



City of
Santa Monica

Ocean Avenue Project
Draft
Environmental Impact Report
SCH# 2018121060

May 2020

Prepared for:

City of Santa Monica
Planning and Community Development Department
1685 Main Street
Santa Monica, CA 90401

Prepared by:

Wood Environment & Infrastructure Solutions, Inc.
104 West Anapamu Street, Suite 204A
Santa Barbara, CA 93101

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**ENVIRONMENTAL IMPACT REPORT
FOR THE
OCEAN AVENUE PROJECT
FOR THE CITY OF SANTA MONICA, CA**

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LIST OF ACRONYMS AND ABBREVIATIONS

%	percent
°C	Celsius
°F	Fahrenheit
µg/m ³	micrograms per cubic meter
A.M.	Ante meridiem (period from midnight to noon)
AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	average daily trips
AF	acre-feet
AFY	acre-feet per year
ALUC	Los Angeles County Airport Land Use Commission
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
Applicant	Ocean Avenue Project Applicant
APS	Alternative Planning Strategy
AQMP	Air Quality Monitoring Plan
ARB	Architectural Review Board
ASF	Age Sensitivity Factors
ASHRAE	American Society of Heating and Air-Conditioning Engineers
asl	Above Sea Level
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxic Control Measures
AVR	Average Vehicle Ridership
AWPF	Advanced Water Purification Facility
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan for the Los Angeles Region
BC	Bayside Conservation
bgs	below ground surface
BMP	best management practice
BPD	Beach Parking District
BSCD	Bayside Commercial District
C&D	construction and demolition
CAA	Clean Air Act
CAAP	Climate Action and Adaptation Plan
CalEEMod	California Emission Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California's Green Building Standard Code
California Register	California Register of Historical Resources
CalOSHA	California Occupational Safety and Hazard Administration
Cal-OSHA	California Division of Occupational Safety and Health
CalRecycle	California Department of Resources Recycling and Recovery

Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAS	California Adaptation Strategy
CAT	Climate Action Team
CBC	California Building Code
CBD	Central Business District
CBI	Clean Beaches Initiative
CC	Civic Center
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CDS	Continuous Deflective Separation
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CHP	California Highway Patrol
CHRIS	California Historical Resources Inventory System
CIMP	Construction Impact Mitigation Plan
CIS	Coastal Interceptor Sewer
CISS	Coastal Interceptor Sewer System
City	City of Santa Monica
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
Coastal Act	California Coastal Act
Coastal Commission	California Coastal Commission
Coastal Zone	California Coastal Zone
CPA	Clean Power Alliance
CRHR	California Register of Historical Resources
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
cy	cubic yard
DA	Drainage Area
dB	decibel

LIST OF ACRONYMS AND ABBREVIATIONS

dBA	A-weighted decibels
DCP	Downtown Community Plan
DDW	Division of Drinking Water
DEED	Local Land Records
Delta	Sacramento-San Joaquin River Delta
DTSC	Department of Toxic Substance Control
DU	Dwelling Unit
DWR	Department of Water Resources
ECSP	Erosion and Sediment Control Plan
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report
ELS	Established Large Site
EMD	Environmental Monitoring Division
EMFAC	EMission FACtors model
EMS	emergency medical service
ENVIROSTOR	State/Tribal-Equivalent CERCLIS
EO	Executive Order
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
EV	Electric Vehicle
EVAP	Electric Vehicle Action Plan
EWMP	Enhanced Watershed Management Plan
Expo LRT	Expo Light Rail Transit line
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICUN	Federal Interagency Committee on Urban Noise
FID	Facility Inventory Database
FIRM	Flood Insurance Rate Maps
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
FTE	full-time equivalent
gal/hp/hr	gallons per horsepower per hour
GCF	Green Climate Fund
GHG	greenhouse gas
GIS	Geographic Information System
gpcd	gallons of water per capita per day
GPM	gallons per minute
GSA	groundwater sustainability agency
GSP	groundwater sustainability plan
Gt CO ₂ e	billions of metric tons
GWh	gigawatt hours

H ₂ CO ₃	carbonic acid
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HCM	Highway Capacity Manual
HI	hazard index
HMMP	Hazardous Materials Management Plans
HMRRP	Hazardous Materials Reporting and Response Planning
HPLV	high-pressure low-volume
HQTA	High Quality Transit Areas
HRA	Health Risk Assessment
HRI	Historic Resource Inventory
HSWA	Hazardous and Solid Waste Act
HTP	Hyperion Treatment Plant
HVAC	heating, ventilation, and air conditioning
HWRP	Hyperion Water Reclamation Plant
hz	hertz
I-	Interstate
IBC	International Building Code
IC/EC	Federal Engineering and Institutional Controls
ILRP	Irrigated Lands Regulatory Program
in/sec	inches per second
IP	Implementation Plan
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Water Resources Plan
IRPs	Integrated Resource Plans
IRWMP	Integrated Water Resource Management Plan
ISO	Insurance Service Office
ITE	Institute of Transportation Engineers
JPA	Joint Powers Authority
kBTU	kilo-British thermal units
KPFF	KPFF Consulting Engineers
KSF	thousand square feet
KVA	Key Viewing Area
kWh	kilowatt
LACFD	Los Angeles County Fire Department
LACM	Natural History Museum of Los Angeles County
LACMA	Los Angeles County Museum of Art
LADOT	Los Angeles Department of Transportation
LADPW	City of Los Angeles Department of Public Works
LADWP	City of Los Angeles Department of Water and Power
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	City of Los Angeles Bureau of Sanitation
LAX	Los Angeles International Airport
LBP	lead-based paint
LCP	Local Coastal Program

LIST OF ACRONYMS AND ABBREVIATIONS

L _{dn}	Day-Night Average Noise Level
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent Noise Level
LFD	low-flow diversion
LHMP	Local Hazard Mitigation Plan
LID	low-impact development
L _{max}	Maximum Instantaneous Noise Level
L _{min}	Minimum Instantaneous Noise Level
LNG	liquefied natural gas
LORS	Laws, Ordinances, Regulations, and Standards
LOS	Level of Service
LRA	Local Responsibility Area
L RTP	Long Range Transportation Plan
LUCE	Land Use and Circulation Element
LUFT	Leaking Underground Fuel Tanks
LUP	Land Use Plan
LUST	leaking underground storage tank
MAPS	Moss Avenue Pump Station
MATES IV	Multiple Air Toxics Exposure Study
MEIR	maximum exposed individual resident
MEP	mechanical, electrical, and plumbing
Metro	Los Angeles Metropolitan Transportation Authority
mgd	million gallons per day
MGP	manufactured Gas Plant
MLD	Most Likely Descendant
MM	Mitigation Measure
mm/year	millimeters per year
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MODRAT	Modified Rational Method
MOU	Memorandum of Understanding
MOXI	Santa Barbara Children's Museum
MPD	Multiple Property Documentation
mpg	miles per gallon
mph	miles per hour
MPNP	Memorial Park Neighborhood Plan
MPO	metropolitan planning organization
MS4	Municipal Separate Storm Sewer System
MT CO _{2e}	metric tons
MTBE	methyl tertiary butyl ether
MW	megawatts
MWD	Metropolitan Water District of Southern California
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission

NAL	Numeric Action Level
NASA	National Aeronautics and Space Administration
National Register	National Register of Historic Places
ND	Negative Declaration
NEL	Numeric Effluent Limitation
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standard for Hazardous Air Pollutants
NETR	Nationwide Environmental Title Research, LLC
NFPA	National Fire Protection Association
NFRAP	No Further Remedial Action Planned
NHMAP	Natural Hazards Mitigation Action Plan
NHPA	National Historic Preservation Act of 1966
NO ₂	nitrogen dioxide
NOA	Notice of Availability
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NPS	National Park Service
NRHP	National Register of Historic Places
O ₃	ozone
Ocean Plan	Water Quality Control Plan for Ocean Waters of California
OEHHA	Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OHP	Office of Historic Preservation
OPIS	Online Property Information System
OPR	Office of Planning and Research
OSE	Office of Sustainability and the Environment
OSHA	Occupational Safety and Health Administration
OT	Ocean Transition
OVA	organic vapor analyzer
P.M.	post meridiem (the period from 12 noon until 12 midnight)
Pb	lead
PBDE	polybrominated diphenyl ether
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PCH	Pacific Coast Highway
PDWF	Peak Dry Weather Flow
PE	Professional Engineer
PFC	perfluorocarbons
PG	Professional Geologist
PI	Plasticity index
PL	Public Lands
PM	particulate matter

LIST OF ACRONYMS AND ABBREVIATIONS

PM ₁₀	particulate matter equal to or less than 10 microns in diameter
PM _{2.5}	particulate matter equal to or less than 2.5 microns in diameter
PMI	point of maximum impact
POTW	publicly owned treatment work
POUs	publicly owned utilities
ppb	parts per billion
PPC	Public Protection Classification
ppm	Parts per million
Project	Ocean Avenue Project
PSI	per square inch
PV	photovoltaic
PWD	Public Works Department
PWWF	Peak Wet Weather Flow
R	Rapid
RCRA	Resource Conservation and Recovery Act
RCRA COR ACT	Resource Conservation and Recovery Act- Corrective Action
REAP	Rain Event Action Plan
REC	recognized environmental conditions
RNG	renewable natural gas
RO	reverse osmosis
ROG	reactive organic gases
ROWD	Report of Waste Discharge
RPA	Registered Professional Archaeologist
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer, Affordable, Fuel-Efficient
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SEMS	Superfund Enterprise Management System
sf	square foot/feet
SF ₆	sulfur hexafluoride
SGF	Sewage Generation Factors
SGMA	Sustainable Groundwater Management Act
SHBC	State Historic Building Code
SHMP	State of California Multi-Hazard Mitigation Plan
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SITES	The Sustainable SITES Initiative
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLF	Sacred Lands File

SLIC	Spills, Leaks, Investigations, and Cleanups
SMBGSA	Santa Monica Groundwater Sustainability Agency
SMBRC	Santa Monica Bay Restoration Commission
SMC	Santa Monica College
SMFD	Santa Monica Fire Department
SMGB	Santa Monica Groundwater Basin
SMHRI	Santa Monica Historic Resources Inventory
SMMC	Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Union School District
SMO	Santa Monica Municipal Airport
SMPD	Santa Monica Police Department
SMURRF	Santa Monica Urban Runoff Recycling Facility
SO ₂	sulfur dioxide
SoCal Edison	Southern California Edison Company
SoCal Gas	Southern California Gas Company
SOV	Single Occupancy Vehicle
SO _x	sulfur oxides
SRRE	Source Reduction and Recycling Element
SSSMP	Sanitary Sewer System Master Plan
STIP	State Transportation Improvement Program
STOA	Statement of Official Action
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWEEPS	Statewide Environmental Evaluation and Planning System
SWL	State/Tribal Solid Waste List
SWMP	Sustainable Water Master Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TAZ	traffic analysis zone
TAZs	transportation analysis zones
TCE	trichloroethylene
TDFM	Transportation Demand Forecast Model
TDM	Transportation Demand Management
TDR	Transfer of Development Rights
TDS	total dissolved solids
Tg CO ₂ e	millions of metric tons
TIA	Transportation Impact Analysis
TMDL	Total Maximum Daily Load
TNC	Transportation Network Companies
TPA	Transit Priority Areas
Transportation Study	Ocean Avenue Project Transportation Impact Analysis
TSCA	Toxic Substances Control Act of 1976
U.S.	United States
UCLA	University of California, Los Angeles

LIST OF ACRONYMS AND ABBREVIATIONS

UFMP	Urban Forest Master Plan
UNFCCC	United Nations Framework Convention on Climate Change
USC	U.S. Code
USDOT	U.S. Department of Transportation
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
UWMPA	Urban Water Management Planning Act
UXO	Unexploded Ordinance Sites
V/C	volume-to-capacity ratio
VA	Veterans Affairs
VCP	Voluntary Cleanup Program
VMT	vehicle miles traveled
VOC	Volatile Organic Compound
WCU	Water Conservation Unit
WMA	Watershed Management Area
WMP	Waste Master Plan
WMP	Watershed Management Plan
Wood	Wood Environment & Infrastructure Solutions, Inc.
WSA	water supply assessments
WSRP	Water Shortage Response Plan
WUA	Water Use Allowance
WWFP	Wastewater Facilities Plan
ZEV	zero emission vehicle
ZNE	Zero Net Energy

EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) evaluates the potential environmental impacts of the proposed Ocean Avenue Project in the City of Santa Monica (City), California. The EIR was prepared by Wood Environment & Infrastructure Solutions, Inc. (Wood) in cooperation with City of Santa Monica (City) staff. The proposed Project comprises the redevelopment of an approximately 82,500 square foot (sf) site with approximately 122,400 square feet (sf) of full-service hotel space with up to 120 guestrooms, meeting and banquet rooms, and a hotel spa; 100 residential apartment units (including deed-restricted affordable units, replacement rent-controlled units, and market rate units); 36,110 sf of restaurant (including outdoor dining areas) and retail uses; and a 35,500-sf Cultural Use Campus (e.g., museum, gallery, event space). The proposed Project also includes three underground levels providing a subterranean parking garage with capacity for up to approximately 285 vehicles as well as 231 bicycle parking spaces with long-term storage available in the subterranean parking garage. The proposed Project would construct five new buildings onsite that would range in maximum height from 53 feet to 130 feet (excluding permitted rooftop projections) as well as adaptively reuse two existing City-designated Landmarks for a total Floor Area Ratio (FAR) of 2.95 and a total above-grade building floor area of approximately 243,630 sf with an additional 4,940 sf of outdoor dining. The proposed Project includes 40,920 sf of open space to promote an active pedestrian environment. The proposed hotel would be located along Ocean Avenue and would feature an approximately 5,070-sf publicly-accessible rooftop observation deck providing panoramic views of the Downtown, Santa Monica Pier, Santa Monica Mountains, Palisades Park, Santa Monica State Beach, and the Pacific Ocean. In addition to the publicly-accessible rooftop observation deck, three ground floor pedestrian-only paseos, a ground floor publicly-accessible courtyard in front of the Cultural Use Campus, and widened sidewalks along Ocean Avenue, 2nd Street, and Santa Monica Boulevard would provide public open space.

The Project site encompasses 11 lots contained in five assessor parcels (Assessor Parcel Numbers [APN] 4291-014-016, -017, -018, -024, and -025) and is generally bordered by Ocean Avenue to the west, Santa Monica Boulevard to the south, 2nd Street to the east, and existing commercial development to the north, including 1323 Ocean Avenue (Gussie Moran House) and 1332 2nd Street (Flower Child, Elephanté, and Laemmle Monica Film Center). The Project site, which is separated by 1st Court, has a total size of approximately 82,500 sf (1.89 acres) with approximately 350 feet of frontage on Ocean Avenue, 320 feet of frontage on Santa Monica Boulevard, and 200 feet of frontage on 2nd Street.

1st Court is a one-way public alleyway between Ocean Avenue and 2nd Street running north-south from Arizona Avenue to Santa Monica Boulevard. The proposed Project would reroute 1st Court into an “L”-shaped configuration, which would turn vehicles traveling south from Arizona Avenue east toward 2nd Street partway down the alley across the northernmost portion of the Second Street Parcel (privately owned by the Applicant). The southern portion of 1st Court would be converted to a pedestrian-only paseo, limiting vehicular-pedestrian interaction.

The Project site is zoned *Downtown District*, per Chapter 9.10 of the Zoning Ordinance, and refers all development standards to the Downtown Community Plan (DCP). 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. 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. The Project site is one of three sites identified in the DCP with the Established Large Site (ELS) Overlay. These ELS Overlay sites may provide significant community benefits, including affordable housing, open space, and cultural institutions that would otherwise not be possible for smaller projects (City Planning and Community Development Department 2017). The ELS Overlay designation allows a project on the Project site to request approval for development up to 130 feet in height and a 4.0 FAR subject to the application being processed through a Development Agreement as well as compliance with other specified requirements. Such requests would be subject to rigorous public review process, including the preparation of a Development Agreement, additional environmental review, shade and shadow analysis of the proposed Project’s impact on adjacent uses, and review of the proposed community benefits.

The DCP identifies three preferred community benefits for the Project site, including affordable housing, cultural institution, and historic preservation. The Project proposes to satisfy all three of the DCP’s preferred community benefits for this site, as well as additional community benefits as outlined in a Development Agreement with the City.

PROJECT OBJECTIVES

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) requires a project description to contain a statement of a project’s objectives, and CEQA Guidelines Section 15124(b) requires the statement of objectives includes the purpose of the project. The Applicant has identified 14 objectives for the proposed Project:

- 1. LUCE and DCP Consistency and Implementation:** Develop a project through the Development Agreement process as contemplated in the 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 California Coastal Zone (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.

ENVIRONMENTAL IMPACT ANALYSIS

This EIR examines potential short- and long-term impacts of the project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the project is implemented. For each impact topic, thresholds for determining impact significance are identified based on City and State CEQA Guidelines, along with descriptions of methodologies used for conducting the impact analysis. For some topics, such as air quality, greenhouse gas (GHG) emissions, noise, and transportation, the analyses of impacts are more quantitative in nature and involve the comparison of effects against a numerical threshold. For other topics, such as land use and planning, the analysis of impacts are inherently more qualitative, involving the consideration of a variety of factors, such as adopted City policies.

The EIR impact discussions classify impact significance levels as:

1. **Significant and Unavoidable** – a significant impact to the environment that remains significant even after mitigation measures are applied;
2. **Less Than Significant with Mitigation** – a significant impact that can be avoided or reduced to a less than significant level with mitigation;
3. **Less Than Significant** – a potential impact that would not meet or exceed the identified thresholds of significance for the topic area; and
4. **No Impact/Beneficial Impact** – no impact would occur for the topic area or a beneficial effect would result.

Determinations of significance levels in the EIR are made based on impact significance criteria and applicable CEQA Guidelines for each topic area.

Per CEQA Guidelines, Section 15126.4, where potentially significant environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts are also identified. Pursuant to CEQA, feasible mitigation measures must be implemented for all significant impacts.

NOTICE OF PREPARATION/SCOPING

As a first step in complying with the procedural requirements of CEQA, the City conducted a public scoping process consistent with CEQA Guidelines Section 15083. The public was provided with an opportunity to comment on the scope of the EIR through a Notice of Preparation (NOP) released on December 21, 2018. The NOP was distributed to Federal, State, and local agencies,

neighborhood groups, and all occupants and owners within a 1,000-foot radius of the Project site. The NOP comment period began on December 21, 2018 and ended on January 30, 2019. A Public Scoping Meeting for the EIR was held during the NOP comment period on January 10, 2019. During this meeting, City staff described the proposed Project and the environmental review process and received public comment on the scope and content of the EIR. The scoping process assisted the City in determining if any aspect of the proposed Project may cause a significant effect on the environment and, based on that determination, narrow the focus of the subsequent environmental analysis. Comments received during the NOP comment period were considered during EIR preparation and are included in Appendix A.

SUMMARY OF PROJECT IMPACTS

The significance of each impact resulting from implementation of the proposed Project has been determined based on impact significance criteria and applicable CEQA Guidelines for each impact topic. Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts that could result from implementation of the proposed Project. In summary, the proposed Project would result in significant and unavoidable construction-related impacts related to cultural resources as a result of construction ground-borne vibration. Additionally, the proposed Project would result in significant and unavoidable long-term impacts associated with neighborhood effects and transportation impacts related to intersection level of service (LOS) based on the City's *Traffic Study Guidelines* and the City's previously adopted significance criteria.

SUMMARY OF CUMULATIVE IMPACTS

CEQA Guidelines Section 15130(a) states that an EIR shall “*discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable.*” In this context, “cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and/or the effects of probable future projects (as defined by CEQA Guidelines Section 15130). Cumulative impacts were determined to be less than significant for aesthetics and shade/shadow effects; air quality; construction effects, cultural resources; geology and soils; GHG emissions; hazards and hazardous materials; land use and planning; noise; tribal cultural resources; and utilities. The proposed Project would substantially contribute to cumulatively considerable impacts to neighborhood effects and transportation related to intersection LOS.

ALTERNATIVES ANALYSIS

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). As such, the EIR evaluates five alternatives, including a No Project Alternative, in compliance with CEQA. 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 Alternative

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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.

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. 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 significant and unavoidable construction effects, cultural resources, noise, neighborhood effects, and transportation (e.g., construction-related ground-borne vibration and increased traffic congestion).

Of the five alternatives considered for further analysis, Alternative 3, Maximum 84-Foot Building Height (Reduced FAR/Development), would achieve the greatest number of primary 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, Alternative 3 would be less consistent with Policy 199 of the City's Local Coastal Plan (LCP) Land Use Plan (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.

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts		
Impacts	Mitigation Measures	Residual Impacts
AESTHETICS AND SHADE/SHADOW EFFECTS		
VIS-1 The proposed Project would not substantially change public scenic vistas along Ocean Avenue, Santa Monica Boulevard, and 2 nd Street in Downtown Santa Monica during construction or operation.	No mitigation required	Less Than Significant
VIS-2 The proposed Project would adaptively reuse and relocate two existing City-designated Landmarks within the Project site. However, the proposed Project would comply with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and therefore, would not adversely affect scenic vistas or scenic resources, including trees, rock outcroppings, and historic buildings within a State scenic highway or locally designated scenic corridor.	No mitigation required	Less Than Significant
VIS-3 The proposed Project would alter the visual character of the site and surrounding areas, but the change would be consistent with adopted standards and policies for architectural design, massing, landscaping, and pedestrian orientation, and would be subject to design review by the City to ensure that the proposed Project would not visually degrade surrounding uses.	No mitigation required	Less Than Significant
VIS-4 The proposed Project would create new sources of light and glare. However, light and glare levels would not adversely affect daytime or nighttime visual resources in the area.	No mitigation required	Less Than Significant
VIS-5 Construction of the proposed Project would increase shadows over existing adjacent sensitive uses due to the proximity of existing residential uses to the Project site, including adjacent residential uses on 2 nd Street and public open spaces provided by	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
sidewalks and roadways to the north and east of the Project site.		
AIR QUALITY		
AQ-1 Construction and operation of the proposed Project would contribute to basin-wide criteria pollutant emissions. However, criteria pollutant emissions associated with the proposed Project would not increase the severity of or cause existing air quality violations and would not exceed the AQMP's forecasts. Therefore, the project would not conflict with the AQMP and this impact would be <i>less than significant</i> .	No mitigation required	Less Than Significant
AQ-2 The South Coast Air Basin is designated as non-attainment for O ₃ , PM ₁₀ , and PM _{2.5} under Federal and/or State ambient air quality standards. Construction activity for the proposed Project would generate air pollutant emissions to the Basin. Construction emissions of CO, NO _x , SO _x , PM ₁₀ , and PM _{2.5} would not exceed SCAQMD regional thresholds, and with implementation of recommended mitigation measure, VOC emissions would be less than regional thresholds. Therefore, this impact would be <i>less than significant</i> .	MM AQ-1 Super Compliant Coatings. To reduce VOC levels during the architectural coating phase, low VOC-emission paint shall be used with levels of 10 g/L or less (e.g., paints from the SCAQMD's list of Super Compliant Architectural Coatings, such as Benjamin Moore Natural Odorless, Zero VOC Paint). The Applicant or construction contractor shall also utilize high-pressure low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent. The Applicant or construction contractor shall implement additional measures to reduce daily and quarterly VOC levels related to architectural coatings to the extent determined feasible by the City and APCD, such as extending coating applications by limiting daily coating activities. City staff shall ensure measures are depicted on all submitted building and construction plans submitted to City prior to the issuance of building permits. City building inspectors shall ensure compliance.	Less Than Significant
AQ-3 Operation of the proposed Project would generate air pollutant emissions that would be below SCAQMD mass daily thresholds; therefore, this impact would be <i>less than significant</i> .	No mitigation required	Less Than Significant
AQ-4 Onsite and offsite emissions associated with the proposed Project would not exceed the	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
SCAQMD localized significance thresholds (LSTs), would not generate substantial Toxic Air Contaminants (TACs) or place sensitive receptors within buffer zones of potential TAC emitters, and would not generate CO hotspots. Therefore, this impact would be <i>less than significant</i> .		
AQ-5 Project-generated traffic, together with other cumulative traffic in the area, would incrementally increase CO levels near local intersections. However, Federal and State CO standards would not be exceeded with implementation of the proposed Project and this impact would be <i>less than significant</i> .	No mitigation required	Less Than Significant
AQ-6 None of the land uses included in the proposed Project would result in other emissions including odors that would affect a substantial number of people. Therefore, this impact would be <i>less than significant</i> .	No mitigation required	Less Than Significant
CONSTRUCTION EFFECTS		
CE-1 Construction of the proposed Project would have considerable construction-period-related impacts due to the scope, or location of construction activities. However, with Implementation of identified mitigation, would <u>reduce the majority of these impacts would be to less than significant; however, it has been conservatively concluded that construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House because the consent of the adjacent offsite property owner to conduct mitigation cannot be guaranteed.</u>	MM CE-1 The Applicant shall prepare, implement and maintain a Construction Impact Mitigation Plan (CIMP) for review and approval prior to issuance of a building permit to address manage traffic during construction and shall be designed to: <ul style="list-style-type: none"> Prevent traffic impacts on the surrounding street network Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable Ensure safety for both those constructing the proposed Project and the surrounding community Prevent substantial truck traffic through residential neighborhoods Provide for coordination with the Metro regarding the Metro layover zone on 2nd Street regarding traffic controls. 	Less Than Significant with Mitigation <u>Significant and Unavoidable construction vibration impacts to the Gussie Moran House</u>

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ul style="list-style-type: none"> • Provide for coordination with adjacent or nearby construction projects <p>The CIMP shall be subject to review and approval by the following City departments: Public Works, Fire, Community Development, and Police to ensure that the Plan has been designed in accordance with this mitigation measure and meets City standards. This review shall occur prior to issuance of grading or building permits. It shall, at a minimum, include the following:</p> <p><i>Ongoing Requirements throughout the Duration of Construction</i></p> <ul style="list-style-type: none"> • A detailed CIMP for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans shall be reviewed and approved by the Strategic and Transportation Planning Division prior to commencement of construction and implemented in accordance with this approval. • Work within the public right-of-way shall be performed between 9:00 AM and 4:00 PM. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an after-hours construction permit. • An Applicant-funded on-site monitor shall be present to ensure safety when Metro workers are in the immediate vicinity, or when more dangerous activities are occurring (e.g., raising of heavy equipment to roof levels). The CIMP shall identify the activities that would prompt the presence of an on-site monitor. • Streets and equipment shall be cleaned in accordance with established Public Works Department requirements. 	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ul style="list-style-type: none"> Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on City streets. Limited queuing may occur on the construction site itself. Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit. Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division. Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City. <p><i>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction</i></p> <ul style="list-style-type: none"> The Applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved CIMP). The Applicant shall obtain a Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required, for any construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way. The Applicant shall provide timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Metro, Police Department, Fire Department, Public Works Department, and Community Development Department), and all owners and residential and commercial tenants of property within a radius of 500 feet. 	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ul style="list-style-type: none"> The Applicant shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks per each submittal. Coordination with Metro regarding construction activities that may impact Metro bus lines (e.g., Metro layover zone) or result in closures lasting over 6 months shall be initiated at least 30 days in advance of construction activities. The Applicant shall obtain Mobility Division approval of any haul routes for earth, concrete, or construction materials and equipment hauling. 	
CULTURAL RESOURCES		
<p>CR-1 The proposed Project would retain the integrity of general location context, setting, design, materials, workmanship, feeling, and association of the onsite City-designated Landmarks essential to their historical significance. With implementation of mitigation measures identified in the Historic Resources Technical Report – Ocean Avenue Project (2020), the proposed Project would not result in a substantial adverse change in the significance of a <u>onsite</u> historical resources; and impacts would be <i>less than significant with mitigation</i>. <u>However, it has been conservatively concluded that construction activities could have potentially <i>significant and unavoidable</i> construction vibration impacts to the Gussie Moran House because the consent of the adjacent offsite property owner to conduct mitigation cannot be guaranteed.</u></p>	<p>MM-CR-1 The Applicant shall implement and comply with all of the measures from the Historic Resources Technical Report – Ocean Avenue Project (2020) prepared by Ostashay & Associates Consulting (see Appendix E). These measures shall be formalized as a part of the Development Agreement Process, identified in all final site plans, and implementation shall be confirmed by the City prior to the issuance of any permit, demolition, abatement, grading/excavation, relocation, or rehabilitation work the two City-designated Landmark.</p> <ol style="list-style-type: none"> <i>Archival Recordation Documentation.</i> Prior to the issuance of any permit, demolition, abatement, grading/excavation, relocation, or rehabilitation work the two City-designated Landmarks onsite, the Applicant shall have prepared recordation documents similar in format and content to an Historic American Buildings Survey (HABS) Level III recordation document. <i>Preparation of a Preservation-Protection Plan.</i> The Applicant shall develop a Preservation-Protection Plan to support conformance with applicable <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i>. At a minimum, a Preservation-Protection Plan shall be prepared for the two historic buildings and their associated character-defining features. 	<p>Less Than Significant with <u>Mitigation for onsite historical resources; Significant and Unavoidable construction vibration impacts to the Gussie Moran House</u></p>

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ol style="list-style-type: none"> 3. <i>Historic Preservation Professional Oversight.</i> Final site plans for the two City-designated Landmark buildings onsite shall be developed in coordination with a qualified historic preservation professional. 4. <i>Santa Monica Landmarks Commission.</i> The Applicant shall obtain a Certification of Appropriateness (or equivalent approval pursuant to the Development Agreement) issued by City Landmarks Commission. 5. <i>Compliance with The Secretary of the Interior's Standards for the Treatment of Historic Properties.</i> Any maintenance, repair, stabilization, rehabilitation, relocation, preservation, conservation, or reconstruction proposed for any exterior portion of the City-designated Landmark Buildings shall comply with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i>. 6. <i>California Historic Building Code Compliance.</i> Where applicable, any work for code mitigations such egress, fire safety, railing heights, door widths, ADA accessibility, etc. shall utilize and follow the perspective code of the California Historical Building Code and the relevant guidelines specific in <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> and NPS briefs, bulletins, references and guidelines. 7. <i>Seismic Retro-Fit Plans and Reviews.</i> Any and all seismic plans to stabilize and retro-fit the two City-designated Landmark buildings shall be prepared for the proposed Project and shall comply with the California Historical Building Code and the relevant guidelines specific in <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> Standards and NPS briefs, bulletins, references and guidelines. Such plans shall be reviewed and approved by the historic preservation consultant for compliance with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> prior to formal submittal to the City for review, plan check, and building and safety review. 	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>8. <i>Project Plans and Reviews.</i> Any and all project plans, including but not limited to architectural, structural, mechanical, relocation, landscape plans shall be prepared by the Applicant and reviewed and approved by the qualified historic preservation professional for compliance with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> prior to formal submittal to the City for design review, plan check and building and safety review.</p> <p>9. <i>Historic Material Replacement.</i> In compliance with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> Standards, in cases where the project would replace a distinctive historic feature or material, the new feature shall match the old in design, type, color, texture, profile, material, and overall appearance. Consistent with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i>, all such work shall be accurately reproduced based on historical, pictorial, and physical documentation and evidence. Such replacement of features shall be supported by investigations and studies conducted as part of the Preservation-Protection Plan prepared for this project.</p> <p>10. <i>Compatible New Construction.</i> As the current site plans are considered conceptual and such plans have not yet been finalized, it is possible that final site plan could include elements that would result in a potentially significant impact to the historic resources onsite. Therefore, for any new construction proposed, the historic preservation consultant shall consult with the Applicant team during the entire design process to insure that the new permanent built forms are compatible with the historic qualities and characteristics of the historic buildings located within and adjacent to the Project site.</p> <p>11. <i>Relocation/Construction Monitoring.</i> The Preservation-Protection Plan requires the Applicant to retain a qualified historic preservation professional with at least 7 years of</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>relevant experience who satisfies the Secretary of the Interior’s Professional Qualification Standards for History, Architectural History, and/or Architecture pursuant to 36 CFR Part 61, to provide guidance and oversight for the preservation, relocation, and rehabilitation of the two City-designated Landmark buildings onsite. Once the project has been approved and entitled, the historic preservation professional shall conduct onsite construction monitoring during the relocation, demolition, excavation, and construction phases of the project.</p> <p>12. <i>Vibration Impact Measures and Monitoring Assessments.</i> in coordination with the City and qualified historic preservation professional the Applicant shall assure avoidance of vibration impacts to such resources and their associated character-defining features, as identified in the Preservation-Protection Plan, by preparing a pre-construction vibration survey report and post-construction damage assessment survey report. These reports shall be prepared by a qualified independent structural engineer with qualifications in completed historic preservation projects that conformed to The <i>Secretary of the Interior’s Standards for the Treatment of Historic Properties</i>. These reports shall be submitted to the City for review and approval prior to initiating any type of construction work activity onsite (pre-construction vibration survey report) and upon completion of such work (post-construction damage assessment survey report).</p> <p>13. <i>Shoring Plan.</i> A shoring plan shall be implemented as part of the Preservation-Protection Plan by the Applicant to ensure the protection of onsite and adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of soils in and around the location of the onsite Landmark buildings.</p> <p>14. <i>Unanticipated Discoveries.</i> The Applicant should be aware of the possible encounter of unanticipated discoveries on site</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>upon implementation of the proposed Project, particularly during excavation, grading, demolition, and relocation activities. In the event that any unusual or distinctive architectural features associated with the design or use of the Landmark buildings are encountered during site preparation, grading, demolition, excavation, relocation, or construction activities around the two sites work shall be immediately stopped and relocated from that area until it can be assessed by the City or qualified onsite historic preservation consultant. Such features, if determined to be important character-defining features of either building, it shall be assessed, possibly salvaged, and reused in the project as directed by the preservation consultant in coordination with the Applicant and City staff.</p> <p>15. <i>Interpretive Educational Program.</i> To assist the public in understanding the historical, cultural, and architectural significance of the City-designated Landmarks commemorative interpretive signage, displays, and/or plaques shall be created and incorporated into the Project site, particular as part of the Cultural Use Campus. The displays, signage, plaques and exhibits created for the site may incorporate salvaged “period appropriate” items from the historic buildings and any historical information, photographs, postcards, plans and illustrations, maps and brochures, etc. of the buildings, Ocean Avenue, the downtown commercial area in a creative medium accessible or visible to the public.</p>	
<p>CR-2 Ground disturbing activities associated with Project construction could uncover significant prehistoric or historic-period archaeological deposits that qualify as cultural resources as defined in Section 15064.5 of the CEQA Guidelines. Damage or destruction of such resources would be a potentially significant impact. This impact would be <i>less than significant with mitigation.</i></p>	<p>MM CR-2 Archaeological Construction Monitoring. Archaeological monitoring shall be conducted by a qualified professional archaeologist familiar with the types of prehistoric and historic-period archaeological resources that could be encountered within the Project site. All grading, excavation, trenching, and site preparation including vegetation removal between 2 and 6 feet bgs and existing fill soils shall be monitored. A monitoring program shall be developed and implemented prior to the commencement of construction activities to ensure the effectiveness of monitoring.</p>	<p><u>Less Than Significant with Mitigation</u></p>

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>DCP MM CR-3a Archaeological Data Recovery: For projects that inadvertently discovered buried prehistoric or historic-period archaeological resources the City shall apply a program that combines resource identification, significance evaluation, and mitigation efforts into a single combined effort. This approach would combine the discovery of deposits (Phase 1), determination of significance and assessment of the project's impacts on those resources (Phase 2), and implementation of any necessary mitigation (Phase 3) into a single consolidated investigation. This approach must be driven by a Treatment Plan that sets forth explicit criteria for evaluating the significance of resources discovered during construction and identifies appropriate data recovery methods and procedures to mitigate project effects on significant resources. The Treatment Plan shall be prepared prior to issuance of building permits by a Registered Professional Archaeologist (RPA) who is familiar with urban historical resources, and at a minimum shall include:</p> <ul style="list-style-type: none"> • A review of historic maps, photographs, and other pertinent documents to predict the locations of former buildings, structures, and other historical features and sensitive locations within and adjacent to the specific development area; • A context for evaluating resources that may be encountered during construction; • A research design outlining important prehistoric and historic-period themes and research questions relevant to the known or anticipated sites in the study area; • Specific and well-defined criteria for evaluating the significance of discovered remains; and • Data requirements and the appropriate field and laboratory methods and procedures to be used to treat the effects of the project on significant resources. <p>The Treatment Plan shall also provide for a final technical report on all cultural resource studies and for curation of artifacts and other recovered remains at a qualified curation facility, to be funded by the</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>developer. To ensure compliance with City and State preservation laws, this plan shall be reviewed and approved by the Historic Landmarks Commission and the City of Santa Monica Planning Division prior to issuance of building permits.</p> <p>DCP MM CR-3b Inadvertent Discoveries: In the event of any inadvertently discovered prehistoric or historic-period archaeological resources during construction, the developer shall immediately cease all work within 50 feet of the discovery. The proponent shall immediately notify the City of Santa Monica Planning and Community Development Department and shall retain a Registered Professional Archaeologist (RPA) to evaluate the significance of the discovery prior to resuming any activities that could impact the site. If the archaeologist determines that the find may qualify for listing in the California Register, the site shall be avoided, or a data recovery plan shall be developed pursuant to MM CR-2a. Any required testing or data recovery shall be directed by a RPA prior to construction being resumed in the affected area. Work shall not resume until authorization is received from the City.</p>	
CR-3 Unknown, isolated Native American human remains could potentially be inadvertently uncovered during Project construction. In the unlikely event of this occurrence, the Applicant would immediately cease activity in the vicinity of the discovery and comply with existing regulations. Therefore, impacts would be reduced to <i>less than significant</i> .	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts		
Impacts	Mitigation Measures	Residual Impacts
ENERGY		
EN-1 The proposed Project would increase energy demand, but would not result in wasteful, inefficient, and unnecessary consumption of energy. Incorporation of the Project's sustainability features as well as compliance with standard regulations – including the policies of the City's LUCE, Downtown Community Plan, Energy Code, and Green Building Standards Code – would reduce this impact to <i>less than significant</i> .	No mitigation required	Less Than Significant
EN-2 The proposed Project would conform with the policies of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City's LUCE, DCP, Energy Code, and Green Building Standards Code; therefore, this impact would be <i>less than significant</i> .	No mitigation required	Less Than Significant
GEOLOGY		
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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	No mitigation required.	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
disturbance and excavation of soils, compliance with applicable State and City regulations and requirements would ensure potential impacts would be <i>less than significant</i> .		
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 <i>less than significant</i> .	No mitigation required.	Less Than Significant
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 <i>less than significant with mitigation</i> .	<p>DCP 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.</p> <p>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.</p> <p>DCP MM CR-4b Inadvertent Discovery of Fossils. If fossils are discovered during excavation, the Paleontological Monitor will make</p>	Less Than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>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.</p> <p>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,</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>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.</p> <p>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.</p>	
GREENHOUSE GAS EMISSIONS		
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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	DCP 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.	Less Than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
through the routine transport, use, or, disposal of hazardous materials. This impact would be <i>less than significant with mitigation</i> .		
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 <i>less than significant with mitigation</i> .	<p>DCP MM HAZ-2a: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.</p> <p>DCP 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)</p>	Less Than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>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.</p> <p>DCP 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.</p> <p><i>Soils Management Plan</i></p> <p>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.</p> <p>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.</p> <p><i>Soil and Material Segregation</i></p> <p>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</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>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.</p> <p><i>Stockpile Management</i></p> <ul style="list-style-type: none"> • 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. <p>The temporary stockpiles containing affected soils shall be managed as follows:</p> <ul style="list-style-type: none"> • 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 	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made.</p> <ul style="list-style-type: none"> • 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. <p><i>Decontamination Methods and Procedures</i></p> <p>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.</p> <p>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.</p> <p>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.</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>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:</p> <ul style="list-style-type: none"> • Non-phosphate detergent and tap-water wash, using a brush if necessary. • Tap-water rinse. • Initial deionized/distilled water rinse. • Final deionized/distilled water rinse. <p><i>Truck Loading</i></p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p><i>Storm Water Management</i></p> <p>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</p>	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>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:</p> <ul style="list-style-type: none"> • 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. <p><i>Transportation Plan</i> 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</p>	
HYDROLOGY & WATER 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 <i>less than significant</i> .	No mitigation required	Less Than Significant
HYD-2 Construction and operation of the proposed Project would not require dewatering activities or otherwise substantially deplete groundwater supplies	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts		
Impacts	Mitigation Measures	Residual Impacts
or interfere with groundwater recharge. Compliance with existing regulations and plans would ensure potential impacts to groundwater supplies would be <i>less than significant</i> .		
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
LAND USE AND PLANNING		
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 1 st 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 <i>no impact</i> related to the potential division of the community.	No mitigation required	No Impact
LU-2 The proposed Project would be consistent with applicable land use plans, policies, and	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
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 <i>less than significant</i> .		
NEIGHBORHOOD EFFECTS		
NHE-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 <i>significant and unavoidable</i> 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 <i>significant and unavoidable</i> neighborhood effects.	No feasible mitigation measures available	Significant and Unavoidable for intersection LOS based on the City's <i>Traffic Study Guidelines</i> and the City's previously adopted significance criteria
NOISE		
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 <i>less than significant with mitigation</i> .	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: <ul style="list-style-type: none"> 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 Section 4.12.110(d) of the Santa Monica Municipal Code. 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: 	Less Than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ul style="list-style-type: none"> ○ 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. <p>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.</p>	
NOI-2 Operation of the proposed Project would permanently increase vehicle trips and associated	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
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 <i>less than significant</i> .		
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 <i>significant and unavoidable</i> . With respect to human annoyance, construction activities adjacent to or near inhabited structures would not result in excessive vibration levels and impacts would be <i>less than significant</i> .	<p>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:</p> <ul style="list-style-type: none"> • 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. 	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ul style="list-style-type: none"> 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 on-site 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 offsite Gussie Moran House and onsite historic 1333 Ocean Avenue and 1337 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. 	
TRANSPORTATION		
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 <i>less than significant</i> .	No mitigation required	Less Than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
<p>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 <i>less than significant</i> transportation impact related to VMT. Nevertheless, a VMT analysis is provided for informational purposes only.</p> <p>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 <i>significant and unavoidable</i> impacts to intersection operations based on LOS thresholds.</p>	No feasible mitigation measures available.	Significant and Unavoidable for intersection LOS based on the City's <i>Traffic Study Guidelines</i> and the City's previously adopted significance criteria.
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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	<p>MM CE-1 The Applicant shall prepare, implement and maintain a Construction Impact Mitigation Plan (CIMP) for review and approval prior to issuance of a building permit to address manage traffic during construction and shall be designed to:</p> <ul style="list-style-type: none"> Prevent traffic impacts on the surrounding street network 	Less Than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
<p>lane closures, or other construction activities. However, with implementation of a Construction Impact Management Plan, impacts of construction on emergency access would be <i>less than significant with mitigation</i>.</p>	<ul style="list-style-type: none"> • Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable • Ensure safety for both those constructing the proposed Project and the surrounding community • Prevent substantial truck traffic through residential neighborhoods • Provide for coordination with the Metro regarding the Metro layover zone on 2nd Street regarding traffic controls • Provide for coordination with adjacent or nearby construction projects <p>The CIMP shall be subject to review and approval by the following City departments: public Works, Fire, Community Development, and Police to ensure that the Plan has been designed in accordance with this mitigation measure and meets City standards. This review shall occur prior to issuance of grading or building permits. It shall, at a minimum, include the following:</p> <p><i>Ongoing Requirements throughout the Duration of Construction</i></p> <ul style="list-style-type: none"> • A detailed CIMP for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans shall be reviewed and approved by the Strategic and Transportation Planning Division prior to commencement of construction and implemented in accordance with this approval. • Work within the public right-of-way shall be performed between 9:00 AM and 4:00 PM. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these 	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<p>hours shall only be allowed after the issuance of an after-hours construction permit.</p> <ul style="list-style-type: none"> • An Applicant-funded on-site monitor shall be present to ensure safety when Metro workers are in the immediate vicinity, or when more dangerous activities are occurring (e.g., raising of heavy equipment to roof levels). The CIMP shall identify the activities that would prompt the presence of an on-site monitor. • Streets and equipment shall be cleaned in accordance with established Public Works Department requirements. • Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on City streets. Limited queuing may occur on the construction site itself. • Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit. • Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division. • Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City. <p>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction</p> <ul style="list-style-type: none"> • The Applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved CIMP). 	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	<ul style="list-style-type: none"> The Applicant shall obtain a Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required, for any construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way. The Applicant shall provide timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Metro, Police Department, Fire Department, Public Works Department, and Community Development Department), and all owners and residential and commercial tenants of property within a radius of 500 feet. The Applicant shall coordinate construction work with affected agencies and Downtown Farmer's Market operators in advance of start of work. Approvals may take up to 2 weeks per each submittal. Coordination with Metro regarding construction activities that may impact Metro bus lines (e.g., Metro layover zone) or result in closures lasting over 6 months shall be initiated at least 30 days in advance of construction activities. The Applicant shall obtain Strategic and Transportation Planning Division approval of any haul routes for earth, concrete, or construction materials and equipment hauling. 	
TRIBAL CULTURAL RESOURCES		
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 <i>less than significant with mitigation</i> .	MM TRC-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	Less Than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
	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.	
UTILITIES		
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 on-site trenching for new connections and any in-kind replacement of the 8-inch water main in 1 st Court adjacent to/within the Project site, 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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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 <i>less than significant with mitigation</i> .	No mitigation required MM WW-1 Sewer Study and Monitoring. <u>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 Developer 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</u>	Less Than Significant <u>with Mitigation</u>

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts		
Impacts	Mitigation Measures	Residual Impacts
	shall be submitted to the Engineering Division. All reports and plans shall also be approved by the Water Resources Engineer.	
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 <i>less than significant-with mitigation</i> .	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. 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 Developer shall be responsible to upgrade any downstream deficiencies, 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. No mitigation required	Less Than Significant-with Mitigation
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 <i>less than significant</i> .	No mitigation required	Less Than Significant
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 <i>no impact</i> .	No mitigation required	Less Than Significant No Impact
CUMULATIVE IMPACTS		
Neighborhood Effects: Transportation: The proposed Project would contribute to potentially significant and unavoidable cumulative impacts to new vehicle trips that would result in an exceedance of the City's adopted LOS thresholds at six intersections under Future Year (2025) Plus Project traffic conditions.	No feasible mitigation measures are available	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
Transportation: The proposed Project would contribute to potentially significant and unavoidable cumulative impacts to new vehicle trips that would result in an exceedance of the City's adopted LOS thresholds at six intersections under Future Year (2025) Plus Project traffic conditions.	No feasible mitigation measures are available	Significant and Unavoidable
Utilities: <u>With the implementation of DCP MM U-1, The the proposed Project would not result in a considerable contribute contribution</u> to potentially significant and unavoidable cumulative impacts to wastewater utilities and infrastructure	DCP MM U-1 Fair Share Contribution: If a City Sewer Master Plan is completed prior to the issuance of the last building permit for the project, the project applicant shall provide a fair share contribution (based the methodology set forth by the City's Sewer Master Plan) to the City's Capital Improvements Program or any Public Infrastructure Financing Program (PIFP) required to upgrade sewer service to the site (i.e., Ocean/ Main corridor). A security shall be provided or a payment agreement executed prior to issuance of the last building permit for the project.	Less Than Significant <u>with Mitigation</u>
All other cumulative impacts would be less than significant.		

