Impact | Greater | Less | Greater | Similar |
| Tribal Cultural Resources | Less Than Significant with Mitigation | No Impact | Similar | Similar | Similar | Similar |
| Utilities | Less Than Significant | No Impact | Less | Slightly Less | Less | Similar |
| **Project Objectives Met?** | **Yes** | **No** | **Less** | **Slightly Less** | **Less** | **Less** |

According to CEQA Guidelines Section 15126.6(a), the purpose of an alternatives analyses is to identify alternative developments that would feasibly attain most of the basic objectives of the project but that would avoid or substantially reduce any of the significant effects of the proposed Project. Other than the No Project Alternative, none of the remaining alternatives would avoid all the significant transportation impacts associated with the Project. Only Alternative 3 would

measurably reduce significant transportation impacts by eliminating the weekend midday peak hour impact at 2nd Street & Arizona Avenue under the Future Year (2025) traffic conditions.

Further, Alternative 2 and Alternative 4 would retain the existing City-designated Landmarks on the Project site and would no longer require the implementation of MM CR-1. Alternative 2, Alternative 3, and Alternative 4 would result in a reduced duration of construction activities; however, daily impacts would be similar to those described for the proposed Project (i.e., construction noise levels would be similar; however, the total duration of construction noise would be reduced due to the reduced construction schedule).

Alternative 2 would reduce the proposed building heights and would retain the existing City-designated Landmarks on the Project site, but due to the mix of land uses – including increased residential units and restaurant and retail floor area – operational impacts related to air quality, greenhouse gas emissions, and transportation impacts would be increased related to the proposed Project. Alternative 4 would also reduce the proposed building heights but would similarly result in an increase in operational impacts due to the increase in restaurant and retail floor area and the addition of commercial office. Both alternatives would not provide overnight visitor serving accommodations and would substantially reduce public open space. Further, Alternative 2 would not provide a Cultural Use Campus and Alternative 4 would provide a substantially reduced Cultural Use Campus (i.e., museum). The reduction of publicly accessible open space and the elimination of the Cultural Use Campus under Alternative 2 would substantially reduce the community benefits provided by the proposed Project and envisioned for the Project site in the DCP (refer to Section 2.3.2, *Downtown Community Plan*).

Alternative 5 would involve development of a mixed-use hotel, residential, commercial, and Cultural Use Campus as generally described for the proposed Project, but the valet/drop-off area would be replaced with an additional entrance to the Project site via a vehicle access ramp to the subterranean parking garage along Ocean Avenue. While this alternative reduces certain policy issues and City concerns related to the potential vehicle drop-off along Ocean Avenue the additional vehicle access ramp on Ocean Avenue would substantially disrupt the public courtyard proposed under the Project and would support less ground floor open space when compared to the Project. Therefore, Alternative 5 would be less consistent with Policy LU 4.6 from the LUCE and Policy D10.2 from the DCP, as compared to the proposed Project.

Alternative 3 would consist of an 84-foot-tall mixed-use project totaling 270,570 sf with 36,110 sf of ground floor restaurant and retail uses, 100,291 sf of upper floor residential uses, 88,929 sf of hotel uses, and 35,500 sf of cultural uses resulting in a 2.36 FAR. This alternative would result in

an approximately 9 percent decrease (9 units) in residential units from 100 units under the proposed Project. This alternative would also decrease the number hotel guestrooms by approximately 46 percent (55 guestrooms) and the total hotel floor area by approximately 28 percent (33,471 sf), from 120 guestrooms and 122,400 sf under the proposed Project. There would be no change in total floor area of the restaurant and retail uses or Cultural Use Campus as compared to the proposed Project. The reduction in the scope of development under Alternative 3 would reduce the overall duration of construction impacts relative to the proposed Project. Additionally, due to the reduced number of residential units and hotel guestrooms, this alternative would eliminate the weekend midday peak hour impact at 2nd Street & Arizona Avenue under the Future Year (2025) traffic conditions and reduce the increases in vehicle delay at the other impacted intersections.

Alternative 3 would also meet the primary Project objectives summarized in Section 5.2, *Project Objectives*. For example, while Alternative 3 would not develop to the maximum height permitted within the ELS Overlay, this alternative would remain consistent with the LUCE and DCP including with respect to development standards, visitor-serving, residential, and pedestrian-oriented ground floor uses, historic preservation and adaptive reuse of two City-designated Landmarks, pedestrian-oriented design, publicly accessible open space, sustainability, high quality architectural design, TDM measures, and community benefits. Further, this alternative would enhance the Downtown by adding culturally rich uses, publicly accessible open space, affordable and market rate housing, retail, restaurant and entertainment uses, and a full-service hotel. However, due to the reduced scope of development, Alternative 3 would eliminate the publicly accessible rooftop observation deck described for the proposed Project. Due to the substantial reduction in hotel guestrooms from 120 under the proposed Project to 55 under this alternative, Alternative 3 would be less consistent with Policy 199 of the LCP LUP provides that *"overnight visitor accommodations and related support facilities such as shops, restaurants and cultural uses that serve visitors and the local community alike shall be priority uses"* along the east side of Ocean Avenue between Colorado Avenue and California Avenue, which includes the Project site. Additionally, this alternative would provide affordable and market-rate housing to the same extent as the proposed Project due to the minor reduction in residential units.