Table ES-2. 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 <u>with Mitigation</u>	No Impact	Less	Slightly Less	Less	Similar
Project Objectives Met?	Yes	No	Less	Slightly Less	Less	Less

¹Impact determinations are project-specific and are not inclusive of cumulative impacts.

1.0 INTRODUCTION

1.1 OVERVIEW

This Environmental Impact Report (EIR) evaluates the potential environmental impacts of the proposed Ocean Avenue Project (Project) in the City of Santa Monica (City), Los Angeles County, California. The EIR was prepared by Wood Environment & Infrastructure Solutions, Inc. (Wood) in cooperation with City staff. The proposed Project comprises 248,570 square feet (sf) of mixed-use development – including 120 hotel guestrooms, 100 residential units, restaurant and retail uses, and a Cultural Use Campus (e.g., museum, art gallery, etc.) – in the Downtown District of the City. Two City-designated Landmarks located at 1333 Ocean Avenue and 1337 Ocean Avenue would be relocated onsite and integrated into the proposed Cultural Use Campus. The proposed Project would include the development of five buildings ranging in height from 57 feet to 130 feet with a publicly-accessible rooftop observation deck atop the 130-foot-tall Hotel Building. The proposed Project would provide 40,920 sf of open space – including 22,407 sf at ground level (e.g., pedestrian-only paseos, pedestrian breezeway, and publicly-accessible courtyard) – along with widened sidewalks along 2nd Street and Santa Monica Boulevard. The proposed Project would also provide approximately 285 vehicle parking spaces in a proposed three-level subterranean parking garage.

Table 1-1. Project Overview

Project Element	Size (above & below grade)
Project Site Area	82,500 sf
Proposed Development	248,570 sf
Hotel Rooms	120 rooms
Residential Units	100 units
Restaurant and Retail	36,110 sf
Cultural Use Campus	35,500 sf
Maximum Building Height	130 feet
Parking Spaces	285 spaces
Open Space	40,920 sf

The Project site encompasses five assessor parcels (Assessor Parcel Numbers [APN] 4291-014-016, -017, -018, -024, and -025), which together have a total lot size of 82,500 sf (1.89 acres) with approximately 350 feet of frontage on Ocean Avenue, 320 feet of frontage on Santa Monica Boulevard, and 200 feet of frontage on 2nd Street. This block is on a busy corner of Santa Monica Boulevard and Ocean Avenue at the southern edge of the Downtown District, a popular shopping and entertainment destination with more than 260 stores, including vending carts and farmers’

markets, multiple dining options, and entertainment. As described in Section 1.4, *Regulatory Framework*, the Project site is also located within the boundaries of the Coastal Zone.

1.2 PROJECT APPLICANT

Ocean Avenue Partners LLC
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100 Wilshire Blvd., Suite 1600
Santa Monica, CA 90401
Contact: Janna M. Boelke
Telephone: (310) 393-9653
E-Mail: JannaB@worthe.com

1.3 PROJECT BACKGROUND

In February 2013, the Project Applicant (Applicant) submitted a Development Agreement application (13DEV-004) to the City for approximately 338,695 sf of development on the Project site, including a 22-story (244-foot-tall) building. Following a community meeting and Architectural Review Board (ARB) conceptual review in 2013, City Council direction put this project on hold pending adoption of the Downtown Community Plan (DCP), which was under preparation to guide new public and private development, including urban form, circulation, open space, arts and cultural uses, economic sustainability, housing, and historic preservation. The EIR for the DCP was certified and the DCP adopted by the City Council in July 2017. The Final EIR for the DCP (State Clearinghouse [SCH] Number 2013091056) is hereby incorporated by reference in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15150. The EIR and the DCP are available for public review during normal business hours at City Hall at 1685 Main Street, Room 212, Santa Monica, CA 90401.

Following adoption of the DCP in July 2017, the Applicant submitted revised plans in December 2017 to be consistent with the DCP and address feedback received in 2013. The revised plans were reviewed during a community meeting on January 11, 2018 and the ARB held a preliminary concept discussion for the revised plans on February 20, 2018. The ARB was generally supportive of the revised design, including the creation of interconnected open spaces and the proposed reuse of the City-designated Landmark Victorian residence (1333 Ocean Avenue) to create a publicly-accessible courtyard with the City-designated Landmark Spanish Colonial Revival building (1337 Ocean Avenue) (see Section 2.6.3, *Cultural Use Campus*).

The revised plans were also conceptually reviewed by the City Landmarks Commission on March 12, 2018. The Landmarks Commission requested further refinement of the treatment of the City-designated Landmark buildings onsite and the relationship of historic features and styles with the proposed contemporary architectural style of the revised plans. Additionally, the City Planning Commission held a public hearing on May 2, 2018 to consider, review and provide



Under the proposed Project, the two City-designated Landmarks located at 1333 Ocean Avenue and 1337 Ocean Avenue on the Project site would be relocated onsite and integrated into the proposed Cultural Use Campus.

preliminary comments on the revised design concept, and to identify potential community benefits for consideration (referred to as a “float up” discussion). The Planning Commission was generally supportive of the overall design concept, including the relationship between building height and open space, the emphasis on the pedestrian experience, and the proposed Cultural Use Campus as a community benefit; the Planning Commission recommended that the City Council proceed with Development Agreement discussions. On June 12, 2018, the City Council held a subsequent “float up” discussion, concurred with the Planning Commission’s recommendation, and directed City staff to initiate the Development Agreement negotiations and review process on the revised plan, which provide the basis for the proposed Project subject to environmental analysis in this EIR.

1.4 REGULATORY FRAMEWORK

The City’s 2010 Land Use and Circulation Element (LUCE) designates the Project site as Downtown Core. The LUCE envisions the Downtown Core as a thriving, mixed-use urban environment where people can live, work, and be entertained and culturally enriched. The LUCE did not establish maximum building height limits, target floor area ratios (FAR), or other specific development standards (e.g., setbacks and step backs for new buildings).¹ Rather, the LUCE defers such standards to the DCP.² The Project site is zoned Downtown District, per Chapter 9.10 of the Zoning Ordinance, and defers all development standards and regulations to the DCP. The Final DCP was adopted by City Council on July 25, 2017 and contains all regulating code and

¹ FAR is the ratio of a building’s total floor area (Gross Floor Area) to the size of the piece of land upon which it is built.

² The LUCE and City Zoning Ordinance refer to the Downtown Specific Plan, but through the planning process, the plan’s name was changed to DCP.

design guidelines for the Downtown District; therefore, the proposed Project must conform to land use development standards set forth in the Final DCP.

The Project site is located within the Coastal Zone and is subject to the provisions of the California Coastal Act of 1976 (Coastal Act) (Public Resources Code Sections 30000 et seq.). The City is currently in the process of adopting a Local Coastal Program (LCP) to reflect the combined policies, goals, and objectives set forth in the City's LUCE, Zoning Ordinance, and DCP. The LCP comprises two documents: the Land Use Plan (LUP), which outlines conditions, objectives, and policies for the Coastal Zone; and the Implementation Plan (IP), which is an ordinance of regulations to implement LUP policies. Both documents require certification by the California Coastal Commission (Coastal Commission).

The City recently adopted the LUP on October 9, 2018 and submitted the LUP to the Coastal Commission for certification in November 2018. It is anticipated that a Coastal Commission certification hearing for the LUP will be scheduled in 2020. The City is now preparing the IP, which will take approximately 2 to 3 years to complete (City of Santa Monica 2018). The entire Project site is located in LUP Subarea 5 (Downtown), within which the LUP states that allowable uses 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."*

1.5 EIR PURPOSE AND LEGAL AUTHORITY

The proposed Project requires the discretionary approval of the City of Santa Monica City Council. As such, the proposed Project is subject to the requirements of CEQA. Per CEQA Guidelines Section 15182, a residential or mixed-use project, or a project with a FAR of at least 0.75 on commercially-zoned property, including any required subdivision or zoning approvals, is exempt from CEQA if the project satisfies the following criteria:

"(A) It is located within a transit priority area as defined in Public Resources Code section 21099(a)(7);

(B) It is consistent with a specific plan for which an environmental impact report was certified; and

(C) It is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board has accepted the

determination that the sustainable communities strategy or the alternative planning strategy would achieve the applicable greenhouse gas emissions reduction targets.”

The proposed Project meets all of the above criteria. Specifically, the Project site is located in a Transit Priority Area (TPA), as it is within 0.5 miles of a major transit stop – the Downtown Station for the Metro E (Expo) Light Rail line. Additionally, the proposed Project is consistent with the Downtown Community Plan, for which a Program EIR was certified. Lastly, the proposed Project is consistent with the general use designation, density, building intensity, and policies of the Southern California Association of Government’s (SCAG’s) adopted 2016-2040



The Project site is located approximately 1,500 feet from the Pacific Ocean within the Coastal Zone and is therefore subject to the requirements of the Coastal Act and the City’s LCP.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (see Section 3.10, *Land Use and Planning*). Therefore, the proposed Project is legally exempt from CEQA per Section 15182.

Nevertheless, given public interest and to promote informed decision-making, the City has elected to prepare an EIR for the proposed Project. This EIR was prepared in accordance with the Guidelines for Implementation of CEQA, published by the Resources Agency of the State of California (Title 14, California Code of Regulations 15000 et seq.), and the City’s procedures for implementing CEQA.

Per CEQA Guidelines Sections 21067, 15367, and 15050 through 15053, the City is the Lead Agency under whose authority this document has been prepared. This EIR is intended to provide information to public agencies, regulatory agencies, decision-makers, and the public regarding the environmental impacts that would potentially result from implementation of the proposed Project. Under the provisions of CEQA, *“the purpose of the environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided”* (Public Resources Code 21002.1[a]). This document analyzes the environmental effects of the proposed Project to the degree of specificity appropriate to the proposed Project, as required under CEQA Guidelines Section 15146. The analyses consider the construction and operational activities associated with the proposed Project, to determine the short- and long-term environmental effects. This EIR

discusses both the direct and indirect impacts of the proposed Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

In a practical sense, this EIR functions as a tool for fact-finding, allowing the public and the City an opportunity to collectively review and evaluate baseline existing conditions and the potential of the proposed Project to result in environmental impacts through a full disclosure process. Additionally, this EIR provides the primary source of environmental information for the City to consider when exercising any permitting or approval authority directly related to the proposed Project. The EIR will be used in connection with the Development Agreement and all other approvals necessary for the construction and operation of the proposed Project. The EIR will be used by the City and other responsible public agencies that must approve activities undertaken with respect to the proposed Project.

The CEQA process was established to enable public agencies to evaluate a project in terms of its environmental consequences, to examine and implement mitigation measures for eliminating or reducing potentially adverse impacts, and to consider alternatives to a project. While CEQA Guidelines Section 15021(a) requires that major consideration be given to avoiding environmental damage, where feasible, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, considering economic, legal, social, and technological factors. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with CEQA Guidelines Section 15091, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a “statement of overriding considerations.”

1.6 ENVIRONMENTAL REVIEW PROCESS

As a first step in complying with the procedural requirements of CEQA, the City conducted a public scoping process consistent with CEQA Guidelines Section 15083. The public was provided with an opportunity to comment on the scope of the EIR through a Notice of Preparation (NOP) released on December 21, 2018. The NOP was distributed to Federal, State, and local agencies, neighborhood groups, and all occupants and owners within a 1,000-foot radius of the Project site. The NOP comment period began on December 21, 2018 and ended on January 30, 2019 (see Appendix A). A Public Scoping Meeting for the EIR was held during the NOP comment period on January 10, 2019. During this meeting City staff described the proposed Project and the

environmental review process, and received public comment on the scope and content of the EIR. The scoping process assisted the City in determining if any aspect of the proposed Project may cause a significant effect on the environment and, based on that determination, to narrow the focus of the subsequent environmental analysis. Comments received during the NOP comment period were considered during EIR preparation and are included in Appendix A.

As with the NOP, the Notice of Availability (NOA) for the Draft EIR was distributed to Federal, State, local agencies, neighborhood groups, all occupants and owners within a 1,000-foot radius of the Project site, and NOP commenters. State CEQA guidelines require a minimum 45-day review period for public review of the Draft EIR. In recognition of the current COVID-19 pandemic, an extended 90-day comment period for the Draft EIR was provided, which began on May 18, 2020 and ended on August 17, 2020.

The Draft EIR is available for review online at the City's Planning and Community Development Department website at:

<http://www.smgov.net/Departments/PCD/Environmental-Reports/The Ocean Avenue Project/>

1.7 SCOPE OF THE EIR

This EIR assesses potential environmental impacts that could occur with implementation of the proposed Project. The scope of the EIR includes evaluation of potentially significant environmental issues raised in response to the NOP and during scoping discussions. The NOP and comment letters received during the NOP comment period are included in Appendix A. The scoping process determined that construction and/or operation of the proposed Project may result in potentially significant impacts with respect to the following issue areas, which are addressed in detail in this EIR:

- Aesthetics and Shade/Shadow Effects
- Air Quality
- Construction Effects
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Neighborhood Effects

- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

This EIR addresses the issues referenced above and identifies potential environmental impacts, including Project-specific and cumulative effects of the proposed Project, in accordance with the provisions set forth in the CEQA Guidelines. In addition, the EIR recommends feasible mitigation measures, where necessary, that would reduce or eliminate adverse environmental effects.

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. In accordance with CEQA Guidelines Section 15128, environmental impacts related to Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Population, Employment, and Housing, Public Services, Recreation are not considered significant. Section 4.0, *Other CEQA Considerations*, provides a brief discussion of these resources.

A summary of cumulative impacts, which considers other projects in the immediate vicinity, is presented in each resource area analysis section of EIR. Cumulative project analyses represent an assessment of potential impacts on City resources using a list of past, present, and probable future projects capable of producing related or cumulative impacts.

Consistent with CEQA Guidelines Section 15126.6(d), this EIR includes the assessment of a reasonable range of alternatives to the proposed Project that could feasibly attain the objectives of the proposed Project while avoiding or substantially lessening any of the significant effects of the proposed Project (see Section 5.0, *Alternatives*).

1.8 AREAS OF KNOWN PUBLIC CONTROVERSY

CEQA Guidelines Section 15123 states that an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agency and the public. Based on Planning Commission, City Council, and ARB meetings, public hearings, and discussions regarding the proposed Project, as well as letters received from the public in response to the NOP, the following environmental issues are known to be of concern and may be controversial. Each issue is further evaluated in the EIR:

- Effects on public views and community character due to size, height, bulk, and scale of new development in Downtown;
- Preservation and treatment of onsite and adjacent historic resources;

- Safe accommodation for all modes of travel during construction and operation, particularly sidewalk access during construction;
- Effects on transit (e.g., Big Blue Bus and Metro) during construction and operation;
- Provision of ample electric vehicle (EV) charging stations within the parking garage;
- Operational noise from proposed public open space and delivery and trash trucks (e.g., associated reverse “beeper” noise) in an already noisy area; and
- Downcast lighting to preserve night skies and star visibility.

1.9 ORGANIZATION OF THE EIR

This EIR is organized into the following seven sections.

- Section 1.0, *Introduction*, summarizes the background of the proposed Project and explains the environmental review process.
- Section 2.0, *Project Description*, provides a detailed description of the proposed Project and the Project site setting.
- Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, is separated by environmental topics and provides analysis of existing environmental conditions, Project-specific impacts, mitigation measures, cumulative impacts, and residual impacts after mitigation for each topic.
- Section 4.0, *Other CEQA Considerations*, identifies significant and irreversible, growth-inducing, and unavoidable effects, as well as resources areas that would not be significantly affected by the proposed Project.
- Section 5.0, *Alternatives*, describes alternatives to the proposed Project, and identifies the Environmentally Superior Alternative.
- Section 6.0, *List of Preparers*, identifies the City and consultant team that prepared the EIR.
- Section 7.0, *References and Persons or Organizations Contacted*, provides information about resources used in the preparation of the EIR.

Appendices to the EIR include the NOP, responses to the NOP, comments on the Draft EIR, and supporting technical studies used as a basis of information and analyses in preparation of the environmental analysis in the EIR.

2.0 PROJECT DESCRIPTION

2.1 INTRODUCTION

The proposed Ocean Avenue Project (Project) would redevelop an approximately 82,500-square foot (-sf) (1.89-acre) site on the corner of Ocean Avenue and Santa Monica Boulevard in the City of Santa Monica (City). The mixed-use Project would include a hotel, residential apartments, cultural uses, a publicly-accessible roof-top observation deck, restaurant/retail

Project at a Glance

Site Area:	1.89 acres
Hotel Rooms:	120 rooms
Residential Units:	100 units
Commercial Uses:	36,110 square feet
Cultural Use:	35,500 square feet
Maximum Height:	130 feet (12 stories)
Parking Spaces:	285 spaces

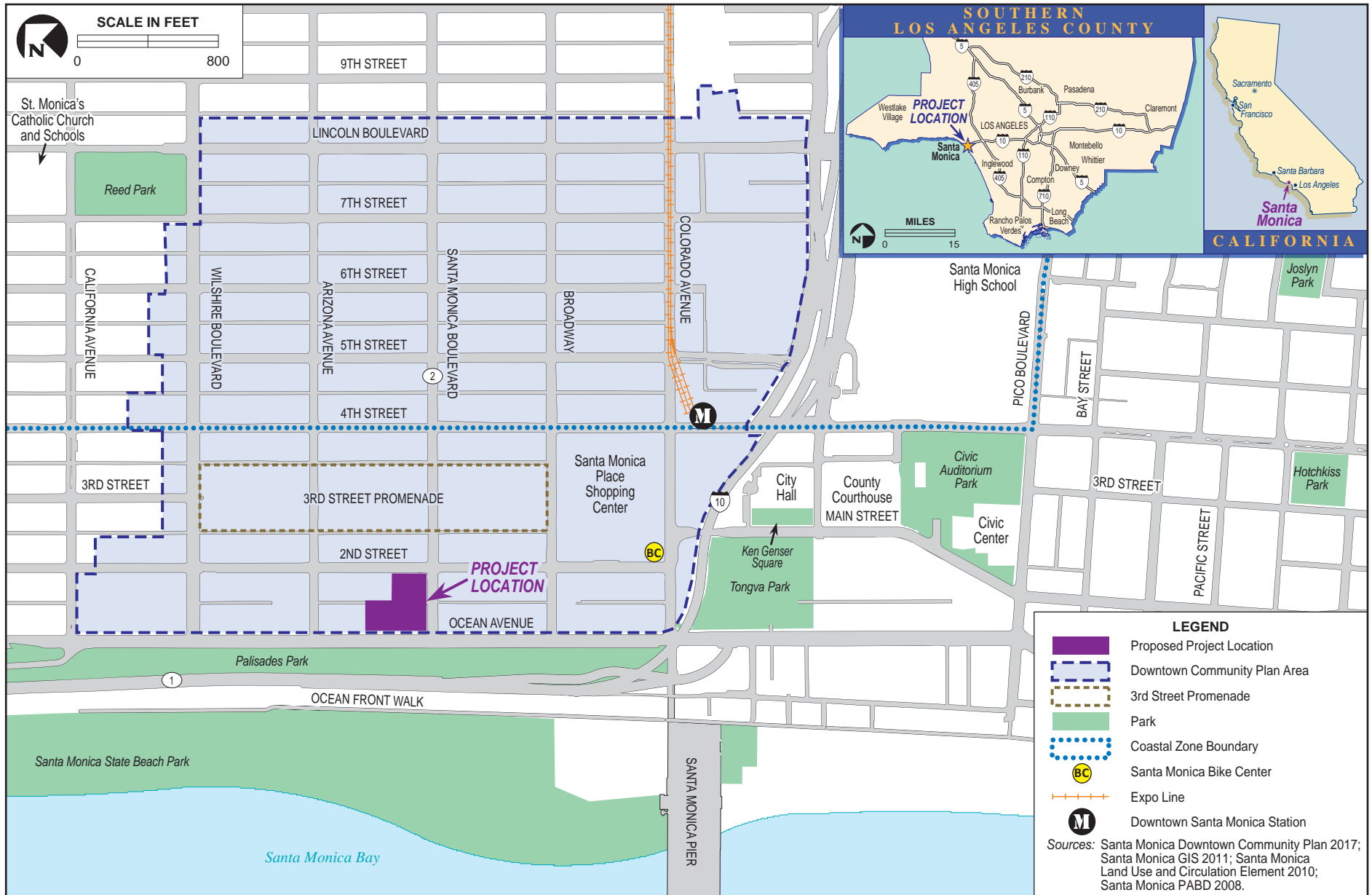
uses, open space, and subterranean parking in the Downtown District of the City. The proposed development would provide 122,400 square feet (sf) of full-service hotel space with up to 120 guestrooms, meeting and banquet rooms, and a hotel spa; 100 residential apartment units (including deed-restricted affordable units, replacement rent-controlled units, and market rate units); 36,110 sf of restaurant (including outdoor dining areas) and retail uses; and a 35,500-sf Cultural Use Campus (e.g., museum, gallery, event space). The Cultural Use Campus would include 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, as well as a new building located behind (i.e., to the east of) the City-designated Landmarks. The proposed Project also includes three underground levels providing a subterranean parking garage with capacity for up to approximately 285 vehicles and cultural use, hotel, and restaurant uses. The proposed Project would include 231 bicycle parking spaces, with long-term bicycle parking/storage in the subterranean parking garage.



The Project site is located on a busy corner of Ocean Avenue and Santa Monica Boulevard that currently supports retail, restaurant, residential, and office uses.



The Project site is fully developed with mixed use buildings and surface parking lots (foreground). The Project site is located among a range of commercial and residential uses, and structures in the vicinity vary widely in height and architectural style.



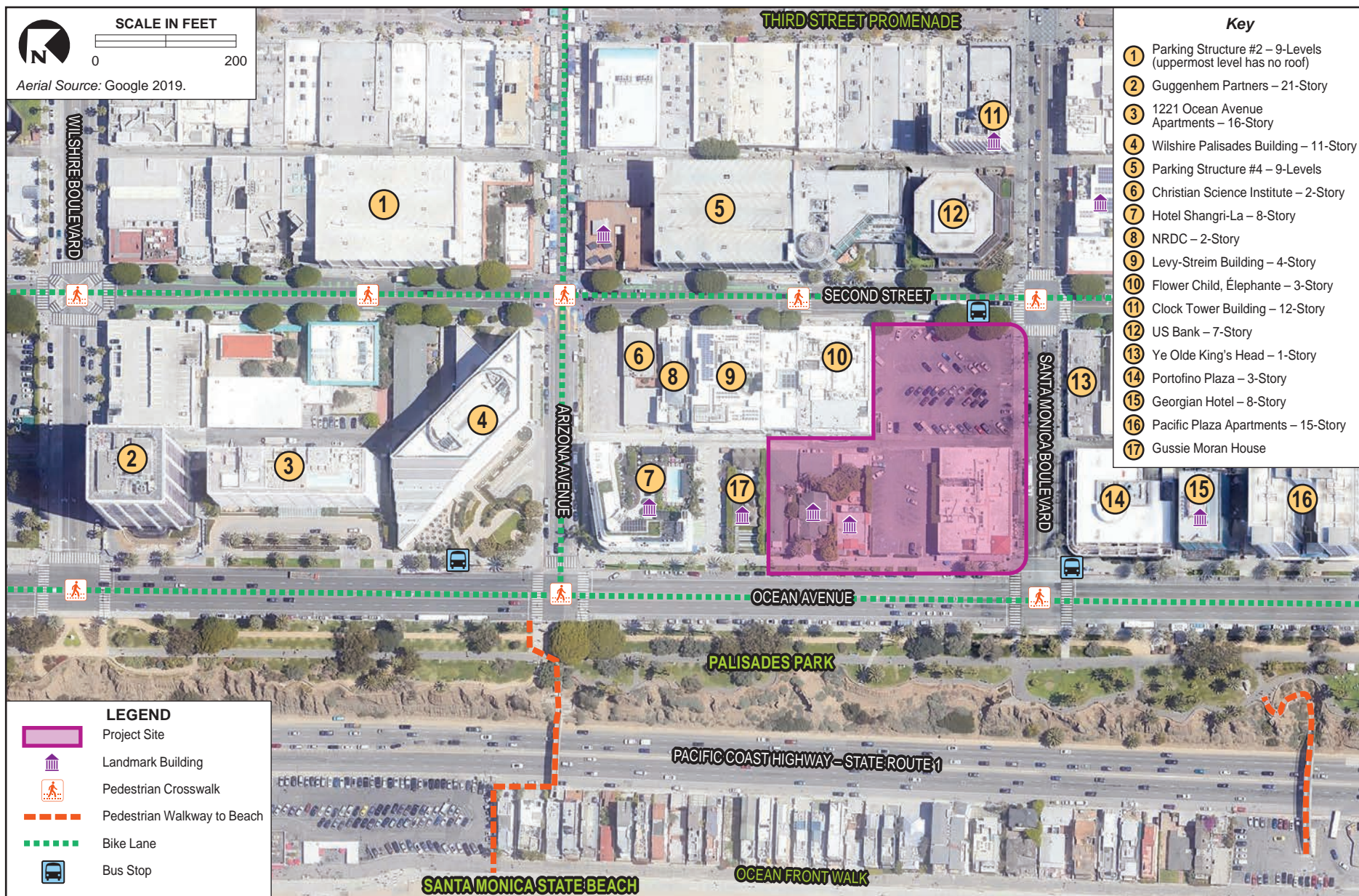
The proposed Project would construct five new buildings onsite that would range in maximum height from 53 feet to 130 feet (excluding permitted rooftop projections) as well as adaptive reuse of two existing Landmarks for a total Floor Area Ratio (FAR) of 2.95 and a total above-grade building floor area (calculated per the Santa Monica Municipal Code [SMMC]) of approximately 248,570 sf with an additional 4,940 sf of outdoor dining. The proposed Project includes 40,920 sf of open space to promote an active pedestrian environment. The proposed hotel would be located along Ocean Avenue and would feature an approximately 5,070-sf publicly-accessible rooftop observation deck providing panoramic views of the Downtown, Santa Monica Pier, Santa Monica Mountains, Palisades Park, Santa Monica State Beach, and the Pacific Ocean. In addition to the publicly-accessible rooftop observation deck, three ground floor pedestrian-only paseos, a ground floor publicly-accessible courtyard in front of the Cultural Use Campus, and widened sidewalks along Ocean Avenue, 2nd Street, and Santa Monica Boulevard would provide public open space.

2.2 EXISTING PROJECT SITE CHARACTERISTICS

2.2.1 Project Location

The Project site is located in the City's Downtown District, in the western portion of Los Angeles County, California. The Project site encompasses 11 lots contained in five assessor parcels (Assessor Parcel Numbers [APN] 4291-014-016, -017, -018, -024, and -025) and is generally bordered by Ocean Avenue to the west, Santa Monica Boulevard to the south, 2nd Street to the east, and existing commercial development to the north, including 1323 Ocean Avenue (Gussie Moran House) and 1332 2nd Street (Flower Child, Elephanté, and Laemmle Monica Film Center) (see Figures 2-1 and 2-2). The Project site, which is separated by 1st Court, has a total size of approximately 82,500 sf (1.89 acres) with approximately 350 feet of frontage on Ocean Avenue, 320 feet of frontage on Santa Monica Boulevard, and 200 feet of frontage on 2nd Street.



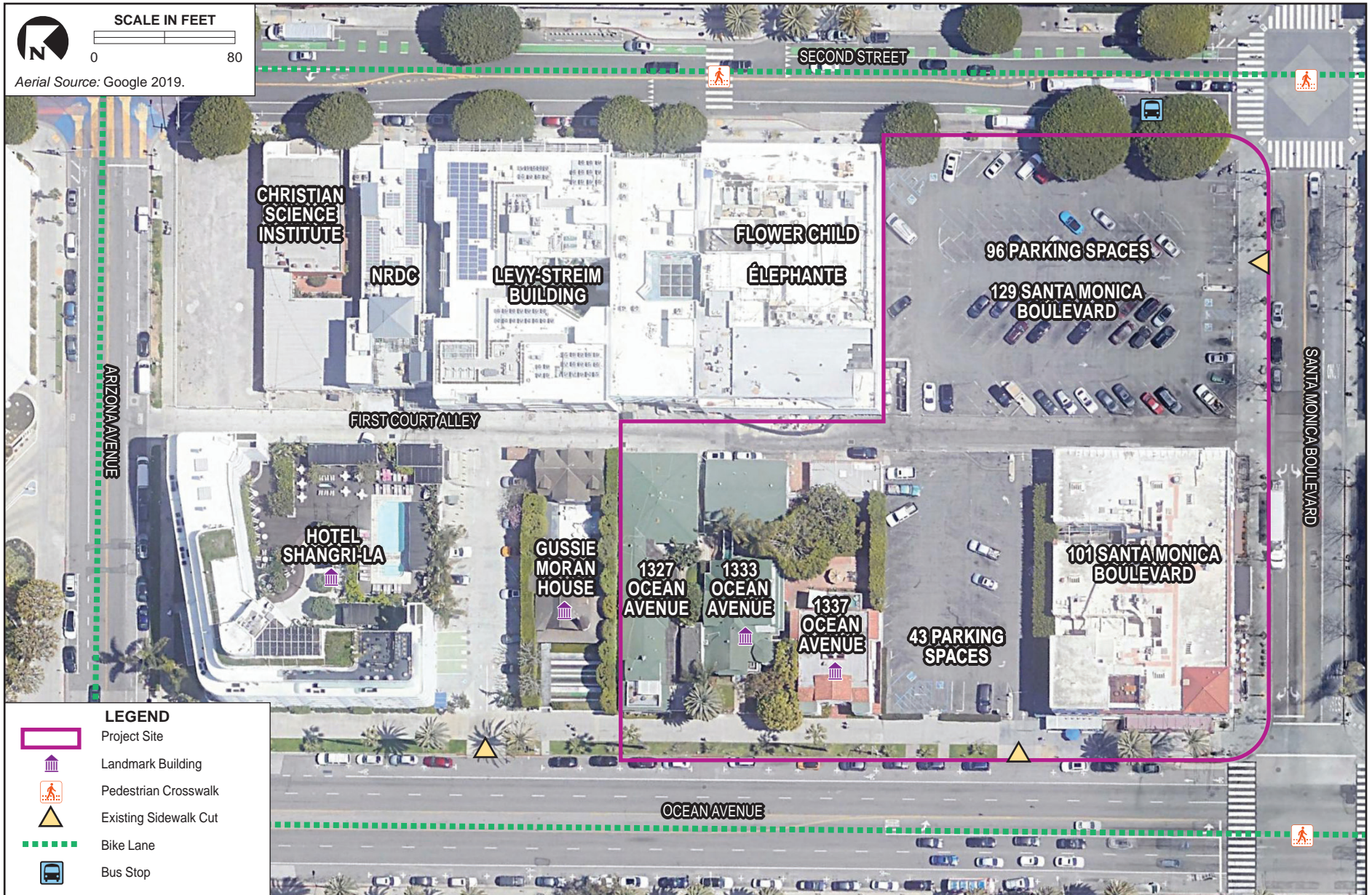


The Downtown District is one of the most densely developed areas in the City and includes multiple taller buildings, particularly in its western portion and along Ocean Avenue (see Figure 2-2). The Project site is located at the western edge of the Downtown District, an urban area with a broad mix of commercial retail, office, hotel, restaurant, and entertainment uses, as well as multi-family residential uses. Popular destinations near the Project site include Third Street Promenade (a major retail district providing pedestrian-only shopping, dining, and services) approximately 0.1 miles to the east, Palisades Park directly across Ocean Avenue to the west, the Santa Monica Pier approximately 0.4 miles to the south, and the open-air Santa Monica Place shopping center approximately 0.3 miles southeast.

Along Ocean Avenue, existing development primarily includes commercial and residential uses in a variety of building sizes and styles. Key surrounding uses include the Gussie Moran House, which is a two-story commercial use Queen Anne-style building (City-designated Landmark) immediately north of the Project site; the eight-story Hotel Shangri-La (City-designated Landmark) at the corner of Ocean Avenue and Arizona Avenue; 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, which is a mixed-use building with ground floor retail and apartments on the upper floors. Palisades Park (City-designated Landmark) is located west of the Project site across Ocean Avenue. State Highway 1 (i.e., Pacific Coast Highway) and Santa Monica State Beach are located at the base of the Palisades Bluffs to the west of the Project site.

Along 2nd Street, 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 building with ground floor restaurant uses and upper floor office and multi-family (i.e., apartment) residential uses; a three-story office building; and a one-story church. A six-story commercial building, a seven-story mixed-use office building with ground floor retail and fitness uses, and an eight-story City parking structure (Parking Structure #4, which provides nine levels of parking, including rooftop parking) are located across 2nd Street from the Project site.

Across Santa Monica Boulevard, development includes a one-story commercial building with restaurant and commercial tenants; a three-story mixed-use office building with ground floor retail and restaurant 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.



2.2.2 Existing Project Site

The 1.89-acre Project site is fully developed with one- to three-story buildings and surface parking lots. Existing development includes a mixed-use commercial and residential building at the northwest corner of Ocean Avenue and Santa Monica Boulevard and three commercial buildings along Ocean Avenue. Additionally, two privately operated surface parking lots with driveways off Ocean Avenue, Santa Monica Boulevard, and 1st Court are located onsite (see Table 2-1 and Table 2-2).

Table 2-1. Summary of Existing Development within the Project Site

Existing Development	Floor Area (sf)
Residential (19 units)	10,590
Commercial office	14,005
Medical Office	4,875
Medical Spa	725
Salon	1,175
Restaurant	11,100
Outdoor dining	1,290
Storage	690
Total Existing Floor Area	44,450
Parking Spaces	154

The Project site comprises five addresses, each with a different building and use (see Table 2-2).

Table 2-2. Existing Development by Address

Address	Existing Improvement	Use	Floor Area (sf)	Height	Number of Employees
1327 Ocean Avenue	Commercial Structure (8,080 sf)	Commercial Office	6,530	2-story	25-50
		Hair salon	825		15-20
		Medical Spa	725		15-20
1333 Ocean Avenue	Landmark Structure	Medical Office	4,875	2.5-story	15-20
	Rear Commercial Structure	Commercial Office	2,500	2-story	25-50
1337 Ocean Avenue	Landmark Structure (4,425 sf)	Commercial Office	4,075	2-story	20-40
		Salon	350		15-20
	Rear Commercial Structure	Commercial Office	900	1-story	15-20
101 Santa Monica Boulevard^a	Mixed-Use Restaurant and Residential Structure (23,670 sf)	Rental Apartments	10,590 (19 units)	2-story with rooftop penthouse unit and deck	2 (Property manager and maintenance coordinator)
		Commercial Storage	690		
		Restaurant	11,100		
		Outdoor Dining	1,290		85-125
	Surface Parking Lot	Parking	-	-	2-5
129 Santa Monica Boulevard	Surface Parking Lot	Parking	-	-	

Note: ^a Other addresses associated with this property are 1355 and 1357 Ocean Avenue and 103, 105, 107, 109, 111, 113 and 115 Santa Monica Boulevard.

1327 Ocean Avenue is improved with a two-story commercial structure that consists of 8,080 sf located on the north end of the Project site. This site is currently used for commercial purposes including a commercial office, hair salon, and medical spa. This parcel also includes eight parking spaces including seven covered parking spaces on the eastern edge of the site at ground-level and one parallel space behind the building, all of which are accessed via 1st Court.

1333 Ocean Avenue is improved with a 2.5-story, 4,875-sf building and a separate two-story 2,500-sf structure at the rear (east) connected by an unenclosed catwalk and staircase located immediately south of 1327 Ocean Avenue. The front building currently supports a medical office

and the rear structure supports a commercial office. This parcel includes three parallel parking spaces against the rear structure, accessed from 1st Court.

The front building located at 1333 Ocean Avenue was originally constructed in 1906 and is a City-designated Landmark (LC-01LM-001). The building is an example of Queen Anne style Victorian architecture and is an important contribution to Ocean Avenue's character and history of blufftop residential use. The rear structure was built in 1941 and is not identified as a historic structure.

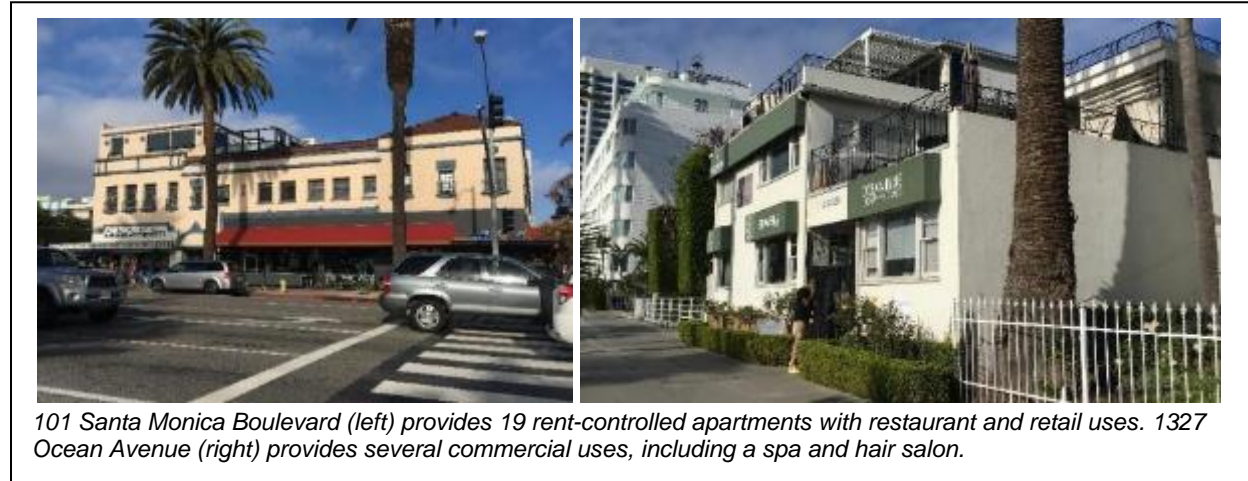


1333 Ocean Avenue (left) and 1337 Ocean Avenue (right) include City-designated Landmarks.

1337 Ocean Avenue is located immediately south of 1333 Ocean Avenue (and immediately north of the surface parking lot at 101 Santa Monica Boulevard). This site is improved with a two-story 4,425-sf building and a detached one-story 900-sf structure located at the rear (east) portion of the lot. The front building currently supports a commercial office and salon and the rear structure supports a commercial office. This parcel includes three parking spaces comprised of two parallel parking spaces against the rear structure and one additional space perpendicular to the rear structure, all accessed from 1st Court.

The front building located at 1337 Ocean Avenue was originally built in 1926 and is a City-designated Landmark (LC-04-LM-005). The building is considered a typical example of the Spanish Colonial Revival style as interpreted for multi-family dwellings and commercial buildings of the period. The rear structure is not recorded as a historic structure.

101 Santa Monica Boulevard is developed with a two-story mixed-use commercial/residential structure with a rooftop penthouse apartment consisting of 23,670 sf (including outdoor dining) located at the northeast corner of Santa Monica Boulevard and Ocean Avenue (southwest corner of the Project site). The ground floor commercial space is occupied by two restaurants totaling approximately 12,390 sf (including outdoor dining) with an additional 690 sf being used for storage.



Nineteen rent-controlled apartment units are located within the 101 Santa Monica Boulevard building. Eighteen of the apartments are located on the second floor (12 studio units and 6 one-bedroom units) and there is a rooftop penthouse apartment (1 one-bedroom unit). There is a surface parking lot located to the north of the 101 Santa Monica Boulevard building that has approximately 47 parking spaces (including two handicapped spaces).

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*.

129 Santa Monica Boulevard consists of 30,000 sf of land located at the northwest corner of Santa Monica Boulevard and 2nd Street (east of 101 Santa Monica Boulevard across 1st Court). This site is improved with a surface parking lot containing approximately 93 parking spaces (including four handicapped spaces), with an entrance provided off Santa Monica Boulevard and an exit onto 1st Court.



129 Santa Monica Boulevard (left, foreground) provides surface parking lot.

2.2.3 Site Access and Circulation

2.2.3.1 Street Network

The Project site is bordered by Ocean Avenue to the west, Santa Monica Boulevard to the south, and 2nd Street to the east. 1st Court runs north-south through the Project site connecting Arizona Avenue to Santa Monica Boulevard. Vehicle access to the Project site is currently provided by a driveway on Santa Monica Boulevard to the east of 1st Court and another driveway on Ocean Avenue, with internal site access to buildings and utility areas provided by 1st Court (see Section 2.2.3.2, *Vehicle Access to Existing Buildings*).

Ocean Avenue is a north-south street with four vehicle lanes and left-turn channelization for traffic turning east onto Santa Monica Boulevard. Ocean Avenue provides a primary blufftop connection through the Downtown District, connecting the Ocean Park and Wilshire Montana (Wilmont) neighborhoods, and provides multi-modal access to Palisades Park. Ocean Avenue provides designated bicycle lanes, wide sidewalks, and metered parking on both sides of the street. Several of the metered parking spaces on the east side of Ocean Avenue adjacent to the Project site are currently used for a valet drop-off/pick-up zone serving the existing commercial uses on the Project



The east side of Ocean Avenue bordering the Project site provides pedestrian-friendly landscaping, including koelreuteria trees and queen palm trees.

site. Along the Project site's Ocean Avenue frontage, sidewalks are approximately 24 feet, which includes a landscaped median with palm trees and lawn and a pedestrian pathway.

Santa Monica Boulevard (California State Route 2) is an east-west arterial with three vehicle lanes (two eastbound lanes and one westbound lane) and is a major thoroughfare across the City and County. The eastbound right lane also functions as a bus lane. Santa Monica Boulevard terminates at Ocean Avenue, so the westbound lane splits into right turn only and left turn only lanes at this intersection. Santa Monica Boulevard provides metered parking on the northside of the street between 2nd Street and 1st Court. Sidewalks along Santa Monica Boulevard are approximately 18 feet wide along the Project site frontage with the



Santa Monica Boulevard. intersects with Ocean Avenue and provides multi-modal access to Palisades Park.

pedestrian pathway narrowing slight in some areas as a result of existing tree wells. The entire southern curb of Santa Monica Boulevard bordering east-bound traffic is painted red to prohibit street parking on that side of the street. Between Arizona Avenue and 1st Court, there is one westbound lane and metered parallel parking. The intersection of Ocean Avenue and Santa Monica Boulevard is controlled by a traffic signal with pedestrian countdown heads for all approaches and crosswalks are striped across three legs of the intersection.

2nd Street is a north-south street with two vehicle lanes and left-turn channelization for northbound traffic turning left (west) onto Santa Monica Boulevard and left (west) onto Arizona Avenue and for southbound traffic turning left (east) onto Santa Monica Boulevard. 2nd Street is a designated bicycle route connecting the Wilmont neighborhood with the Civic Center and provides green painted bicycle lanes in both directions. Sidewalks are also provided in both directions and are approximately 15 feet wide along the Project site frontage, with the pedestrian pathway



2nd Street is a designated cross-town bicycle route with green bicycle lanes.

narrowing to 5 feet in some locations due to existing tree wells. A Metro bus layover zone is located on 2nd Street adjacent to the Project site. 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.

1st Court is an approximately 20-foot-wide public alley accessed from Arizona Avenue that provides one-way southbound connectivity between Arizona Avenue and Santa Monica Boulevard. 1st Court provides access to several private garages and surface parking for adjacent and onsite uses.

2.2.3.2 Vehicle Access to Existing Buildings

Vehicle access to the existing buildings on the Project site are summarized below:



1st Court provides southbound access to the Project site from Arizona Avenue.

- **101 Santa Monica Boulevard.** Vehicle ingress to the 101 Santa Monica Boulevard surface parking lot is provided via a curb cut on Ocean Avenue located north of the 101 Santa Monica Boulevard building. Vehicle egress from the surface parking is southbound along 1st Court to Santa Monica Boulevard. The lot for this building contains 47 parking spaces (including two handicapped spaces).
- **1327 Ocean Avenue.** There is one parallel space behind the rear building and seven covered parking spaces on the ground-level that are all accessed via 1st Court.
- **1333 Ocean Avenue.** There are three existing surface parking spaces located on the east side of 1333 Ocean Avenue adjacent to and accessed from 1st Court.
- **1337 Ocean Avenue.** There are two existing surface parking spaces located on the east side of 1337 Ocean Avenue accessed from 1st Court.
- **129 Santa Monica Boulevard.** This surface parking lot contains 93 spaces (including four handicapped spaces) and is accessed via a curb cut from Santa Monica Boulevard, located approximately halfway between 1st Court and 2nd Street. An exit at the northwest corner of the parking lot provides southbound egress along 1st Court back to Santa Monica Boulevard.

2.2.3.3 Existing Transit, Bicycle, and Pedestrian Facilities/Services

The Project site is located within approximately 0.5 miles of the Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line, which is located southeast of the Project site

at the corner of 4th Street and Colorado Avenue. The Downtown Santa Monica Station connects the Downtown District to the entire rail network throughout Los Angeles County.

Bus service in the Downtown District is provided by the City Big Blue Bus and the Los Angeles Metro. 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 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.



A Metro bus layover zone for service routes 33 and 733 runs along the eastern border of the Project site on 2nd Street.

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. These public amenities are used by Downtown District patrons and employees to store and maintain bicycles while visiting shops and services within the Project vicinity. The bicycle network within 0.5 miles of the Project site includes the beach bike path and connection to prominent bicycle routes on Ocean Avenue, 2nd Street, Arizona Avenue, Broadway, and Colorado Avenue. 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. Additionally, several shared mobility device companies (e.g., Uber, Lyft, Bird) have placed dockless electric scooters and/or electric bikes throughout Downtown Santa Monica in close proximity to the Project.

2.3 EXISTING LAND USE DESIGNATIONS AND ZONING

2.3.1 Land Use and Circulation Element

The Project site is designated *Downtown Core* in the City's Land Use and Circulation Element (LUCE). The Downtown Core designation allows for a broad range of uses, including retail, restaurant, hotel, cultural and entertainment, office, and residential. The LUCE envisions Downtown as a thriving urban district serving the needs of residents and visitors and encourages a balance of high quality uses that will generate activity during daytime and evening hours. Moreover, 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 (see LUCE Policy D1.5). The LUCE does not establish maximum building height limits and target FAR or other specific standards in the Downtown Core designation; rather the LUCE defers to the standards of the Downtown Community Plan (DCP). The Project site is zoned *Downtown District*, per Chapter 9.10 of the Zoning Ordinance, and refers all development standards to the DCP.

2.3.2 Downtown Community Plan

The City Council adopted the DCP for the Downtown District in July 2017. The DCP implements the LUCE's vision for the Downtown, including the Project site. The DCP includes detailed actions to guide new public and private development within the Downtown District, including urban form, circulation, open space, arts and culture, economic sustainability, housing, and historic preservation.

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. 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. The Project site is one of three sites identified in the DCP under the Established Large Site (ELS) Overlay, given their larger parcel size. These ELS Overlay sites may provide significant community benefits, including affordable housing, open space, and cultural institutions that would otherwise not be possible for smaller projects (City Planning and Community Development Department 2017). The ELS Overlay designation allows a project on the Project Site to request approval for development up to 130 feet in height and a 4.0 FAR subject to the application being processed through a Development Agreement as well as compliance with other specified requirements. Such requests would be subject to rigorous public review process, including the preparation of a Development Agreement, additional environmental review, shade and shadow analysis of the proposed Project's impact on adjacent uses, and review of the proposed community benefits.

The DCP identifies three preferred community benefits for the Project site, including affordable housing, cultural institution, and historic preservation. The Project proposes to satisfy all three of the DCP's preferred community benefits for this site, as well as additional community benefits as outlined in a Development Agreement with the City (see Section 2.6.10, *Development Agreement*). The proposed Project includes affordable and market-rate housing, a new Cultural Use Campus, and historic preservation with the rehabilitation of City-designated Landmarks on this Downtown site. Additionally, the proposed Project would implement the DCP's vision for its uses by adding a new hotel, ground floor commercial uses (restaurant/retail), publicly-accessible open space

(including a rooftop publicly-accessible observation deck), and subterranean parking accessed by 1st Court, while limiting its maximum height to 130 feet and the FAR to 2.95 (less than the maximum allowable 4.0 FAR). Therefore, the proposed Project is designed to be substantially consistent with the DCP.

2.3.3 Local Coastal Program

The Project site is located entirely within the Coastal Zone and, therefore, would be subject to the provisions of the California Coastal Act of 1976 (Coastal Act; Public Resources Code Section 30000 et seq.) and discretionary review by the California Coastal Commission (Coastal Commission), as well as the City's Local Coastal Program (LCP). 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).

The City is currently in the process of adopting a LCP to reflect the combined policies, goals, and objectives set forth in the City's LUCE, Zoning Ordinance, and DCP (all of which were adopted after the City's existing of Land Use Plan [LUP] of its Local Coastal Program was partially certified in 1992). The City Council adopted a new LUP in October 2018 which has yet to be certified by the Coastal Commission. 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.

The Project site is located in 2018 LUP's Subarea 5 (Downtown). The 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 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 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).

2.3.4 Zoning Ordinance

In 2017, concurrent with adoption of the DCP, the City Council adopted amendments to its Zoning Ordinance to implement the DCP within the Downtown. The Zoning Ordinance includes the land

use regulations for the Downtown, including the Project site (see Section 3.10, *Land Use and Planning* for additional details).

2.4 PROJECT OBJECTIVES

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) requires a project description to contain a statement of a project's objectives and CEQA Guidelines Section 15124(b) requires that the statement of objectives includes the purpose of the project. The Applicant has identified 14 objectives for the proposed Project:

- 1. LUCE and DCP Consistency and Implementation:** Develop a project through the Development Agreement process as contemplated in the DCP for this ELS Overlay site that is consistent with and implements the City's 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 Second Street, Santa Monica Boulevard, and Ocean Avenue, minimizing vehicle-pedestrian conflicts by reducing the existing curb cuts to one entry from the First Court and one exit on Second 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.

2.5 PROJECT OVERVIEW

The proposed Project would redevelop the approximately 82,500-sf Project site with five new mixed-use buildings, anchored by a Hotel Building with up to 120 guestrooms in the central area of the site along Ocean Avenue (122,400 sf of the Hotel Building for full service hotel uses) and ground floor restaurant/retail. Two mixed-use residential buildings comprising 117,700 sf of residential uses in 100 apartment units would be



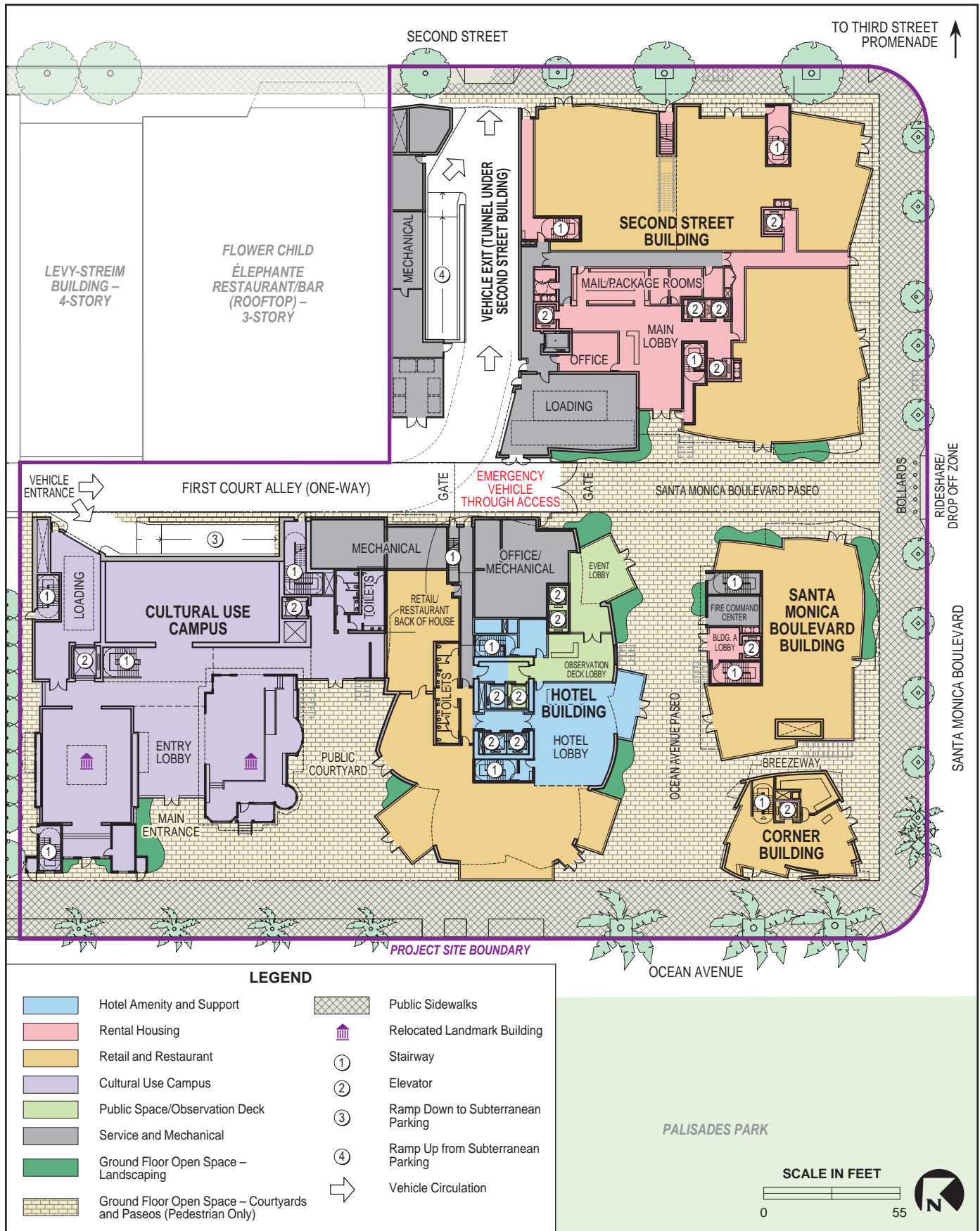
The proposed Project would redevelop the corner of Santa Monica Boulevard and Ocean Avenue with a mixed-use development anchored by a new hotel.

located along Santa Monica Boulevard, including the Santa Monica Boulevard Building along Santa Monica Boulevard between 1st Court and Ocean Avenue, and the Second Street Building at the corner of 2nd Street and Santa Monica Boulevard. The Corner Building with restaurant/retail uses would be located at the corner of Ocean Avenue and Santa Monica Boulevard. The proposed Project would include a total of 36,110 sf of restaurant (including outdoor dining areas) and retail uses within the Hotel Building, the Second Street Building, the Santa Monica Boulevard Building, and the Corner Building. The proposed Cultural Use Campus would include 35,500 sf of cultural uses, including a potential new gallery-museum on the Project site’s north side fronting Ocean Avenue. The campus would be comprised of a new building and two relocated City-designated Landmarks, which would be rehabilitated for adaptive reuse as part of the Cultural Use Campus (see Table 2-3). Building heights across the Project site would range from 53 feet to 130 feet. The proposed Project’s total above-grade floor area would be approximately 248,570 sf, resulting in a 2.95 FAR, calculated in accordance with SMMC Section 9.04.090.

Table 2-3. Proposed Mix of Uses

Use	Units/ Rooms	Floor Area (sf)	Above-grade Floor Area (sf)	Below-grade Floor Area (sf)
Hotel	120	122,400	94,400	28,000
Spa		4,400		
Meeting & Banquet		8,700		
Guestrooms/Circ/Lobby/Kitchen		109,300		
Residential	100	117,700	103,900	13,800
Studio	12			
One-Bedroom	55			
Two-Bedroom	23			
Three-Bedroom	10			
Retail/ Restaurants		36,110	28,130	7,980
Indoor Dining		19,130		
Outdoor Dining		4,940		
Retail		12,040		
Cultural Use Campus		35,500 (including relocated City-designated Landmarks)	17,100	18,400
Total Open Space		Minimum 50% of Parcel Area	40,920	
Ground Level Open Space		Minimum 25% of Parcel Area	22,407 (including up to 4,940 sf for outdoor dining and 2,670 sf for paseo on the to-be- vacated portion of 1 st Court)	
Rooftop Publicly-Accessible Observation Deck		5,070 total (including 240 sf of enclosed lobby area)*	4,830 (outdoor portion only)	
Non-Ground Floor Open Space (Private)		Minimum 25% of Parcel Area	23,500	
Subterranean Parking	285 spaces			
Bicycle Parking	231 spaces			
Mechanical / Shared Services Above-Grade (i.e., trash, storage, utilities)		4,800	4,800	N/A
Total Floor Area		316,750*	248,570*	68,180
Floor Area for FAR		N/A	243,630 (not including outdoor dining)	N/A

Notes: *The total floor area calculation does not include open space, with the exception of the 240-sf enclosed lobby area of the rooftop public observation deck.



The proposed Project would also include a minimum of 40,920 sf of open space comprised of a ground floor publicly-accessible courtyard fronting the proposed Cultural Use Campus; a north-south oriented ground floor pedestrian-only paseo (Ocean Avenue Paseo); an east-west oriented ground floor pedestrian-only paseo (Santa Monica Boulevard Paseo); a ground floor pedestrian breezeway (between the Corner Building and Second Street Building); and a publicly-accessible hotel rooftop observation deck. Private open space for residents, their guests, and hotel and museum guests on the upper levels would also be provided.

Three subterranean levels would include one level with hotel, residential, commercial, and cultural uses and two levels of subterranean parking with up to 285 spaces.

The southern portion of 1st Court, which traverses the site to provide a mid-block connection between Santa Monica Boulevard and Arizona Avenue, would be vacated and repurposed as a pedestrian-oriented public paseo and 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 vehicular egress from 1st Court onto 2nd Street (see Section 2.6.7, *Circulation, Access, and Parking*).

2.6 PROJECT COMPONENTS

2.6.1 Hotel Building

The proposed hotel would include 12 stories, rising to 130 feet in height, and would have below-grade facilities. The full-service hotel would include a hotel lobby and bar, a hotel restaurant, meeting and banquet space, a pool and pool deck, and a hotel spa. The main hotel entrance and ground floor lobby would be accessed from the proposed public paseo between the Hotel Building and the Santa Monica Boulevard Building. The lobby would include a front desk, hotel bar, restrooms, guest elevators, and a staircase (see Figure 2-4). Ground floor hotel restaurant/retail



The Project would be anchored by a 12-story hotel. The Hotel Building would lie centrally within the site along Ocean Avenue and provide ground-level public open space.

would front Ocean Avenue and may include outdoor seating. Hotel and restaurant back-of-house uses (e.g., back of house areas such as kitchen, service hallways, laundries, etc.) would be located on the eastern side of the hotel's ground floor near 1st Court. The proposed hotel's ground floor would include a hotel ballroom lobby with an entrance off the Ocean Avenue Paseo. A staircase

and guest elevators would provide access to pre-function areas and the banquet/ballroom located on the first below-grade level (Level B1). A service elevator off the ballroom lobby would connect the entire hotel with below-grade floor area, including hotel back-of-house uses, electrical rooms, bicycle storage, employee lockers, and shower facilities (see Figure 2-16).

The proposed hotel's second floor would include guestrooms, a lounge, business center, meeting rooms, and an open-air pool deck with a pool available for hotel guests only. The open-air pool deck may include fire pits, outdoor heaters, and food and beverage service and would overlook both 1st Court and the publicly-accessible courtyard that would front the Cultural Use Campus and Ocean Avenue (see Figure 2-5).

Floors 3 through 12 of the proposed Hotel Building would each provide the balance of the guest rooms (see Figures 2-6 through 2-9). Above Floor 12, the hotel would feature a 5,070-sf publicly-accessible rooftop observation deck providing panoramic views of Downtown, Santa Monica Pier, Santa Monica State Beach, Palisades Park, the Santa Monica Mountains, and the Pacific Ocean. Access to the publicly-accessible observation deck would be provided via a single elevator accessed by an observation deck lobby accessible off the Ocean Avenue Paseo (see Figure 2-3). Other mechanical, electrical, and plumbing (MEP) space surrounded by an open-air observation deck (see Figure 2-10).



The publicly-accessible rooftop observation deck on the proposed hotel's rooftop would sit at 130 feet, providing 360-degree views toward the beach, Santa Monica Pier, and the Downtown.

2.6.3 Corner Building

The proposed two-story Corner Building would be located at the intersection of Ocean Avenue and Santa Monica Boulevard and would provide restaurant/retail uses on the ground and second floors (refer to Figure 2-4 and see Figure 2-5). Access to the Corner Building would be available off both Santa Monica Boulevard and Ocean Avenue. Access to the second floor uses of the Corner Building would be provided via elevator and stairway. The Corner Building would be bordered to the north by the Ocean Avenue Paseo, to the east by the proposed breezeway, and to the south and west by sidewalks along Santa Monica Boulevard and Ocean Avenue. Ground-level outdoor restaurant seating is envisioned along the paseo, the breezeway, and street frontages. The maximum height of the Corner Building would be 55 feet tall.



The Corner Building would provide restaurant and retail uses and outdoor seating on the corner of Santa Monica Boulevard and Ocean Avenue.

2.6.4 Mixed-Use Residential Buildings

The proposed Project includes the development of two new mixed-use residential buildings: the Santa Monica Boulevard Building and the Second Street Building (refer to Figure 2-4). Together, these mixed-use buildings would provide 100 apartments, including 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 to replace 19 existing rent-controlled units onsite, consistent with SMMC Section 9.22.020. The proposed mixed-use buildings would be located along Santa Monica Boulevard and would include ground floor restaurant/retail uses with access from Ocean Avenue, Santa Monica Boulevard, 2nd Street, and the proposed pedestrian-only paseos and breezeway. The Project's 36,110 sf of restaurant/retail uses would be distributed between all five new buildings, including these two mixed-use residential buildings.

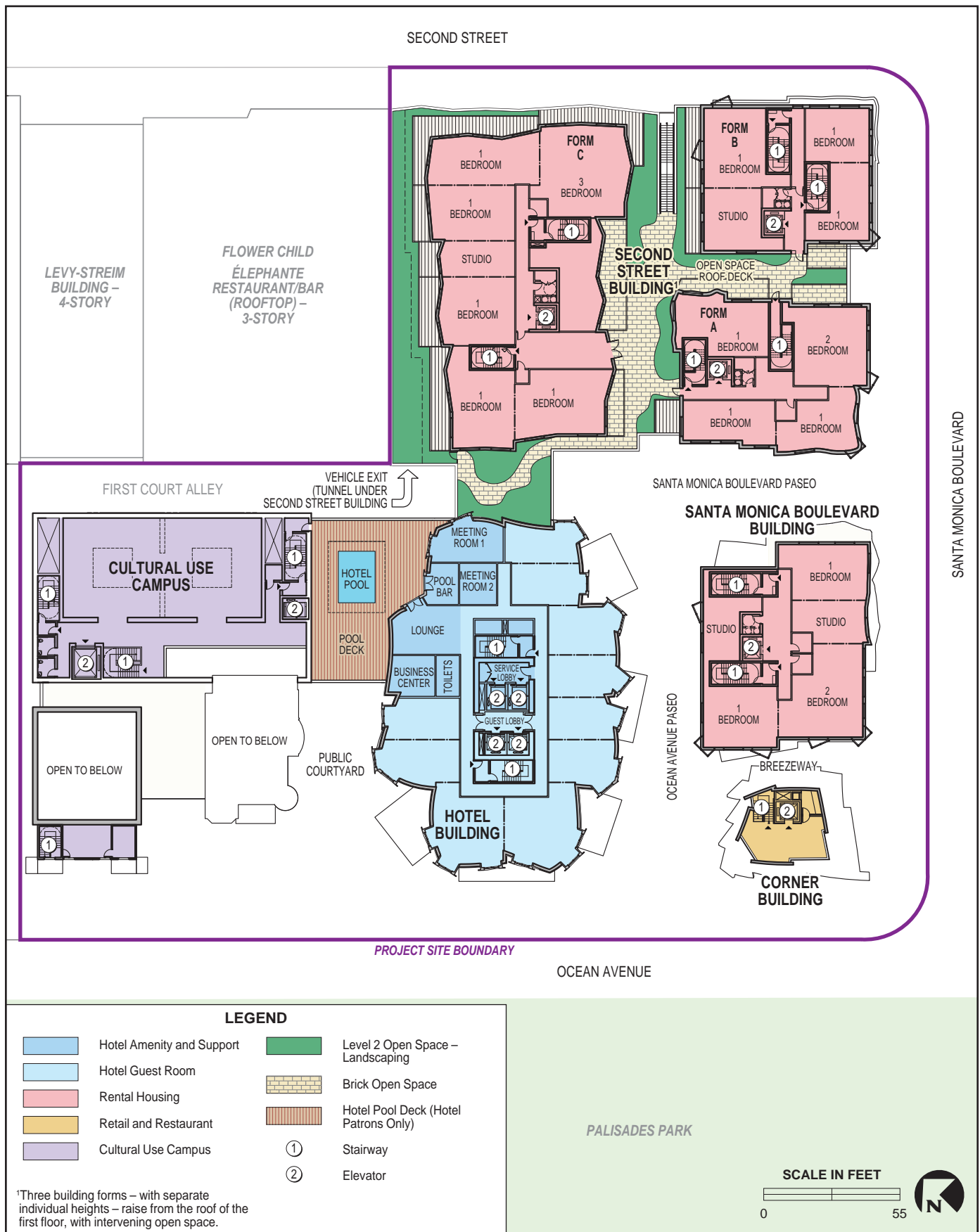




Table 2-4. Summary of Residential Unit Types

Unit Type	Number of Units
Studio	12
One-Bedroom	55
Two-Bedroom	23
Three-Bedroom	10
Total	100

2.6.4.1 Santa Monica Boulevard Building

The Santa Monica Boulevard Building would be located to the west of 1st Court and the east of the Corner Building along Santa Monica Boulevard and would contain residential units and restaurant/retail uses. The Santa Monica Boulevard Building would be a maximum of 62 feet tall with five stories. Residential units ranging in average size from approximately 540 sf to approximately 1,300 sf would be provided on the upper floors. Floors 2 through 5 of the Santa Monica Boulevard Building would each provide apartment units accessed via a centrally located elevator and stairways. The primary entrance to the apartments would be from the Ocean Avenue Paseo between the

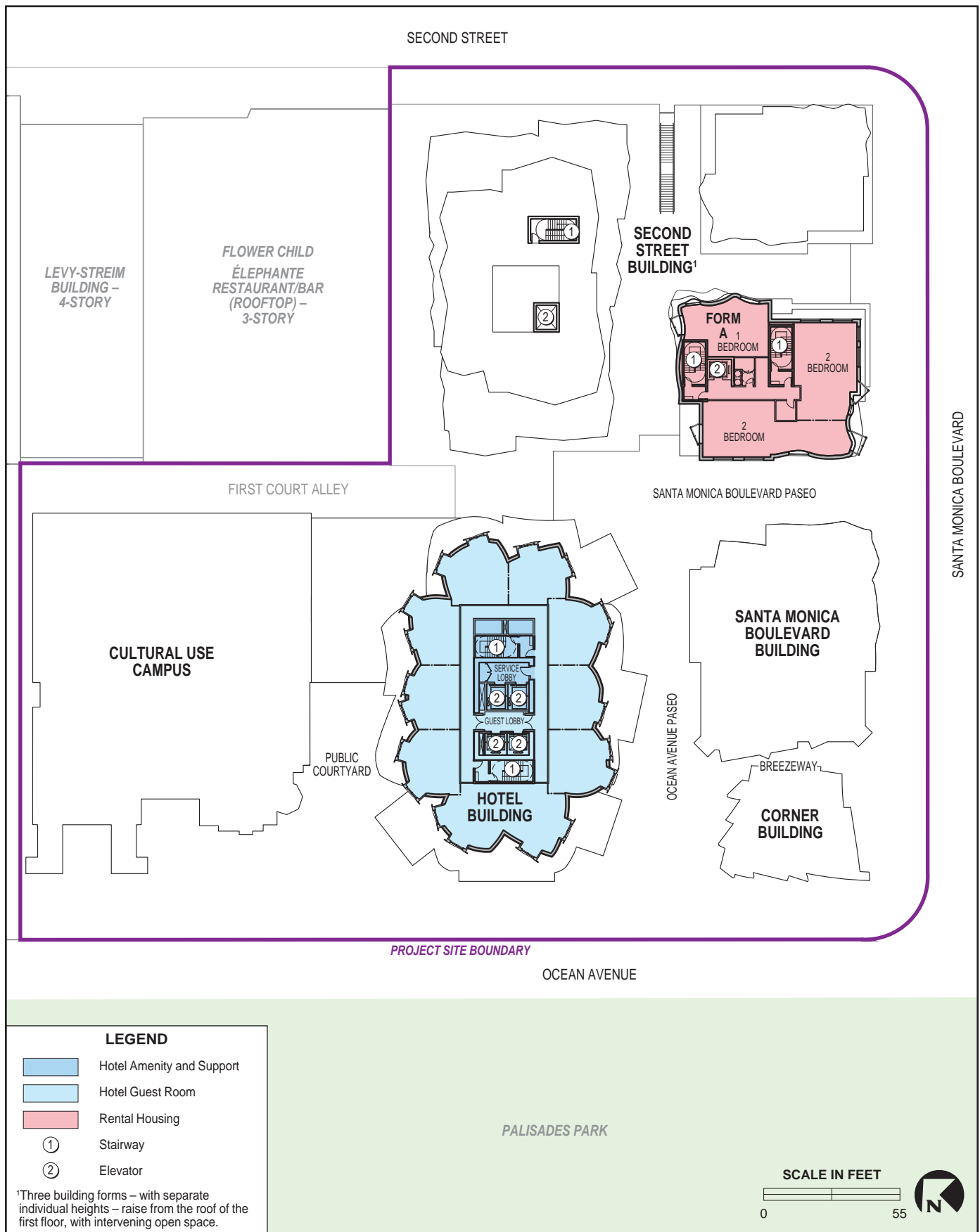


Ground floor commercial spaces with retail windows and outdoor dining areas in the Santa Monica Boulevard Building would activate the Project site along Santa Monica Boulevard.

Santa Monica Boulevard Building and the Hotel Building. Access to ground floor restaurants would be available off both the proposed paseos, the proposed breezeway (between the Corner Building and Second Street Building), and Santa Monica Boulevard. Access to the second-floor restaurant would be provided via a separate elevator and stairway from those serving the apartments. The Santa Monica Boulevard Building would be bordered to the north, east, and west by the proposed pedestrian-only paseos and breezeway, and to the south by the sidewalk along Santa Monica Boulevard. Ground-level outdoor restaurant seating is envisioned along both the paseos and street frontages.







2.6.4.2 Second Street Building

The Second Street Building would be located on the corner of Santa Monica Boulevard and 2nd Street and would provide ground floor restaurant/retail uses and upper floor residential uses. The Second Street Building would extend to a maximum of 106 feet tall with three separate structures (Structures A, B, and C) rising above the second-floor podium deck. Structure A would be nine stories (106 feet), Structure B would be four stories (53 feet), and Structure C would be eight stories (97 feet). Residential units ranging in average size from approximately 540 sf to approximately 1,300 sf would be divided into each of these structures, which would also include centrally-located elevators and stairways, with MEP and elevator overrides extending approximately 10 feet above the rooftop.

The primary lobby and entrance for the residences would be located on the ground floor west side of the building, fronting the Santa Monica Boulevard Paseo. Residents would have three access points to stairways off 2nd Street. A smaller lobby with an additional elevator would be located off Santa Monica Boulevard. Restaurant/retail uses would be provided on the ground floor. Access to the ground floor restaurants and shops would be available from the Santa



Residential uses in the Second Street Building would be supported by ground floor commercial spaces.

Monica Boulevard Paseo, Santa Monica Boulevard, and 2nd Street. The Second Street Building would be bordered on the north by the subterranean parking garage exit and the reconfigured segment of 1st Court (see Section 2.6.7, *Circulation, Access, and Parking*), a new driveway would connect 1st Court to 2nd Street, and the Santa Monica Boulevard Paseo located to the west. Sidewalks along Santa Monica Boulevard and 2nd Street would border this building to the south and east. Ground-level outdoor restaurant seating is envisioned along both the paseos and street frontages. The Second Street Building would include private open space located on the second floor podium deck for use by residents and their guests only. The podium deck would include landscaped planters and pedestrian pathways between the residential towers. A portion of the landscaped podium deck would extend above the vacated portion of 1st Court (loading zone), abutting the east side of the Hotel Building, although no access from the hotel would be provided (refer to Figure 2-5). This extension would provide covered loading access at grade from the loading dock area.

Table 2-5. Mixed-Use Building Residential Uses and Heights

Building	Structure	Approximate Number of Units	Number of Floors	Height (feet)
Santa Monica Boulevard Building	-	16	5	76
Second Street Building	Structure A	28	9	106
	Structure B	8-10	4	53
	Structure C	47	8	97

2.6.5 Cultural Use Campus

The proposed Cultural Use Campus would be located at the north end of the site and would front on a publicly-accessible courtyard that would open onto Ocean Avenue. The Cultural Use Campus would consist of three structures totaling 35,500 sf, including a new cultural use building and two relocated and adaptively reused City-designated Landmarks currently located at 1333 and 1337 Ocean Avenue. This new cultural use building would border the proposed hotel to the south and 1st Court to the east, adjacent to the entrance to the proposed subterranean parking garage



While the precise use is not yet known, the Cultural Use Campus would provide space for a special cultural use, such as a museum, gallery, and/or event space, with a publicly-accessible courtyard.

accessed from 1st Court. The new cultural use building would be a maximum of 60 feet in height with two stories above-grade featuring cultural uses such as art galleries, museum exhibits, or conservatories. The building would also include approximately 18,400 sf of below-grade floor area for additional galleries and back-of-house uses. A lobby entrance to the cultural use building would be located between the City-designated Landmarks, with access to stairs and an elevator to provide access to upper and subterranean levels. A ground-level publicly-accessible courtyard in front of the cultural use building and adjacent to the hotel would be open to and accessible from Ocean Avenue to encourage pedestrian activity at the Project site (see Section 2.6.5, *Open Space and Public Amenities*). A separate lobby entrance off the publicly-accessible courtyard between the Hotel Building and the southernmost City-designated Landmarks would provide access to an elevator and stairs to a rooftop courtyard, which would be available to guests for special cultural use events such as Founders' dinners, artist talks, or opening events.

The City-designated Landmarks currently located at 1333 and 1337 Ocean Avenue would be relocated, rehabilitated, and incorporated on the west side of the new cultural use building, facing Ocean Avenue. Rehabilitation of these buildings would include seismic and structural retrofitting, handicap accessibility improvements where feasible, fire-life safety improvements, and upgrades to MEP equipment. 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. The rehabilitated City-designated Landmarks would then be repurposed for prominent new functions (e.g., gallery, retail, ticketing, bag check, etc.) and integrated into the Cultural Use Campus. A stairway located adjacent to the ticketing and bag check building on the northern portion of the site would provide access to subterranean levels. See also Section 2.7, *Construction Activities*.

2.6.6 Open Space and Public Amenities

The proposed Project would exceed the minimum requirements for open space (i.e. 50 percent of the parcel area, with a least 25 percent at ground level; refer to Section 2.1, *Introduction*). Ground-level publicly-accessible open space would be provided across the publicly-accessible courtyard, the Ocean Avenue Paseo, the breezeway, and the Santa Monica Boulevard Paseo, which would be activated by the proposed restaurant, retail, and cultural uses. All ground-level open spaces would include ornamental landscaping and be gently sloping (<5% grade) designed to comply with the Americans with Disabilities Act of 1990 (ADA) and invite pedestrian orientation and circulation. Shady seating or rest spots throughout the ground-level open space would



Public open space would be provided on the ground level as the Public Courtyard, Ocean Avenue Paseo (pictured above), Santa Monica Boulevard Paseo, and a breezeway.

create a welcoming, comfortable experience for all users. Additionally, there would be an approximately 5,070 sf (including an enclosed lobby area) publicly-accessible rooftop observation deck on top of the hotel providing panoramic views of the Downtown, Santa Monica Mountains, Palisades Park and the Pacific Ocean. The remaining upper floor open space (minimum 17,160 sf) would be accessible only to hotel guests, residents and their guests.

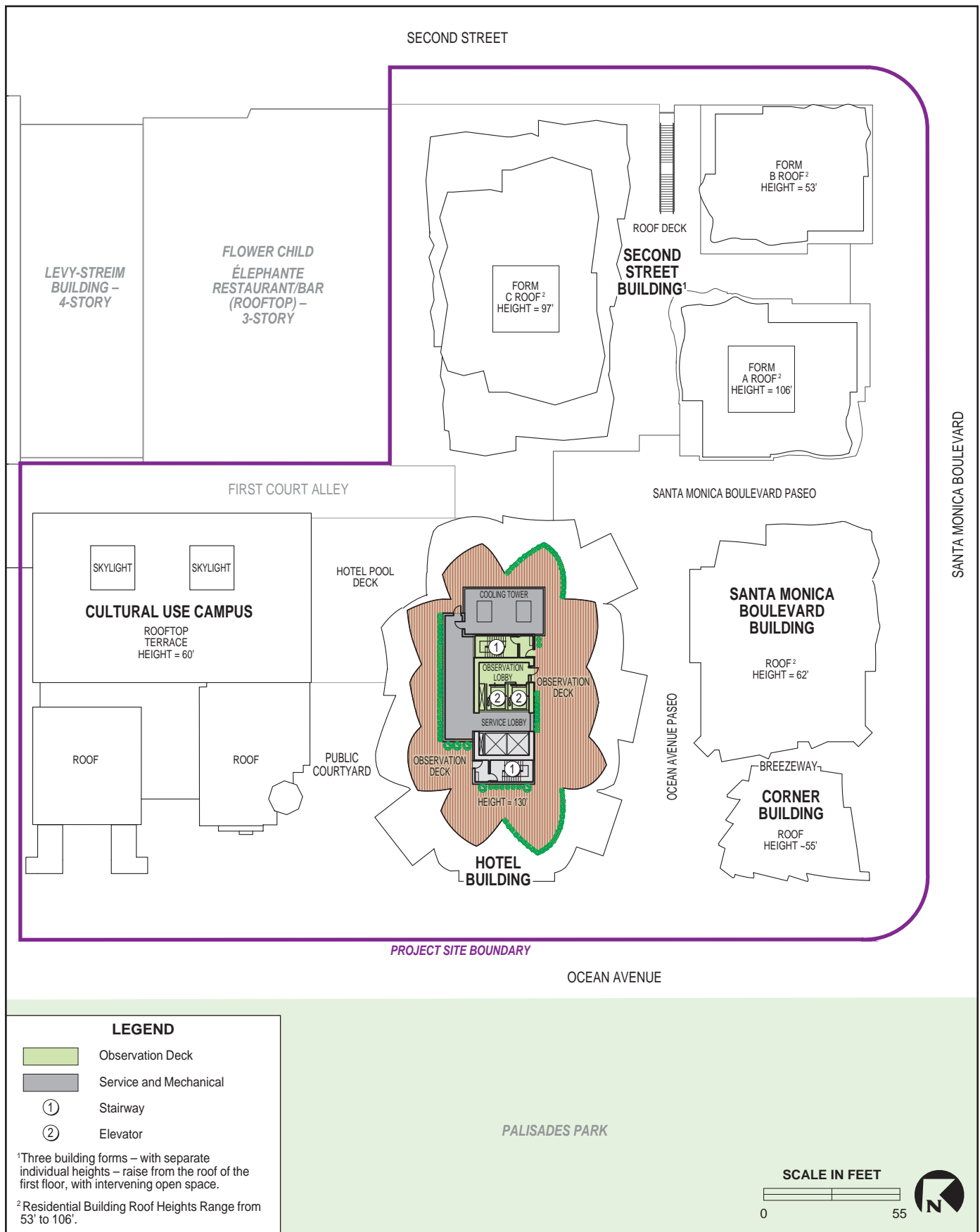
The Ocean Avenue Paseo would be an east-west oriented pedestrian only paseo ranging from approximately 20 to 50 feet in width that would extend for approximately 170 feet from Ocean Avenue, between the Hotel Building and the Corner and Santa Monica Boulevard Buildings, to

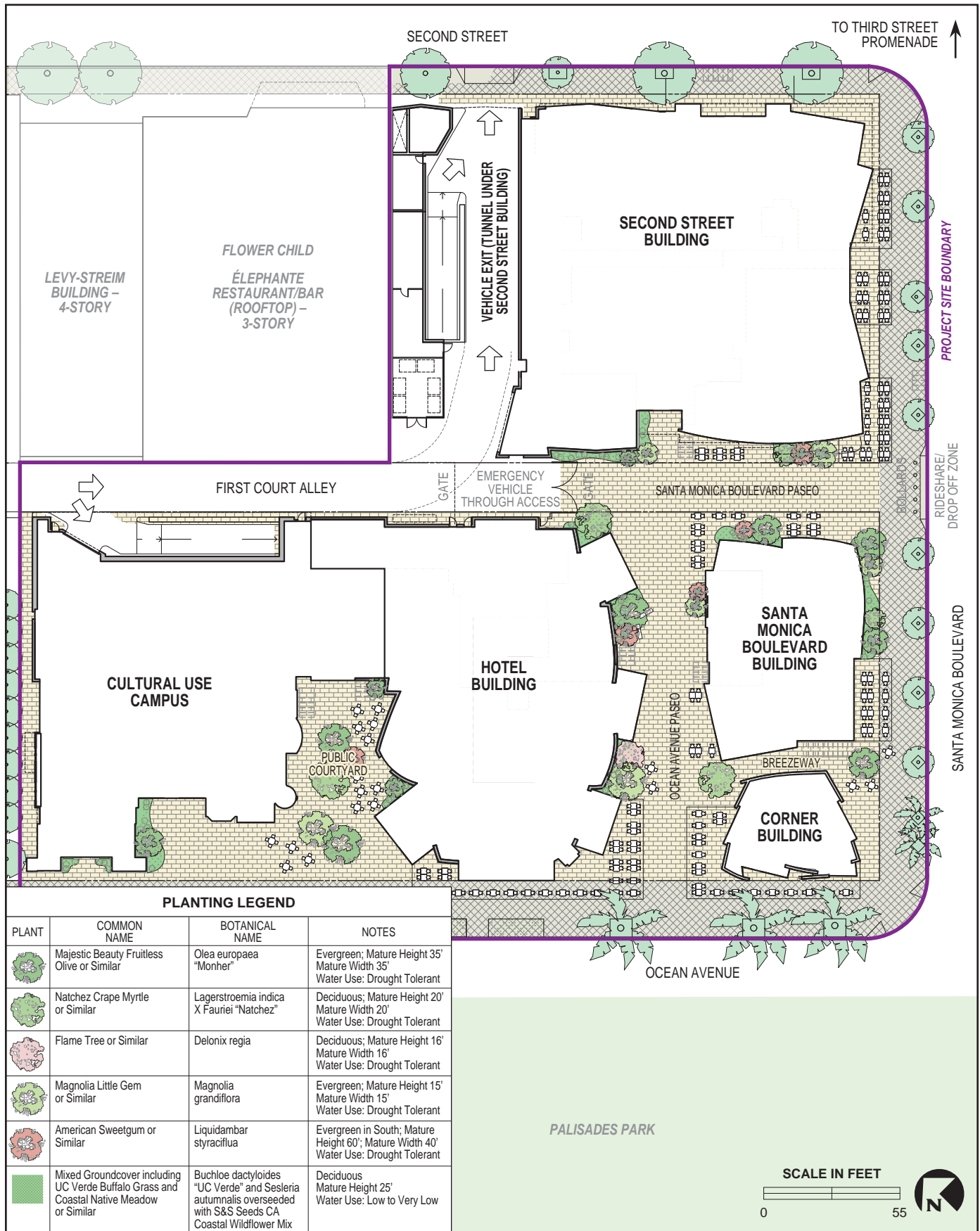
the terminus of the paseo at the Second Street Building. The Santa Monica Boulevard Paseo would be a north-south oriented pedestrian paseo ranging from approximately 20 to 40 feet in width that would extend along the vacated portion of 1st Court for approximately 130 feet from Santa Monica Boulevard, between the Second Street Building and the Santa Monica Boulevard Building, to the paseo terminus at 1st Court. The connection of the Ocean Avenue Paseo and the Santa Monica Boulevard Paseo would create an “L”-shaped plaza to provide pedestrian access to and through the Project site (see Section 2.6.7, *Circulation, Access, and Parking*). A breezeway of approximately 10 feet in width would separate the Corner Building and the Santa Monica Boulevard Building, connecting pedestrians from Santa Monica Boulevard to the Ocean Avenue Paseo.

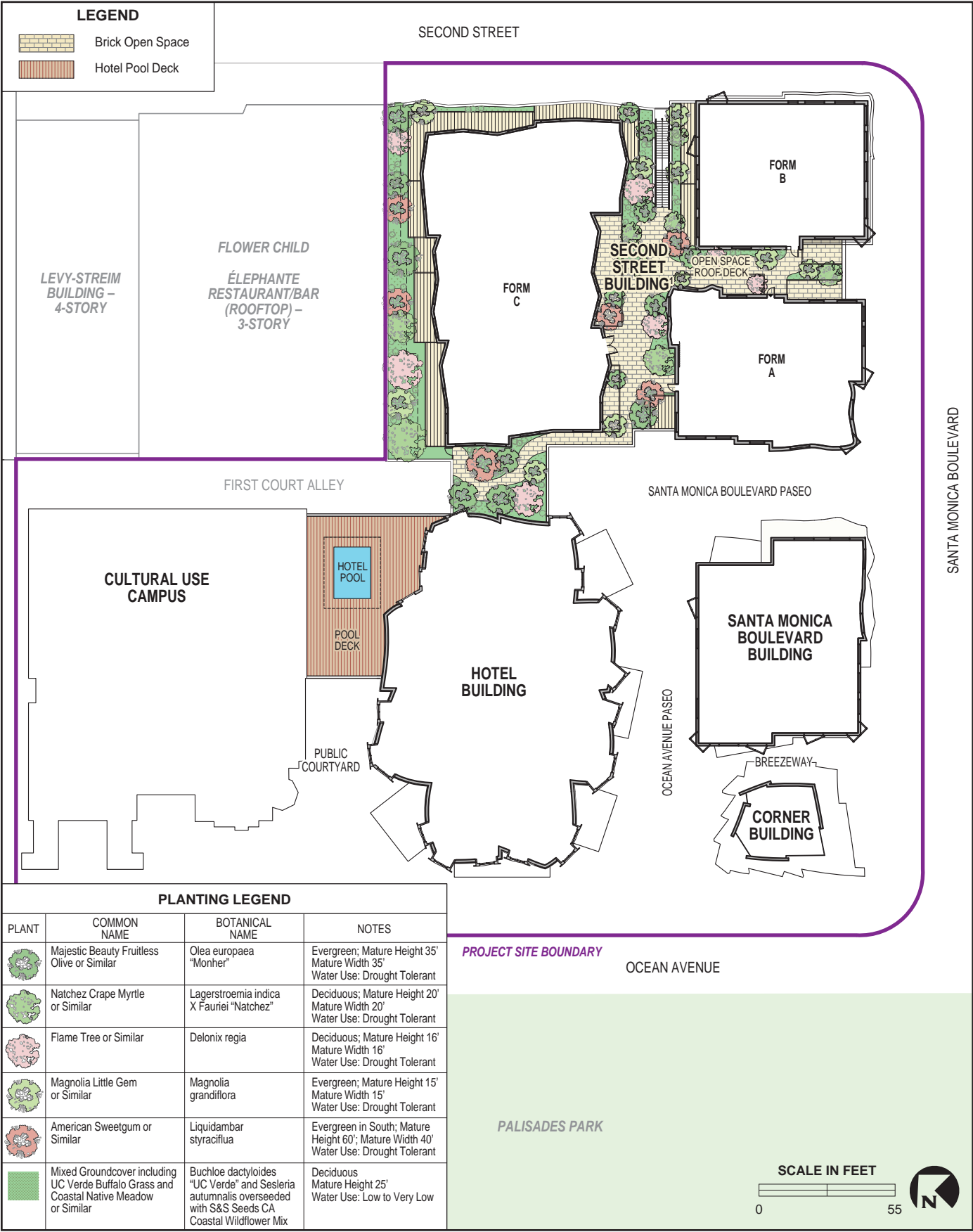
A publicly-accessible courtyard along Ocean Avenue ranging in width from approximately 25 feet to 40 feet would provide access to the hotel’s restaurant/retail amenities (including outdoor dining and hotel event space) and access to the Cultural Use Campus rooftop terrace (for museum guest/special events only), as well as viewing access to the southern-façade of the City-designated Landmark currently located at 1333 Ocean Avenue. The publicly-accessible courtyard would be framed by the hotel on the south, the new building of the Cultural Use Campus to the east, the relocated 1333 Ocean Avenue City-designated Landmark to the north, and Ocean Avenue on the west, and would include landscaping and seating to encourage pedestrian enjoyment of the Project site (refer to Figure 2-4). On its northern end, the publicly-accessible courtyard would connect to a walkway leading to the museum entrance off Ocean Avenue (between the two relocated City-designated Landmarks).



The southern portion of 1st Court would be transformed into the pedestrian-only Santa Monica Boulevard Paseo to provide connectivity through the site and public amenities, such as seating and landscaping.







2.6.7 Project Architecture and Design

The proposed Project would employ a variety of architectural styles and materials to reduce visual bulk and create compatibility with existing development in the vicinity. The design of the proposed Project is intended to complement the existing urban patterns found in the Downtown District through building siting and orientation; building mass modulation; location of uses and program; and preservation and adaptive reuse of two City-designated Landmarks. The design separates the massing and programmatic components (i.e., hotel, residential, and cultural uses) into distinct buildings separated by landscaped pedestrian paseos to allow for varying pedestrian access points throughout the Project site. The configuration of the buildings on the site and their individual structures have been designed to maintain access to natural light and ocean breezes and provide view corridors toward the ocean through the Project site from the Ocean Avenue Paseo and the publicly-accessible courtyard.

The distinctive mixed-use building forms in the Corner Building (one structure), Santa Monica Boulevard Building (one structure), and Second Street Building (three structures) would vary in height from 53 to 106 feet. The Santa Monica Boulevard Building and Second Street Building structures would echo the form of the Hotel Building (130 feet). Each one of these buildings would incrementally decrease in floor area with each successive level, creating terraces around each of the buildings and setting



The Project would employ a variety of modern architectural styles in each building proposed.

back building façades to minimize the effect of the building's perceived height from the pedestrian perspective at street level. Providing the residential uses in four separate structures would also provide cross ventilation to each of the proposed residential units. Outdoor spaces would be designed to maximize oceanfront views from several locations on the Project site (e.g., ground-level open space, private residential open space, rooftop observation deck, etc.). A common, landscaped terrace would join the residential buildings on the 2nd Street Parcel at the second level to provide outdoor space (common and private areas) for the residents. New cultural uses on the northern portion of the Project site would activate Ocean Avenue between Santa Monica Boulevard and Arizona Avenue. The City-designated Landmarks at 1333 and 1337 Ocean Avenue would be relocated onsite without compromising direct visual and pedestrian access from Ocean

Avenue and would be repurposed for prominent new functions as integral parts of the Cultural Use Campus.

Each of the proposed buildings feature a contemporary design with modulated façades to provide visual interest. Building design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the Landmarks Commission and/or the Architectural Review Board (ARB). The locations, sizes, materials and colors of signage will be reviewed by the Landmarks Commission and/or ARB in accordance with either or both the Santa Monica Sign Code (SMMC Section 9.61) and *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, as applicable.

Outdoor lighting would provide nighttime security and wayfinding around and through the Project site. Outdoor lighting would be provided in accordance with SMMC Section 9.21.080 so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. Code-required lighting for passageways and recesses would be provided in sufficient levels for public safety. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate, to minimize energy use.