Alternative 3 is the environmentally superior alternative because impacts to transportation and temporary construction-related impacts to air quality and noise would be reduced to the greatest extent under the Maximum 84-Foot Building Height Alternative (Alternative 3; refer to Table 5-7).

## Table 5-8. Maximum Daily Construction Emissions for Alternatives (lbs/day)

| Emission Source | CO (lbs/day) | VOCs (lbs/day) | NOx (lbs/day) | $PM_{10}$ (lbs/day) | $PM_{2.5}$ (lbs/day) | $SO_x$ (lbs/day) |
|---|---|---|---|---|---|---|
| Thresholds of Significance[1] | 550 | 75 | 100 | 150 | 55 | 150 |
| Localized Significance Thresholds[2] | 827 | -- | 147 | 6 | 4 | -- |
| **PROPOSED PROJECT** | | | | | | |
| Total | 52.3 | 16.9 | 43.7 | 6.7 | 2.5 | 0.2 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 2: DCP TIER II MIXED-USE HOUSING PROJECTS** | | | | | | |
| Total | 53.1 | 70.2 | 63.9 | 10.4 | 4.8 | 0.2 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 3: MAXIMUM 84-FOOT BUILDING HEIGHT** | | | | | | |
| Total | 54.1 | 63.5 | 43.4 | 7.3 | 2.8 | 0.2 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 4: RETENTION OF EXISTING CITY-DESIGNATED LANDMARKS AND 1O1 SANTA MONICA BOULEVARD** | | | | | | |
| Total | 45.5 | 49.4 | 28.3 | 6.6 | 2.0 | 0.2 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 5: REVISED CIRCULATION ALTERNATIVE** | | | | | | |
| Total | 52.1 | 16.79 | 43.4 | 7.3 | 2.8 | 0.2 |
| Above Thresholds? | No | No | No | No | No | No |

[1] Source: SCAQMD 2015.
[2] Localized significance thresholds for a 2-acre site in SRA-2 within 25-meter distance from sensitive receptors.
[3] Mitigation measure requiring "super compliant coatings" (VOC <10 g/L) not applied to Alternatives 2, 3, and 4.
Note: Values for maximum daily emissions represent peak values during the 2021 to 2024 construction period. LSTs are compared to onsite construction emissions only; therefore, each of these alternatives' onsite construction emissions would be below LSTs. See Appendix C for CalEEMod output sheets.

## Table 5-9. Maximum Operational Emissions from Alternatives (lbs/day)

| Emission Source | CO (lbs/day) | VOCs (lbs/day) | NOx (lbs/day) | $PM_{10}$ (lbs/day) | $PM_{2.5}$ (lbs/day) | SOx (lbs/day) |
|---|---|---|---|---|---|---|
| Thresholds[1] | 550 | 55 | 55 | 150 | 55 | 150 |
| **PROPOSED PROJECT** | | | | | | |
| Total | 35.2 | 11.2 | 16.7 | 6.1 | 1.9 | <0.1 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 2: DCP TIER II MIXED-USE HOUSING PROJECTS** | | | | | | |
| Total | 48.6 | 10.8 | 12.1 | 2.4 | 7.8 | 0.1 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 3: MAXIMUM 84-FOOT BUILDING HEIGHT** | | | | | | |
| Total | 30.7 | 9.7 | 14.9 | 5.0 | 1.5 | <0.1 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 4: RETENTION OF EXISTING CITY-DESIGNATED LANDMARKS AND 1O1 SANTA MONICA BOULEVARD** | | | | | | |
| Total | 37.5 | 8.3 | 19.0 | 0.3 | 1.8 | 0.1 |
| Above Thresholds? | No | No | No | No | No | No |
| **ALTERNATIVE 5: REVISED CIRCULATION ALTERNATIVE** | | | | | | |
| Total | 34.0 | 11.1 | 16.3 | 5.6 | 1.7 | <0.1 |
| Above Thresholds? | No | No | No | No | No | No |

[1] Source: SCAQMD 2015.
See Appendix C for CalEEMod output sheets.