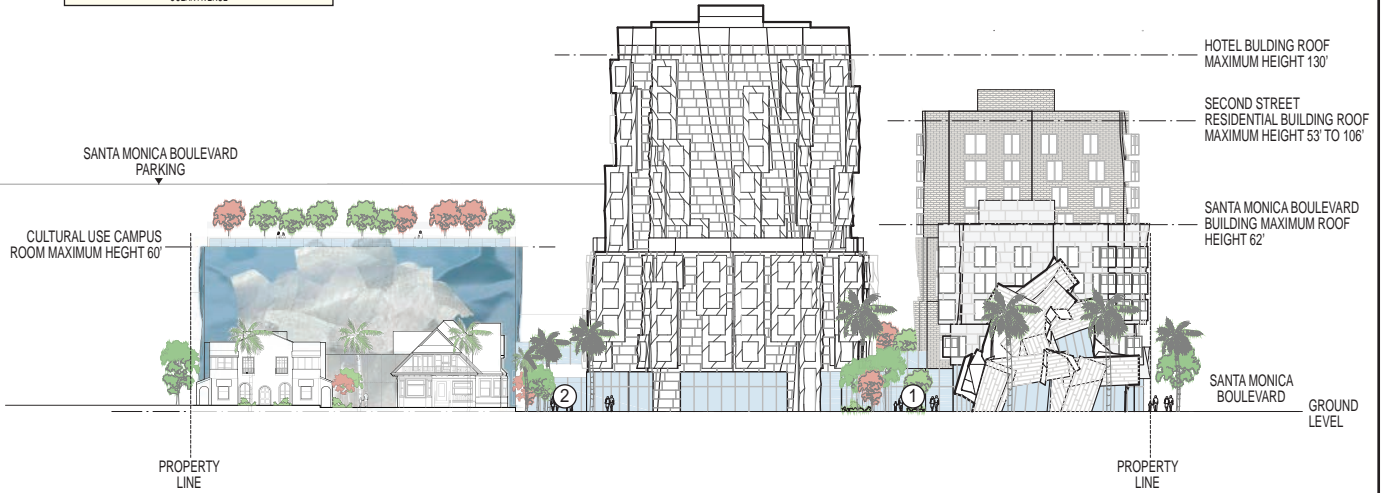
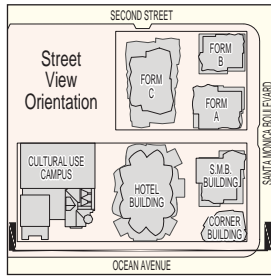


The Project proposes a contemporary architectural design with modulated facades for visual interest and recognition.

SCALE IN FEET



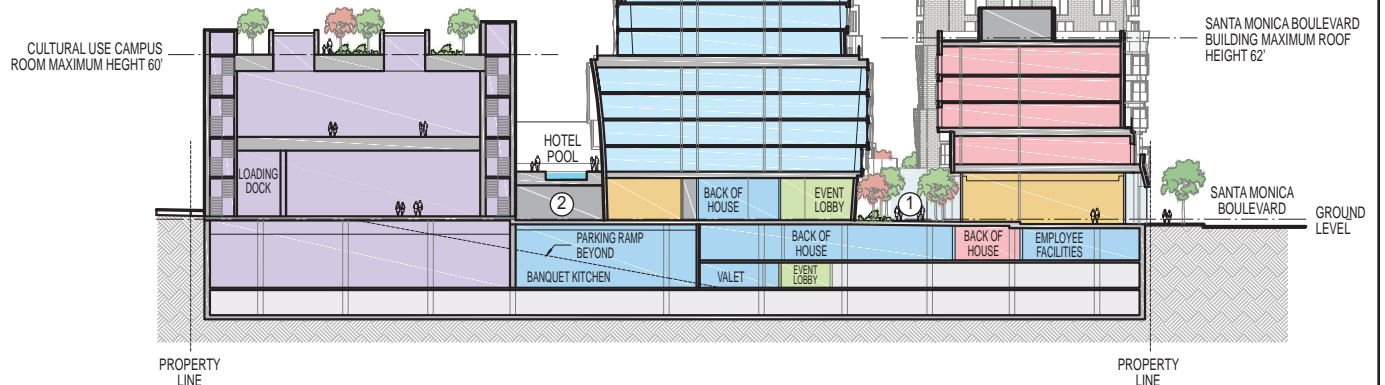
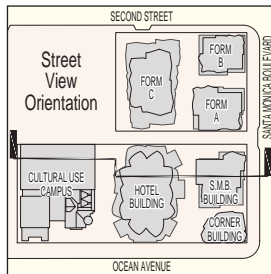
Street View from Ocean Avenue



SCALE IN FEET



Cross-Section from Ocean Avenue



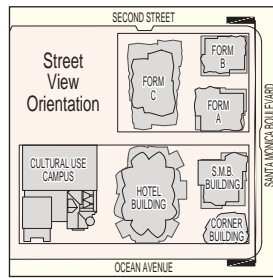
LEGEND

Hotel Amenity and Support	Rental Housing	Cultural Use Campus	Service and Mechanical	① Ocean Avenue Paseo
Hotel Guest Room	Retail and Restaurant	Public Space/Observation Deck	Parking	② Public Courtyard

wood.

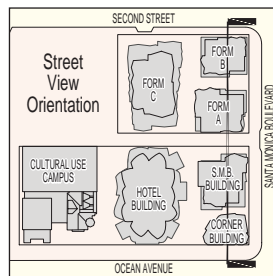
Conceptual Ocean Avenue Cross-Section

**FIGURE
2-13a**



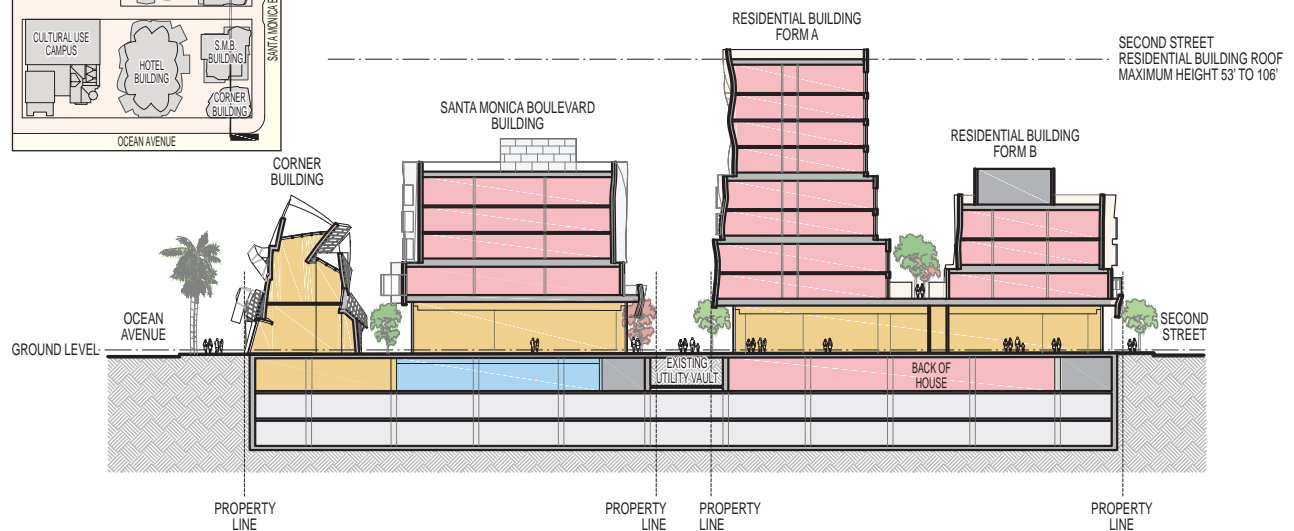
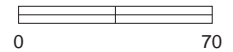
Street View from Santa Monica Boulevard

SCALE IN FEET



Cross-Section from Santa Monica Boulevard

SCALE IN FEET



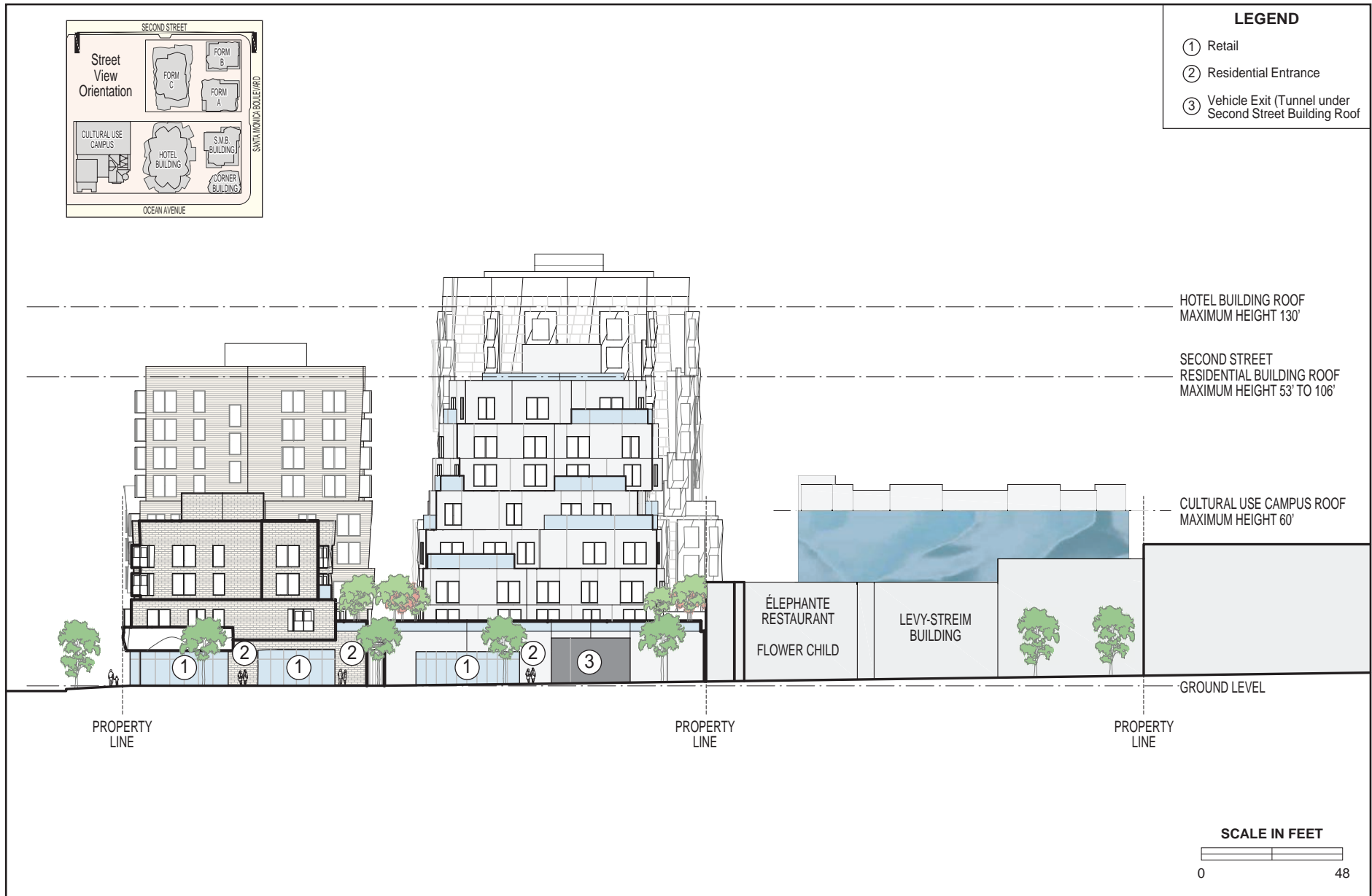
LEGEND

Hotel Amenity and Support	Retail and Restaurant	Parking	① Santa Monica Boulevard Paseo with Emergency Access Gate (no pedestrian through access to First Court Alley)	② Breezeway
Rental Housing	Service and Mechanical			

wood.

Conceptual Santa Monica Boulevard Cross-Section

FIGURE
2-13b





2.6.8 Access, Circulation, and Parking

Vehicular access (ingress) to the Project would be provided via 1st Court, which is currently a 20-foot-wide one-way southbound public alley that connects Arizona Avenue to Santa Monica Boulevard. 1st Court would be reconfigured to an L-shape, exiting onto 2nd Street on the northern side of the Second Street Building (see Figure 2-15). 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. Rather, the alley would connect east to 2nd Street providing a single lane of exit for vehicles. 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 (see Figure 2-15). Loading and deliveries would occur within commercial loading zones on site along the reconfigured alley across from the proposed Hotel Building and adjacent to the ground floor service area of the Second Street Building (see Figure 2-15).

On Ocean Avenue, the existing curb-cut located near the middle of the Project site would be removed and no parking access would be provided for vehicles from Ocean Avenue directly. For the purposes of this EIR, the Applicant has proposed that the existing valet drop-off/pick-up zone along Ocean Avenue be used to provide valet parking for the limited purpose of first-time hotel guest drop-off. Returning and departing guests would be encouraged to use the hotel drop-off point located on Level B1 (using the ramp located off First Court Alley; Figure 2-16).

On Santa Monica Boulevard, the existing curb-cut/intersection of 1st Court Alley would be closed with removable bollards and used only for emergency vehicles. A drop-off/pick-up location for ride-share services (e.g., Uber, Lyft, etc.) and other passenger vehicles could be potentially located along the north side of Santa Monica Boulevard, immediately east of the Santa Monica Boulevard Paseo (see Figure 2-15).

All proposed parking would be provided onsite in a subterranean parking garage. The final number of parking spaces to be provided by the Project will be determined during the design process and will be informed by the results of the entitlement process and what is required by the responsible agencies, recognizing that the DCP does not require that the Project provide any parking. For the purposes of this EIR, the proposed subterranean parking garage is assumed to be three levels and provide up to 285 vehicle parking spaces. Pursuant to SMMC Section 9.28.160(B)(2), approximately 6 of the 285 total spaces would be reserved for Electric Vehicle (EV) charging

stations. Additionally, designated parking for carpools and vanpools would be provided in accordance with SMMC Section 9.28.150.

The upper parking level (Level B2) would provide spaces for hotel, retail, and restaurant patrons; employee self-park; and restaurant or hotel valet services (see Figure 2-17). The lower parking level (Level B3) would provide residential spaces with a key-card controlled access (see Figure 2-18). Residents of the proposed apartment units would have the opportunity (but not the obligation) to rent available parking spaces rather than having parking fees included in the rent costs. This approach would allow for parking spaces to be used flexibly to meet shifting commercial and residential demands and potential parking demands from offsite uses. All market-rate residential parking is anticipated to be valet, to further provide flexibility and potential sharing of unused residential spaces with other uses.

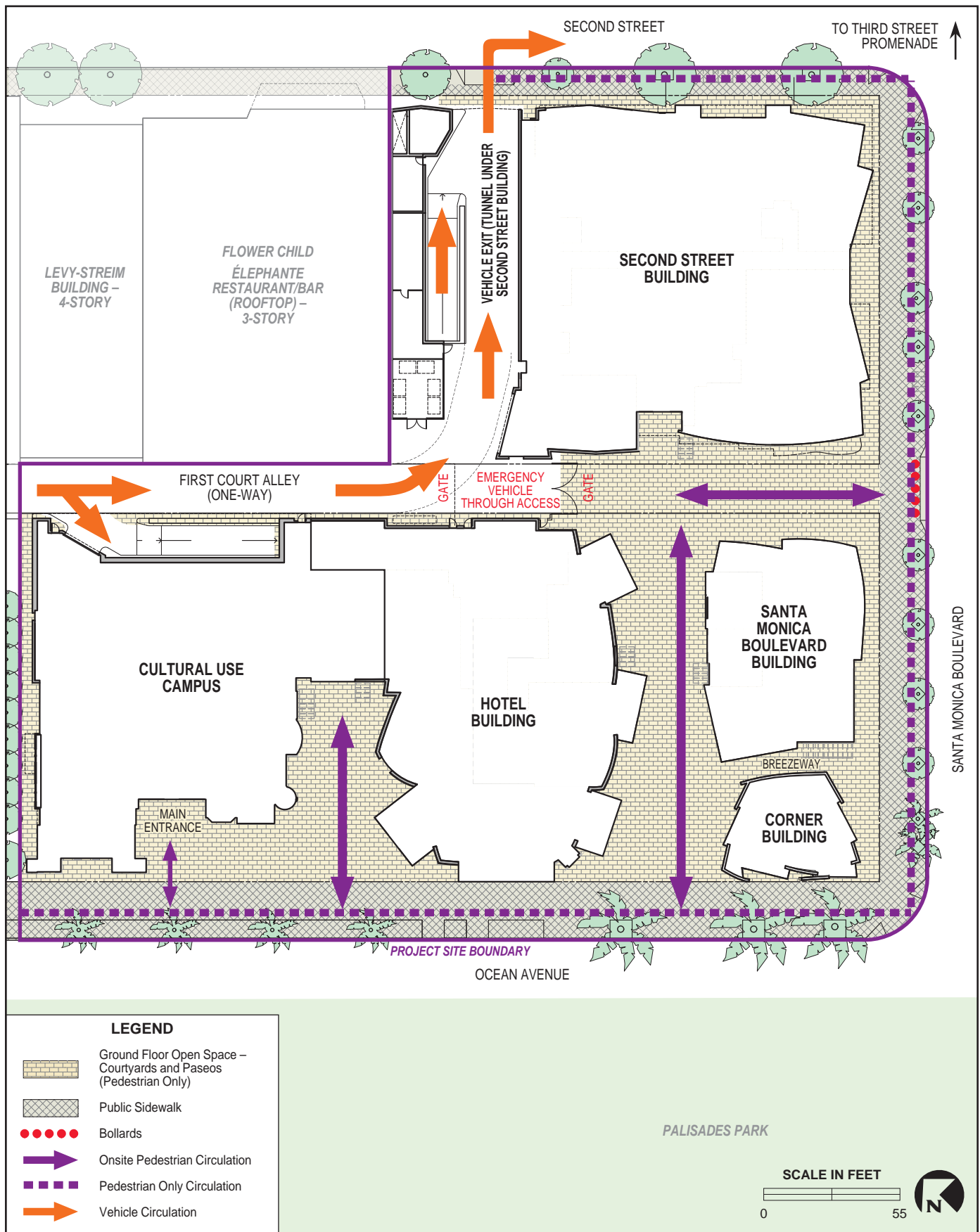
Bicycle facilities would also be provided for residents, employees, and visitors. The Project would include parking for a minimum of 231 bicycles consistent with SMMC Section 9.28.140. Short-term bicycle parking stations would be provided for visitors to the Project on the ground level. Bicycle facilities would also include a bicycle repair station and shower and locker facilities in accordance with SMMC Section 9.28.170. Long-term bicycle storage for the residential uses would be located on Level B1 (see Figure 2-16). Hotel, cultural use, and retail long-term bicycle storage would be located on Level B3. The proposed bicycle repair station would be located in the subterranean parking garage. Employee shower and locker facilities would also be provided to encourage bicycle commuters.

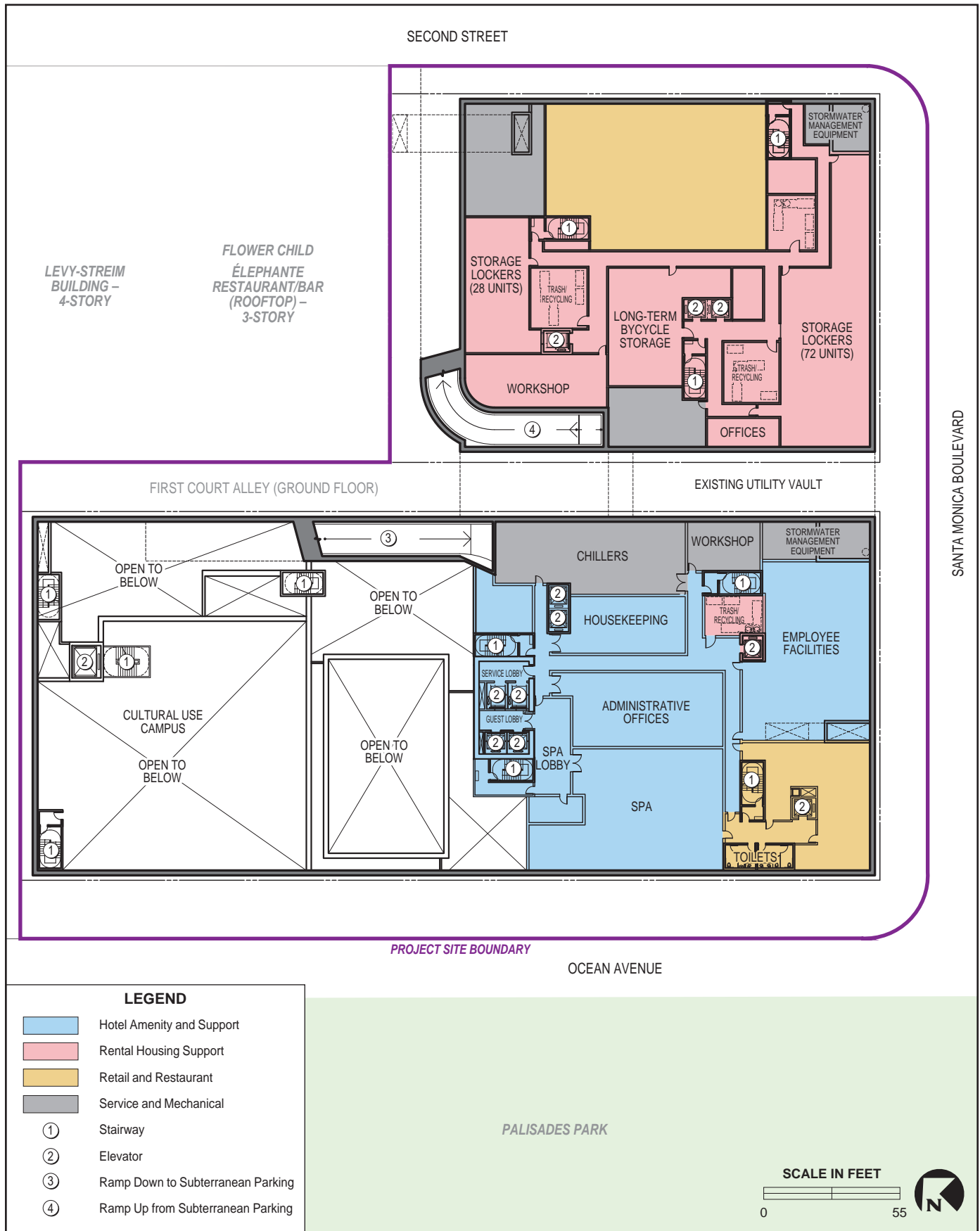


The Ocean Avenue Paseo (left) would connect Ocean Avenue to the Santa Monica Boulevard Paseo (right). This "L"-shaped configuration would provide connectivity between the proposed Hotel Building, Corner Building, and Second Street Building and surrounding sidewalks on Santa Monica Boulevard and Ocean Avenue.

Pedestrian access to the Project site would be available from Ocean Avenue, Santa Monica Boulevard, and 2nd Street. The proposed Ocean Avenue Paseo and Santa Monica Boulevard Paseo,

as well as the 1st Court Breezeway, would connect to one another to provide pedestrian access through the Project site. The paseos would provide direct public access to the Hotel Building, Second Street Building, Santa Monica Boulevard Building, and Corner Building. The paseos would also provide car-free publicly-accessible open space with seating, shade, landscaping, and street furniture. The proposed publicly-accessible courtyard would provide access to the Cultural Use Campus and north side of the Hotel Building. Further, the sidewalk along 2nd Street would be widened 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 sidewalks along Ocean Avenue and Santa Monica Boulevard would also have a minimum of 18 feet and 20 feet building-to-frontage, respectively, in accordance with the DCP. These widened sidewalks would allow space for outdoor dining to help activate the streets.









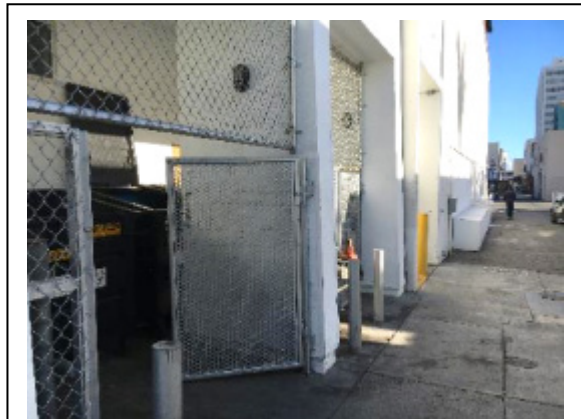
2.6.9 Utilities and Services

Electrical service would be provided by Southern California Edison (SCE). Natural gas service would be provided by Southern California Gas Company (SoCal Gas) with meters along 1st Court. To reduce the power demand, the proposed Project would include the installation of solar electric photovoltaic (PV) systems with a minimum total wattage of 2.0 times the square footage of the building footprint (i.e., 2.0 watts per sf), as required by the City's Green Building Code Solar Ordinance (SMMC Section 8.106.080). With a building footprint of 62,727 sf, the Project would provide a minimum of a 125-kilowatt PV solar system for the Project site. The Project would also include install energy-efficient heating, ventilation, and air conditioning (HVAC) systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use (see Section 2.6.9, *Sustainability Features*).

Water would be supplied by the City from existing City water mains, including one or more of the following: a 12-inch main in Ocean Avenue, a 12-inch main in 2nd Street, and a 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 proposed fire suppression water system would be served by the existing water mains in either Santa Monica Boulevard or Ocean Avenue and connect to other mains as required by applicable SMMC requirements. The existing 8-inch water main in 1st Court would be cut/capped and abandoned in place.

Sewer service would be provided by the City existing City sewer lines, with wastewater being directed to one or both of the 18-inch sewer mains along Ocean Avenue and 2nd Street. The Project would connect to this system through the construction of 8-inch sewer lines on the Project site.

Solid waste hauling services would be provided by the City. Trash and recycling collection facilities for commercial tenants and residents would be provided within enclosures along the 1st Court driveway. Trash trucks would access the Project site via 1st Court and the proposed commercial loading zone.



Trash bins required for the proposed Project uses would be enclosed on the Project site facing 1st Court, similar to existing conditions at the Project site.

2.6.10 Sustainability Features

As required by Santa Monica code, 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, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. Project design would optimize passive design strategies, which use ambient energy sources (e.g., daylight, wind) to supplement electricity and natural gas to increase the energy efficiency. The proposed Project would incorporate the following sustainable design features:

- Photovoltaic solar 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;
- Water efficient equipment and plumbing infrastructure (e.g., sinks, toilets, etc.); and
- Interior materials with low volatile organic compound (VOC) content.

The proposed Project would also include sustainable transportation infrastructure, such as bicycle parking; employee shower and locker facilities; EV charging stations; designated parking for carpools and vanpools; and ride-share amenities to provide options to reduce internal-combustion vehicle usage for residents and visitors. The Development Agreement for the proposed Project would require implementation of a TDM plan and a commitment to reduce vehicle use. The TDM plan 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. Annual monitoring, reporting, and enforcement of the TDM Plan would occur, pursuant to SMMC Section 9.53.

2.6.11 Development Agreement

Per the DCP's ELS Overlay designation, the Project would be subject to a Development Agreement, which would be negotiated with the City. The Development Agreement process is ongoing and final details of the Development Agreement will be determined at the time of Project approval. The Development Agreement will set forth the community benefits to be provided by the Project. The proposed Project is expected to include:

- **Publicly-Accessible Open Space:** Publicly-accessible rooftop observation deck to provide panoramic views of Santa Monica and the Pacific Ocean, a publicly-accessible courtyard fronting the Cultural Use Campus, the Ocean Avenue and Santa Monica Boulevard Paseos,

and the breezeway. These spaces would provide public amenities, such as seating, shading, landscaping, and street furniture.

- **Transportation Demand Management (TDM):** Preparation and implementation of an enhanced TDM plan to provide trip reduction strategies to be implemented by the Applicant. Specific strategies required in the TDM plan would be finalized during the Project approval process and would meet minimum LUCE and DCP requirements. At minimum, the Project would include unbundled parking, onsite bicycle facilities (i.e., shower, racks, and lockers), transit pass subsidies, and participation in a Transportation Management Association. Additional measures to reduce vehicular trips and parking demand generated by the proposed Project would be negotiated and may include 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 currently in place to reduce vehicular trips in an annual report delivered to the City.
- **Transportation/Pedestrian Infrastructure Contribution:** A monetary contribution towards transportation and pedestrian improvements in the Downtown area, 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 bus lines, light rail, and schedules.
- **Historic Preservation Contribution:** Historic preservation of onsite City-designated Landmarks by rehabilitating and relocating the structures and incorporating the buildings into the proposed Cultural Use Campus.
- **Sustainability:** Sustainability measures that reduce the Project's carbon footprint using a high comfort–low impact strategy. Sustainability features would include energy efficient features, appliances, and design that meets or exceeds the City's Building Code requirements, including LED lighting, and water efficient equipment and plumbing infrastructure.
- **Electric Vehicle (EV) Charging Stations:** Approximately six EV charging stations and stub outs within the onsite parking garage.
- **Affordable Housing:** Exceedance of the City's Affordable Housing Production Program requirements by providing 19 replacement rent-controlled housing units and additional affordable housing units within the Downtown area, subject to negotiations with the City. For the purposes of this EIR, the proposed Project is assumed to provide all required affordable housing onsite (i.e., a portion of the 81 non rent-controlled residential units would be deed restricted as affordable housing).

Although the Project's makeup of community benefits will not be finalized until the Development Agreement is approved, for the purposes of this EIR analysis, the proposed Project components described in Section 2.6, *Project Components* will be evaluated for their potential physical environmental impacts.

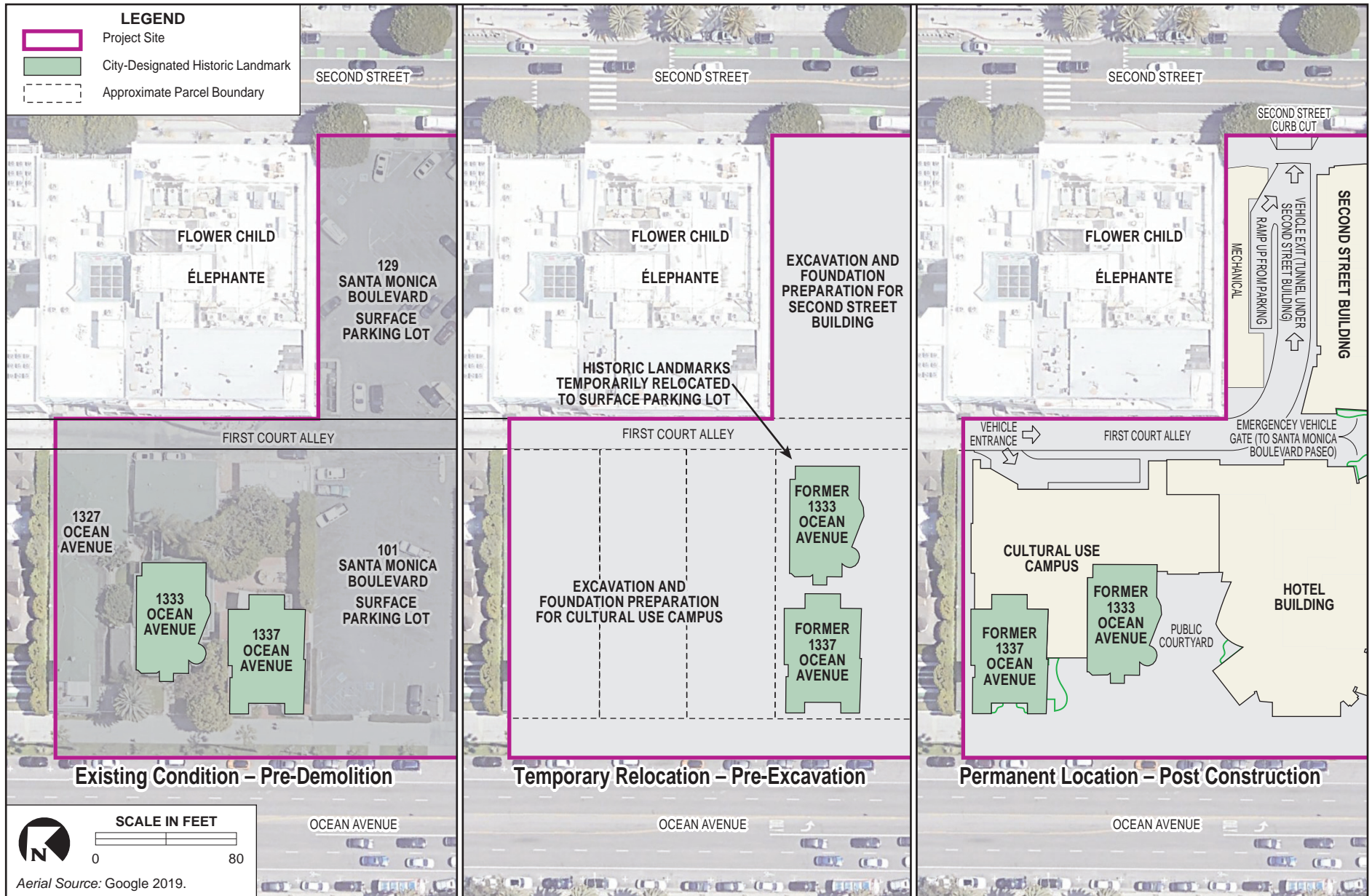
2.6.12 Operational Staffing

Between all hotel, restaurant, retail, and cultural uses staff, the commercial component of the proposed Project is 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 anticipated to include onsite resident managers and one offsite property manager.

2.7 CONSTRUCTION ACTIVITIES

Details regarding construction activities for the proposed Project are provided below. Construction of the Project would involve several sequential activities, including site preparation; demolition of existing buildings and parking lots; excavation, including special treatment and protections for the City-designated Landmarks; construction, including relocation of the City-designated Landmarks; and building finishing, including architectural coatings, landscaping, and rehabilitation of the City-designated Landmarks.

Regarding relocation of the City-designated Landmarks, several options for methodologies were reviewed by the Applicant team (including a structural engineer, historic preservation architect and general contractor), with the goal of avoiding/minimizing damage or disturbance to the City-designated Landmarks (Figure 2-19). The selected methodology is described here, but others were considered and discarded. For example, the Applicant contemplated moving the buildings entirely offsite for the duration of construction Project, but this method was determined to be infeasible because: (1) there are no viable options for open space available in the immediate vicinity for storage of the structures; and (2) the massing of the buildings is too large to travel over City streets without requiring removal of trees and street lights, or dividing the buildings into smaller sections for travel. The Applicant also considered lifting the City-designated Landmarks from their foundations via crane and suspending them above the Project site during construction of the Project, then lowering the buildings back down after completion of excavation, shoring and construction of the basement space beneath the historic resources; however, the Applicant determined that the City-designated Landmarks would be more vulnerable if suspended in air for the duration of construction than if they were placed on platforms and rolled to an interim location within the Project site while their permanent foundations were established at new locations. Ultimately, the Applicant selected the below-described method of relocation onsite and developed a sequence of events that aims to minimize avoidable risk of damage and vulnerability of the City-designated Landmarks.



2.7.1 Phasing

Construction of the Project would occur in a single phase without interruption over 3 years. Total construction time is anticipated to be 34 to 36 months with 2 months for demolition, 4 to 6 months for the relocation of the City-designated Landmarks, 3 months for excavation, and 25 months for construction from foundations to occupancy. It is anticipated that existing tenants would vacate existing structures and construction work would begin in late 2021 with future occupancy and operation of the proposed Project commencing in late 2024. While the precise construction start date and timing for the Project depends on the timing of entitlements and permit processing, elements of the construction period – some of which would occur concurrently – are summarized below.

2.7.2 Pre-Demolition

Once the City-designated Landmarks at 1333 Ocean Avenue Landmark and/or 1337 Ocean Avenue would be permanently vacated in preparation for proceeding with the proposed Project, they each would be secured to protect against vandalism. Steel or plywood closures, with one-inch-diameter air holes, would be installed over all doors and windows. Sandwich panel installation would be used so as to avoid drilling into window frames and sash, doors, ornament, or masonry units. Maximum legal height chain-link perimeter fencing would be installed around 1333 Ocean Avenue and 1337 Ocean Avenue (or around the entire Project Site or a larger portion of the Project Site) to further secure the City-designated Landmarks.

2.7.3 Demolition

Approximately 44,450 sf of the existing structures (including outdoor dining areas) and surface parking lots would be demolished/removed (refer to Figure 2-3). The existing building and paved surface parking lot at 101 Santa Monica Boulevard would be demolished and removed. The paved existing surface parking lot at 129 Santa Monica Boulevard would be demolished and removed. 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 to a City-approved mixed construction and demolition debris recycling facility pursuant to a Construction & Demolition Waste Management Plan. Where needed, any existing hazardous materials used in construction of these buildings would be properly handled and disposed of in

accordance with governing authority requirements. The construction haul route would be determined in coordination with City staff, and residential streets would be avoided.

All required equipment and materials staging would be accomplished on the Project site (including parking lots) and in the vacated area of 1st Court. Any staging in the public rights-of-way (e.g., potential intermittent sidewalk closures and/or minor encroachments in the adjacent parking lanes of Ocean Avenue, Santa Monica Boulevard, and 2nd Street) would occur within traffic-controlled or delineated areas, and all work would be subject to a Construction Mitigation Plan required and approved by the City (see Section 3.13, *Transportation*). Demolition equipment would be staged and stored on top of the existing surface parking lots located at 129 Santa Monica Boulevard and 101 Santa Monica Boulevard.

2.7.4 Pre-Excavation of 1327 Ocean Avenue, 1333 Ocean Avenue, and 1337 Ocean Avenue

Effective planning and protective measures would be initiated before excavation and construction takes place to prevent and/or mitigate any damage to the historic structures. This would include documenting the existing condition of the structures, implementing protective measures during construction, and monitoring the condition of the structures for the duration of the construction period. The existing conditions of the City-designated Landmarks have been documented in as-built drawings that have been reviewed and approved by a historic preservation architect and registered structural engineer with over 25 and 30 years of experience, respectively, in the rehabilitation and restoration of historic buildings.

As part of the excavation and shoring of the Project site, the City-designated Landmarks located at 1333 and 1337 Ocean Avenue 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. Prior to: (1) any excavation on the 1327 Ocean Avenue, 1333 Ocean Avenue, or 1337 Ocean Avenue sites; or (2) disturbance of 1333 and 1337 Ocean Avenue properties – including separation from their current foundations – a historic preservation architect with a minimum of 5 years of experience in the rehabilitation and restoration of historic buildings would thoroughly document the existing conditions of the City-designated Landmarks onsite through field photographs and written descriptions, including documenting the character-defining features of the City-designated Landmarks. Excavation and/or soil disturbance would not proceed until the adequacy of the required documentation has been reviewed and approved by the City Landmarks Commission Planning Staff Liaison (Historic Preservation Officer). The Historic Preservation Officer would review such documentation in consultation with other City staff as may be appropriate.

Prior to: (1) any excavation on the 1327 Ocean Avenue, 1333 Ocean Avenue, or 1337 Ocean Avenue sites; or (2) disturbance of 1333 and 1337 Ocean Avenue properties, or separation of the City-designated Landmarks from their foundations, the historic preservation architect would establish and provide a construction employee training program that emphasizes protection of historic resources for all construction workers involved in their relocation, protection, or rehabilitation. This program would include information on recognizing historic fabric and materials, and directions on how to exercise care when working around and operating equipment near the City-designated Landmarks, including storage of materials away from the historic buildings, whether before, during, or after their relocation. Training would also include information on effective means to reduce dust and vibrations from demolition and construction activities and monitoring and reporting any potential activities that could affect the historic resources. A provision for instituting this training program would be incorporated into the construction contract for the proposed Project.

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.

2.7.5 Relocation of the City-Designated Landmarks

After demolition (refer to Section 2.7.3, *Demolition*) of non-historic structures, the 1333 and 1337 Ocean Avenue Landmarks would be relocated to their final positions through a sequence of events. The City-designated Landmarks would be stabilized, temporary locations for the City-designated Landmarks would be prepared on the 101 Santa Monica Boulevard property, the City-designated Landmarks would be separated from their existing foundations and relocated to their temporary locations on the 101 Santa Monica Boulevard site. Once the City-designated Landmarks are moved to their temporary locations, the permanent foundations for the City-designated Landmarks on the northern portion of the Project site would be prepared. After their permanent foundations are prepared, the City-Designated Landmarks would be moved to their permanent locations in support of the Cultural Use Campus. After the City-Designated Landmarks are attached to their permanent foundations, excavation would occur under and around them.

Prior to relocating the City-designated Landmarks onsite, the buildings would be shored/stabilized including by placing I-beam shoring in the crawl space beneath bearing walls and posts to provide

gravity and lateral support, removing fragile/at-risk items from the historic buildings, and constructing bracing and temporary restraints in and around historic structure to protect the buildings during relocation. The structural engineer, the historic preservation architect, and a qualified moving company (with experience in moving historic buildings) would confirm the precise forms of shoring/stabilization necessary



The City-designated Landmarks at 1333 Ocean Avenue and 1337 Ocean Avenue would be relocated onsite over a period of approximately 4 to 6 months.

prior to relocation of the buildings. During transfer, each of the buildings would be lifted and supported with a series of stabilized girders located below critical load bearing locations. The building movers would use *Moving Historic Buildings*, a publication of the National Park Service by John Obed Curtis, to guide the relocation. A historic preservation architect with a minimum of 5 years of experience in the rehabilitation and restoration of historic buildings would document the precise forms of shoring/stabilization in a written narrative that would be provided to the Landmarks Commission Planning Staff Liaison (Historic Preservation Officer).

After the City-designated Landmarks are moved to the 101 Santa Monica Boulevard property, the permanent locations would be prepared to receive the City-designated Landmarks. A new support structure(s)/platform would be constructed, which may include foundations, shoring, and/or cribbing. Once the support structures are in place, the 1337 Ocean Avenue Landmark would again be lifted and supported in place with a series of stabilized girders located below load bearing locations. The 1337 Ocean Avenue Landmark would then be guided to its new foundation, lowered, and loads transferred to the new foundation where it would be structurally secured. The same process would then occur for the 1333 Ocean Avenue Landmark. This relocation process would occur over the course of approximately 4 to 6 months.

The construction of a proposed basement (35-foot excavation depth) would occur under/around the newly shored City-designated Landmarks (and on the 101 Santa Monica Boulevard property) (refer to Figure 2-13a). The shoring for the buildings would either be incorporated into the final structure of the basement or it potentially may be removed, provided the structural engineer ultimately determines the basement framing and foundations are appropriately configured to provide permanent support for the relocated buildings in lieu of the caissons.

The Applicant has developed the following sequence for moving the onsite City-designated Landmarks (subject in all cases to necessary adjustments during relocation) after demolition of the non-designated buildings:

Shoring/Stabilizing structures:

1. Place I-beam shoring in the crawl space beneath bearing walls and posts to provide gravity and lateral support in the existing historic structures;
2. Remove or otherwise protect all fragile/at-risk items in the historic buildings; and
3. Construct bracing and temporary restraints in and around historic structure.

Temporary relocation of the City-designated Landmarks:

1. Lift the I-beam shoring sub-structure sufficiently to safely transfer building loads to the shoring and disconnect the buildings from their current foundations; and
2. roll the shoring platforms with the buildings to the south to align with their temporary location in the 101 Santa Monica Boulevard parking lot.

Future site preparation:

1. Bore 4-8 caisson piles beneath the areas where each historic structure will be placed as necessary to support each structure, lower reinforcement cages into the caisson borings, and place concrete in the caissons;
2. Bore a shoring system of soldier piles around the parcel perimeter (for the garage excavation);
3. Install soldier piles and slurry; and
4. Trench for grade beams between the caissons to provide final support for the historic structures, place reinforcement cages in the grade beam excavations, place concrete in the grade beam framework, and erect formwork, install reinforcing and place concrete for the Plaza Level slab for the existing historic structure a platform slab at plaza level for the existing historic structure.

Permanent relocation of the City-designated Landmarks:

1. Roll the shoring platforms with each building north into each building's final position;
2. Construct the crawl space support walls;

3. Lower each building onto the crawl space support walls;
4. Attach each building to the plaza level concrete slab through the crawl space support walls;
and
5. Remove the steel I-beam shoring from the crawl spaces.

2.7.6 Excavation

Excavation and shoring would occur over a period of 3 months. The proposed Project would involve excavation to a depth of approximately 35 feet below existing grade (including beneath the relocated City-designated Landmarks, as described above). Excavation on the 129 Santa Monica Boulevard property may occur while the permanent foundations for the City-designated Landmarks are being prepared on the Ocean Avenue sites. The construction technique for installing the soldier piles for shoring would be by drill and pour. Excavation and hauling of earth would be performed pursuant to South Coast Air Quality Management District (SCAQMD) rules for the control of hauling impacts, including dust and diesel emissions.

An estimated 108,000 cubic yards (cy) of soil would be excavated with shoring of sidewalls inside the property line. Excavated soil would be exported at an average rate of approximately 80 trucks per day (10 trucks per hour, 8 hours per day, and 14 cy per load). This average may be increased or decreased depending on availability of truck haulers during the timeframe of work activity. Trucking and removal would also be dictated by the rate of shoring installation. In addition to these haul truck trips, additional heavy truck traffic during this period would include cement trucks, material and equipment delivery trucks, and worker vehicles.

Excavation and shoring would be performed using the following equipment: a track-crane-mounted vertical drilling rig; a track-mounted auger rig for tiebacks; a medium-sized track bulldozer; an all-terrain rubber tire forklift; one or more small rubber-tire backhoes; a rubber-tire front-end loader; one or more track-mounted excavators; dump trucks, a concrete truck/grout pump for soldier piles, caissons, and tiebacks; a rubber-tire rough-terrain hydraulic crane; and miscellaneous small tools, compressors, mixers, generators, portable welding machines, and light duty pickup trucks.

2.7.6.1 Protection of City-Designated Landmarks During Excavation

Construction of the basement below and adjacent to the relocated City-designated Landmarks as follows:

1. Construct slabs and columns adjacent to the historic buildings to provide lateral support for the caissons;
2. Excavate the site for the parking garage and museum building, including excavation around caissons below the historic building;
3. Install lagging around excavation perimeter as basement excavation advances;
4. Excavate to Level B1 (first floor level below grade), brace the caissons with beams (this level is open to below, as part of basement gallery for the Cultural Use Campus);
5. Continue excavating to Level B2 (second level below grade), and brace caissons with beams;
6. Continue excavating to Level B3 (third level below grade), and integrate caissons with parking structure foundation system; and
7. Place basement/parking structure foundations and slab on-grade.

2.7.7 Construction

2.7.7.1 Project Construction

Construction associated with the proposed Project would include construction of a three-level below-grade concrete structure and a first-level concrete podium structure supporting multiple buildings, open space, and landscaping. The Hotel Building, Second Street Building, Santa Monica Boulevard Building, Corner Building, and new building in the Cultural Use Campus would be constructed of wood, steel, and/or concrete framing with between 2 to 12 floors above grade. Building construction is estimated to require approximately 25 months.

All construction activities would be staged within secured construction areas onsite. Based upon the flow of goods and services to the site, traffic control may be modified but should not change significantly once construction areas are established and secured. Construction activities may require use of the following types of equipment, all of which would be Tier 4 equipment:

- Tower cranes
- Rubber-tired hydraulic cranes as required for specific lifts
- All-terrain rubber-tired forklift and material-handling equipment
- Concrete trucks and hydraulic boom pumps during foundation construction
- Material deliveries (daily)
- Office trailers and storage containers

- Light trucks
- Miscellaneous small tools, compressors, mixers, generators, and portable welding machines
- During excavation, earthmoving equipment as indicated in Section 2.7.5, *Excavation*

All required equipment and material staging would be provided onsite and within the traffic controlled or delineated areas and all work would be subject to a Construction Mitigation Plan required and approved by the City (see Section 3.13, *Transportation*). No pile driving would be used for construction of the Project.

2.7.7.2 Monitoring the City-Designated Landmarks During Relocation and Construction

The historical preservation architect and structural engineer would monitor the City-designated Landmarks during construction and relocation of the City-designated Landmarks and report any material changes to pre-construction conditions. Monitoring reports would be submitted to the City's Planning Department on a periodic basis. The City's Planning Department would establish the frequency of monitoring and reporting. The structural engineer would consult with the historic preservation architect, especially if any problems with character-defining features of a historic resource are discovered.

If in the opinion of the structural engineer, in consultation with the historic preservation architect, substantial adverse impacts to historic resources related to construction activities are encountered during construction, the Applicant or Applicant's designated representative responsible for construction activities would inform City staff. In this event, the Applicant and/or construction contractor would adhere to City staff's recommendations for corrective measures, including halting construction in situations where construction activities would imminently endanger the historic resources. The Applicant and/or construction contractor would respond to any claims of damage by inspecting the affected property promptly. Any suspected damage to the designated historic resources would be compared to pre-construction conditions and a determination made as to whether the proposed Project caused such damage. If the proposed Project is demonstrated to have caused any damage, such damage would be repaired to pre-construction conditions by the Applicant. Site visit reports and documents associated with claims processing would be provided to the City's Planning Department.

2.7.7.3 Rehabilitation of the City-Designated Landmarks

During construction, the rehabilitation of the City-designated Landmarks consistent with the certificate of appropriateness (or equivalent approval) would be undertaken with the assistance of a qualified historic preservation architect meeting the *Secretary of the Interior's Standards and*

Guidelines for Historic Preservation, Professional Qualifications Standards. The historic preservation architect would regularly review the ongoing rehabilitation to ensure that it continues to satisfy conditions of the associated Certificate of Appropriateness (or other analogous permit) issued by the City Landmarks Commission. The historic preservation architect would submit status reports to the Historic Preservation Officer according to a schedule agreed upon prior to commencement of rehabilitation.

2.7.8 Construction Staffing

An estimated 80 workers would be onsite at any time during construction for the proposed Project. A combination of on- and offsite parking facilities for construction workers would be identified during demolition, excavation, and construction period and all work would be subject to the required Construction Mitigation Plan.

2.8 REQUIRED APPROVALS AND PERMITS

As described in Section 2.6.10, *Development Agreement* the proposed Project would be subject to a Development Agreement to be negotiated between the Applicant and the City. In addition, the following entitlements are anticipated to be required for various components of the Project and would need approval either in an initial or subsequent process with the City and other agencies. The Project's entitlements may include, but are not limited to:

- Certification of the Final EIR
- Adoption of a Mitigation Monitoring and Reporting Program (MMRP)
- Design review and approval for building design, materials, colors, and landscaping, as well as rehabilitation and adaptive reuse of the existing City-designated Landmarks to be determined by a public body, such as the Architectural Review Board, Landmarks Commission or another design review process/body
- Approval of a Coastal Development Permit(s) for the Project
- Issuance of demolition permits for the existing buildings (other than the City-designated Landmarks) on the Project site
- Approval of all City of Santa Monica, South Coast Air Quality Management District (SCAQMD), Regional Water Quality Control Board (RWQCB), and other discretionary or administrative approvals needed for construction and operation, including construction haul route, building permits, and Certificates of Occupancy
- Offsite improvement permit(s) for public infrastructure, if determined necessary by the City of Santa Monica Department of Public Works.

3.0 ENVIRONMENTAL IMPACT ANALYSIS AND MITIGATION MEASURES

3.0.1 Introduction

This section of the Environmental Impact Report (EIR) addresses potentially significant environmental impacts of the proposed Ocean Avenue Project (Project). The EIR addresses potential environmental impacts that could result from the construction and operation of the proposed Project. The discussion of each topic area is subdivided into the following subsections: *Environmental Setting*, *Regulatory Framework*, *Impact Assessment and Methodology*, *Project Impacts and Mitigation Measures*, and *Cumulative Impacts*.

Impact Assessment Guidelines and Impact Classification

The California Environmental Quality Act (CEQA) requires an EIR analysis to “*identify and focus on the significant environmental effects of a proposed project*” (CEQA Guidelines Section 15126.2[a] and Public Resources Code Section 21000[a]). The emphasis of the EIR should be placed on the potential “physical” adverse effects of a proposed project. CEQA Guidelines Section 15360 define “environment” as the physical conditions that exist within the area that would be affected by a proposed project, including, but not limited to, land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The section further defines the area involved as the area in which significant effects would occur either directly or indirectly as a result of the proposed project. The “environment” includes both natural and man-made conditions.

CEQA Guidelines Section 15382 further clarifies the definition of “significant effect on the environment” as a substantial, or potentially substantial, adverse change in any of the *physical* conditions within the topic area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment. However, an economic or social change that may have a *physical* impact (e.g., large-scale big box retail uses resulting in urban decay) should be considered in an EIR (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184). The proposed Project does not propose any uses that would result in physical deterioration of the environment from economic or social changes. Therefore, economic effects are not analyzed in this EIR pursuant to CEQA.

For each topic area, thresholds for determining impact significance are identified based on State CEQA Guidelines and City of Santa Monica (City) standards, along with descriptions of methodologies used for conducting the impact analysis. For some topic areas, such as air quality, greenhouse gas (GHG) emissions, traffic, and noise, the analyses of impacts are more quantitative in nature and involve the comparison of effects against numerical thresholds. For other topic areas,

such as land use and planning, the analyses of impacts are inherently more qualitative, involving the consideration of a variety of factors, such as adopted City policies and regulations.

The EIR impact discussions classify impact significance levels as:

1. **Significant and Unavoidable** – a significant impact to the environment that remains significant even after mitigation measures are applied;
2. **Less Than Significant with Mitigation** – a significant impact that can be avoided or reduced to a less than significant level with mitigation;
3. **Less Than Significant** – a potential impact that would not meet or exceed the identified thresholds of significance for the topic area; and
4. **No Impact/Beneficial Impact** – no impact would occur for the topic area or a beneficial effect would result.

Determinations of significance levels in the EIR are made based on impact significance criteria and applicable CEQA Guidelines for each topic area.

Mitigation Measures and Monitoring

Per CEQA Guidelines Section 15126.4, where potentially significant environmental impacts have been identified in the EIR, feasible mitigation measures that would avoid or minimize the severity of those impacts are also identified. Pursuant to CEQA, feasible mitigation measures must be implemented for all significant impacts. In this context, feasible is defined as “*capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.*” A Lead Agency must impose mitigation measures unless findings can be made that the mitigation measures are found to be infeasible or within the jurisdiction of another agency (*City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341*). Mitigation measures must be fully enforceable and may involve various means of implementation, such as:

- Measures incorporated directly into the project design as new or revised development standards, or in conditions of approval.
- Measures implemented in multi-year City operational programs, such as a capital improvements program or development impact fee program.
- Measures incorporated as new or revised policies or development standards, or in implementing ordinances for the project site.

The mitigation measures for the proposed project are identified as part of the analysis of each topic area in Sections 3.1 through 3.15 of this EIR. CEQA requires that implementation of adopted

mitigation measures or any revisions made to the project by the Lead Agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 require that a public agency adopt a Mitigation Monitoring and Reporting Program (MMRP) for adopted mitigation measures and project revisions. With respect to responsibility of MMRP implementation, the CEQA Guidelines provide that “...until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP].” That is, the MMRP may include a range of type of mitigation measures and responsible parties (e.g., the applicant, individual City departments, etc.), but the City is responsible for overseeing and implementing the MMRP (CEQA Guidelines Section 15097[b]). A draft MMRP will be provided in Section 11.0, *Mitigation Monitoring and Reporting Program* of this EIR following public review and preparation of a final document.

3.0.2 Cumulative Impacts

CEQA Guidelines Section 15130(a) states that an EIR shall “*discuss the cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.*” In this context, “cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and/or the effects of probable future projects (as defined by CEQA Guidelines Section 15130). The CEQA Guidelines define cumulative impacts as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines Section 15355 further state that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects. The CEQA Guidelines allow for the use of two different methods to determine the scope of projects for the cumulative impact analysis:

- **List Method** – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (CEQA Guidelines Section 15130).
- **General Plan Projection Method** – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (CEQA Guidelines Section 15130).

This EIR primarily examines cumulative effects using the List Method. Table 3.0-1 contains a list of pending, approved, and recently completed projects within the City’s Downtown and surrounding vicinity (City of Santa Monica 2019). This list of cumulative projects was compiled

using Citywide permit records as of April 30, 2019. The approximate locations of projects that are in the vicinity of the proposed project (generally within the Downtown District) are shown in Figure 3.0-1.

The analysis of cumulative impacts contained in this chapter includes the impacts of the proposed Project plus cumulative projects within the affected area for each resource. Additionally, for some issue areas, such as land use and transportation/traffic growth, the cumulative impacts analysis programmatically considers land use and development patterns that would potentially occur under pending and approved plans for areas within the City, including the following:

Land Use and Circulation Element: 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.

Downtown Community Plan (DCP): The Project site is located within the planning boundary for the recently adopted DCP. The adoption of the DCP established the land use plan and regulatory framework to support a successful, mixed use Downtown District with multiple opportunities for living, working, entertainment, and cultural enrichment. With the completion of Metro E (Expo) Light Rail Transit (LRT) line connecting Downtown Santa Monica with Downtown Los Angeles, the DCP implements the Land Use and Circulation Element (LUCE) to address issues in the Downtown, including community benefits, transportation management, historic preservation, sustainability, cultural offerings, open space, and economic diversity through the year 2030.

Bergamot Area Plan: The Bergamot Area Plan, adopted in 2013, is a community-based planning document that provides guidance on transitioning former industrial lands into an arts-focused mixed use pedestrian oriented neighborhood. The Bergamot Area Plan serves as a regulatory tool governing development by describing the desired uses of and activities in this neighborhood as called for in the LUCE, and establishing a distinct set of standards and guidelines that will apply to projects – both private and public – wishing to develop, remodel, or adaptively reuse. The Bergamot Area Plan provides policies and strategies to

both conserve and shape the cultural, economic, and urban design characteristics of the area.

Memorial Park Neighborhood Plan. The pending Memorial Park Neighborhood Plan (MPNP) is in the early planning stages and is intended to create strong connections to major destinations in the area, parkland and existing neighborhoods with particular focus on adaptive reuse, urban design and place-making. The Memorial Park Neighborhood Planning Area generally covers the area around the 17th Street/Colorado Station for the Expo LRT. The MPNP will combine strategies to create multi-modal access to the 17th Street/Colorado Station, shared parking on key sites, and neighborhood integration of the future improved Memorial Park open space.

Regional issues regarding the supply of water and treatment of wastewater also take into account regional projections, such as those provided by the Southern California Association of Governments (SCAG) in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The cumulative analyses for air quality, greenhouse (GHG) emissions, geology and soils, hydrology and water quality, and energy also include the full extent of the City and beyond. The cumulative analyses for each environmental issue, including a discussion regarding the identification of relevant cumulative projects are provided in their applicable sections in Section 3, *Environmental Impact Analysis and Mitigation Measures*.

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica

No.	Project	Location	Description of Net New Development	Status
1	Mixed Use DA	1318 2 nd Street	53 DU - residential -11.672 KSF - retail	Final
2	Residential	1012 2 nd Street	4 DU - residential	Final
3	Convert Retail to Office	1305 2 nd Street	-48 DU - residential 25.292 KSF - office	Under Construction
4	Convert Hotel Space to Restaurant	1530 2 nd Street	3 KSF - restaurant	Under Construction
5	Commercial Addition	1201 3 rd Street	3.154 KSF - retail	Approved
6	Commercial Addition	1437 3 rd Street	6 KSF - retail	Approved
7	Convert Restaurant to Retail	1410 3 rd Street	-6.225 KSF - restaurant 6.225 KSD - retail	Final

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
8	Convert Restaurant to Retail	1444 3 rd Street	-2.996 KSF - restaurant 2.996 KSF - retail	Final
9	3-Unit Condominiums	2316 3 rd Street	2 DU - residential	Final
10	5-Unit Condominiums	947 4 th Street	5 DU - residential	Final
11	3-Unit Condominiums	1919 4 th Street	1 DU - residential	Final
12	Retail/Office (Michael's Building)	1427 4 th Street	7.5 KSF - retail	Approved
13	4th/Arizona - Plaza at Santa Monica	1301 4 th Street	48 DU - affordable housing 209 KSF - office 21.03 KSF - retail 117 KSF - hotel 12 KSF - museum 2.25 KSF - restaurant	Pending
15	Residential	908 5 th Street	-5 DU - residential	Final
16	Residential	954 5 th Street	1 DU - residential	Final
17	5-Unit Condominiums	914 5 th Street	5 DU - residential	Final
18	Mixed Use	1235 5 th Street	23 DU - residential 5 DU - affordable housing 1.36 KSF - retail	Pending
19	SM Post Office Adaptive Reuse	1248 5 th Street	46.82 KSF - creative office	Approved
20	Mixed Use	1323 5 th Street	32 DU - residential 2 DU - affordable housing 3.341 KSF - retail	Pending
21	Mixed Use	1338-1342 5 th Street	69 DU - residential 7.025 KSF - retail	Pending
22	Mixed Use	1415-1423 5 th Street	50 DU - residential 14 DU - affordable housing -5.304 KSF - retail	Approved
23	Mixed Use	1425-1427 5 th Street	92 DU - residential 1.144 KSF - retail	Pending
24	Affordable housing	1437 5 th Street	43 DU - affordable housing -6.499 KSF - retail	Approved
25	Courtyard by Marriot Hotel	1554 5 th Street	74.25 KSF - hotel -17.6 KSF - restaurant	Final

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
26	3-Unit Condominiums	2102 5 th Street	1 DU - residential	Approved
27	2-Unit Condominiums	2215 5 th Street	1 DU - residential	Approved
28	Mixed Use	1313-1325 6 th Street	56 DU - residential 5 DU - affordable housing 4.86 KSF - retail	Approved
29	Addition of Units	1548 6 th Street	4 DU - residential	Final
30	100% SRO Mixed Use with commercial	1437 6 th Street	40 DU - residential 1.6 KSF - retail/restaurant	Pending
31	Affordable housing with commercial	1238 7 th Street	37 DU - affordable housing 1.444 KSF - retail -1.976 KSF - office	Pending
32	Mixed Use	1317 7 th Street	57 DU - residential 2.676 KSF - retail	Final
33	Fire Station #1	1337 7 th Street	26.72 KSF - fire station	Approved
34	Mixed Use	1437 7 th Street	65 DU - residential -14.86 KSF - retail	Pending
35	Affordable Housing with commercial	1514 7 th Street	50 DU - affordable housing 1 KSF - retail	Pending
36	Mixed Use	1543-1547 7 th Street	100 DU - residential -11 KSF - retail	Pending
37	SRO Project with Commercial	1557 7 th Street	32 DU - residential 2.9 KSF - retail	Pending
38	Mixed Use	711 Colorado Avenue	8 DU - affordable housing 2.8 KSF - retail -3.9 KSF - office	Pending
39	8-Unit Condominiums	2510 7 th Street	2 DU - residential	Approval Expired
40	3-Unit Condominiums	2512 7 th Street	3 DU - residential	Approved
41	5-Unit Condominiums	1211 9 th Street	5 DU - residential	Final
42	Residential	1827 9 th Street	2 DU - residential	Final
43	Affordable Senior Housing	1445-1453 10 th Street	36 DU - affordable housing	Pending
44	Residential	1750 10 th Street	7 DU - residential	Final
45	Condominiums	2913 10 th Street	1 DU - residential	Final
46	8-Unit Condominiums	1444 11 th Street	2 DU - residential	Under Construction

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
47	5-Unit Condominiums	1518 11 th Street	5 DU - residential	Under Construction
48	5-Unit Condominiums	1533 11 th Street	2 DU - residential	Under Construction
49	15-Unit Condominium	1211 12 th Street	13 DU - residential	Approved
50	8-unit Condominium	1837 12 th Street	4 DU - residential	Final
51	5-unit Condominiums	1244 14 th Street	4 DU - residential	Approved
52	Residential	1433 14 th Street	19 DU - residential	Final
53	6-Unit Condominiums	1434 14 th Street	5 DU - residential	Approved
54	Media Production	1523 14 th Street	7.414 KSF - creative office	Final
55	3-Unit Condominiums	817 16 th Street	1 DU - residential	Approved
56	5-Unit Condominiums	943 16 th Street	3 DU - residential	Final
57	11-Unit Condominium	1803 16 th Street	10 DU - residential	Final
58	Affordable Housing	1820-1826 14 th Street	39 DU - residential -5.3 KSF - office	Approved
59	Residential (5-Unit Condominiums / 1 Low Income Unit)	1807 17 th Street	4 DU - residential	Under Construction
60	5-Unit Condominiums	1949 17 th Street	5 DU - residential	Approved
61	5-Unit Condominiums	1840 17 th Street	4 DU - residential	Approved
62	3-Unit Condominiums	1136 18 th Street	1 DU - residential	Final
63	Residential	1433 18 th Street	5 DU - residential	Final
64	Senior Housing (Affordable) FAME	1753 18 th Street	15 DU - affordable housing	Final
65	Condominiums	1443 18 th Street	10 DU - residential	Approved
66	3-Unit Condominiums	1927 18 th Street	2 DU - residential	Under Construction
67	Medical Office addition	1419 19 th Street	5.3 KSF - medical office	Under Construction
68	3-Unit Condominiums	1927 19 th Street	0 DU - residential	
69	Mixed Artist Studio and Office	1347 19 th Street	3 DU - residential 1.8 KSF - creative office	Final
70	3-Unit Condominiums	1420 20 th Street	-2 DU - residential	Approved
71	3-Unit Condominiums	1422 20 th Street	-2 DU - residential	Approved
72	Auto Shop Addition	1718 20 th Street	0.443 KSF - autobody shop	Under Construction
73	New Science Building Crossroads	1731-1733 20 th Street	20.45 KSF - School	Final

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
74	Residential	1959 20 th Street	2 DU - residential	Final
75	3-Unit Condominiums	1900 20 th Street	3 DU - residential	Approved
76	Wellness Center	1242 20 th Street 1925 Arizona Avenue	65 KSF - R&D 16.5 KSF - medical office 14 KSF - ancillary meeting	Pending
77	3-Unit Condominiums	1035 21 st Street	2 DU - residential	Approved
78	Storage	1645 21 st Street	1 KSF - warehouse	Final
79	21-Unit Condominium	2002 21 st Street	2 DU - residential 2 DU - affordable housing	Pending
80	3-Unit Condominiums	1121 22 nd Street	2 DU - residential	Approved
81	Residential	1236 25 th Street	1 DU - residential	Final
82	Creative Office	1681 26 th Street	7.5 KSF - creative office	Final
83	8-Unit Condominium	2323 28 th Street	6 DU - residential	Final
84	3-Unit Condominiums	1665 Appian Way	-1 DU - residential	Pending
85	Condominiums	713 Ashland	1 DU - residential	Final
86	Mixed Use DA	603 Arizona Avenue	27.5 KSF - hotel -3.64 KSF - restaurant	Pending
87	Mixed Use	702 Arizona Avenue	45 DU - residential 4 DU - affordable housing -8.845 KSF - retail	Final
88	2-Unit Condominium	1216 Arizona Avenue	1 DU - residential	Approved
89	3-Unit Condominiums	212 Bay Street	3 DU - residential	Approved
90	3-Unit Condominiums	1014 Bay Street	2 DU - residential	Approved
91	2-Unit Condominiums	1038 Bay Street	1 DU - residential	Final
92	Affordable housing	1342 Berkeley	8 DU - affordable housing	Approved
93	401 Broadway	401 Broadway	7.5 KSF - bank	Final
94	500 Broadway DA (Fred Segal) Site	500 Broadway	249 DU - residential 60 DU - affordable housing 22.997 KSF - retail	Under Construction
95	Mixed Use DA (Performance Bicycles)	501 Broadway	94 DU - residential -3.58 KSF - retail	Pending
96	Mixed Use (Sway Building)	525 Broadway	125 DU - residential -26.29 KSF - restaurant	Final
97	Conversion of Commercial to Residential	829 Broadway	19 DU - residential -4.3 KSF - retail	Final

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
98	Office/Retail Addition	1501 Broadway	1.172 KSF - creative office	Pending
99	Mixed Use	2225 Broadway 1452 23 rd Street	13 DU - residential 2.751 KSF - retail/restaurant -1.7 KSF - office	Approved
100	4-Unit Residential	3004 Broadway	4 DU - residential	Under Construction
101	St. Monica School Expansion	725 California Avenue (also 1030 Lincoln)	11.887 KSF – church/school	Final
102	3-Unit Condominiums	1329 California Avenue	3 DU – residential	Under Construction
103	3-Unit Condominiums	1649 Centinela Avenue	2 DU – residential	Approved
104	SM Place Movie Theater	315 Colorado Avenue	0 KSF – movie theater	Under Construction
105	Affordable Housing (StepUp on Fifth)	520 Colorado Avenue	34 DU - affordable housing	Final
106	Adaptive Reuse of Sears	302 Colorado Avenue	7.365 KSF - retail	Under Construction
107	Wyndham Hotel DA	120 Colorado Avenue	104,190.65 KSF - hotel 25 DU - residential 3 DU - affordable housing 5.47 KSF - meeting space 17.244 KSF - retail/restaurant	Pending
108	Mixed Use DA	525 Colorado Avenue	32 DU - residential 8 DU - affordable housing 1.919 KSF - retail	Pending
109	Mixed Use DA	1431 Colorado Avenue	42 DU - residential 8 DU - affordable housing -6.556 KSF - retail	Pending
110	Mixed Use DA (Fritto Misto)	601-609 Colorado Avenue	54 DU - residential 9 DU - affordable housing 1.35 KSF - retail	Pending
111	Affordable Housing	711 Colorado Avenue	56 DU - affordable housing 2 KSF - retail	Pending
112	Creative Office Addition	2041 Colorado Avenue	15 KSF - creative office	Approved

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
113	Creative Office / Post Production DA	2834 Colorado Avenue	133 KSF - creative office 9 KSF - retail	Under Construction
114	Village Trailer Park - Mixed Use DA	2930 Colorado Avenue	324 DU - residential -70 DU - affordable housing 24.94 KSF - retail 4.2 KSF - creative office	Under Construction
115	Mixed Use	1450 Cloverfield	31 DU - residential 3 DU - affordable housing 7.384 - retail	Approved
116	Mixed Use	1707 Cloverfield	58 DU - residential 5 DU - affordable housing 74.665 KSF - retail	Pending
117	Conversion of Office to Grocery Store / Restaurant	2121 Cloverfield	-53 KSF - office	Final
		2301 Pico Boulevard	53 KSF - retail	
118	Mixed Use	1550 Euclid Street	33.946 KSF - office 4.13 KSF - restaurant	Under Construction
119	Creative office	1645 Euclid Street	23 KSF - creative office	Pending
120	Duplex Addition to SFR	1834 Euclid Street	2 DU - residential	Final
121	Apartments	1423 Franklin Street	3 DU - residential	Final
122	Apartments	1541 Franklin Street	5 DU - residential	Unknown
123	3-Unit Condominiums	1621 Franklin Street	0 DU - residential	Under Construction
124	6-Unit Condominiums	1171 Franklin Street	6 DU - residential	Final
125	45-Unit Affordable Condominium	1943-59 High Place	38 DU - affordable housing	Final
126	6-Unit Condominiums	3214 Highland	-2 DU - residential	Final
127	Residential/Retail Building	207 Hollister	1 DU - residential	Final
128	Edison Elementary School	2425 Kansas	65 KSF - school	Final
129	4-Unit Townhomes	612 Lincoln Boulevard	0 DU - residential	Final
130	Walgreens (Conversion of Existing Retail)	1907 Lincoln Boulevard	0 KSF - retail	Final

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
131	Mixed Use DA	1318 Lincoln Boulevard	39 DU - residential 4 DU - affordable housing 3.473 KSF - retail	Approved
132	Mixed Use	1427 Lincoln Boulevard	15 DU - residential -3.746 KSF - retail	Pending
133	Mixed Use DA	1430-1444 Lincoln Boulevard	92 DU - residential 8 DU - affordable housing 5.878 KSF - retail	Approved
134	Mixed Use DA (Upscale Furniture Building)	1437-1443 Lincoln Boulevard	23 DU - residential 6 DU - affordable housing -8.5 KSF - retail	Approved
135	Commercial Building Addition	1447 Lincoln Boulevard	4 KSF - retail 1 DU - residential	Approved
136	Mixed Use DA (Denny's Site)	1560 Lincoln Boulevard	80 DU - residential 20 DU - affordable housing 9.402 KSF - retail	Under Construction
137	Mixed Use DA (Norm's Site)	1601 Lincoln Boulevard	72 DU - residential 18 DU - affordable housing 6.448 KSF - retail	Under Construction
138	Mixed Use DRP (Wertz Bros & Joann's Fabric Site)	1613-1637 Lincoln Boulevard	184 DU - residential 9 DU - affordable housing -8.784 KSF - retail	Under Construction
139	Affordable Housing	1626 Lincoln Boulevard	64 DU - affordable housing -8.9 KSF - autobody shop	Under Construction
140	Mixed Use DRP (Aarons brothers)	1641-1645 Lincoln Boulevard	68 DU - residential 10 DU - affordable housing -0.11 KSF - retail	Under Construction

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
141	Mixed Use DRP	1650-1660 Lincoln Boulevard	90 DU - residential 8 DU - affordable housing -14.808 KSF - retail	Approved
142	Conversion of Medical Office to Restaurant	1670 Lincoln Boulevard	-5.352 KSF - medical office 5.352 KSF - restaurant	Final
143	Affordable Housing	2120 Lincoln Boulevard	37 DU - affordable housing 0.5 KSF - retail 0.5 KSF - gas station	Pending
144	Residential	2640 Lincoln Boulevard	0 DU - residential	Final
145	Mixed Use	2903 Lincoln Boulevard	43 DU - residential 4 DU - affordable housing 14.475 KSF - retail	Approved
146	Residential	2919 Lincoln Boulevard	10 DU - residential	Under Construction
147	Commercial Building	3280 Lincoln Boulevard	4 KSF - retail	Pending
148	2-Story Commercial	3204 Lincoln Boulevard	1.192 KSF - medical office 0.043 KSF - office	Approval Expired
149	Retail/Office	2321 Main Street	0.9 KSF - retail 2 KSF - office	Final
150	Retail	2740-2750 Main Street	4.8 KSF - retail	Pending
151	City Services Building	1685 Main Street	45 KSF - government office	Under Construction
152	Civic Center Early Childhood Center	1855 Main Street	12.5 KSF - child and family development center	Under Construction
153	Parking Structure	2341 Michigan Avenue	93 KSF - parking 21.6 KSF - creative office	Approved
154	City Yards Master Plan	2500 Michigan Avenue	79 KSF - industrial	Approved
155	Mixed Use DRP	3030 Nebraska Avenue	164 DU - residential 13 DU - affordable housing 66.1 KSF - creative office	Pending

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
156	Mixed Use DRP	3025 Olympic Boulevard	172 DU - residential 75.247 KSF - creative office 8.5 KSF - retail	Pending
157	Adaptive Reuse	423 Ocean Avenue	4 DU - residential	Approved
158	Miramar Hotel Revitalization Plan DA	1133 Ocean Avenue	35.056 KSF - hotel 120 DU - residential 40 DU - affordable housing 16.69 KSF - retail/spa 8.704 KSF - restaurant -7.125 KSF - meeting space	Pending
159	Conversion of Office to Restaurant	1401 Ocean Avenue	1.98 KSF - restaurant -1.98 KSF - office	Final
160	Residential	1828 Ocean Avenue	83 DU - residential	Pending
161	Condominiums	2438 Ocean Park Boulevard	1 DU - residential	Final
162	Big Deans Café	1615 Ocean Front Walk	2.342 KSF - restaurant	
			-2.342 KSF - retail	
163	Conversion of retail to restaurant	1736 Ocean Front Walk	-1.792 KSF - retail 2.044 KSF - restaurant	Approved
164	Mixed Use	1921 Ocean Front Walk	23 DU - residential 1.97 KSF - retail	Pending
165	3-Unit Condominiums	436 Pier Avenue	2 DU - residential	Pending
166	3-Unit Condominiums	723 Pier Avenue	1 DU - residential	Under Construction
167	Mixed Use DA (Bowling Alley)	234 Pico Boulevard	97 DU - residential 8 DU - affordable housing -13.041 KSF - retail	Approved
168	Santa Monica High School (Science and Technology Building)	601 Pico Boulevard	97 KSF - school	Final
169	Residential	1112-1122 Pico Boulevard	28 DU - residential 4 DU - affordable housing	Under Construction

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
170	Conversion of Bar to Restaurant	2827 Pico Boulevard	-2.3 KSF - bar 2.3 KSF - restaurant	Final
171	Office	2929 Pico Boulevard	12.066 KSF - office 6.284 KSF - retail -1.224 KSF - auto service	Approved
172	Office	3205 Pico Boulevard	4.81 KSF - office	Under Construction
173	3-Unit Condominiums	1127 Princeton	2 DU - residential	Final
174	2-Unit Condominium	1514 Princeton	2 DU - residential	Approved
175	Mayfair Theater	214 Santa Monica Boulevard	38 DU - residential 19.025 KSF - retail	Final
176	Hotel / Mixed Use DA (Ocean Avenue)	101-129 Santa Monica Boulevard 1327-1333-1337 Ocean Avenue	22 DU - residential 5 DU - affordable housing 165 KSF - hotel 40.722 KSF - museum 21.75 KSF - retail	Pending
177	Auto Dealership	1802 Santa Monica Boulevard	-18 DU - residential 1.39 KSF - retail 15.1 KSF - auto dealership	Pending
178	Conversion of Office to Medical Office/Café	1919 Santa Monica Boulevard	-25.2 KSF - office 24.2 KSF - medical office 1 KSF - restaurant	Final
179	St Johns Campus Master Plan Phase II	2121 Santa Monica Boulevard	339 KSF - hospital and health care 59 KSF - medical research 41 KSF - health wellness center 55 KSF - education/conference center 25.5 KSF - child and family development center 17 KSF - health related services 9 KSF - day care	Pending

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
			10 KSF - restaurants 5 KSF - neighborhood commercial 40 DU - visitor housing 10 DU - multifamily replacement housing	
180	Mixed Use DA (Mini)	1402 Santa Monica Boulevard	33.75 KSF - auto dealership	Final
181	Mixed Use	2822 Santa Monica Boulevard	46 DU - residential 4 DU - affordable housing -3.405 KSF - retail	Approved
182	Mixed Use Apartment	2901 Santa Monica Boulevard	49 DU - residential 3 DU - affordable housing	Approved
			1.3 KSF - retail	
183	Mixed Use	2906-2918 Santa Monica Boulevard	40 - residential 4 - affordable housing 11.002 KSF - restaurant	Pending
184	Mixed Use	1618 Stanford	43 DU - residential 4 DU - affordable housing -11.055 KSF - office 15.987 KSF - retail/restaurant	Approved
185	3-Unit Condominiums	122 Strand Street	-1 DU - residential	Approved
186	Santa Monica College AET Campus Expansion (SMC Jurisdiction)	1660 Stewart Street	20 KSF - School 28 KSF - creative office	Final
187	Conversion of Retail to Restaurant	214 Wilshire Boulevard	-7.986 KSF - office 7.986 KSF - restaurant	Final
188	Conversion of Retail to Restaurant	331 Wilshire Boulevard	-2.453 KSF – retail 2.453 KSF - restaurant	Final
189	Mixed Use DRP	601-611 Wilshire Boulevard	37 DU - residential 3 DU - affordable housing -1.779 KSF - retail	Approved

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
190	Mixed Use Hotel	710 Wilshire Boulevard	122.87 KSF - hotel 2.348 KSF - retail 5.573 KSF - restaurant	Approved
191	Mixed Use Condominiums/ Commercial	2300 Wilshire Boulevard	30 DU - residential 22.3 KSF - retail 2.7 KSF - restaurant	Under construction
192	SRO Project with Commercial	2729 Wilshire Boulevard	9 DU - residential -2.4 KSF - retail	Pending
193	Retail	2919 Wilshire Boulevard	9.799 KSF - retail	Approved
194	Mixed Use DA	3032 Wilshire Boulevard	80 DU - residential 20 DU - affordable housing 4.232 KSF - retail	Withdrawn
195	Mixed Use	3223 Wilshire Boulevard	49 DU - residential 4 DU - affordable housing	Pending
			-6.196 KSF - retail/restaurant	
196	3-Unit Condominiums	2219 Virginia Avenue	2 DU - residential	Approved
197	Pico Branch Library	2200 Virginia Avenue	7.5 KSF - library	Final
198	6-Unit Condominium	1319 Yale Street	1 DU - residential	Final
199	Airport Park Expansion	3201 Airport Avenue	12 acre - park	Approved
200	SM Pier Bridge Widening and Pier Ramp	Colorado Avenue/ Ocean Avenue	0 KSF - widen pier bridge and construct ramp to PCH 1440/1550 Lot	Pending
201	Cadillac Mixed Use Development (City of Los Angeles)	12101 West Olympic Boulevard	516 DU - residential 200 KSF - creative office 67 KSF - retail	Approved
202	Civic Center Specific Plan	1705-1755 Ocean Avenue	318 DU - residential 25 KSF - retail/restaurant 12.8 acre - park	Final

Table 3.0-1. Pending, Approved, and Recently Constructed Projects in the City of Santa Monica (Continued)

No.	Project	Location	Description of Net New Development	Status
203	Parking Structure 6 Rebuild	1431 2nd Street	350 spaces - parking	Final
204	Colorado Esplanade	Colorado Avenue between 4 th & Ocean	0 KSF - pedestrian promenade	Final
205	California Incline Bridge Replacement	Ocean Avenue and California	0 KSF – bridge replacement	Final

Notes:

DA = Development Agreement

DRP = Development Review Permit

DU = Dwelling Unit

KSF = Thousand Square Feet

Net New Development includes proposed new DU and KSF after demolition of existing on-site structures.

List of projects current as of April 30, 2019 and represent known projects pending, approved, and completed since the time of the Citywide traffic counts conducted in 2013.

Project locations depicted in Figure 3.0-1 are highlighted in blue within Table 3.0-1 and are located near the Project site.

*Cumulative projects list includes all projects as of April 2019, which may include projects completed or withdrawn during preparation of this EIR; therefore, this EIR conservatively accounts for all projects in the cumulative analysis.

Source: City of Santa Monica 2019.



Cumulative Project Locations

**FIGURE
3.0-1**

3.1 AESTHETICS AND SHADE/SHADOW EFFECTS

This section describes the existing visual setting and analyzes the potential aesthetic changes – including light, glare, and shade/shadow effects – that could result with development of the proposed Ocean Avenue Project (Project). California Environmental Quality Act (CEQA) Section 21099 – as amended by Senate Bill (SB) 743 – states that infill residential, mixed-use, or employment center projects located within a Transit Priority Area (TPA)¹ shall not be considered to have significant impacts to aesthetics or visual resources. The Project site is located in a TPA due to its accessibility to high quality transit service. The Project site is located within 0.5 mile of the Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line at 4th Street and Colorado Avenue (see Section 3.13, *Transportation*). Additionally, the Project site is accessible 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. Therefore, aesthetic and shade/shadow impacts are not considered significant, and an analysis of aesthetics and shade/shadow impacts is not necessary. The analysis of these issues is included herein for planning purposes only to provide decision-makers and the public a comprehensive review of the visual effects of the proposed Project.

3.1.1 Aesthetics

Most communities recognize scenic resources as important assets, though the specific valued scenic resources may vary depending on the community and context. Aesthetics and visual resources are principally defined by how residents and visitors perceive the visual attractiveness of an area. Based on this subjective perception, the key elements and features that create or enhance an area's visual quality are definable. In general, visual resources are features of urban (i.e., built) or natural environments with scenic value. In a fully urbanized area like the Downtown and the Project site, visual resources typically consist of features of the urban environment or distant views of natural features. Urban visual resources are valued features that contribute to a community's inherent character and overall identity and generally include:

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. 4th Street includes several existing major transit stops (i.e., "intersection[s] of two or more major bus routes with a frequency of service intervals of 15 minutes or less during the A.M. and P.M. peak commute periods"), at Wilshire, Arizona, Santa Monica, Broadway, and Colorado Avenue. In addition, the Downtown is served by the Expo LRT Downtown Santa Monica Station at 4th Street and Colorado Avenue.

- Architecturally recognized buildings or iconic structures;
- Historic structures, buildings, or landscapes;
- Public art installations of visual prominence;
- Designated scenic local routes and gateways;
- Visually iconic bridges or signs, such as the Santa Monica Pier; and
- Scenic public vistas or urban elements, such as the skyline or ocean views.

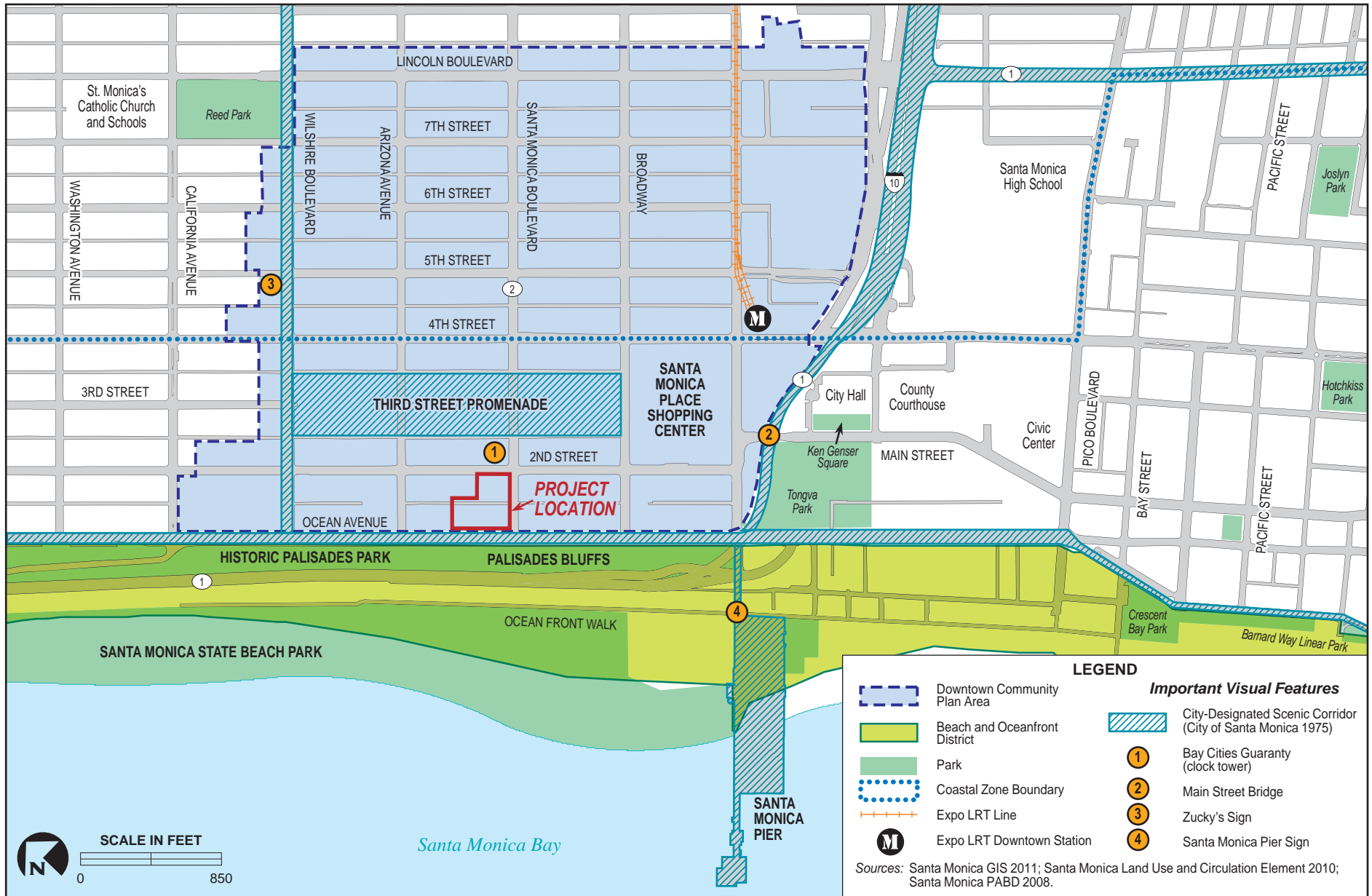
Additionally, the natural environment can play an important role in defining the visual setting, even for an urban community. In such cases, regional natural environmental features may contribute to an urban community's aesthetic character and visual quality and potentially include views of:

- Mountain peaks or ranges;
- Oceans or other water bodies;
- Beaches and dunes;
- Bluffs or cliff faces;
- Large expanses of open sky open or green spaces of scenic value; and
- Unique geologic features or formations.



Palisades Park is located along Ocean Avenue within the Downtown and provides sweeping views of the Pacific Ocean to the west, the Santa Monica Mountains to the north, and the Downtown to the east.

The proximity and connectivity of the Downtown to Palisades Park, the City of Santa Monica's (City's) wide sandy beaches, the Santa Monica Pier, and the Pacific Ocean are closely linked to an individual's perception of Downtown's aesthetic and visual character. Distant views of the Santa Monica Mountains to the north, and occasional views to Downtown Los Angeles to the east are also a valued visual resource within the City (see Figure 3.1-1).



Important Visual Resources
within the Downtown

**FIGURE
3.1-1**

3.1.1.1 Environmental Setting – Aesthetics

Visual Character in Downtown Santa Monica

The Downtown includes a 236-acre area that is generally characterized by medium- and high-density urban land uses. The Downtown is organized in a 60-block street grid with closely spaced tree-lined blocks with street-level retail and restaurant uses. The Project site is located along Ocean Avenue, near the western border of the Downtown, which is visually defined by the edge of urban development along Ocean Avenue, the natural green space of Palisades Park atop the Palisades Bluffs, and the expansive beaches and waters of the Pacific Ocean.



The Project site is located on the western boundary of the Downtown along Ocean Avenue amongst a variety of low-rise and high-rise buildings including the eight-story Georgian Hotel and 15-story Pacific Plaza Apartments to the south (left) as well as eight-story Shangri-la Hotel, 11-story Wilshire Palisades, and 21-story 100 Wilshire Office Building to the north (right).

Building heights in the Downtown vary considerably, with low-rise one- to three-story buildings intermixed amongst taller, high-rise buildings. In general, the tallest buildings in the Downtown are located along the western boundary, particularly along Ocean Avenue and near the Project site (see Table 3.1-1).

A variety of building types and designs, representing a range of time periods and architectural styles capture the Downtown's architectural and cultural heritage. Buildings that contribute to Downtown's unique aesthetic character include its Spanish Colonial Revival, Art Deco, Streamline Moderne, and iconic brick buildings constructed in the 1920s and 1930s. The Downtown includes numerous City-designated historic landmark buildings such as the high-rise Georgian Hotel or the Clock Tower Building, as well as the single-level Queen Anne-style Victorian building (1333 Ocean Avenue) and the Spanish Colonial Revival style building (1337 Ocean Avenue) located on the Project site (see Section 3.4, *Cultural Resources*). New development in the Downtown generally includes new four- to six-story modern mixed-use buildings that have replaced older

one- to three-story buildings and surface parking lots, particularly along 5th Street, 6th Street, and 7th Street.

Table 3.1-1. High-Rise Buildings Located within Three City Blocks of the Project Site

Existing Building	Address	Height
100 Wilshire Office Building	100 Wilshire Avenue	300 feet
Pacific Plaza Apartments	1431 Ocean Avenue	180 feet
Bay Cities Guaranty Building (Clock Tower)	221 Santa Monica Boulevard	173 feet
First Federal Square /One West Bank	401 Wilshire Avenue	160 feet
Radisson Huntley Hotel Santa Monica	1111 2 nd Street	160 feet
1221 Ocean Avenue	1221 Ocean Avenue	159 feet
Wilshire Palisades Office Building	1299 Ocean Avenue	143 feet
Searise Office Tower	233 Wilshire Avenue	114 feet
Georgian Hotel	1415 Ocean Avenue	100 feet
Central Tower	1424 4 th Street	90 feet
Shangri-la Hotel	1301 Ocean Avenue	85 feet

Built resources that contribute to Downtown's overall visual character include iconic signage (e.g., Santa Monica Pier, located at the intersection of Ocean Avenue and Colorado Boulevard), public art, pedestrian-scale streetscapes, historic or iconic buildings (e.g., the Georgian Hotel or the Clock Tower Building), the varied urban skyline of low-rise and intermittent high-rise buildings, and the eclectic mix of buildings with architectural styles from various development eras. The built environment is complemented by an urban forest consisting of tree-lined streets, such as the pines (*Pinus* spp.) and palms (*Arecaceae* spp.) that line Ocean Avenue, and the dense shade canopy of the Indian laurel figs (*Ficus microcarpa*) along 4th Street and 5th Street (City of Santa Monica 2010).



The Colorado Esplanade – which was completed and opened in June 2016 – includes wide decorative concrete sidewalks with overhead lighting, focusing the view of the Santa Monica Pier Sign (distant).

Distant views of the Pacific Ocean (to the west) and the Santa Monica Mountains (to the north) augment the urban character of the Downtown. Views of the Pacific Ocean are visible from along the entire length of Ocean Avenue and Palisades Park and the western end of many east-west

streets, including Santa Monica Boulevard and Arizona Avenue. Peaks of Santa Monica Mountains, including some ridgelines, are available through channelized views looking north from north-south streets.

There are no highways within the City that have been officially designated as scenic by the State of California (California Department of Transportation [Caltrans] 2019). State Highway 1 (Pacific Coast Highway [PCH]), located approximately 250 feet to the west of the Project site, is eligible for State scenic highway designation; however, it is not currently designated as a scenic highway by the State, the County of Los Angeles, or the City (Caltrans 2019).

Project Vicinity Visual Characteristics

The Project site is located on the corner of Ocean Avenue and Santa Monica Boulevard, two blocks north of the Santa Monica Pier. The Project site sits atop and overlooks the Santa Monica Bluffs directly across Ocean Avenue from Palisades Park. The Project site is bordered to the east by 2nd Street and is bisected by 1st Court, which provides a connection from Arizona Avenue to Santa Monica Boulevard.

Ocean Avenue and Palisades Park

Within the Project site vicinity, Ocean Avenue from Bernard Way to the northern City boundary, the California Incline and the Santa Monica Pier are designated scenic corridors in the City's Local Coastal Program Land Use Plan (LUP). As discussed in the LUP, views to preserve include existing beach and ocean views along Ocean Avenue through Palisades Park; Ocean views from public rights of way intersecting Ocean Avenue; and the view of the Pier and Harbor Sign at Colorado and Ocean Avenue. The LUP further discusses scenic open space, such as public landscape along Ocean



Ocean Avenue near the Project site (center) is an open sunny street characterized by a mix of buildings, including older two-story uses and newer mixed-use buildings up to 21 stories.