## Table 5-10. Peak Hour Trip Generation for Alternatives – Net Incremental Trips

| Land Use | AM Peak Hour Trips | PM Peak Hour Trips | Weekend Midday Peak Hour Trips |
|---|---|---|---|
| **PROPOSED PROJECT** | | | |
| Residential Units: 100<br>Hotel Guestrooms: 120<br>Commercial Floor Area: 36,110 sf | 146 | 146 | 168 |
| **ALTERNATIVE 2: DCP TIER II MIXED-USE HOUSING PROJECTS** | | | |
| Residential Units: 150<br>Office Floor Area: 4,075 sf<br>Commercial Floor Area: 72,062 sf | 198 | 240 | 252 |
| Change in Trip Generation Compared to Proposed Project | +36 percent | +64 percent | +50 percent |
| **ALTERNATIVE 3: MAXIMUM 84-FOOT BUILDING HEIGHT** | | | |
| Residential Units: 91<br>Hotel Guestrooms: 65<br>Commercial Floor Area: 36,110 sf | 127 | 123 | 148 |
| Change in Trip Generation Compared to Proposed Projects | -13 percent | -16 percent | -12 percent |
| **ALTERNATIVE 4: RETENTION OF EXISTING CITY-DESIGNATED LANDMARKS AND 1O1 SANTA MONICA BOULEVARD** | | | |
| Residential Units: 80<br>Office Floor Area: 12,000 sf<br>Commercial Floor Area: 60,526 sf | 170 | 199 | 222 |
| Change in Trip Generation Compared to Proposed Project | +16 percent | +36 percent | -32 percent |
| **ALTERNATIVE 5: REVISED CIRCULATION ALTERNATIVE** | | | |
| Residential Units: 100<br>Hotel Guestrooms: 120<br>Commercial Floor Area: 36,110 sf | 146 | 145 | 167 |
| Change in Trip Generation Compared to Proposed Project | 0 percent | -1 percent | -1 percent |

Source: Fehr & Peers 2020; see Appendix K.

## Table 5-11. Comparison of Significantly Impacted Intersections for Alternatives

| # | Intersection | Peak Hour | Approval Year (2020) | | | | | Future Year (2025) | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Proposed Project | Alt 2 | Alt 3 | Alt 4 | Alt 5 | Proposed Project | Alt 2 | Alt 3 | Alt 4 | Alt 5 |
| 1 | Palisades Beach Road & California Incline | AM | X | X | X | X | X | X | X | X | X | X |
| | | PM | | | | | | | | | | |
| | | WKND | | | | | | | | | | |
| 2 | Ocean Avenue & California Avenue | AM | | | | | | X | X | X | X | X |
| | | PM | X | X | X | X | X | X | X | X | X | X |
| | | WKND | X | X | X | X | X | X | X | X | X | X |
| 11 | 2nd Street & Wilshire Boulevard | AM | | | | | | | | | | |
| | | PM | | | | | | | | | | |
| | | WKND | X | X | X | X | X | | | | | |
| 12 | 2nd Street & Arizona Avenue | AM | | | | | | | | | | |
| | | PM | | | | | | | | | | |
| | | WKND | | | | | | X | X | | X | X |
| 13 | 2nd Street & Santa Monica Boulevard | AM | | | | | | | | | | |
| | | PM | | | | | | X | X | X | X | X |
| | | WKND | | X | | X | | | | | | |
| 16 | Main Street & Olympic Drive | AM | X | X | X | X | X | X | X | X | X | X |
| | | PM | | | | | | | | | | |
| | | WKND | X | X | X | X | X | X | X | X | X | X |
| 19 | 4th Street & Santa Monica Boulevard | AM | | | | | | | | | | |
| | | PM | | | | | | X | X | X | X | X |
| | | WKND | | | | | | X | X | X | X | X |
| 38 | Lincoln Boulevard & Colorado Avenue | AM | | | | | | | X | | X | |
| | | PM | | | | | | | | | | |
| | | WKND | | | | | | | | | | |
| **Total Impacted Intersections** | | | **4** | **5** | **4** | **5** | **4** | **6** | **7** | **5** | **7** | **4** |

# 6.0 LIST OF PREPARERS

**City of Santa Monica**

| | |
|---|---|
| Rachel Kwok | Environmental Planner |
| Roxanne Tanemori | Principal Planner |
| Susan Cola | Deputy City Attorney |

**Wood Environment & Infrastructure Solutions, Inc.**

| | |
|---|---|
| Dan Gira | CEQA Program Manager |
| Erika Leachman | Project Manager |
| Nick Meisinger | Deputy Project Manager |
| Doug McFarling | QA/QC Manager |
| Caryn Kelly | Senior Toxicologist |
| Taylor Lane | Air Quality Specialist |
| Brian Cook | Senior Noise Specialist |
| David Stone | Senior Cultural Resources Specialist |
| Ken Victorino | Senior Archaeologist |
| Lucas Nichols | Archaeologist |
| Sydnie Margallo | Lead Environmental Analyst |
| Ryan Ramos | Environmental Analyst |
| Hannah Thomas | Environmental Analyst |
| Janice Depew | Word Processor |

**Vix F/X**

| | |
|---|---|
| Robert Staehle | Architect/Illustrator |

**Ostashay & Associates Consulting**

| | |
|---|---|
| Jan Ostashay | Architectural Historian |

**iLanco Environmental, LLC**

| | |
|---|---|
| Lora Granovsky | Air Quality Specialist |

**Fehr & Peers**

| | |
|---|---|
| Netai Basu, AICP CTP | Principal-in-Charge |
| Jeremiah LaRose | Senior Transportation Planner |
| Vivian Lee | Transportation Planner |

**Graphics Consultant**

| | |
|---|---|
| Deirdre Stites | Graphics Specialist |

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