Avenue, and public art as among the City's visual resources. Views along Ocean Avenue are remarkable. The bluff-top setting adjacent to Palisades Park affords clear views of Santa Monica Bay and the unique streetscape frontage comprising modern and historic building styles creates an iconic Southern California aesthetic (City of Santa Monica 2017). Ocean Avenue is a north-south street with four vehicle lanes, metered on-street parking, and Class II (i.e., striped) bicycle lanes. An approximately 18-foot-wide pedestrian sidewalk is provided along the eastern side of the street,

lined by narrow 8-foot-wide sidewalk landscaping consistent of turf grass planted with tall Canary Island date (*Phoenix canariensis*) and Mexican fan palm trees (*Washingtonia robusta*). Limited private outdoor seating and street furniture also occupy various areas along the sidewalk (e.g., at the intersection with Santa Monica Boulevard). Ocean Avenue is characterized by a mix of commercial, retail, and residential buildings with a range of architectural styles including Spanish revival, modern, Art Deco, and craftsmen. Older one- and two-story commercial structures are interspersed among new mixed-use buildings up to 21 stories or 300 feet in height. Views from Ocean Avenue include the Santa Monica Mountains, Santa Monica State Beach, the Pacific Ocean, Santa Monica Pier, Palisades Park, and open sky above.

Palisades Park, which is situated at the top of the Palisades Bluffs and runs along the west side of Ocean Avenue, is a prominent feature of Ocean Avenue and is a City-designated landmark. The park is landscaped with a strip of continuous lawn and distinctive palm trees along the street edge, as well as a broad range of exotic trees. As such, the park provides a visual relief and open space between Santa Monica's highly urbanized Downtown and the Santa Monica Bay. Following the top edge of the bluffs, the park features pedestrian pathways and lawns and provides broad vistas of Santa Monica Bay and the Santa Monica Mountains. The park also contains a rose garden and several works of public art.



The Project site is located immediately to the east of Palisades Park and can be seen by pedestrians and bicyclists using the trail system through the park between Wilshire Boulevard and Broadway (left). In addition to views of the Downtown, the west Palisade Park provides sweeping views of the Pacific Ocean, including the Santa Monica Pier (right).

Santa Monica Boulevard

Santa Monica Boulevard is the southern boundary of the Project site. Santa Monica Boulevard is a four-lane road – including two westbound vehicle lanes, one eastbound lane, one eastbound dedicated bus lane and metered on-street parking – that serves as a key east-west entrance to the Downtown. Adjacent to the Project site, Santa Monica Boulevard is lined with approximately 18-foot-wide pedestrian sidewalks lined with Chinese flame tree (*Koelreuteria bipinnata*),

carrotwood (*Cupaniopsis anacardioides*), and Indian laurel fig street trees, creating shaded street and sidewalk areas in the summer. Private outdoor seating and street furniture also occupy the sidewalk between the intersection of Ocean Avenue and 1st Court. Santa Monica Boulevard is comprised of a mix of older lower-rise commercial buildings with several surface parking lots and high-rise mixed-use or residential structures. The visual characteristic of Santa Monica Boulevard is a mix of traditional and modern commercial building architectural styles; combined with modern high-density residential and mixed-use buildings. City-designated landmarks including the Bay Cities Guaranty Building (Clock Tower) and Mayfair Theater building are visible to the east along with views of the Pacific Ocean and open sky to the west.



Santa Monica Boulevard provides wide sidewalks lined with landscaped trees and private outdoor dining. To the west Santa Monica Boulevard provides views of the Pacific Ocean and open sky.

2nd Street

To the east, the Project site is bounded by 2nd Street, a two-lane road with metered on-street parking and a Class II bicycle lane. 2nd Street includes a narrower approximately 10-foot-wide pedestrian sidewalk lined with mature Indian laurel fig and Canary Island date palm street trees. 2nd Street supports a variety of mixed-use commercial, retail, and restaurant buildings. These buildings vary in scale; ranging from one- to two-story buildings to several multi-story structures. 2nd Street also includes the historic William Rapp Saloon, located one half block south of the Project site, and Mar Vista Apartments, located at the intersection with Arizona Boulevard. Thousands of public parking spaces are located within multi-level parking structures along 2nd Street, including the nine-level Parking Structure #4, located immediately to the east of the Project site. Additionally, a Metro bus layover zone is located on 2nd Street near the corner of Santa Monica Boulevard adjacent to the Project site. Views of open



2nd Street includes wide pedestrian sidewalks with lined with large mature Indian laurel fig street trees, with limited private outdoor seating, street furniture, and bicycle racks nearby the Metro bus layover zone.

sky are generally limited due to large street trees and intervening multi-story. Intermittent views of the Pacific Ocean are visible from 2nd Street intersections.

1st Court

1st Court is an approximately 20-foot-wide public alleyway accessed from Arizona Avenue that provides one-way southbound connectivity between Arizona Avenue and Santa Monica Boulevard. 1st Court, which bisects the Project site, runs parallel to and between Ocean Avenue and 2nd Street. This alleyway is generally used by service trucks (e.g., delivery and trash collection) and passenger vehicles accessing designated underground or at-grade private parking spaces. No landscaping or formal pedestrian or bicycle facilities exist along 1st Court. Views are channelized along the alleyway. Views of the open sky are generally limited due to the two- to four-story buildings that face away from the alleyway onto Ocean Avenue and 2nd Street. There is a limited 100-foot-wide view of the Pacific Ocean provided across the existing surface parking lot on the Project site. While the water can be visible across the parking lot, this view is often obscured by parked vehicles both in the surface parking lots and at metered on-street parking spaces along Ocean Avenue, as well as by vegetation in Palisades Park.



1st Court is a 20-foot-wide alleyway with limited visual character. However, there is an approximately 100-foot-wide gap in the buildings that provides views of the open sky and obscured views of the ocean across the existing surface parking lot.

In summary, the visual character in the vicinity of the Project site is dominated by multi-story residential, mixed-use, and office buildings, with scattered older one- to three-story retail buildings and surface parking lots. Several five- to seven-story buildings line Ocean Avenue north and south of the Project site with limited single-story commercial uses and surface parking areas. With ongoing development in the vicinity of the Project site, nearby streets are undergoing visual

transformation as older one- to three-story buildings and surface parking lots are replaced with new taller five- to seven-story buildings, as well as major streetscape improvements. Taller buildings near the Project include four- to six-story buildings along 2nd Street and Santa Monica Boulevard. These structures generally range from 52 to 60 feet in height, and provide upper-level residential uses. Additionally, street trees along 2nd Street and Santa Monica Boulevard add to the visual character of the vicinity and can partially obstruct views of the Project site from the residential units in these surrounding structures.

Streetscape and Pedestrian Environment

Sidewalks on Ocean Avenue and Santa Monica Boulevard bordering the Project site range between 12 to 18 feet wide and generally provide adequate unobstructed passage for pedestrians. Sidewalks along 2nd Street are slightly narrower, ranging between 8 and 10 feet. Ocean Avenue supports intermittent street trees, including Canary Island date and Mexican fan palms, up to 85 feet tall. Deciduous Chinese flame trees line Santa Monica Boulevard along the Project site frontage, with average heights of approximately 20 to 25 feet. The lighter spacing and density of the tree canopies along Ocean Avenue and Santa Monica Boulevard produce a sunny, open streetscape environment. The mature Indian laurel figs on 2nd Street stand up to 40 feet tall and provide dense canopy creating a mix of sun and shadow on



Sidewalks along Santa Monica Boulevard bordering the Project site are 15 to 18 feet wide, which allow room for pedestrian circulation and outdoor seating, and are shaded by street trees.

paved surfaces and building façades, which produces a shady outdoor environment.² In the vicinity of the proposed Project, parallel parking is allowed on both sides of Ocean Avenue. Four parallel parking spaces are provided on the north side of Santa Monica Boulevard and another four spaces are provided on the east side of 2nd Street. These on-street parking spaces create buffers between vehicular traffic and pedestrians using sidewalks on these streets, contributing to a comfortable pedestrian environment. The surface parking lot on the corner of Santa Monica Boulevard and 2nd Street creates a visual break from the continuous building façade and allows glimpses of the Pacific

² As described in the DCP Program EIR, street trees can generate public concerns. For example, the large Indian laurel figs are viewed by some members of the public as an important visual resource, while others are concerned over litter and stains from fruit dropped by the trees and damage to sidewalks from intrusive roots.

Ocean but is visually separated from the public streetscape by low-lying fencing at the property line.

Project Site

The 1.89-acre Project site encompasses almost one half of a City block. The Project site has approximately 350 feet of frontage along Ocean Avenue, 320 feet of frontage along Santa Monica Boulevard, and 200 feet of frontage along 2nd Street. The Project site is currently occupied with one- to three-story buildings and surface parking lots. Existing development includes a mixed-use commercial and residential building at the northwest corner of Ocean Avenue and Santa Monica Boulevard and three commercial buildings along Ocean Avenue (two of which are designated Landmarks). The external façades of the commercial buildings are finished in white paint along Ocean Avenue and the mixed-use commercial building at the northeast intersection of Ocean Avenue and Santa Monica Avenue has a light tan finish with navy blue trim. All of the Project site's street frontages feature windows and transparency to the public sidewalk. The Ocean Avenue façade is lined with established short shrubs and hedges.

Existing City-designated Landmarks located on the Project site include the Queen Anne style Victorian building originally constructed in 1906 (1333 Ocean Avenue) and the Spanish Colonial Revival building constructed in 1926 (1337 Ocean Avenue). These buildings are significant due to their unique architecture and not necessarily because they are associated with important individuals or historic events (see Section 3.4, *Cultural Resources*, for further descriptions of these City-designated Landmarks). The City-



The Project site is highly visible from Ocean Avenue with approximately 350 feet of frontage along Ocean Avenue, 320 feet of frontage along Santa Monica Boulevard, and 200 feet of frontage along 2nd Street.

designated Landmarks differ in architectural style from each other and from surrounding development, which creates visual variety along the Ocean Avenue corridor.

Existing buildings on the Project site differ greatly from one another in terms of architectural design, colors, style, scale, bulk, and landscaping. The northernmost building along Ocean Avenue (1327 Ocean Avenue) is an improved two-story commercial building with a white façade and non-tinted windows. Dark green signs advertise the building's current commercial uses. The building has approximately 45 feet of frontage along Ocean Avenue and is landscaped with low-lying hedges beneath its pedestrian level windows. The City-designated Landmark at 1333 Ocean Avenue, located adjacent and immediately south of 1327 Ocean Avenue, is set back approximately

20 feet from the property line. The two-story structure and the metal gate that separates the property from the sidewalk are both finished with white paint. Two mature trees occupy the space in the southern portion of this property's yard. Both the properties at 1327 and 1333 Ocean Avenue have green colored trim and roofing. The



The three commercial buildings along Ocean Avenue within the Project site (1327, 1333, and 1337 Ocean Avenue) are all painted white and provide visual interest via windows, setbacks, and colored trim.

City-designated Landmark at 1337 Ocean Avenue is similarly painted white but has red roofing tiles consistent with the Spanish Colonial Revival style. This building abuts the sidewalk along Ocean Avenue and is separated from the surface parking lot at 101 Santa Monica Boulevard by one shorter and one taller hedge running the length of the building's southern perimeter.

The building at 101 Santa Monica Boulevard is beige with blue trim and finishes. The European style building façade along Ocean Avenue and Santa Monica Boulevard is lined with several small windows and balconettes with blue railings. Similar to the structure at 1337 Ocean Avenue, 101 Santa Monica Boulevard has red roofing tiles consistent with the Spanish Colonial Revival style. The remainder of the Project site at 101 and 129 Santa Monica Boulevard is developed with two paved surface parking lots separated by the southern portion of 1st Court.



101 Santa Monica Boulevard is currently developed with a two-story mixed-use commercial and residential building with a rooftop penthouse apartment and outdoor dining located along the corner of Santa Monica Boulevard and Ocean Avenue.

Existing Public Views of the Project Site

Public views of the Project site are generally confined to those available from immediately adjacent streets, sidewalks, and Palisades Park. Views from streets even one block away are blocked by intervening structures. Views of the existing buildings and surface parking lots onsite from Ocean Avenue, Palisades Park, Santa Monica Boulevard, and 2nd Street are generally uninterrupted and only sometimes partially obscured by street trees, other landscaping, and parked cars.



Parking Structure #4 provides rooftop views across the Project site – including views of multi-story mixed-use commercial retail and restaurant buildings and more distant views of the beach and the Pacific Ocean (left). Santa Monica Pier also affords clear views of the Project site set amongst the City's beachfront skyline along Ocean Avenue and the Palisades Bluffs (right).

Key views of the Project site from public areas include the Santa Monica Pier, Palisades Park along Ocean Avenue, Santa Monica Boulevard, 2nd Street, and the Santa Monica beach (see Figure 3.1-2). The 350 feet of frontage along Ocean Avenue offers the most complete and extensive views of the Project site between Arizona Avenue looking south and Santa Monica Boulevard looking north. Santa Monica Boulevard and 2nd Street frontages also allow views across the Project site by both motorists, bicyclists, and pedestrians. Views of the Project site from identified key viewing areas are further described below in Section 3.1.1.3, *Impact Assessment and Methodology*.

Public views of the Project site and the Pacific Ocean are also available from the rooftop of Parking Structure #4. However, the rooftop of Parking Structure #4 is not a designated public vista and has not been developed with benches or platform to provide comfortable viewing locations. The view from the top deck of the parking structures is an incidental experience for users of the parking structure. Similar rooftop views are provided for private viewers from nearby high-rise buildings (e.g., from the Elephanté restaurant within the three-story 1332 2nd Street Building); however, as described further in Section 3.1.1.3, *Impact Assessment and Methodology – Aesthetics*, case law has established that only public views, not private views, are subject to analysis under the California Environmental Quality Act (CEQA).

Light and Glare

Public exposure to light and glare varies substantially in the Downtown with some City blocks having higher levels of lighting and glare than others depending on the amount and location of outdoor light sources and reflective materials. Light impacts occur during the evening and nighttime hours, and can have adverse effects if they affect views. Glare is largely a daytime phenomenon, occurring when sunlight is reflected off highly polished surfaces or objects (e.g., windows, windshields, etc.), light-colored surfaces, or by vehicle headlights on adjacent roadways. Excessive glare not only restricts visibility but can also increase the ambient heat reflectivity in each area.



The building at 1333 2nd Street located across from the eastern boundary of the Project site is a source of indoor illumination and glare due to the high reflectivity of its glassy façade.

The Project site is in an area of the Downtown that includes numerous sources of urban nighttime lighting, including interior building illumination, streetlights, exterior security lighting, decorative lighting within trees, and vehicle lights. Adjacent office and residential buildings include both indoor and outdoor illumination of façades, including indoor illumination of windows, balconies and limited exterior lighting fixtures. Indoor lighting is generally confined within the existing buildings and does not spill over to the public realm. Outdoor lighting sources include exterior light fixtures, which range from small fixtures adjacent to the entrance of 1337 Ocean Avenue to illuminated signs for the ground-level restaurant at 101 Santa Monica Boulevard. Additionally, many of the public trees have decorative lighting and the outdoor dining areas at the corner of Ocean Avenue and Santa Monica Boulevard also have limited street lighting.

Street lights illuminate the sidewalks along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. Security lighting onsite is located around the perimeter of the surface parking lot at the corner of Santa Monica Boulevard and 2nd Street. In addition to vehicle lights along the adjacent roadways, vehicle lights from the entrance/exit to the Park Structure #4 and the underground parking structure associated with the U.S. Bank building shine directly into the Project site. Vehicle headlights within the surface parking lots located on the Project site create light sources at the Project site driveways on Ocean Avenue and 1st Court.

Potential sources of glare in the Project vicinity include the windows and façades of various light-colored structures adjacent to the Project site. For example, the existing building at 1333 2nd Street

east of the Project site generates glare at certain viewing locations due to reflective glass surfaces on all sides of the building.

Land uses that are typically sensitive to excess light and glare include residential uses, parks, senior housing, and other types of uses where excessive light and glare may disrupt sleep or other activities. In addition, light and glare may interfere with the vision of drivers. Existing light-sensitive receptors in the area include residents of nearby buildings, 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, and the Christian Institute of Spiritual Sciences building across 2nd Street to the north. Palisades Park to the west of the Project site and the Santa Monica Pier could also be considered sensitive receptors to light and glare generated from the Downtown and the Project site.

3.1.1.2 Regulatory Framework – Aesthetics

Federal Regulations

There are no Federal regulations that pertain to aesthetic or visual resources related to the proposed Project.

State Policies and Regulations

SB 743. Governor Brown signed SB 743 in September 2013, which made several changes to CEQA for projects located in areas served by transit (Public Resources Code Section 21099). Although the most drastic change that SB743 makes is the elimination of automobile delay for analyzing the transportation impacts under CEQA (see Section 3.13, *Transportation*), CEQA Section 21099, as amended by SB 743, also states that aesthetic and parking impacts shall not be considered significant effects on the environment if:

- The project is a residential, mixed-use residential, or employment center project;³ and
- The project is located on an infill site within a TPA.⁴

The Downtown – including the Project site – is classified as a TPA; therefore, the potential impacts to aesthetics and visual resources associated with the proposed Project impacts are not considered significant, and an analysis of aesthetic impacts of the proposed Project is not required pursuant to CEQA and SB 743.

³ “Employment center project” means “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.”

⁴ “Transit priority area” means “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 CFR §450.216 or §450.322.”

Caltrans Scenic Highway Program. Caltrans defines a scenic highway as any freeway, highway, road, or other public rights-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. PCH, located approximately 300 feet to the west of the Project site at the base of the Palisades Bluffs, is eligible for State Scenic Highway designation; however, it is not currently designated as scenic by the State (Caltrans 2019).

California Coastal Act. The California Coastal Act (Coastal Act) prioritizes the protection of important scenic resources and views from public areas, such as highways, roads, beaches, and trails. There are two provisions relevant to the Downtown and the proposed Project:

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...”*

Section 30253: New development shall: *“(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses. The California Coastal Commission has defined special communities as “areas that add to the visual attractiveness of the coast.”*

Local Policies and Regulations

Santa Monica General Plan Land Use and Circulation Element. The Project site is located in the Downtown District land use designation. The vision of the Land Use and Circulation Element (LUCE) for the Downtown District seeks to maintain and enhance the area as a thriving, mixed-use urban environment in which people can live, work, and be entertained. The Downtown District allows for the broadest mix of uses and activities, and seeks to provide new complimentary retail and residential opportunities in the area. Many goals and policies within the LUCE relate to aesthetics, visual character, and visual quality. The most pertinent goals and policies are provided below, and consistency with these goals and policies are analyzed in Section 3.10, *Land Use and Planning*.

Goal LU2: Integrate Land Use and Transportation for Greenhouse Gas (GHG) Emission 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 improve community quality of life.

Policy LU2.6. Active Spaces. Focus new development in defined districts to creative 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 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 LU4.4. 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 LU12: Historic Preservation. Encourage historic preservation Citywide – Preserve buildings and features which characterize and represent the City’s rich heritage.

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.

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

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

Policy LU15.4. Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.

Policy LU15.7. Street-Level Pedestrian-Oriented Design. Buildings in the mixed-use and commercial areas should generally be located at the back of the sidewalk or the property line (street front) and include active commercial uses on the ground floor. Where a residential use occupies the ground floor, it should set back from the property line, be located one half level above the street or incorporate design features to provide

privacy for the unit. Front doors, porches and stoops are encouraged as part of orienting residential units to the street.

- Policy LU15.8. **Building Articulation.** Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.
- Policy LU15.9. **Pedestrian-Oriented Design.** Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.
- Policy LU15.10. **Roofline Variation.** Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.
- Policy LU15.11. **Building Façades and Step Backs.** Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the façade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air, and sense of openness for the general public. Guidelines or standards for the building mass above the streetwall shall be established in the zoning ordinance.
- 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 percent on each block.

Policy 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.

Goal LU19: Design Complete Streets – Design and manage complete streets and alleys to support adjacent land uses and human activity, keeping in mind the unique character of each area of the City.

Goal LU20: Promote the Urban Forest – Maintain a citywide pattern of street trees to reduce GHG and heat gain, provide biodiversity, and provide shade to create a comfortable pedestrian environment.

Policy LU20.2. Street Landscaping. Provide street landscaping and streetscape features to enhance the public realm throughout the City. Increase landscaping in medians, parkways, and residual areas resulting from changes to parking or traffic patterns.

Policy LU20.3. Maintaining the Urban Forest. Encourage properties adjacent to the public right-of-way to contribute to the urban forest environment through onsite plantings and street tree care and maintenance.

Policy HP1.8. Encourage the preservation and regular maintenance of mature trees and landscaping that contribute to the unique character of a neighborhood.

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 D3.2. Ensure pedestrian orientation of ground floor uses in new development.

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 D8.2. Scale buildings to the pedestrian to create an intimate sidewalk walking/shopping experience. Incorporate enhanced materials and

detailing in ground floor façades where they will be perceived by passing pedestrians.

- Policy D8.3. Design buildings with a variety of heights, architectural elements and shapes to create visual interest along the street. Walls should have meaningful combinations of materials, and articulation that creates shadow patterns to engage the eye.
- Policy D8.4. Avoid buildings with uniformly flat roofs or cornices in order to create an interesting skyline.
- Policy D8.6. Limit ground floor uses mostly to active retail with generally continuous, transparent (non-tinted) display windows facing the sidewalk.
- 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 D.8.8. 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.
- Policy D9.3. Discourage open on-grade parking and on-grade parking visible from the street.
- Policy D9.4. Locate active retail space on a pedestrian street facing the sidewalk at the ground floor.
- Policy D9.6. Improve the aesthetic appearance of the alleys and where appropriate incorporate the alleys into the pedestrian system.

Goal T8: Provide a beautiful and attractive pedestrian environment throughout the City.

Downtown Community Plan. The DCP was adopted by the City Council in July 2017. The DCP, along with related Zoning Ordinance amendments, implements the LUCE vision for the Downtown District, including the Project site. Santa Monica's Downtown is one of the County's most recognizable city centers, framed by Santa Monica Bay and mountains. The quality and charms of its buildings, public spaces, urban-scale ambience, access to beaches, and walkability make it a destination for locals and visitors (City of Santa Monica 2017).

Goal LU2: The Downtown District is a thriving creative and cultural center with a unique concentration of innovative businesses, performance spaces, museums, and programmed events.

Policy LU2.1. Enhance creative and cultural uses, including spaces for artists, performers, writers and musicians, and consider development of a prominent museum space.

Goal LU7: New development, infrastructure, and land-use changes contribute to the enhancement of the social, cultural, physical and environmental quality of the Downtown District.

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.

Policy LU7.5. Encourage the restoration, rehabilitation and adaptive reuse of historic resources, both designated and those identified on the Historic Resource Inventory, to ensure that the physical fabric of the Downtown District integrates and respects our historic assets as it continues to evolve.

Goal CCP1: The Downtown District evolves as a diverse and complete neighborhood, with housing opportunities available to households of all sizes and income levels.

Policy CCP1.2. Encourage projects to provide a variety of housing types and sizes to serve individuals, families, seniors, and persons living with disabilities.

Goal CCP4: The Downtown District has a diversity of uses and attractions that reinforce its role as the City's shared "living room."

Policy CCP4.1. Continue to work with local agencies, property owners and Downtown Santa Monica to promote good design and management of public amenities and open spaces.

Goal HP2: The character of the Downtown District is enhanced by visual elements that convey and celebrate its history.

Policy HP2.4. Adaptive reuse of older buildings or façades should be considered for new construction and rehabilitation projects, when the scale, materials or method of construction evokes the Downtown District's history.

Goal AM1: People come first in the Downtown District. Streets are designed and operated so that people want to walk because it feels enjoyable, social, comfortable and safe.

Policy AM1.2. Enhance the comfort and safety of sidewalks and intersections in the Downtown District for people of all ages and abilities.

Santa Monica General Plan Scenic Corridors Element. The City of Santa Monica's Scenic Corridors General Plan Element, adopted in 1975, provides for protection and enhancement of the City's scenic resources. The Element aims to accomplish this by establishing a system of scenic corridors along existing roadways that traverse areas of scenic beauty and interest. The Element establishes seven scenic corridors in the City:

1. Santa Monica Freeway from the City boundary to Ocean Avenue;
2. Ocean Avenue from the north City boundary to Barnard Way;
3. PCH within the City limits;
4. Barnard Way from Ocean Avenue to south City boundary;
5. Wilshire Boulevard from the City boundary to Ocean Avenue;
6. Santa Monica Mall; and
7. Santa Monica Municipal Pier.

Ocean Avenue, immediately adjacent to the Project site, is a City-designated scenic corridor (City of Santa Monica 1997). Additionally, the Santa Monica Municipal Pier located to the southwest is also a City-designated scenic corridor. The goals of the Scenic Corridors Element require policies that provide for the beautification of thoroughfares which lend themselves to landscaping, pleasing architectural treatments, and the development of scenic corridors for the use of pedestrians and bicyclists.

Santa Monica Zoning Ordinance. The City Santa Monica Zoning Ordinance (Chapter 9.01 through Chapter 9.68 of the Santa Monica Municipal Code [SMMC]) sets forth specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, sign regulations, and open space and setback requirements. The most recent Zoning Ordinance was adopted in March 2017 and was comprehensively updated to reflect the LUCE vision, goals, and policies.

The official districting map for the Zoning Ordinance designates the Project site as being zoned DCP District. The Zoning Ordinance does not provide standards for the Downtown District, as the standards for the Downtown District are addressed in the DCP.

As required by Chapter 9.55, Architectural Review Board (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 District.

Regarding lighting and glare, the following sections of the Zoning Ordinance apply to the Project site:

Section 9.21.080 Lighting:

Shielding: "All lighting fixtures shall be shielded as to not produce obtrusive glare onto the public right-of-way or adjacent properties. All luminaries shall meet the most recently adopted criteria of the Illuminating Engineering Society of North American for "Cut Off" or Full Cut Off" luminaries.

Light Trespass: "Lighting may not illuminate other properties in excess of a measurement of 0.5 foot-candles of light.'"

Section 9.21.120 Reflective Materials:

"No more than twenty-five percent of the surface area of any façade on any new building or addition to an existing building shall contain black or mirrored glass or other mirror-like material that is highly reflective. Materials for roofing shall be of a non-reflective nature."

Santa Monica Municipal Code. Other sections of the SMMC address the aesthetics of facilities and the public right of way:

Section 7.06.030: "The City Council finds and determines that it is in the interest of the City of Santa Monica to establish regulations to manage the installation of facilities in or along the PROW...The large number and variety of these uses make management of the PROW necessary in order to preserve and to maintain the public health and welfare. Accordingly, this PROW Management Ordinance is adopted:

(3) To preserve view corridors, to discourage visual blight and clutter and to encourage aesthetic placement of facilities.

(6) To ensure the structural integrity, reliability, performance, safety, quality, ease of maintenance, and aesthetic integrity of the PROW.”

Section 07.06.270: “The applicant/permittee shall maintain all facilities installed in the PROW in a condition which maintains the safety, integrity, and aesthetics of the PROW and the facilities, including, but not limited to: all landscaping installed must be properly and regularly maintained; graffiti and posters must be removed within forty-eight hours after written notification to the permittee; and aboveground cabinets and other aboveground facilities shall not appear to be unkempt.”

In addition, tree protection and maintenance measures are provided in Chapter 7.40, which constitutes the City’s Tree Code:

Section 7.40.110.a: “No person shall remove, cut, trim, prune, plant, or interfere with any tree, shrub, or plant upon any public street, sidewalk, parkway, alley, or other public property without having first obtained a City permit authorizing such work. The permit may be granted on the condition that the owner or authorized representative bears the cost of the permitted work and on the condition that the owner or authorized representative bears the cost of replanting any tree, shrub, or plant.”

Section 7.40.160: “During the erection, repair, alteration or removal of any building, house, or structure in the City, any person in charge of such work shall protect any tree, shrub or plant in any street, sidewalk, parkway, alley or other public property within the City in the vicinity of such building or structure with sufficient guards or protectors as to prevent injury to the tree, shrub or plant arising out of or by reason of said erection, repair, alteration or removal.”

City of Santa Monica Urban Forest Master Plan 2017. The trees in any public street or public place in Santa Monica are collectively referred to as a Community Forest and are managed by the City’s Department of Public Works Public Landscape Division. The City’s Urban Forest Management Plan (UFMP) includes objectives to enhance the urban forest, promote conservation of tree resources, maintain trees in a healthy condition, ensure optimum tree planting, and public education. City Public Landscape Division staff reviews and field checks construction plans for street tree code requirements to ensure protection of street trees and review and field check landscape plans as well. The UFMP states that the best option for existing public trees is to retain them in their existing locations. However, relocation and/or replacement of public trees may be considered as part of new City public improvement projects. All tree relocations are subject to review and approval by the City Council upon completion of each project’s community design and commission review process.

3.1.1.3 Impact Assessment and Methodology – Aesthetics

Thresholds for Determining Significance

CEQA Section 21099 – as amended by SB 743 – states that the impacts to aesthetic and visual resources shall not be considered significant effects on the environment if:

- The project is a residential, mixed-use residential, or employment center project; and
- The project is located on an infill site within a TPA.

The Downtown – which encompasses the Project site – is classified as a TPA; therefore, the potential impacts to aesthetics and visual resources associated with the proposed Project are not considered significant and an analysis of these impacts is not required pursuant to CEQA. An analysis has been included herein to provide decision-makers and the public a comprehensive review of the aesthetic effects of the proposed Project for planning purposes.

Consistent with Appendix G of the CEQA Guidelines, the EIR considers whether:

- a) The project would have a substantial adverse effect on a scenic vista;
- b) The project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway;
- c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?; and/or
- d) The project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Methodology

This section analyzes the potential effects of the proposed Project on aesthetics and visual resources of the Project site and vicinity. This assessment addresses the whole of the Project once installed onsite. Construction of the proposed Project would have temporary effects to aesthetic and visual resources and is further discussed in Section 3.3, *Construction Effects*.

The analysis includes fieldwork and visual reconnaissance of the Project site, notes and photographs of existing visual resources (e.g., trees, buildings, and view corridors, etc.), analysis of the Project site's relationship to the surrounding community, and the City's existing policy

framework for protecting visual resources. Field notes and photographs of existing visual resources of the Project site and vicinity are used to support this analysis. This information was utilized to identify important visual resources present on the Project site and in the vicinity.

Scenic Vistas and Scenic Resources

This analysis focuses on changes to public views. The public view assessment depends upon the sensitivity of the resource, as supported by public testimony, viewer susceptibility, viewing conditions (e.g., angle of view, distance, and primary viewing directions), degree of change and visual contrasts to surroundings. These could include changes to existing features that no longer appears characteristic of the Project site or development that substantially or entirely blocks public scenic views or remove key aesthetic features. Effects on private views are typically not considered under CEQA (Public Resources Code Section 21082.2). CEQA case law has established that only public views, not private views, need be analyzed under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal. App. 4th 720, the court determined that “we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188, “[all] government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general.”

To evaluate potential changes to visual resources, Key Viewing Areas (KVAs) were identified. KVAs were selected to provide representative locations from which the Project would be seen from public sidewalks, streets, and recreational resources in the Project vicinity (refer to Figure 3.1-2). Each KVA was photographed to establish the existing visual condition from the selected public location. Photosimulations of the Project’s 3D model were prepared in place within each KVA to provide a “before and after” representation for analysis. The KVA analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm. KVAs are then reviewed in the context of Project site plans, architectural renderings, a 3D model of the proposed Project and elevations which are used to determine whether the proposed Project may substantially degrade or conflict with the existing visual character of the site and Project vicinity.

The following KVAs were selected for analysis (refer to Figure 3.1-2 for KVA locations).

KVA 1: Santa Monica Pier

This KVA represents distant views of the Project site within the context of the surrounding urban development along Ocean Avenue. The Santa Monica Pier was selected as a KVA due to its designation as a scenic corridor in the City's General Plan Scenic Corridors Element (1975) and because it allows for consideration of changes to the visual character of the western edge of the Downtown. The pier is a main attraction within the City and would provide a clear line-of-sight for the thousands of tourists and residents who visit the pier every day.

KVA 2: Ocean Avenue between Santa Monica Boulevard and Broadway

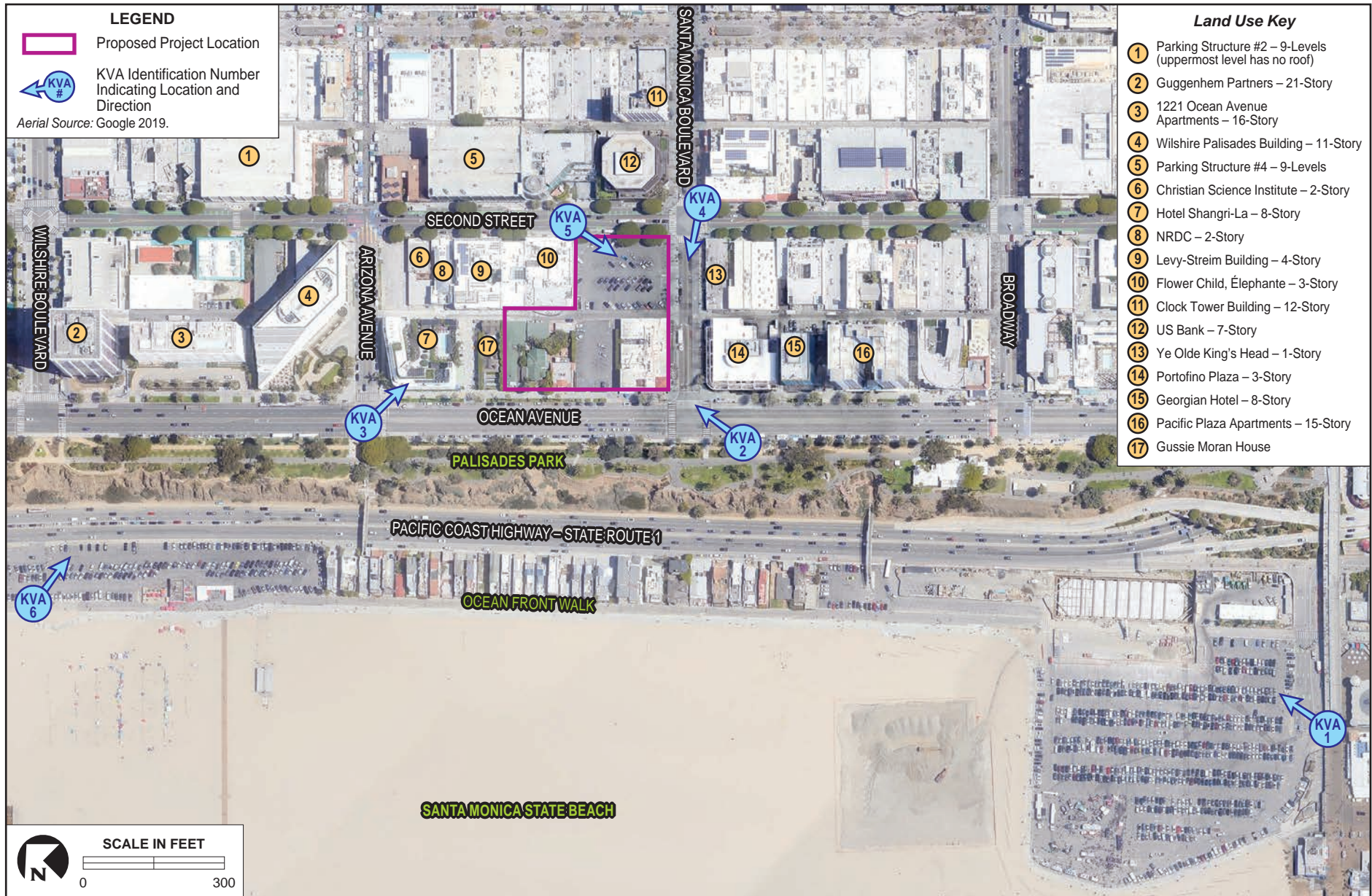
This KVA represents a view of the Project site from the public sidewalk on the west side of Ocean Avenue near its intersection with Santa Monica Boulevard. The KVA is located on the edge of Palisades Park, approximately one half of a City block south of the proposed Project's 350-foot frontage along Ocean Avenue. This KVA was selected because it provides a clear view of the Project site experienced by pedestrians walking north along Ocean Avenue, a City-designated scenic corridor, parallel to the Project site. This KVA also provides a representative view of the Project site from Palisades Park, a City-designated landmark and an important visual resource within the Downtown.

KVA 3: Ocean Avenue and Arizona Avenue Intersection

This KVA represents a view of the Project site from the public sidewalk on the west side of Ocean Avenue near its intersection with Arizona Avenue. This KVA was selected because it provides a view experienced by vehicles, cyclists, and pedestrians heading south towards the Santa Monica Pier along Ocean Avenue, a City-designated scenic corridor. As with KVA 2, this KVA also provide a representative view of the Project site from Palisade Park.

KVA 4: 2nd Street and Santa Monica Boulevard intersection

This KVA represents views of the southeast corner of Project site from the intersection of Santa Monica Boulevard and 2nd Street. This KVA was selected because it provides a clear view of the existing onsite surface parking lot, two-story mixed-use restaurant and residential building at 101 Santa Monica Boulevard, street trees, sidewalks, and metered on street parking. This KVA also affords views of Palisades Park and the Pacific Ocean serving as a backdrop to the Project site.



KVA 5: 2nd Street at northern edge of Project boundary

This KVA represents views of the Project site from 2nd Street between Arizona Avenue and Santa Monica Boulevard. Similar to KVA 4, 2nd Street adjacent to this location currently supports moderate pedestrian traffic and heavy auto traffic and was selected because it affords a clear view of the eastern edge of the Project site.

KVA 6: Heading south on Ocean Front Walk Bike Path

This KVA represents views of the Project site from Ocean Front Walk Bike Path that runs along the edge of the beach off PCH. This KVA was selected because it provides a clear view of the open sky above the Project site surrounded by the Santa Monica skyline including high-rise buildings along Ocean Avenue.

Consistency with Applicable Regulations and Policies Governing Scenic Quality

The analysis focuses on changes from existing conditions as they would be experienced by public viewers in the Downtown. As feasible, this assessment quantifies the potential changes to visual resources (i.e., change in building heights, setbacks, and distances), but by the nature of this resource, aesthetic effects are addressed qualitatively where quantification was determined to be infeasible or unreliable. The changes to visual character are also discussed in the context of major pending public and private developments within the vicinity of the Project site as well as existing applicable regulations and policies governing scenic quality.

A comprehensive analysis of policy consistency is provided in Section 3.10, *Land Use and Planning*. This analysis describes consistency with all the applicable goals and policies – including policies governing scenic quality – of the following long-range planning documents:

- City of Santa Monica General Plan;
- City of Santa Monica Land Use and Circulation Element;
- City of Santa Monica Downtown Community Plan;
- City of Santa Monica Local Coastal Plan (LCP) Land Use Plan (LUP); and
- California Coastal Act (Coastal Act).

This analysis includes a rigorous discussion of consistency with development standards, including DCP design guidelines and LCP LUP guidelines for designated scenic corridors and vantage points and signs and lighting.

Based on the side-by-side comparisons, it is determined whether the proposed Project would be substantially consistent with the objectives of these regulations and plans. A proposed Project that does not implement a particular policy or regulation, would not necessarily result in a conflict or

an impact. Many of these programs must be implemented by the City itself over time, and over a broad area, therefore the focus of the consistency analysis is to ensure that proposed development projects do not preclude the City from implementing relevant plans and policies. Further, if a conflict is identified in association with the proposed Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given policy or regulation would foreseeably result in a physical impact on the environment.

Light/Glare

The analysis of light/glare changes reviews the new light/glare sources that would be introduced under the proposed Project and determines whether light/glare would substantially affect views. A key element in this assessment methodology involves consideration of the existing light/glare standards in the City's Zoning Ordinance and the design guidelines that would regulate light/glare in the Downtown.

3.1.1.4 Applicable Mitigation Measures from the DCP Program EIR

The DCP Program EIR does not include any applicable mitigation measures for potential effects on aesthetics and light/glare associated with the proposed Project.

3.1.1.5 Project Impacts and Mitigation Measures – Aesthetics

<i>Would the project have a substantial effect on a scenic vista?</i>

VIS-1 The proposed Project would not substantially change public scenic vistas along Ocean Avenue, Santa Monica Boulevard, and 2nd Street in Downtown Santa Monica during construction or operation.

Impact Description (VIS-1)

Construction Effects

The proposed Project 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. After demolition and site clearing, the Project site would be excavated to a depth of approximately 35 to 40 feet below the existing grade for the three-level subterranean parking garage. Following the development of the subterranean parking garage, the Hotel Building, Second Street Building, Santa Monica Boulevard Building, Corner Building, and the Cultural Use Campus would be constructed. The two City-designated Landmarks located on the Project site would be rehabilitated and relocated onsite for incorporation into the proposed Cultural Use Campus (refer to Section 2.7, *Construction Activities*). During the 3-year construction period, views of the Project site would

include construction fencing, construction staging areas and construction equipment onsite, demolition debris piles, excavation for the subterranean parking garage, and scaffolding and new construction. Following the completion of construction, the Project site would be characterized by five new buildings ranging in height from 53 feet to 130 feet separated by landscaped ground-level paseos, courtyards, and a pedestrian breezeway (refer to Section 2.5, *Project Overview*).

During construction, the proposed Project would primarily affect the viewers adjacent to the Project site, including those walking along Ocean Avenue, Santa Monica Boulevard, and 2nd Street. Additionally, viewers within Palisades Park would also be able to see the construction activities. For example, the Project site would be visible for approximately 0.40 miles between Broadway to the south and Arizona Avenue to the north. For the average pedestrian walking 3.1 miles per hour, the construction site would be visible for less than 10 minutes. The Project site would be visible by bicyclists for an even shorter duration. This limited visual effect would constitute a temporary visual distraction typically associated with construction activities and equipment, which are common in Downtown.

Operation Effects

East-west streets in the Downtown – including Santa Monica Boulevard – provide channelized westward-looking views of Palisades Park and the Pacific Ocean. These public views are typically framed by existing buildings with occasional glimpses across limited surface parking areas. The effect of urban development along these east-west streets – including the proposed Project located on the northern side of Santa Monica Boulevard – further focuses views along the existing street grid. However, many of the east-west views along Santa Monica Boulevard are already obstructed by street trees, parked vehicles, and cross traffic along Ocean Avenue. The proposed development – including the Second Street Building, Santa Monica Boulevard Building, and the Corner Building along Santa Monica Boulevard, would not diminish views of scenic vistas along east-west streets. The sidewalks along Santa Monica Boulevard would meet or exceed the DCP setback requirements of 18 feet and Santa Monica Boulevard would continue to provide views of Palisades Park and the Pacific Ocean

Inland north-south streets in the Downtown – including 2nd Street – provide distant views of the Santa Monica Mountains to the north. However, such views are barely perceptible and are insubordinate relative to the broader views of urban development. As described Section 3.1.1.3, *Existing Setting – Aesthetics*, 2nd Street and 1st Court provide an approximately 100-foot wide view to the west across the existing surface parking lots. While the ocean is visible across these parking lots, this view is often obscured by parked vehicles both in the surface parking lots as well as the metered on-street parking spaces along Ocean Avenue. Further, for the average pedestrian walking

3.1 miles per hour, views of the ocean would be available for less than 1 minute. The view would be available for bicyclists and vehicles for an even shorter duration.

Ocean Avenue and Palisades Park provide the most valued scenic views of the Pacific Ocean, Santa Monica Pier, and the beach areas. Ocean Avenue is designated as a scenic corridor, as defined by the City's Scenic Corridors Element of the General Plan (1975) (see Impact VIS-2), due to its bluff-top setting adjacent to Palisades Park as well as its unique streetscape fronting a mix of modern and historic building styles (City of Santa Monica 2017).

The proposed Project would redevelop the existing low-lying commercial buildings and associated parking lots into an iconic high-rise mixed-use property with public paseos, plazas, and ground-floor commercial and cultural uses. The proposed Project would preserve the character defining features of the two City-designated Landmarks located at 1333 Ocean Avenue and 1337 Ocean Avenue. The proposed Project would construct five new buildings ranging in height from 53 feet to 130 feet separated by landscaped ground level pedestrian-only paseos and a pedestrian breezeway. This visual transformation would be consistent with the character of the surrounding development fronting Ocean Avenue, Santa Monica Boulevard, and 2nd Street. The following analysis includes descriptions of the selected KVAs described under Section 3.1.1.3, *Impact Assessment and Methodology* and summarizes the changes to visual character that would result from the proposed Project.

KVA 1: Santa Monica Pier

KVA 1: Existing development at the Project site includes low-rise buildings obscured by existing Mexican palm trees. The Project site is framed by high-rise buildings. The proposed Project would rise above the adjacent one-to three-story buildings and the Mexican fan palm trees in the mid-ground, but would be similar in height and scale to the adjacent eight-story Shangri-la Hotel and 11-story Wilshire Palisades Office Building. Additionally, it would be much smaller than the 21-story 100 Wilshire Office Building located approximately 850 feet to the north (background), the 15-story Pacific Plaza Apartments (foreground), and other multi-story structures visible from this KVA. Source: VIZf/x 2019.



KVA 1 represents distant views of the Project site and the surrounding Downtown skyline from the popular Santa Monica Pier. This KVA – near the Bubba Gump Shrimp Co. restaurant at the base of the pier – includes foreground views of the sand, mid-ground view of large Mexican fan palms along the Palisades Bluffs, and background views of Downtown development and the distant Santa Monica Mountains. Views of the open sky above the existing Project site are also

provided from the deck of the Santa Monica Pier, which is located approximately 0.35 miles to the southwest.

The KVA frames a pocket of low-lying commercial buildings surrounded by multi-story commercial and residential development – including the 21-story 100 Wilshire Office Building, 11-story Wilshire Palisade to the north, and the 15-story Pacific Plaza Apartments.

The proposed Project would be visually prominent from this KVA, rising above the existing Mexican fan palm trees along Ocean Avenue in the mid-ground. The proposed Project's 12-story, 130-foot-tall Hotel Building would be substantially taller and larger than the existing one- to three-story commercial and residential buildings currently onsite, as well as the adjacent three-story buildings. However, these low-rise buildings are not visible from the Santa Monica Pier beyond the existing Mexican fan palm trees. The existing City street trees within the public right-of-way, including the mature Canary Island date and Mexican fan palm trees along Ocean Avenue, would remain and would be protected during Project construction in accordance with requirements of the City's Tree Code and UFMP.

Although the height and mass of the proposed Project would be greater than what currently exists onsite, the proposed Project would remain within the overall context of existing and pending development in the Downtown, where mixed-use developments at heights up to and above 130 feet are common. Therefore, the proposed Project would not substantially change or degrade the character or quality of the Project site and its surroundings when viewed from this KVA.

KVA 2: Ocean Avenue and Broadway intersection

KVA 2: Views of the proposed Project from the Ocean Avenue and Broadway intersection would be partially screened by mature street trees. The proposed building would rise up to 130 feet tall and would incrementally change the visual character and views of this KVA. However, the existing mature street trees would soften views of the buildings and the height, bulk, and scale of the Project would be consistent with existing multi-story development in the Project vicinity and throughout the Downtown. Source: VIZf/x 2019.



KVA 2 provides a view of the Project site from the northwest corner of Ocean Avenue and Broadway facing north toward Santa Monica Boulevard. The KVA is dominated by the existing multi-story mixed-use and commercial buildings with their impermeable façade directly facing the public sidewalk. Ocean Avenue is characterized by wide sidewalks, a five-lane street with on-

street metered parking, Palisades Park landscaped with Canary Island dates, Mexican fan palms trees, other street trees, and background views of the multi-story office and residential buildings north of the Project site. The mature street trees that line Ocean Avenue are a dominant visual feature from this KVA, providing shade and greenery and blocking some views of the existing Project site.

The proposed Project would construct five new buildings onsite that would range in maximum height from 53 feet to 130 feet (excluding permitted rooftop projections), which would be consistent with existing views from this KVA. The proposed Project would also enhance the streetscape character of Ocean Avenue by providing pedestrian-oriented ground floor commercial uses, including transparent street frontages, widened sidewalks, and a landscaped public courtyard fronting Ocean Avenue. While the proposed Project would eliminate onsite landscaping, the mature trees along Ocean Avenue would be preserved and would continue to provide shade and visual benefits associated with the dense canopy and foliage. Since the proposed Project would activate and improve the pedestrian character of the Ocean Avenue public realm, it would not substantially degrade the visual character or quality of the Project site and its surroundings when viewed from this KVA.

KVA 3: Ocean Avenue and Arizona Avenue intersection

KVA 3: Views along the Project's Ocean Avenue frontage from Arizona Avenue are framed by mature street trees, the eight-story Shangri-La Hotel (foreground) and the eight-story Georgian Hotel and 15-story Pacific Plaza Apartments (background). The Project would be visible along the Ocean Avenue, but would be consistent with existing surrounding development and would continue to be partially shielded from view by the existing mature street trees. Source: VIZf/x 2019.



Views from KVA 3 near the southwest corner of Ocean Avenue and Arizona Avenue are framed by tall Canary Island date trees lining Ocean Avenue, the eight-story Hotel Shangri-La building in the foreground, and the 15-story Pacific Plaza Apartments building in the background. Views of the Project site from this KVA are limited in places due to existing palm trees and landscaping. The existing frontage along Ocean Avenue is characterized by low-lying shrubs, white fencing,

and an open surface parking lot. The proposed Cultural Use Building and Hotel Building would be visible beyond the canopy of the street trees lining Ocean Avenue.

Specifically, the frontage along Ocean Avenue would change as the surface parking lot and opaque white walls of the City-designated landmark buildings would be reconfigured and incorporated into a 35,500-sf Cultural Use Campus. Five new buildings would be constructed anchored by the 12-story Hotel Building. Pedestrian improvements, including wider sidewalks, landscaped pedestrian paseos, outdoor seating areas, and a public courtyard on the corner of Ocean Avenue and Santa Monica Boulevard would activate the ground floor commercial uses (e.g., private outdoor dining) and help to create a more pedestrian-friendly environment along these streets. Proposed building height and mass would be compatible with the scale and design of the adjacent eight-story Georgian Hotel, 15-story Pacific Plaza Apartments mixed-use building, and seven-story office building east of the site. The proposed Project would preserve and protect the trees along Ocean Avenue. These existing street trees would be augmented by the proposed Project's onsite landscaping on the ground level. Therefore, the proposed Project would not substantially degrade the character or quality of a scenic vista. Overall, the proposed ground floor streetscape and frontage improvements along Ocean Avenue would improve the scenic experience on Ocean Avenue.

KVA 4: 2nd Street and Santa Monica Boulevard intersection

KVA 4: Views along Santa Monica Avenue are characterized by the multi-story mixed-use buildings (right) and the opaque façade of the existing two-story restaurant and residential building onsite. A channelized view of the Pacific Ocean is visible when looking west through Palisades Park, and this view along Santa Monica Boulevard is influenced by ocean effects (e.g., fog), which imparts a coastal aesthetic to the climate in this KVA. The Project would reduce access to open sky, but would not obstruct existing views along Santa Monica Boulevard and would be consistent with multi-story development in the vicinity. Source: VIZf/x 2019.



Views of the Project site from KVA 4 include the existing two-story mixed-use restaurant and residential building at 101 Santa Monica Boulevard along with the surface parking lot on the northwest corner of 2nd Street and Santa Monica Boulevard. The Pacific Ocean and Palisades Park are visible across the Project site from KVA 4, particularly from the north side of Santa Monica Boulevard. This KVA also includes views of the low-lying mixed-use restaurant and retail

buildings south of the Project site, as well as the green-painted Class II (i.e., striped) bicycle lanes and mature Indian laurel figs on 2nd Street.

Implementation of the proposed Project would substantially alter existing views of the Project site from this KVA. The existing three-story structure at 101 Santa Monica visible from this KVA would be replaced by views of the proposed 2nd Street Building, Hotel Building, and a portion of the Santa Monica Boulevard Building, with articulated façades and ground floor restaurant and retail uses and outdoor seating. Although substantially taller than the existing one- to three-story buildings in the vicinity, the height of the proposed Project would be generally compatible with existing multi-story buildings along Santa Monica Boulevard, 2nd Street, and Ocean Avenue in the Project vicinity and throughout the Downtown. The proposed Project would reduce access to open sky but would not obstruct existing views of the Pacific Ocean along Santa Monica Boulevard when looking west through Palisades Park. Therefore, while the height of the proposed Project would be greater than existing conditions, the proposed Project would not substantially degrade the character or quality of a scenic vista when viewed from this KVA, as proposed ground floor streetscape and frontage improvements along Santa Monica Boulevard and 2nd Street would improve the visual character and pedestrian experience on along the Project site's frontage.

KVA 5: 2nd Street at northern edge of Project Boundary

KVA 5: Views of the proposed Project from 2nd Street would be partially screened by mature street trees. The proposed building would rise up to 130 feet tall and would change the visual character and views of this KVA. However, the existing mature street trees would soften views of the buildings and the height, bulk, and scale of the proposed Project would be consistent with existing multi-story development in the Project vicinity and throughout the Downtown. Source: VIZf/x 2019.



Views from KVA 5 include the existing surface parking lot on the corner of 2nd Street and Santa Monica Boulevard, the three-story structure at 101 Santa Monica Boulevard, and the multi-story

structures adjacent to and south of the Project site across Santa Monica Boulevard. Palisades Park and the Pacific Ocean are also visible when looking through the Project site from this KVA. Buildout of the proposed Project would dramatically change the frontage along 2nd Street as open views above the surface parking lot would be replaced by views of the Second Street Building up to 111 feet in height and vehicle exit lanes from the reconfigured 1st Court and subterranean parking garage. Views of Palisades Park and the Pacific Ocean would no longer be visible from KVA 5 with Project implementation. However, as previously described for 2nd Street and 1st Court, these views of Palisades Park and the Pacific Ocean are distant, often obscured by parked cars, and are only visible for a short duration by pedestrians, bicyclists, and vehicles traveling in a north-south direction. As described in KVA 4, it should be noted that east-west views of the ocean and the open sky would remain along Santa Monica Boulevard. Additionally, higher quality views of the beach, ocean, and open sky would remain along Ocean Avenue and Palisades Park.

The Project would provide visual interest with design elements that would add varied composition and texture to the Second Street Building. Each of the three building forms within the Second Street Building would decrease in floor area with each level from bottom to top, creating terraces around each of the forms and setting back building façades to minimize the effect of the building's perceived height from the pedestrian perspective at street level. Additionally, pedestrian improvements, including wider sidewalks, outdoor seating areas, and landscaping would help to create a more pedestrian friendly environment along 2nd Street. The pedestrian-focused, ground floor commercial uses with transparent street frontages along 2nd Street would improve the streetscape appearance from this KVA.

KVA 6: Heading south on Ocean Front Walk Bike Path

KVA 6: Views along the Ocean Front Walk Bike Path are characterized by the tall multi-story structures lining Ocean Avenue above the coastal bluffs. While the existing Project site is not visible, the view along the Ocean Front Walk Bike Path is influenced by the open sky above the City skyline, which imparts a coastal aesthetics to the climate in this KVA. The Project would not reduce access to open sky nor obstruct existing views from this KVA, and would be consistent with multi-story development in the vicinity. Source: VIZI/x 2019.



KVA 6 represents distant views of the Project site and the surrounding skyline from the Santa Monica State Beach Ocean Front Walk Bike Path facing southeast toward the Palisades Bluffs (visible) and Ocean Avenue (not visible). This KVA includes views of the ocean bluffs, mature

trees along Palisades Park, the tall structures up to 21 stories in height along Ocean Avenue, and the open sky above from approximately 0.22 miles northwest of the Project site.

The Project site resides in a pocket of low-lying commercial buildings surrounded by multi-story residential and commercial development. Fore and background views of the multi-story residential and commercial buildings along Ocean Avenue are visible within this KVA. The proposed Project, particularly the 130 foot 12-story Hotel Building, would be substantially taller and larger than the existing one- to three-story commercial buildings onsite and would be visible from this KVA. Although the proposed Project's height and mass would be greater than what currently exists onsite, the proposed Project would not be out of context with existing and pending development in the Downtown, where mixed-use developments at heights up to 130 feet are common.

Summary of Impacts on Scenic Vistas

Except for the Project site itself, views of existing development along Ocean Avenue – including high-rise buildings – would not be substantially obscured or otherwise impacted during or construction or following development the proposed Project (see Impact VIS-3). The Project site is set amongst a line of taller buildings with varying architectural styles, bulk, colors, and setbacks from the public sidewalks. Given this developed setting, views of existing development fronting Ocean Avenue would not be substantially obscured or changed by the proposed Project. Rather, the proposed Project, including the 130-foot-tall Hotel Building, would be consistent in height, scale, and facade with the high-rise development fronting Ocean Avenue currently. For example, the 100 Wilshire Office Building, located approximately 850 feet to the north is 300 feet in height. Similarly, the Pacific Plaza Apartments, located approximately 350 feet to the south reaches a total height of 180 feet. The Project would include a variety of structures to complement and complete this existing skyline along Ocean Avenue, and would not affect the existing roadway alignment, sidewalks, or streetscapes. Following the completion of development, the proposed Project – including the 12-story Hotel Building – would be visually consistent with the existing high-rise development along Ocean Avenue.

As described in Section 3.1.1.3, *Existing Setting – Aesthetics*, Palisades Park is valued for its broad vistas of the Pacific Ocean and the Santa Monica Mountains. From PCH, viewers can see the varied skyline along Ocean Avenue created by several tall buildings; shorter buildings (i.e., one to three stories) are not visible from PCH given the steep view angle up from the base of the Palisades Bluffs. Near the end of construction and following the completion of construction, upper levels of the proposed Project components (e.g., the 12-story, 130-foot-tall Hotel Building and portions of the Second Street Building, which rises to a maximum of nine stories and 111 feet) would be visible from PCH. Due to the developed nature of the Downtown and the existing high-rise

structures along Ocean Avenue (refer to Table 3.1-1), the Project would combine with the existing City skyline of buildings along Ocean Avenue. The incremental contribution of an additional taller structure within this skyline would not substantially alter existing views from PCH. While views of the Project site would be visible on the periphery for pedestrians and bicyclist traveling in a north-south direction, the views of the ocean and the mountains to the west would not be obscured or otherwise impacted by the proposed Project.

Once completed, the proposed Project would provide several public spaces with views of the Santa Monica Pier, Santa Monica State Beach, and Pacific Ocean. The proposed pedestrian paseos would create visual corridors through the Project site that would provide views of Palisades Park and the Pacific Ocean. Overall, the implementation of 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 Project would adhere to all standard City construction practices during construction area (e.g., fencing, lighting, etc.) to shield construction activities from public view. Additionally, the proposed Project would adhere to all development and design standards (e.g., building frontage standards) for increased building setbacks and maximum access to light and air. Therefore, effects on scenic vistas would be *less than significant*. Further, the Project would create a new public scenic vista on the rooftop observatory deck atop the Hotel Building, providing panoramic views of Santa Monica Bay, Santa Monica Pier, Palisades Park, and Downtown, with distant views of the Santa Monica Mountains. The proposed Project would create a new public vista onsite; currently, there are no public vistas atop buildings along Ocean Avenue. For additional analysis of representative views at the selected KVA, see Impact VIS-3.

Would the project 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?

Impact Description (VIS-2)

VIS-2 The proposed Project would adaptively reuse and relocate two existing City-designated Landmarks within the Project site. However, the proposed Project would comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and therefore, would not adversely affect scenic vistas or scenic resources, including trees, rock outcroppings, and historic buildings within a State scenic highway or locally designated scenic corridor.

As described in Section 3.1.1.1, *Environmental Setting – Aesthetics*, the Project site is currently developed with one- to three-story buildings, surface parking lots, and associated landscaping in the urbanized Downtown. Because the Project site is completely developed, no exposed ground surfaces – including rock outcroppings – exist onsite. Two of the commercial buildings are City-designated historic landmark buildings (see Section 3.4, *Cultural Resources*). There are no State-designated scenic corridors that may be affected by the proposed Project. PCH is eligible for State scenic highway designation, though it has not been formally designated (Caltrans 2019). Within the Project Site vicinity, Ocean Avenue from Bernard Way to the northern City boundary, the California Incline and the Santa Monica Pier are designated scenic corridors in the City’s LCP LUP.

The existing Project site is landscaped with low-lying shrubs, Mexican fan palms, and Indian laurel fig trees. Landscaping within the Project site would require removal during Project construction to facilitate demolition, excavation, and reconfiguration of the City-designated landmarks and construction of the proposed Cultural Use Campus. The proposed Project would also provide ground level and podium level landscaping to enhance the visual character and pedestrian experience surrounding and within the Project site. The Project would not remove the existing Mexican fan palm trees and other landscaping along the Ocean Avenue sidewalk.

The proposed Project would not result in substantial adverse effects to scenic resources visible from a State scenic highway or locally designated scenic corridor; therefore, visual effects would be *less than significant*.

Would the project conflict with applicable zoning and other regulations governing scenic quality?

VIS-3 The proposed Project would alter the visual character of the site and surrounding areas, but the change would be consistent with adopted DCP standards and policies for architectural design, massing, landscaping, and pedestrian orientation, and would be subject to design review by the City to ensure that the proposed Project would not visually degrade surrounding uses.

Impact Description (VIS-3)

The proposed Project would change the existing visual character of the Project site with the construction of five mixed-use buildings ranging in height from 53 feet to 130 feet that would replace the existing one- to three-story commercial and mixed-use buildings and surface parking lots. Although substantially taller and larger in mass than several buildings in the vicinity, the proposed Project would not detract from the visual character of the surrounding area. The proposed pedestrian paseos and public courtyard would provide mass relief and allow for passage of natural

sunlight and air through the Project site. The proposed Project's 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.

General Plan Land Use and Circulation Element

The proposed Project is compared to the applicable aesthetic policies of the LUCE in Table 3.1-2, Comparison of the proposed Project with Scenic Character Policies of the LUCE. As shown in Table 3.1-2, the proposed Project would be consistent with Citywide goals and policies regarding visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives. The Project would also be consistent with Downtown District goals and policies related to pedestrian character and compatibility of scale with existing buildings and the surrounding residential neighborhoods, lively streetscape with places for people to socialize, sidewalk walking/shopping, architectural elements and features, minimal at-grade parking, public art, and provision of landscaping and open space to create a visual connection to Palisades Park. Because the proposed Project would be consistent with applicable regulations that govern scenic quality, impacts would be *less than significant*.

Table 3.1-2. Consistency with LUCE and DCP Downtown District Policies

Policies	Project Consistency
LUCE Policies	
<p>Policy LU15.1 Create Pedestrian-Oriented Boulevards. Orient the City’s auto-dependent boulevards to be inviting avenues with wider sidewalks, improved transit, distinctive architecture, landscaping, trees, planted medians and neighborhood–friendly services— defining a new sense of place where local residents will be attracted to shop, work, live and play.</p>	<p>Consistent. The proposed Project would comply with building setback requirements of the DCP, expanding the existing sidewalk to a minimum of 15 feet along 2nd Street, 20 feet along Santa Monica Boulevard, and 18 feet along Ocean Avenue. The expanded sidewalks would improve walkability around the Project site and contribute to creating pedestrian-oriented boulevards within the Downtown District. Additionally, the proposed Project includes pathways through the Project site that would further contribute to the pedestrian friendly environment.</p>
<p>Policy LU15.3 Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City’s rich urban character.</p>	<p>Consistent. The proposed Project would be designed to reduce the visual mass and ensure compatibility with the urban character of the surrounding vicinity. The proposed buildings would be of varying heights and would decrease in floor area with each level from bottom to top, creating terraces around each building and creating articulation that would maximize outdoor area and minimize the potential impacts associated with the proposed mixed-use development from a pedestrian perspective. The proposed Project would create a more open and pedestrian-oriented environment with ground floor paseos and courtyards as well as widened sidewalks that would add to the pedestrian character of the Downtown. Lastly, the proposed Project would be subject to review by the ARB, Planning Commission, and City Council to ensure that the design of the proposed Project would be consistent with objectives and policies in the General Plan.</p>
<p>Policy LU15.4 Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.</p>	<p>Consistent. The proposed Project would create a more open and pedestrian-oriented environment by developing a mix of residential and commercial uses with open space, safe pedestrian access, and connectivity to the Downtown District community area. The proposed Project would provide two landscaped pedestrian-only paseos, a public courtyard, and a breezeway on the ground floor for pedestrian-only activities to increase connectivity within the Project site and to the surrounding area’s sidewalk system. Ocean Avenue and Santa Monica Boulevard’s building setbacks would meet DCP requirements of 20 feet and 18 feet, respectively. The sidewalk along 2nd Street adjacent to the Project site would be expanded to a minimum width of 15 feet. The mix of uses would further contribute to the surrounding pedestrian environment. The Project site would be visually and physically permeable, through the use of ground-level open space to provide channelized views. Local community members as well as visitors would be able to access the site by a diverse range of multimodal transportation options including biking, walking, and the Downtown Santa Monica Station.</p>

Table 3.1-2. Consistency with LUCE and DCP Downtown District Policies (Continued)

Policies	Project Consistency
<p>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.</p>	<p>Consistent. As discussed in Policy LU15.4, the proposed Project would provide safe pedestrian access through and around the site via expanded sidewalks, pedestrian paseos connecting through the site, and 22,407 sf of ground-level open space on the Project site. The proposed Project would also include at a minimum of 231 bicycle parking spaces for residents, employees, and visitors. Bicycle facilities would include a bicycle repair center as well as lockers and shower facilities.</p>
<p>Policy LU15.7 Street-Level Pedestrian-Oriented Design. Buildings in the mixed-use and commercial areas should generally be located at the back of the sidewalk or the property line (street front) and include active commercial uses on the ground floor. Where a residential use occupies the ground floor, it should be set back from the property line, be located one half level above the street or incorporate design features to provide privacy for the unit. Front doors, porches and stoops are encouraged as part of orienting residential units to the street.</p>	<p>Consistent. The proposed Project would create a more pedestrian-oriented building design by removing existing commercial, residential, and parking lot development and providing a new mixed-use development, including ground floor retail and restaurant uses with residences located on above-ground levels. Project site uses would be accessible from ground-level open spaces including a public courtyard fronting the proposed Cultural Use Campus; a north-south oriented ground floor pedestrian-only paseo (Santa Monica Boulevard Paseo); an east-west oriented ground floor pedestrian-only paseo (Ocean Avenue Paseo); and a ground floor pedestrian breezeway (between the Corner Building and Santa Monica Boulevard Building). At these locations, visitors, employees, and residents would be able to access a mix of site uses.</p>
<p>Policy LU15.8 Building Articulation. Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.</p>	<p>Consistent. The proposed Project would employ a variety of architectural techniques and materials to reduce visual bulk and create compatibility with development in the vicinity. The design separates the massing and programmatic components (e.g. hotel and cultural uses) into distinct buildings separated by landscaped pedestrian paseos to allow various access points throughout the site. Each of the proposed buildings feature a contemporary design with modulated façades to provide visual interest. Building design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the Landmarks Commission and/or the ARB. The Project site has the potential to include sources of glass associated with windows used in the façade of structures; however, the proposed Project would comply with SMMC Section 9.21.120, which limits reflective materials to no more than 25 percent of a façade's surface area and prohibits black or mirrored glass.</p>

Table 3.1-2. Consistency with LUCE and DCP Downtown District Policies (Continued)

Policies	Project Consistency
Policy LU15.9 Pedestrian-Oriented Design. Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.	Consistent. Refer to the discussion of consistency with Policy LU15.7. The proposed Project would incorporate a pedestrian scale design including widened sidewalks, building entrances at grade, and ground-level open spaces.
Policy LU15.10 Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.	Consistent. The proposed Project would employ a range of architectural techniques, materials, and building heights to ensure consistency with the visual appeal of the Downtown District. The proposed buildings would vary in height from 53 feet to 130 feet. The proposed Project would be in compliance with the maximum heights allowed for the Project site per the DCP.
Policy LU15.11 Building Facades and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the façade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the general public. Guidelines or standards for the building mass above the streetwall shall be established in the zoning ordinance.	Consistent. Buildings on the Project site would step back with each level from bottom to top, creating terraces around each of the buildings and setting back building facades to minimize the effect of building's perceived height from a pedestrian perspective. The configuration of the buildings on the Project site as well as individual structures have been designed to maintain access to natural light and ocean breezes to provide view corridors toward the ocean through the Project site via the Ocean Avenue Paseo and the public courtyard.
Policy LU16.1 Design Buildings with Consideration of Solar Patterns. In designing new buildings, consider the pattern of the sun and the potential impact of building mass on habitable outdoor spaces and adjacent structures in order to minimize shadows on public spaces at times of the day and year when warmth is desired, and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.	Consistent. The proposed Project considers solar patterns in its design to allow light to penetrate the interior spaces between the proposed structural elements and the rooftops. There are no public gathering outdoor spaces such as parks within the vicinity of the Project site that would be shaded by the proposed Project. However, the commercial and residential uses located to the north of the Project site currently have full solar access due to the existing low-lying buildings. While the design of the proposed Project would retain some solar access for these habitable outdoor spaces, some areas and private balconies will experience periods of shading as a result of the Project. Refer to Section 3.1.2, <i>Shade and Shadow Effects</i> for further discussion of potential impacts to shade/shadows and solar access.
Policy LU17.1 New Facilities. Encourage new ground level open space including, but not limited to landscaped areas, gathering spaces, and play areas in new development.	Consistent. Refer to the discussion of consistency with Policy LU15.12 Ground Floor Gathering Spaces.

Table 3.1-2. Consistency with LUCE and DCP Downtown District Policies (Continued)

Policies	Project Consistency
DCP Downtown District Policies	
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.	Consistent. The proposed Project would include contemporary facade design, pedestrian-oriented streetscapes, public paseos and open space, a landscaped courtyard, 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.
Policy D8.2 Scale buildings to the pedestrian to create an intimate sidewalk walking/shopping experience. Incorporate enhanced materials and detailing in ground floor façades where they will be perceived by passing pedestrians.	Consistent. The design of the proposed Project would create a human-scale experience at the ground-level. Specifically, the proposed Project incorporates ground-level retail/restaurant uses and a Cultural Use Campus. Public entrances would be oriented towards widened sidewalks and along site pedestrian-only paseos. The use of a range of building heights and sizes would provide an attractive appearance along with the incorporation of design approaches consistent with the surrounding area, while contemporary design with modulated façades to provide visual interest. Additionally, buildings on the Project site would decrease in floor area with each level from bottom to top, creating terraces around each of the buildings and setting back building facades to minimize the effect of the building's perceived height from a pedestrian perspective.
Policy D8.3 Design buildings with a variety of heights, architectural elements and shapes to create visual interest along the street. Walls should have meaningful combinations of materials, and articulation that creates shadow patterns to engage the eye.	Consistent. The proposed buildings would range in height from 53 feet to 130 feet. The proposed Project would employ a variety of architectural techniques and materials to reduce visual bulk and create compatibility with existing development in the vicinity. The proposed Project design is intended to add visual interest, while complementing the existing land uses in the Downtown District through building siting and orientation; building mass modulation; location of uses and program.
Policy D8.4 Avoid buildings with uniformly flat roofs or cornices in order to create an interesting skyline.	
Policy D8.5: Create a prescribed building envelope for new commercial or mixed-use buildings adjacent to residential districts with step backs to maintain the residential development's access to light and air.	Consistent. Refer to the discussion of consistency with Policy LU15.11.
Policy D8.6 Limit ground floor uses mostly to active retail with generally continuous, transparent (non-tinted) display windows facing the sidewalk.	Consistent. The proposed Project would include ground-level retail/restaurant uses that would face the major boulevards adjacent to the Project site (Santa Monica Boulevard, Ocean Avenue, and 2 nd Street) as

Table 3.1-2. Consistency with LUCE and DCP Downtown District Policies (Continued)

Policies	Project Consistency
	well as the onsite public open spaces. These proposed uses would activate the sidewalks. Additionally, along Ocean Avenue, the proposed Project would include visitor-serving Cultural Use Campus facing sidewalks and onsite paseos to create pedestrian activity. The proposed Project would not consist of any office space.
Policy D9.3 Discourage open on-grade parking and on-grade parking visible from the street.	Consistent. All proposed parking would be provided onsite in a subterranean parking garage that would include up to 285 parking spaces.
Policy D9.4 Locate active retail space on a pedestrian street facing the sidewalk at the ground floor.	Consistent. Refer to the discussion of consistency with Policy D8.6.
Policy D9.6 Improve the aesthetic appearance of the alleys, and where appropriate incorporate the alleys into the pedestrian system.	Consistent. The proposed Project would include convert the southern half of 1 st Court to the Santa Monica Boulevard Paseo, providing additional pedestrian-only space lined by retail and restaurant uses.
Policy D10.2 With new development along the east side of Ocean Avenue, provide landscaping and open space to create a visual connection to Palisades Park.	Consistent. The proposed Project is located on the east side of Ocean Avenue and would include 22,407 sf of ground-level open space with attractive landscaping for visitor and local community member usage as well as the creation of visual corridors to Palisades Park and Santa Monica State Beach. Additionally, the proposed Project would include a 5,070-sf rooftop observation deck, which would be open to the public and provide panoramic views of the Santa Monica Mountains, Santa Monica Pier, and Palisades Park.

Downtown Community Plan

The proposed Project is compared to the applicable aesthetic objectives of the DCP in Table 3.1-3, Comparison of the proposed Project with applicable Aesthetics Objectives of the DCP. As shown in Table 3.1-3, the proposed Project would be consistent with applicable policies, impacts with respect to policies and regulations that govern scenic quality in the DCP would be *less than significant*.

Table 3.1-3. Consistency with DCP Objectives

Objectives	Project Consistency
<p>Objective 1 Maximize architectural integrity and quality.</p>	<p>Consistent. The proposed Project would be designed to complement the character, tone, and scale of surrounding development. The proposed buildings would range in height from 53 feet to 130 feet and would employ a variety of architectural techniques and materials to reduce visual bulk and create compatibility with existing development in the vicinity. The proposed Project design is intended to add visual interest, while complementing the existing land uses in the Downtown District through building siting and orientation; building mass modulation; location of uses and program. The design separates the massing and programmatic components into distinct buildings separated by landscaped pedestrian paseos to allow various access points throughout the site. Each of the proposed buildings feature a contemporary design with modulated façades to provide visual interest. Building design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the Landmarks Commission and/or the ARB.</p>
<p>Objective 2 Create human-scaled buildings that contribute to a pedestrian-oriented public realm.</p>	<p>Consistent. The design of the proposed Project would create a human-scale experience at the ground-level. Specifically, the proposed Project incorporates ground-level retail/restaurant uses and a Cultural Use Campus. Public entrances would be oriented towards widened sidewalks and along site pedestrian-only paseos. The use of a range of building heights and sizes would provide an attractive appearance along with the incorporation of design approaches consistent with the surrounding area, while contemporary design with modulated façades to provide visual interest. Additionally, the proposed buildings on the Project site would decrease in floor area with each level from bottom to top, creating terraces around each of the buildings and setting back building facades to minimize the effect of the building's perceived height from a pedestrian perspective.</p>
<p>Objective 3 Create visual interest and variety in building and landscape design along every street.</p>	<p>Consistent. The proposed Project would provide visual interest with design elements that would add varied composition and texture to the Second Street Building. Each of the three building forms within the Second Street Building would decrease in floor area with each level from bottom to top, creating terraces around each of the forms and setting back building façades to minimize the effect of the building's perceived height from the pedestrian perspective at street level. Additionally, pedestrian improvements, including wider sidewalks, outdoor seating areas, and landscaping would help to create a more pedestrian friendly environment. Each of the proposed buildings feature a contemporary design with modulated façades to provide visual interest. Building design remains</p>

Table 3.1-3. Consistency with DCP Objectives (Continued)

Objectives	Project Consistency
	conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the Landmarks Commission and/or the ARB.
Objective 4 Animate building frontage on the ground floor to create an inviting public realm.	Consistent. Following the completion of construction, the Project site would be characterized by five new buildings ranging in height from 53 feet to 130 feet separated by landscaped ground-level paseos, courtyards, and a pedestrian breezeway. The proposed buildings would be designed in accordance with DCP standards, including those that address pedestrian friendly building frontages. Pedestrian-oriented retail and restaurant uses would be provided along Ocean Avenue, Santa Monica Boulevard, and 2 nd Street. In addition to open space, the Ocean Avenue and Santa Monica frontages would include outdoor dining areas.
Objective 6 Create ambience and a safe environment along the street at night that encourages pedestrian activity.	Consistent. The proposed Project would incorporate street-oriented restaurant and retail uses along Ocean Avenue, Santa Monica Boulevard, and 2 nd Street. The outdoor dining associated with the street-oriented restaurant uses would enliven the Project site, particularly at night. In addition, the Project would include dedicated, 24-hour, on-site security services. Security cameras would be located throughout the property. Code-required lighting for passageways and recesses would be provided in sufficient levels for public safety (see Impact VIS-4).
Objective 7 Create shared enjoyable private open space	Consistent. The proposed Project would provide ground-level open space available to the public and to residents, hotel guests, and visitors. In addition, the Hotel Building and other residential buildings (e.g., Second Street Building), which would provide private outdoor space for hotel guests and residents. Public open space includes the pedestrian-only paseos, courtyard, and breezeway as well as the publicly accessible rooftop observation deck.

Open Space Element

The proposed Project is compared to the applicable aesthetic policies of the General Plan Open Space Element in Table 3.1-4, Comparison of the proposed Project with applicable Aesthetic Objectives of the Open Space Element. As shown in Table 3.1-4, the proposed Project would be consistent with objectives to clarify City form and structure and through the provision of public-access open space, heighten the sense of nature within the City and increase the accessibility of open space. The proposed Project would also meet the objective to incorporate art and cultural park design. Because the proposed Project would be consistent with applicable policies, impacts with respect to policies and regulations that govern scenic quality in the Open Space Element would be *less than significant*.

Table 3.1-4. Consistency with Open Space Objectives

Objectives	Project Consistency
Objective 1 Develop and maintain a diversified and balanced system of high quality open space	Consistent. The proposed Project would contribute to the Downtown's public space inventory with the provision of the publicly accessible open space including pedestrian-only paseos, a courtyard, a breezeway as well as a publicly accessible rooftop observation deck. The proposed publicly associated open space would provide for people-gathering space at the western end of the Downtown.
Objective 7 Clarify City Form and Structure	Consistent. The proposed Project would be consistent with the area's existing building heights and structural form through the implementation of height limitations and variations set forth in the DCP and, as such, would not adversely affect the City's form and structure. The proposed Project would not reduce views of, or access to, any off-site open spaces, such as Palisades Park, Santa Monica Bay, and the Santa Monica Pier.
Objective 8 Heighten the sense of nature within the City	Consistent. The proposed Project would provide landscaped open space available to the public. The open space areas – including the rooftop observation deck – would provide views to the ocean, thereby increasing the sense of nature within the City.
Objective 9 Increase the accessibility of open space	Consistent. 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.
Objective 10 Incorporate art and cultural park design	Consistent. The proposed Project would include the development of the 35,500-sf Cultural Use Campus along Ocean Avenue, which would provide a gallery, museum, or similar cultural space.

City of Santa Monica Local Coastal Program Land Use Plan

Table 3.1-5, Comparison of the Project with applicable aesthetics policies of the Local Coastal Plan provides an analysis of the Project relative to the applicable aesthetic policies of the Final Draft 2018 Land Use Plan. As shown in Table 4.1-5, the Project would be consistent with policies to protect the scenic and visual qualities and views of coastal areas and would not obstruct views of Palisades Park, Santa Monica Bay, the Santa Monica Pier, and mature palm trees along Ocean Avenue. Further, as discussed in Impact VIS-1, the buildings would have varying heights and setbacks and would not block views of scenic resources but would protect scenic resources and enhance the visual quality of the public scenic views of the surrounding area.

The development plans for the proposed Project, including landscape plans for both parcels, would be submitted to the City for final design review subsequent to approval. Signs would be designed and located to minimize impacts to visual resources. Exterior lighting would be designed to minimize all forms of light pollution, including light trespass, glare, and sky glow. Security lighting would be attached to structures and controlled by motion detectors, as required. Thus, the proposed Project would be consistent with applicable policies, in the Final Draft 2018 LUP that govern scenic quality and impacts would be less than significant.

Table 3.1-5. Consistency with LCP LUP Policies

Policies	Project Consistency
Policy 134. 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 courtyard and a 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 proposed Project would not block coastal viewshed access from Palisades Park or the PCH.
Policy 135. All new development in the Coastal Zone to provide underground utilities, etc.	Consistent. All utilities in the vicinity of the proposed Project are currently located underground and any new utilities serving the Project site would also be placed underground.
Policy 136. In all new development, public and private parking lots shall include landscaping.	Not Applicable. The proposed Project would remove existing, onsite surface parking lots. Parking would be provided within a subterranean parking structure.
Policy 143. The City shall protect scenic resources and views from designated scenic corridors and vantage points in order to protect, preserve, and where feasible, enhance the visual quality of scenic resources and public scenic views within the City's Coastal Zone.	Consistent. The removal of onsite surface parking lots, coupled the establishment of pedestrian-only paseos, a courtyard, a breezeway and proposed modern building designs that do not block views of scenic resources (refer to Impact VIS-1), would protect scenic resources and enhance the visual quality of the public scenic views of the surrounding area, including views of Palisades Park and views along Ocean Avenue.

Table 3.1-5. Consistency with LCP LUP Policies (Continued)

Policies	Project Consistency
<p>Policy 144. New development located within the viewshed area identified for view preservation in connection with a designated scenic corridor or vantage point (see Map 20, Chapter 3) shall be designed and sited to be visually compatible with the character of the surrounding area, to restore and enhance visual quality in visually degraded areas, and to protect public views to the coast and scenic coastal areas, etc.</p>	<p>Consistent. As shown on Map 20 of the LUP, within the vicinity of the Project Site vicinity, Ocean Avenue from Bernard Way to the northern City boundary, the California Incline and the Santa Monica Pier are designated scenic corridors. The proposed Project would be compatible in design with the modern design and tone of surrounding mid- and high-rise buildings. The Project with a maximum height of 130 feet and variety of building heights would not exceed the high-rise buildings, which range in height from 125 to 300 feet (refer to Table 3.1-1) that form the surrounding City skyline. The provision of publicly accessible open space would enhance the visual quality with the viewshed. Further, the Project would not alter public views to the coast and scenic coastal areas.</p>
<p>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 alternatives 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.</p>	<p>Consistent. Photosimulations have been prepared for the proposed Project from KVAs and a site-specific visual assessment has been conducted (refer to Impact VIS-1).</p>
<p>Policy 151. Fencing. Where accessory walls or fencing has the potential to impact designated scenic view corridors or vantage points, such development shall be avoided to the maximum extent feasible. Etc.</p>	<p>Consistent. The proposed Project would not install fencing that impacts designated scenic view corridors or vantage points.</p>
<p>Policy 152. Landscape Plans Required. Applications for new development on sites within the viewsheds of designated scenic corridors and vantage points shall be required to have an approved landscape plan prepared by a licensed design professional, etc.</p> <p>a. Plants shall be native and/or drought-tolerant species, and blend with the existing natural vegetation and natural habitats on the site. The use of any plant species listed as problematic, a noxious weed, or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, the State of California, or the U.S. Federal Government shall be avoided unless necessary for habitat restoration of a sensitive species.</p>	<p>Consistent. As part of the Project's necessary approvals, landscape plans for both the proposed Project would be prepared by a licensed design professional shall be submitted for design review to the ARB.</p> <p>a. The Project would implement a low-water drought tolerant landscape plant palette. The selection of plants would consist of native and/or drought-tolerant species, and blend with the existing natural vegetation and natural habitats onsite. No identified problematic, noxious weed, or invasive species would be planted onsite.</p> <p>b. New landscaping, including street trees, when mature would not obstruct or limit public views. Street</p>

Table 3.1-5. Consistency with LCP LUP Policies (Continued)

Policies	Project Consistency
b. Landscaping shall be designed to avoid obstructing or limiting public views for the life of the development. Plant materials shall be chosen to avoid intrusion into the viewshed at their maximum growth potential. The property owner shall maintain or re-establish new plant materials where plant materials inadvertently intrude into the protected viewshed.	trees would be planted in accordance with the UFMP. Plant materials shall be chosen to avoid intrusion into the viewshed at their maximum growth potential.
Policy 153. Plantings and Landscaping Blocking Views. Planting and landscaping plans shall be disapproved if any or all of the proposed plant materials have the potential to block a public scenic view or public views of an important scenic resource with normal growth.	Consistent. The new landscaping would not block or meaningfully diminish views of Palisades Park, Santa Monica Bay, or other scenic resources in the area.
Policy 156. Signage compatibility. Signs shall be designed and located to minimize impacts to visual resources. Signs approved as part of commercial development shall be incorporated into the design of the project and shall be subject to height and width limitations that ensure that signs are visually compatible with surrounding areas and protect designated public scenic viewing areas.	Consistent. Signage would be limited to Project site identification and would be incorporated into the final design of the proposed Project. Signage may have low level accent lighting to provide readability at night similar to the existing signage at the Project site. No digital signage or signage that is substantially different from that on the existing Project site is anticipated. The location, size, materials and colors of any signage would be reviewed by the Landmarks Commission and/or ARB in accordance with either or both the Santa Monica Landmarks Ordinance (SMMC Chapter. 9.56) and the Santa Monica Sign Code (SMMC Chapter 9.61).
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 scenic viewing areas and scenic corridors shall be prohibited.	Consistent. The proposed Project would not locate signs within the scenic corridor along Ocean Avenue. Signage would not be located within sensitive viewsheds of Palisades Park, Santa Monica Bay, or the Pacific Ocean.
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: a. The minimum lighting necessary shall be used to light walkways used for entry and exit to the structures, including parking areas, on the site; b. Security lighting shall be attached to structures and controlled by motion detectors;	Consistent. As described further in Impact VIS-4, outdoor lighting would be in accordance with SMMC Section 9.21.080 and would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. a. Code-required lighting for passageways and recesses would be provided only in sufficient levels for public safety. Parking would be located in a subterranean parking garage and the proposed Project would eliminate pole lighting used in existing surface parking lots. The minimum lighting necessary shall be used to light walkways used for entry and exit to the buildings. b. Security lighting shall be attached to structures and controlled by motion detectors, as required. c. The proposed Project would implement the best available technology and shielding to minimize light spill and

Table 3.1-5. Consistency with LCP LUP Policies (Continued)

Policies	Project Consistency
c. 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; d. 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; e. Lighting shall avoid or minimize light to trespass into native habitat or open space areas to minimize impacts on wildlife; f. Lighting sources shall not be directly visible from public viewing areas; g. Lighting is prohibited around the perimeter of the parcel or for aesthetic purposes.	direct/focalize lighting downward, toward the targeted area only. d. Not applicable – the Project Site is urbanized and no wildlife or natural habitat would be affected. e. Not applicable – the Project Site is urbanized and no wildlife or natural habitat would be affected. f. Lighting will be shielded and directed so that the light source (glare) would not be visible. g. Continuous perimeter lighting (strings of lights) would not be implemented.

Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

VIS-4 The proposed Project would create new sources of light and glare. However, light and glare levels would not adversely affect daytime or nighttime visual resources in the area.

Impact Description (VIS-4)

Lighting needed during construction of the proposed Project could generate minor spillover in the immediate vicinity of the Project site, including residential uses to the north and east. However, construction activities are anticipated to occur during daylight hours and construction-related lighting would only be used for safety and security purposes. Such lighting would be shielded and directed onto the Project site. Security fencing would also screen most light sources from view of nearby receptors and passerby. Thus, light associated with construction activities would not adversely affect daytime or nighttime views in the area.

Project buildout would introduce new sources of light and glare to the Project site and immediately surrounding areas as compared to existing conditions. The proposed Project would increase lighting associated with interior building illumination and outdoor lighting for nighttime security and wayfinding around and through the Project site. Interior lighting would be designed with occupancy sensors and dimmers, where feasible and appropriate. Outdoor ground floor illumination would be limited to outdoor seating areas, pedestrian paseos, the breezeway, and the public courtyard fronting Ocean Avenue. Lighting from the public courtyard and outdoor seating areas would be muted from adjacent uses by the existing mature street trees and proposed landscaping along Ocean Avenue,

Santa Monica Boulevard, and 2nd Street. Lighting along the proposed pedestrian paseos would be primarily contained within interior spaces of the Project site. Vehicle headlights from the driveway onto 2nd Street would also constitute a new source of light. However, based on the location of the driveway across from the entrance to Parking Structure #4, vehicle headlights would not shine into any residential or other sensitive uses.

Lighting intensity and design of the Project would be similar to buildings in the Project vicinity. The Project site is in the urbanized Downtown, which includes numerous sources of nighttime lighting, including street lamps, traffic signal lights, exterior building security, interior building illumination, and vehicular lights from nearby streets. The nearest light-sensitive receptors to the Project site include the residences located in proximity to the Project site, particularly StepUp on Second and the Luxury Apartments building across 1st Court to the north and east. Palisades Park to the west would also experience an increase in light intrusion from the Project. However, unless otherwise specified in the Development Agreement, the proposed Project lighting would be provided 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. Compliance with the SMMC would ensure the Project's new light sources would not substantially affect offsite light-sensitive receptors.

The proposed Project may also include new sources of glare associated with glazing (windows) and other reflective materials used in the façade of the proposed structures, which could potentially result in increased glare emanating from the Project site. Building design remains conceptual and specific colors, siding, windows, and overall materials are still being refined and would be subject to design review by the City prior to issuance of building permits. Due to the proposed increase in building mass and size, it is expected that the Project would include a greater number of windows and reflective surfaces than the existing Project site. SMMC Section 9.21.120 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. The Project's reflective exterior façade elements, such as the fixed aluminum panels, sunshade louvers, and windows would be required to comply with the SMMC regulations regarding glare. Required adherence to the SMMC combined with Project 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 near the Project and would not constitute a new source of substantial nighttime light pollution; therefore, effects would be *less than significant*.

3.1.1.6 Cumulative Impacts

The proposed Project, in combination with future and pending development, would contribute toward visual character changes within the Downtown.

Scenic Vistas and Scenic Resources

Incrementally over time, the Project vicinity is expected to transform further into a more urban Downtown as new taller buildings replace buildings of one to three stories and surface parking lots. All new projects would be required to adhere to the development and design standards of the SMMC and DCP (and LCP LUP for projects in the Coastal Zone) , which include height and setback limitations, to ensure that projects would not have a significant impact on scenic vistas and scenic resources. Further, the DCP Program EIR evaluated the impacts of anticipated development within the Downtown, and concluded that future land uses in the Downtown would not encroach upon existing public view corridors. Scenic vistas would continue to remain available and the development would not block or diminish public views of an existing scenic vista. Impacts with respect to scenic vistas would be less than significant (refer to Impact VIS-1). Additionally, the DCP Program EIR concluded that the future development compliant with the DCP would not substantially damage scenic resources or historic buildings within a State Scenic Highway or locally-designated scenic corridor and, as such, impacts on scenic resources would be less than significant (refer to Impact VIS-2).

Consistency with Applicable Regulations and Policies addressing Scenic Quality

As previously described, all new projects would be required to adhere to the development and design standards of the SMMC and DCP as well as undergo final design review by the City subsequent to approval. Factors considered during design review include a project's effect on scenic vistas and scenic resources, the scale of the existing environment, existing aesthetic designs and patterns within a district, and general patterns and standards of architectural development, further ensuring that the design of new development would be consistent with applicable regulations and policies addressing scenic quality. Additionally, major projects would be required to undergo discretionary review by the Planning Commission and/or City Council to ensure project compatibility with the existing surrounding area. Existing City policies in combination with the DCP development standards and design guidelines would limit changes to key character defining features of the Downtown. Over time, taller buildings would change the character of the Downtown; however, existing policies would ensure that future projects in the Downtown would incorporate pedestrian-scale buildings that would enhance the setting of the area, frame and improve the public realm, support a multi-modal environment, create active gathering spaces, and provide access to natural light and ocean breezes. Thus, the visual character of the Downtown

would gradually change as redevelopment of properties occur, but this incrementally changing character would be consistent with existing regulations and policies addressing scenic quality.

Light/Glare

As with the proposed Project, cumulative projects would introduce new illumination sources. However, given the high levels of existing ambient lighting that currently exists in the City, the increase in nighttime lighting would not significantly affect nighttime views. In addition, future projects would be required to comply with SMMC Section 9.21.080 (Lighting), which requires the restriction of light spillover from commercial development and, requires (for light trespass) lighting may not illuminate other properties in excess of a measurement of 0.5-foot candles of light. Thus, compliance with SMMC would reduce potential impacts associated with light spillover. Also, new development would be subject to design review and approval by the City to ensure compliance with SMMC. Since the proposed Project would be required to comply with SMMC regulations for light and glare, it is not expected to cumulatively contribute to light and glare impacts within the City of Santa Monica. It was further determined in the DCP Program EIR that development in accordance with the DCP would not create new sources of light and glare within the context of an already developed urban downtown and that compliance with the City's Municipal Code pertaining to light and glare would ensure that light and glare would not adversely affect views (refer to Impact VIS-4).

3.1.1.7 Residual Impacts

As described in Section 3.1.1.3, *Impact Assessment and Methodology*, the Downtown – including the Project site – is classified as a TPA; therefore, the potential impacts to aesthetics and visual resources associated with the proposed Project are not considered significant. Consistency with the development and design standards of the SMMC and DCP and final design review by the City would ensure that potential changes to aesthetics and visual resources would be *less than significant*.

3.1.2 Shade and Shadow Effects

This section describes the existing shade/shadow environment near the Project site and analyzes the potential shade and shadow effects that could result from the implementation of the proposed Project. For purposes of this analysis, shading refers to placing shadow sensitive uses in shade, thereby preventing direct access to sunlight due to shadows cast by buildings or structures. Shadow effects are dependent upon several factors, including local topography, building height and bulk, the shade sensitivity of adjacent land uses, the season and consequent length and duration of shadows. Uses may be considered sensitive to shade and shadow effects if they require or are

otherwise dependent on sunlight for regular function, comfort, or commerce (City of Santa Monica 2010).⁵ Land uses and operations sensitive to the effects of shading include, but are not necessarily limited to, residential, recreational, and institutional (e.g., schools, nursing homes, etc.), as well as some public outdoor spaces, such as parks, restaurants with outdoor seating areas, plant nurseries, and existing solar collectors (City of Santa Monica 2010).

The consequences of shadows on land uses may be positive, including cooling effects during warm weather, or negative, such as shading of exterior patios, the loss of natural light access, solar access energy generation purposes, or the loss of warming influences during cool weather. While some incidental shading on shadow sensitive uses is commonly acceptable to provide relief from the sun, shading that occurs over extended periods of time can be considered a detriment.

The angle of the sun relative to a site determines the shadow length and bearing (i.e., the direction in which they are cast) based on the location (i.e., latitude and longitude) of the Project site; that is, the shadow is determined by the angle of the sun relative to the Project site as the sun moves across the sky throughout the daytime. Shadows are cast in a clockwise direction from west/northwest to east/northeast from approximately 7:00 A.M. to 4:00 P.M. or later depending on the time of the year. The Summer Solstice (June 21) when the sun is at its highest position in the sky and Winter Solstice (December 21) when the sun is at its lowest represent the most radical contrast with regards to shadow creation throughout the year. Generally, the shortest shadows are cast during the Summer Solstice and grow increasingly longer until the Winter Solstice. During the winter and peaking at Winter Solstice, the sun is lower in the sky and therefore shadows are at their maximum coverage lengths. Shadow sensitive uses may also be most susceptible to shading effects during the winter due to lower temperatures.

⁵ Shadow-sensitive uses for this analysis are defined based on the City of Santa Monica' LUCE Program EIR (City of Santa Monica 2010).

3.1.2.1 Environmental Setting – Shade and Shadow Effects

Shade and Shadow Patterns

The Project site is located within the Downtown, the most densely developed area of the City, comprising different character areas that vary in overall density, land use mix, height, massing, permeability of the building frontages along the street, and height and density of landscaping plantings, especially street trees. As a result, existing shading patterns are variable on different blocks within the Downtown. These patterns are dependent on the size, shape, and orientation of the buildings and street trees. In the Project vicinity, taller buildings and mature street trees cast shadows in many adjacent areas, including public sidewalks



Many streets in the Downtown, including 2nd Street, have dense canopies of street trees, which, when combined with taller structures, cast shadows and limit solar access to outdoor areas and adjacent structures.

and roadways. Based on the sun's position in the sky, sidewalks along east-west streets in the Downtown experience less shading (more sun exposure); and north-south streets naturally have more shading. For example, 1st Court is shaded throughout most of the day by the two- to four-story buildings on either side of the alleyway. 2nd Street is nearly fully shaded by mature Indian laurel fig trees lining the street and the shadows cast by existing multi-story development along the west side of the street. Direct sunlight is more prevalent along Santa Monica Boulevard, where the east-west orientation of the roadway allows for more solar access throughout the day.

Existing shadows on the Project site are limited due to low-lying development and limited landscaping, with shadows from existing development limited primarily to interior areas of the Project site and immediately adjacent portions of Ocean Avenue and Santa Monica Boulevard. Lower building profiles and the surface parking lots onsite allow for virtually unobstructed solar access within the interior portions of the Project site. The existing buildings have a substantially lower profile than the adjacent four- to six-story commercial and residential buildings that surround the property line to the south and east, so building within the Project



The lower profile of the existing structures within the Project site and proximity of adjacent structures limits the extent of shade and shadow currently cast on adjacent areas and allows for virtually unobstructed solar access within interior portions of the site.

site generally do not cast substantial shadows onto adjacent buildings or open spaces, including private balconies of adjacent multi-story residential development. The proximity of the existing building façade to the public sidewalk on the east side of Ocean Avenue results in some shading of public sidewalks in the morning and early afternoon hours. 2nd Street is partially shaded by the existing buildings throughout most of the day. Given, the Project site's south facing orientation with the angle of the sun, the existing building at the southern corner of the site (101 Santa Monica Boulevard) does not cast shadows on Santa Monica Boulevard; however, 2nd Street is heavily shaded by the existing mature Indian laurel fig trees lining the roadway, including the public sidewalks fronting the Project site, so this public area is substantially shaded.

Shadow-Sensitive Uses in Project Vicinity

Shadow-sensitive uses are those where sunlight is important for function, physical comfort, and/or commerce. The proposed Project site is located near several shadow-sensitive uses, including the adjacent mixed-use and residential structures (i.e., Luxury Apartments, StepUp on Second, Chelsea Santa Monica, the Christian Institute of Spiritual Science, the Mayfair Residences, and Westside Villas). These residential uses feature windows and balconies allowing natural lighting of indoor living spaces and private individual outdoor living spaces. Existing solar collectors are located one block away from the Project site on the south side of Santa Monica Boulevard (see Table 3.1-6).

Table 3.1-6. Shadow-Sensitive Uses in Project Vicinity

Address	Type of Use	Relative Location	Floors
1322 2 nd Street	Luxury Apartments (Mixed-Use)	Northeast	4
1328 2 nd Street	StepUp on Second (Residential)	East	3
1318 2 nd Street	Chelsea Santa Monica (Residential)	Northeast	3
1308 2 nd Street	Christian Institute of Spiritual Science (Institutional)	North	2
210 Santa Monica Boulevard	Mayfair Residences (Residential)	East	5
1431 Ocean Avenue	Pacific Plaza Apartments (Residential)	South	15
1299 Ocean Avenue	Westside Villas (Residential)	North	11
1220 2 nd Street	First Presbyterian Church/British American School (Institutional)	North	2
1227 2 nd Street	Emeritus College (Institutional)	Northeast	3
210 Santa Monica Boulevard	Existing Solar Collectors	Southeast	5

3.1.2.2 Regulatory Framework – Shade and Shadow Effects

Federal Regulations

There are no Federal regulations that pertain to shade and shadow effects.

State Regulations

SB743. Governor Brown signed SB 743 in September 2013, which made several changes to the CEQA for projects located in areas served by transit (Public Resources Code Section 21099). Although SB 743 focuses on the elimination of automobile delay for analyzing the transportation impacts under CEQA (see Section 3.13, *Transportation*), SB 743 also states that aesthetic and parking impacts shall not be considered significant impacts on the environment if:

- The project is a residential, mixed-use residential, or employment center project, and
- The project is located on an infill site within a transit priority area.

The Downtown is classified as a TPA, including the Project site; therefore, shade/shadow impacts would not be considered significant and analyses of shade/shadow impacts of projects within the Downtown are not required pursuant to CEQA.

Local Policies and Regulations

2010 Santa Monica General Plan Land Use and Circulation Element. The LUCE includes several policies that aim to minimize shadow impacts on solar access for adjacent parcels. Pertinent goals and policies are listed below and consistency with these relevant policies are analyzed in Section 3.10, *Land Use and Planning*.

Policy LU15.11. Building Façade and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the façade of the floor below in a manner that will minimize the visual bulk of the overall building similar to the established stepback standards of the zoning ordinance in effect as of May 27, 2010 and as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the general public. Guidelines or standards for the building mass above the streetwall shall be established in the zoning ordinance.

Policy LU16.1. Design Buildings with Consideration of Solar Pattern. In designing new buildings, consider the pattern of the sun and the potential impact of building mass on habitable outdoor spaces and adjacent structures in order to minimize shadows on public spaces at times of the day and year when warmth is desired, and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.

Policy LU16.2. Preserve Solar Access to Neighborhoods. The same development standard that is adopted to require a step down building envelope to transition commercial buildings to lower adjacent residential properties also needs to assure solar access to the residential buildings.

Goal H7: Promote the creation of new housing that is tailored to the needs of residents and emphasizes amenities that increase the livability of the residential environment, such as ground floor open space and access to natural light and air.

Policy H7.5. Ensure that site and building design responds to Santa Monica's natural environment through access to natural light and air.

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 D8.3. Design buildings with a variety of heights, architectural elements and shapes to create visual interest along the street. Walls should have meaningful combinations of materials, and articulation that creates shadow patterns to engage the eye.

Policy D8.5. Create a prescribed building envelope for new commercial or mixed-use buildings adjacent to residential districts with step backs to maintain the residential development's access to light and air.

Downtown Community Plan. Section 9.10.080 of the DCP states that while not required by CEQA, shade and shadow analyses are required for development within parcels included in the ELS Overlay, including the proposed Project site.

3.1.2.3 Impact Assessment and Methodology – Shade and Shadow Effects

Thresholds of Significance

As previously described, CEQA Section 21099 (amended by SB 743) states that if a project is an infill residential, mixed-use, or employment center project located within a TPA, aesthetic impacts shall not be considered significant impacts on the environment. The Downtown – including the Project site – is classified as a TPA, therefore, aesthetic impacts associated the proposed Project would be less than significant pursuant to CEQA. Nevertheless, an analysis is included herein to comply with Section 9.10.080 of the DCP and to provide decision-makers and the public a comprehensive review of the potential shadow effects that could occur as a result of the proposed Project.

Methodology

Shadow length and bearing are dependent on the location of a site, which determines the angle of the sun relative to the Project site. In the Los Angeles basin, the maximum shadow a building can cast is usually equivalent to three times its height during the Winter Solstice (City of Los Angeles 2006). The potential for offsite shadow effects is dependent on the length of shadows created by a building, and the distance between the building and the nearest shade-sensitive land uses.

Shadow simulations were prepared for the proposed Project using a computer-generated 3D model to identify the height and bulk of proposed building elements, mapping the “footprint” (i.e., location, shape, and size) of the Project site, and then calculating and diagramming the shadows that would be cast by the building components during the most extreme, or conservative, conditions. The analysis simulates shadows for the winter equinox, summer equinox, vernal equinox, and autumnal equinox at 9:00 A.M., 12:00 P.M., and 3:00 P.M. By modeling shadows for all the equinoxes, it is possible to see and analyze the worst and best-case scenarios of future shadow effects.

Project Shade and Shadow Effects

The maximum height of the proposed mixed-use buildings on the Project site would be up to 130 feet. This height would cast shadows on adjacent and vicinity buildings and public streets, including shadow-sensitive



The residential buildings located across 1st Court to the north and east of the Project site would experience increased periods of shade from the proposed Project, particularly during winter months.

structures. Shadows created by the Project elements are modeled for both Summer and Winter Solstices, which are the longest and shortest days of the year, respectively (see Figure 3.1-3), as well as the Vernal (Spring) and Autumnal (Fall) Equinoxes, of which the days and nights are of equal duration (see Figure 3.1-4).

3.1.2.4 Applicable Mitigation Measures from the DCP Program EIR

The DCP Program EIR does not include any applicable mitigation measures for potential shade and shadow effects associated with the proposed Project.

3.1.2.5 Project Impacts and Mitigation Measures – Shade and Shadow Effects

<i>Would shadow-sensitive uses be shaded by project-related structures?</i>

VIS-5 Construction of the proposed Project would increase shadows over existing adjacent sensitive uses due to the proximity of existing residential uses to the Project site, including adjacent residential uses on 2nd Street and public open spaces provided by sidewalks and roadways to the north and east of the Project site.

Impact Description (VIS-5)

Potential shading effects of the proposed Project would vary widely depending upon time of day and year. Shadow effects are magnified during the winter, when the sun's lower position in the sky creates longer shadows. For example, according to the accepted shadow length multipliers for the City of Los Angeles, a 130-foot tall building would create morning and afternoon shadows that would reach approximately 393.9 feet in length during the Winter Solstice; the same building would create shadows that would reach approximately 283.4 feet at the same times during the Summer Solstice (City of Los Angeles 2006). Winter is also when maximum solar access is more important to solar energy and passive heat production. For the purposes of this EIR analysis, Winter Solstice is considered the most severe conditions for shade/shadow effects.

The proposed 130-foot tall Hotel Building, which would be the tallest building included in the proposed Project, would replace the existing one- to three-story commercial and mixed-use buildings and surface parking lots, casting shadows up to 393.9 feet long during the Winter Solstice. Therefore, the proposed Project would create longer and more extensive shadows than existing uses onsite.

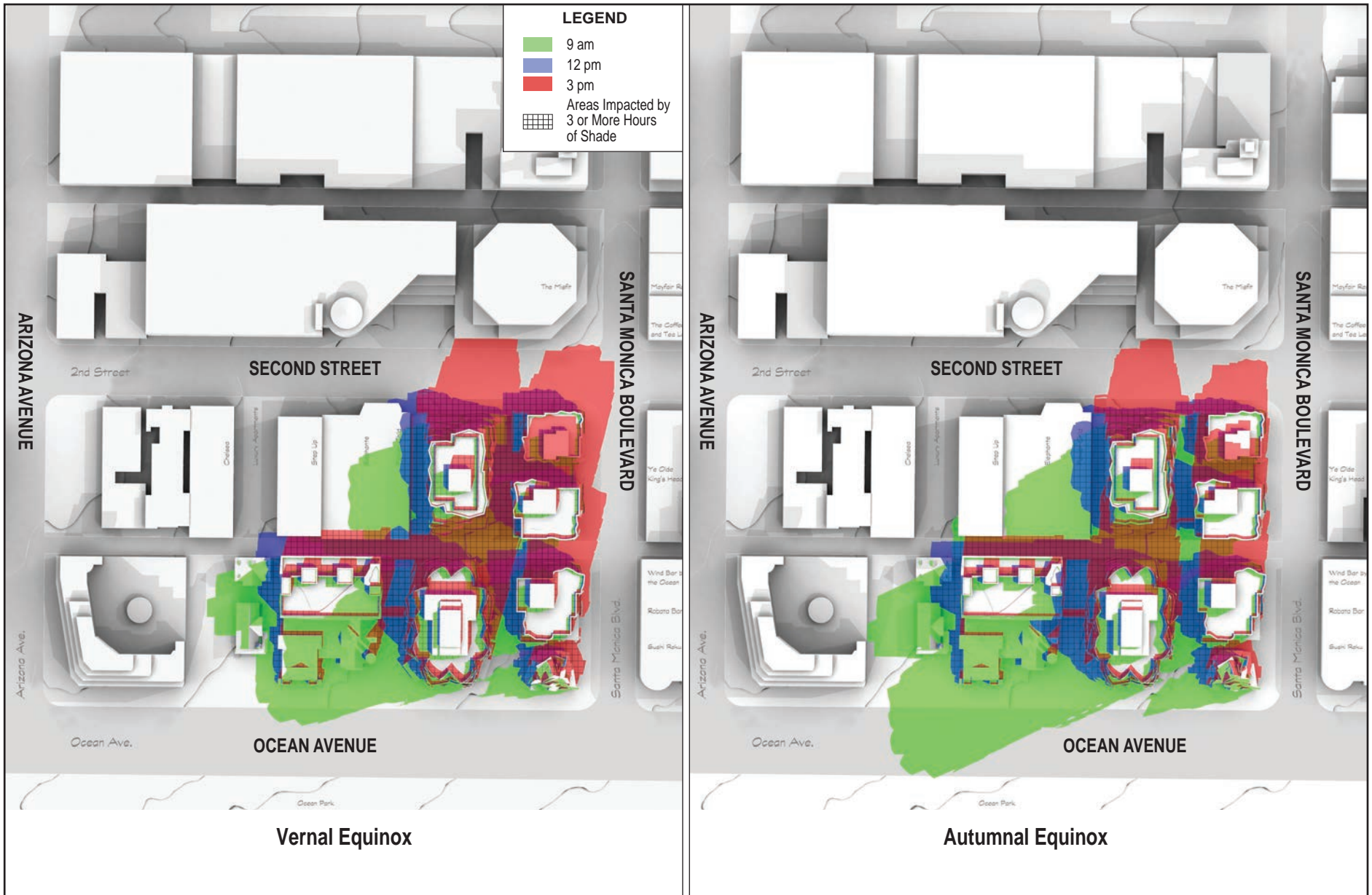
Shadow-sensitive land uses adjacent to the Project site consist primarily of residential buildings, including windows and outdoor balconies of most units. Shadow studies performed for the proposed Project demonstrate that the adjacent residential structures on 2nd Street, including the Luxury

Apartments, StepUp on Second, Chelsea Santa Monica, the Mayfair Residences, and the Westside Villas would be shaded beyond existing shadows. Project development would shade adjacent sensitive structures for greater than three hours during the winter when shadows are longest and most extensive (refer to Figures 3.1-3 and 3.1-4). Project shadows would not shade the residential buildings south of the Project site across Santa Monica Boulevard, including Pacific Plaza Apartments or the Georgian Hotel.

Project buildings would also shade portions of the proposed onsite open spaces, including the public courtyard, pedestrian paseos, and landscaped podium deck for greater than 3 hours during the winter. However, the proposed Project design, which comprises several distinct building forms separated by pedestrian pathways, is designed to maximize solar access to the Project site. Rather than one large building that is impenetrable to natural light, the Project 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 penetration would vary throughout the day.

The adjacent residential uses and onsite public open space would experience shading for greater than 3 hours at a time during the winter. Shadows cast from the proposed Project 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, the proposed Project would not unduly block solar access to these potential solar energy collector sites and shade/shadow effects would be *less than significant*.





3.1.2.6 Cumulative Impacts

Development of the proposed Project in combination with pending and approved multi-story development in the Downtown would contribute to cumulative shading effects in the Downtown. As discussed above, potential new multi-story buildings anticipated to be constructed in the Downtown would result in new shadows that could shade nearby sensitive uses, particularly in the residential blocks near the Project site. However, the LUCE adopted neighborhood protection goals to direct land use changes away from the City's residential neighborhoods and toward transit-rich areas, such as the Downtown, to protect the character of existing neighborhoods. As a result of focusing land use changes within the Downtown, the incremental change in the vicinity of the Project site would limit or avoid changes to the character of the greater area of the City, including established residential neighborhoods. Thus, while new land uses and development projects in the City would result in some changes to shade and shadow effects in these areas, overall shadows would remain largely unchanged throughout most of the City. Further, under CEQA, aesthetic impacts, including shade and shadow effects, of an urban infill project in a TPA are not considered significant impacts on the environment.

3.1.2.7 Residual Impacts

As described in Section 3.1.1.3, *Impact Assessment and Methodology*, the Downtown – including the Project site – is classified as a TPA; therefore, the potential impacts to aesthetics and visual resources associated with the proposed Project are not considered significant. Consistency with the development and design standards of the SMMC and DCP and final design review by the City would ensure that potential changes to aesthetics and visual resources would be *less than significant*.

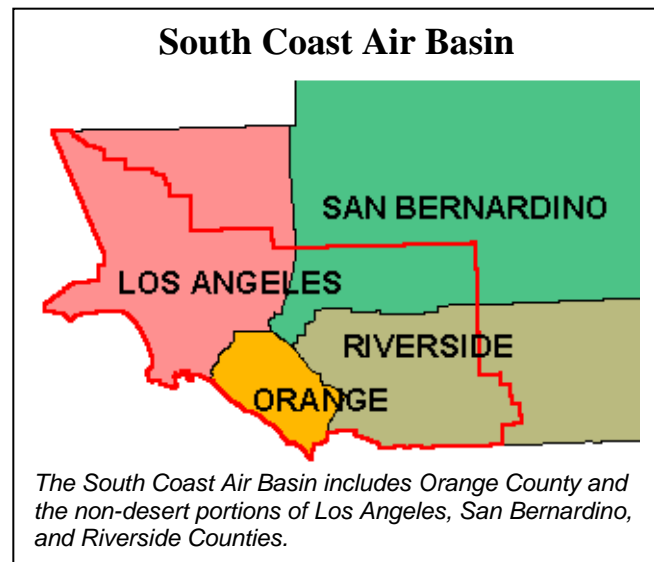
3.2 AIR QUALITY

This section of the Environmental Impact Report (EIR) describes the existing air quality conditions within the region and evaluates the potential impacts of the proposed Ocean Avenue Project (Project) on air quality within the City of Santa Monica (City) and the South Coast Air Basin (Basin). This evaluation addresses both short-term construction and long-term operational criteria pollutant emissions generated by the proposed Project. An analysis of greenhouse gas (GHG) emissions and associated impacts related to global climate change is included in Section 3.7, *Greenhouse Gas Emissions*.

3.2.1 Environmental Setting

Location and Climate

The City is in the western coastal portion of Los Angeles County, which is within the South Coast Air Basin. The Basin is bounded by the Pacific Ocean to the west, and the San Gabriel, San Fernando, and San Jacinto Mountains to the north and east that trap air and its pollutants in the valleys below, making the Basin an area of high air pollution potential. The air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and weather. Air quality within the Basin is monitored and regulated by the South Coast Air Quality Management District (SCAQMD).



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. The City is in the western coastal portion of the Basin, which has moderate variability in temperatures, with average monthly highs from 62 to 71 degrees Fahrenheit (°F) and lows from 51 to 63°F. The annual average rainfall in the City is 12.7 inches, with the majority occurring between December and March (National Climatic Data Center 2010).

The Basin frequently experiences weather conditions that trap air pollutants within the Basin. First, the Basin has persistent temperature inversions formed by warmer air in the upper layer and cooler

air in the lower layer. Temperature inversions limit the vertical dispersion of air contaminants, holding them relatively near the ground. These inversions break when the sun heats the lower layer, allowing the two layers to mix and the previously trapped air to leave the Basin. Second, the Basin experiences periods of stagnant wind conditions, which also limit the movement of air pollutants. The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. Conversely, on days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest.

Air Pollutants

Air pollutant emissions within the Basin are generated from several stationary, mobile, and natural sources – from large power plants and manufacturing facilities to residential water heaters and consumer products. Stationary sources can be divided into two major subcategories: (1) point sources; and (2) area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions in a region. Examples of area sources include residential and commercial water heaters, landscaping (e.g., lawnmowers), agricultural operations, landfills, and consumer products such as barbecue lighter fluid, hair spray, etc. Mobile sources are transportation related emissions, including motor vehicles, aircraft, trains, and construction equipment. Mobile source emissions account for most of the air pollutant emissions within the Basin.

The Federal and State governments have identified criteria pollutants and a host of air toxics that have substantial adverse effects on human health and the environment in concentrations, and established air quality standards to control those concentrations through the Federal Clean Air Act (CAA) and the California Clean Air Act (CCAA). The criteria pollutants for which Federal and State standards have been promulgated and which are most relevant to air quality planning and regulation in the Basin include ozone (O₃), carbon monoxide (CO), suspended particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are described as follows (refer to Section 3.2.2, *Regulatory Framework* for Federal and State standards):

- **Ozone (O₃)**

O₃ is a gas that is produced by a photochemical reaction (i.e., triggered by sunlight) between the O₃ precursors nitrogen oxides (NO_x) and volatile organic compounds (VOCs), which are also referred to as reactive organic gases (ROGs). NO_x is formed during the combustion of fuels, while VOCs are formed during combustion and evaporation of

organic solvents. Conditions that produce high concentrations of O₃ are direct sunshine, stagnation in source areas, high ground surface temperatures, and a strong inversion layer that restricts vertical mixing. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable.

O₃ is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. O₃ can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease. Long-term exposure to O₃ is linked to aggravation of asthma, and is likely to be one of many causes of asthma development, and long-term exposures to higher concentrations of O₃ may also be linked to permanent lung damage, such as abnormal lung development in children. According to the California Air Resource Board (CARB), inhalation of O₃ causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to O₃, which can reduce the volume of air that the lungs breathe in and cause shortness of breath. Groups most sensitive to O₃ include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

- **Volatile Organic Compounds (VOCs) / Reactive Organic Gases (ROGs)**

VOCs, which are also referred to as ROGs are organic chemicals that have a high vapor pressure at ordinary room temperature and include any compound of carbon, excluding CO, carbon dioxide (CO₂), carbonic acid (H₂CO₃), metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. Their high vapor pressure results from a low boiling point, which causes large numbers of molecules to evaporate or sublime from the liquid or solid form of the compound and enter the surrounding air. For example, formaldehyde, which evaporates from paint, has a boiling point of only -2 °F.

VOCs are numerous, varied, and ubiquitous and they include both human-made and naturally occurring chemical compounds. Some VOCs are dangerous to human health or cause harm to the environment. Anthropogenic VOCs are regulated by law, especially indoors, where concentrations are the highest. Harmful VOCs typically are not acutely toxic, but have compounding long-term health effects.

- **Carbon Monoxide (CO)**

CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest near congested transportation corridors and intersections, especially during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels.

The health effects of CO are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (i.e., oxygen deficiency) as seen at high altitudes.

- **Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5})**

PM₁₀ and PM_{2.5} consist of extremely small, suspended particles or droplets with diameters less than 10 microns and less than 2.5 microns, respectively. PM₁₀ generally comes from fugitive dust (i.e., windblown dust and dust generated by mobile sources), while PM_{2.5} is generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Most particulate matter in urban areas is produced by fuel combustion, motor vehicle travel, and construction activities.

Children, the elderly, and people with pre-existing respiratory or cardiovascular disease appear to be more susceptible to the effects of high levels of PM₁₀ and PM_{2.5}. Potential impacts of elevated levels of PM₁₀ and PM_{2.5} include increased mortality rates, respiratory infections, number and severity of asthma attacks, and number of hospital admissions. Daily fluctuations in PM_{2.5} concentration levels have been related to hospital admissions for acute respiratory conditions in children, school absences, a decrease in respiratory lung volumes in normal children, and increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

- **Nitrogen Dioxide (NO₂)**

NO₂ is a reddish-brown toxic gas with a characteristic sharp odor and is a prominent pollutant resulting from NO_x emitted primarily by motor vehicles, making it a strong indicator of vehicle emissions. Population-based studies suggest that an increase in acute respiratory illness – including infections and respiratory symptoms in children – is

associated with long-term exposure to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increases in the resistance to air flow and airway contraction are observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema, etc.) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

- **Sulfur Dioxide (SO₂)**

SO₂ is a colorless, extremely irritating gas or liquid. The largest sources of SO₂ are fossil fuel combustion at power plants and other industrial facilities. Smaller sources of SO₂ emissions include industrial processes such as extracting metal from ore, and the burning of high sulfur containing fuels by locomotives, large ships, and non-road equipment.

SO₂ is linked with several adverse effects on the respiratory system. Asthmatics are particularly sensitive to SO₂, with only a few minutes of exposure to low levels of the gas potentially resulting in airway constriction.

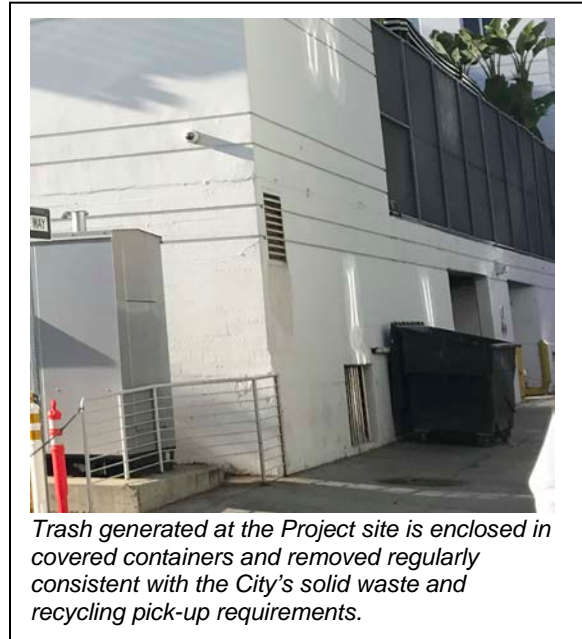
- **Lead**

Pb occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne Pb in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles; therefore, most Pb emissions are associated with aircraft and some racing and off-road vehicles. Substantial Pb emissions also occur in the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters. However, from 1980 to 2015, Pb emissions in the U.S. dropped by 99 percent (U.S. Environmental Protection Agency [USEPA] 2016).

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased levels of lead are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system.

Odors

Odors are not regulated under the CAA or the CCAA (see Section 3.2.2, *Regulatory Framework*); however, they are considered nuisances under the CEQA. Odors can potentially affect human health in several ways. Odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Additionally, VOCs can cause odors that stimulate (e.g., for instance, by compromising the immune system). Unpleasant odors can also trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress. Common sources of odors and nuisance emissions include wastewater treatment plants, landfills, composting



Trash generated at the Project site is enclosed in covered containers and removed regularly consistent with the City's solid waste and recycling pick-up requirements.

facilities, petroleum refineries, and chemical manufacturing facilities. There are no such sources of odors located in the Downtown or the immediate vicinity of the Project site.

Regional Air Quality

Under the CAA, Federal air quality standards, known as the National Ambient Air Quality Standards (NAAQS), were established for the six criteria pollutants described previously. Similarly, the CCAA establishes State air quality standards, known as the California Ambient Air Quality Standards (CAAQS), which are more stringent than the NAAQS. NAAQS and CAAQS for the six criteria pollutants are shown in Table 3.2-1. Measurements of ambient concentrations of criteria pollutants are used by the USEPA and the CARB to assess and classify the air quality of each air basin, county, or in some cases a specific developed area. The classification is determined by comparing monitoring data with the NAAQS and CAAQS. If a criteria pollutant concentration in an area is lower than the air quality standards, the area is classified as being in “attainment.” If the pollutant exceeds the air quality standards, the area is in marginal, moderate, serious, severe, or extreme “nonattainment,” depending on the magnitude of the exceedance. If there are not enough data available to determine whether the air quality standard is exceeded, the area is designated “unclassified.”

As shown in Table 3.2-1, at the Federal level, the Basin is designated as a nonattainment area for O₃, Pb, and PM_{2.5} (USEPA 2019). The Basin is in attainment of Federal standards for SO₂ and NO₂, a subcategory of NO_x (USEPA 2019). At the State level, the Basin, including the Los Angeles

County portion of the Basin, is designated as a nonattainment area for O₃, PM_{2.5}, and PM₁₀ (CARB 2018).

Table 3.2-1. 2019 Los Angeles County-South Coast Air Basin Attainment Status for Criteria Pollutants

Criteria Pollutant	Averaging Period	California Standard	Federal Standard	Criteria Pollutant Attainment Level Summary		No. of Monitoring Sites
				California	Federal	
Ozone (O ₃)	1-hour	0.09 ppm	-	Nonattainment	Extreme Nonattainment	29
	8-hour	0.07 ppm	0.07 ppm	Nonattainment	Extreme Nonattainment	
Carbon Monoxide (CO)	1-hour	20 ppm	35 ppm	Attainment	Attainment as Serious Maintenance Area	25
	8-hour	9 ppm	9 ppm			
Respirable Particulate Matter (PM ₁₀) (1987)	24-hour	50 µg/m ³	150 µg/m ³	Nonattainment	Attainment as Serious Maintenance Area	25
	Annual	20 µg/m ³	-			
Fine Particulate Matter (PM _{2.5}) (2006)	24-hour	-	35 µg/m ³	Nonattainment	Serious Nonattainment	26
	Annual	12 µg/m ³	12 µg/m ³			
Nitrogen Dioxide (NO ₂)	1-hour	0.18 ppm	0.10 ppm	Attainment	Attainment	27
	Annual	0.03 ppm	0.053 ppm	-	-	
Sulfur Dioxide (SO ₂)	1-hour	0.25 ppm	0.075 ppm	Attainment	Attainment	6
	24-hour	0.04 ppm	0.14 ppm			
Lead (Pb) (2008)	3-month rolling average	-	0.15 µg/m ³	-	Nonattainment	13
	30-day rolling average	1.5 µg/m ³	-	Attainment	-	

Notes: The Federal attainment status was updated by the USEPA in 2019. The most recent State attainment status available from the CARB are from 2017.

Sources: USEPA 2019; CARB 2016, 2019a; SCAQMD 2019b.

Local Air Quality

Ambient Air Quality

To monitor the various concentrations of air pollutants throughout the Basin, the SCAQMD operates 37 permanent monitoring stations and four single-pollutant source impact Pb air monitoring sites in the Basin and a portion of the Salton Sea Air Basin in Coachella Valley (i.e.,

Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties). The SCAQMD has divided the region into 38 source receptor areas (SRAs). The City is located within SRA 2, which covers the northwest coastal Los Angeles County area. Ambient air pollutant concentrations within SRA 2 are monitored at the Veterans Administration building in West Los Angeles, which is approximately 6 miles west of the City. Of the criteria air pollutants discussed previously, only ambient concentrations of O₃, CO, and NO₂ are monitored in SRA 2. Measurements for SO₂, PM₁₀, and PM_{2.5} were taken in SRA 1 in Los Angeles at the North Main Street monitoring station, as these pollutants are not measured in SRA 2.

The monitoring station most representative of the Project site is the Northwest Coastal Los Angeles County monitoring station, located in west Los Angeles at the Veteran Affairs Medical Center in SRA 2. Criteria pollutants monitored at this station include O₃, NO₂, and CO. Because this station does not monitor SO₂, PM₁₀, PM_{2.5}, or Pb, data from the Southwest Coastal Los Angeles County monitoring station (SRA 3) was used for SO₂, PM₁₀, and Pb, and data from the Central Los Angeles monitoring station (SRA 1) was used for PM_{2.5}. The most recent data available from the SCAQMD for these monitoring stations are from years 2015 to 2019. The criteria pollutant concentration data for these years are summarized in Table 3.2-2.

Since 2015, exceedances have occurred for the State 1-hour standards for O₃, the Federal and State 8-hour O₃ standard, and the Federal 24-hr PM_{2.5} standard. The State standards for CO, NO₂, and SO₂, and the Federal and State standard for PM₁₀, were not exceeded from 2015 through 2019.

Project Site Emissions

The Project site is currently occupied with commercial restaurant and retail, office uses, and 19 residential units that generate operational criteria pollutant emissions associated with the building's energy needs and vehicle trips generated by residents, employees, and visitors to the Project site. The estimated annual operational air emissions associated with the existing uses at the Project site have been calculated utilizing the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 as recommended by the SCAQMD and are shown in Table 3.2-3.

Table 3.2-2. Ambient Air Quality Standards for Criteria Pollutants

Pollutant/Standard	Number of Days Threshold Was Exceeded & Maximum Levels During Violations				
	2015	2016	2017	2018	2019
Ozone					
State 1-Hour > 0.09 ppm	2 days	0 days	1 day	0 days	0 days
State 8-Hour > 0.07 ppm	3 days	2 days	3 days	2 days	0 days
Federal 8-Hour > 0.07 ppm	2 days	2 days	3 days	2 days	0 days
Max. 1-Hour Conc. (ppm)	0.102 ppm	0.085 ppm	0.099 ppm	0.094 ppm	0.079 ppm
Max. 8-Hour Conc. (ppm)	0.072 ppm	0.073 ppm	0.077 ppm	0.073 ppm	0.067 ppm
Carbon Monoxide (CO)					
State 8-Hour > 9.0 ppm	0 days	0 days	0 days	0 days	N/A
Federal 8-Hour > 9.0 ppm	0 days	0 days	0 days	0 days	N/A
Max. 1-Hour Conc. (ppm)	1.6 ppm	2.2 ppm	2.0 ppm	1.6 ppm	N/A
Max. 8-Hour Conc. (ppm)	1.4 ppm	1.1 ppm	1.2 ppm	1.3 ppm	N/A
Suspended Particulates (PM₁₀)					
State 24-Hour > 50 µg/m ³	0 days	0 days	0 days	0 days	N/A
Federal 24-Hour > 150 µg/m ³	0 days	0 days	0 days	0 days	N/A
Max. 24-Hour Conc. (µg/m ³)	42 µg/m ³	43 µg/m ³	46 µg/m ³	45 µg/m ³	N/A
Annual Average (µg/m ³)	21.2 µg/m ³	21.6 µg/m ³	19.8 µg/m ³	20.5 µg/m ³	N/A
Fine Particulates (PM_{2.5})					
Federal 24-Hour > 35 µg/m ³	7 days	2 days	5 days	3 days	N/A
Max. 24-Hour Conc. (µg/m ³)	56.4 µg/m ³	44.4 µg/m ³	49.2 µg/m ³	43.8 µg/m ³	N/A
Annual Average (µg/m ³)	12.38 µg/m ³	11.83 µg/m ³	11.94 µg/m ³	12.58 µg/m ³	N/A
Nitrogen Dioxide (NO₂)					
State 1-Hour > 0.18 ppm	0 days	0 days	0 days	0 days	0 days
Federal 1-Hour > 0.10 ppm	0 days	0 days	0 days	0 days	0 days
Max. 1-Hour Conc. (ppm)	0.068 ppm	0.055 ppm	0.056 ppm	0.065 ppm	0.049 ppm
Sulfur Dioxide (SO₂)					
State 1-Hour > 0.25 ppm	0 days	0 days	0 days	0 days	0 days
State 24-Hour > 0.14 ppm	0 days	0 days	0 days	0 days	0 days
State 24-Hour > 0.04 ppm	0 days	0 days	0 days	0 days	0 days
Max. 24-Hour Conc. (ppm)	0.002 ppm	0.002 ppm	0.002 ppm	0.002 ppm	0.001 ppm
Max. 1-Hour Conc. (ppm)	0.015 ppm	0.010 ppm	0.010 ppm	0.012 ppm	0.004 ppm

Notes:

Ambient concentrations were measured at the Northwest Coastal Los Angeles County monitoring station (SRA 2) for O₃, CO, and NO₂, at the Southwest Coastal Los Angeles County monitoring station (SRA 3) for PM₁₀ and SO₂, and at the Central Los Angeles County monitoring station (SRA 1) for PM_{2.5}.

The State standard for the annual average for PM_{2.5} is 12 µg/m³ and for PM₁₀ is 20 µg/m³. The Federal standard for the annual average of PM_{2.5} is 15 µg/m³ and there is no Federal standard for annual average for PM₁₀;

ppm = parts per million; µg/m³ = micrograms per cubic meter; N/A = data not available/sufficient to determine the value.

Source: California ARB 2016; 2019b; SCAQMD 2019.

Table 3.2-3. Estimated Operational Emissions for the Existing Project Site

Air Pollutant	SCAQMD Thresholds ²	Onsite Operational Emissions ¹ (pounds/day)			
		Area	Point Source (Energy)	Mobile	Total
CO	550	1.58	0.72	25.77	28.07
PM ₁₀	150	0.01	0.07	5.48	5.56
PM _{2.5}	55	0.01	0.07	1.53	1.61
NO _x	55	0.02	0.90	10.45	11.37
SO _x	150	0.00	0.01	0.07	0.08
VOC	55	1.04	0.10	2.42	3.56

¹ Refer to Appendix C for Winter CalEEMod output sheets; overall = emissions based on rounded totals.

² SCAQMD Thresholds discussed in Section 3.2.3, *Impact Assessment and Methodology*.

Toxic Air Contaminants (TACs)

In addition to criteria pollutants, the SCAQMD periodically assesses levels of toxic air contaminants (TACs) in the Basin as part of its general responsibility pursuant to the Health and Safety Code §41700 to control emissions of air contaminants and prevent endangerment to public health. A TAC is defined by California Health and Safety Code Section 39655 as an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. Any substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the CAA (42 U.S. Code [USC] Section 7412[b]) is a TAC.

TACs are a diverse group of air pollutants including both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different than the criteria pollutants previously discussed in that air quality standards have not been established for TACs, largely because there are hundreds of air toxics and their effects on health tend to be local rather than regional. CARB has designated nearly 200 compounds as TACs. Additionally, CARB has implemented control measures for several compounds that pose high risks and show potential for effective control as a part of the TAC Control Program. Specific measures are identified in the Airborne Toxic Control Measures (ATCM) for several source categories that are codified in the California Code of Regulations (CCR) (CARB 2020).

TACs can cause chronic and acute adverse effects on human health. These health impacts include increased risk of cancer due to continual inhalation of toxic air pollutants. Most of the estimated

health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., diesel particulate matter [DPM]). Based on the Multiple Air Toxics Exposure Study (MATES IV) conducted by SCAQMD in July 2012 and July 2013, DPM is attributable to approximately 68 percent of all airborne carcinogenic risk. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.^{1,2} Approximately 22 percent is due to other toxics associated with mobile sources – including benzene, butadiene, and formaldehyde – and approximately 10 percent of the risk is attributed to stationary sources (which include industries and other certain businesses, such as dry cleaners and chrome plating operations). The study also found lower ambient concentrations of most of the measured air toxics compared to the levels measured in the previous study conducted during 2004 and 2006.

As part of the MATES IV, the SCAQMD prepared maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). Although it is highly unlikely an individual would remain in an area for such a duration, the assumptions used in the MATES IV study are health protective estimates and use conservative parameters which can result in an overestimation of a cancer risk. The background potential cancer risk per million people using the update the Office of Environmental Health Hazard Assessment (OEHHA) methodology is estimated at 837.62 per million (compared to an overall Basin-wide risk of 1,023 per million) (SCAQMD 2015).

CO Hotspot

Passenger vehicles and trucks are the primary source of pollutants in the Project site vicinity. Traffic-congested streets and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed Federal and/or State standards for CO are termed “CO hotspots.” The Federal 1-hour air quality standard for CO is 35 parts per million (ppm) and the State 1-hour standard is 20 ppm. The 8-hour Federal and State air quality standard for CO is 9.0 ppm. Section 9.14 of the SCAQMD’s CEQA Air Quality Handbook (1993) identifies

¹ CARB, Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, Accessed May 14, 2020.

² CARB, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.

CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots.

In the past, the SCAQMD recommended that a CO hotspot analysis should be conducted for intersections where the proposed project would have a significant traffic-related congestion impact causing the LOS to change to E or F or when a project increases the V/C increases by 2 percent and the LOS is D or worse. It should be noted that these recommendations were formulated several years ago when the Basin was a nonattainment area for Federal and State CO standards. As shown Table 3.2-2, CO levels near the Project site are now substantially below the Federal and State standards. Maximum CO levels in recent years are 2.2 ppm (maximum 1-hour concentration) and 1.4 ppm (maximum 8-hour concentration) compared to the CAAQS of 20 ppm (maximum 1-hour concentration) and 9.0 ppm (maximum 8-hour concentration). As such, the Basin is currently designated as an attainment area for both the CAAQS and NAAQS (refer to Table 3.2-1).

Sensitive Receptors

Sensitive receptors are populations that are more susceptible to the effects of air pollution than the population at large. According to CARB, sensitive receptors include children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. While the air quality standards are designed to protect public health, and are generally regarded as conservative for healthy adults, there is greater concern to protect adults who are ill or have long-term respiratory problems, and young children whose lungs are not fully developed. The SCAQMD CEQA Air Quality Handbook identifies the following as locations that may contain a high concentration of sensitive receptors: long-term health care facilities,



Sensitive receptors in the Project vicinity include the three residential buildings north of the Project between 1st Court and 2nd Street, including many units with balconies facing towards the Project site (left). Palisades/Ocean Park is located across Ocean Avenue to the west of the Project site, which regularly supports abundant foot traffic (right).

rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds and parks with active recreational uses, childcare centers, and athletic facilities.

The nearest sensitive uses to the Project site include several residential complexes, two schools, two churches, and a heavily-used park to the north, south, east, and west of the Project site. While Palisades Park is considered a sensitive receptor, the activities that take place on it are mostly transitory in nature. Therefore, those using Palisades Park for recreational purposes are not likely to be exposed to Project related air pollutants for extended periods of time. Similarly, the Hotel Shangri-La is not considered a sensitive receptor because hotel guests only spend a short duration of time at the location compared to a resident (SCAQMD 2005). Sensitive receptors within 1,000 feet of the Project site are listed in Table 3.2-4 below (see also Section 3.11, *Noise* and Figure 3.11-1).

Table 3.2-4. Existing Sensitive Receptors within 1,000 Feet of the Project Site

Sensitive Receptor	Distance from the Project Site	Direction
Luxury Apartments	25 feet	North and East
Palisades Park	100 feet	West
StepUp on Second (permanent supportive housing)	120 feet	North and East
Chelsea Santa Monica (residences)	160 feet	North and East
The Christian Institute	200 feet	North
Mayfair Residences	215 feet	East
Pacific Plaza Apartments	350 feet	South
Residences along PCH/Ocean Front Walk	350 feet	West
Westside Villas	360 feet	Northwest
Criterion Promenade (residences)	600 feet	Northeast
1221 Ocean Avenue (residences)	620 feet	Northwest
First Presbyterian Church	620 feet	Northwest
British American School	630 feet	Northwest
Emeritus College	740 feet	North
Knowledge Universe (day care center)	860 feet	Northeast

3.2.2 Regulatory Framework

Air quality within the Basin is addressed through the efforts of various Federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the air basins are discussed below.

Federal

Clean Air Act (CAA). The CAA was passed in 1963 and amended in 1990 and was the first comprehensive Federal law to regulate air emissions from stationary and mobile sources. Among other things, the law authorizes the USEPA to establish and enforce NAAQS for pollutants considered harmful to public health and the environment, including the six criteria pollutants: CO, Pb, NO₂, O₃, PM_{2.5} and PM₁₀, and SO₂. The NAAQS help to ensure basic health and environmental protection from air pollution. The NAAQS currently in effect for each pollutant are shown in Table 3.2-1. The CAA also gives USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

USEPA. Pursuant to the CAA, the USEPA must designate areas as meeting (i.e., attainment) or not meeting (i.e., nonattainment) the Federal standards (NAAQS) for the six criteria pollutants. As part of its enforcement responsibilities, the USEPA requires each State with Federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the Federal standards. The SIP must integrate Federal, State, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP. These plans are developed by State and local air quality management agencies and submitted to the USEPA for approval.

Additionally, the USEPA regulates emission sources that are under the exclusive authority of the Federal government (e.g., aircraft, ships, and certain locomotives, etc.), maintains jurisdiction over emissions sources outside State waters (i.e., outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

The USEPA has adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first Federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, the USEPA introduced Tier 1 standards for equipment under 37 kilowatts (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for nitrogen oxides and hydrocarbons are similar in stringency to the 2004 standards for highway engines; however, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. Tier 4 standards require that emissions of

particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved using control technologies, including advanced exhaust gas after-treatment, similar to those required by the 2007 to 2010 standards for highway engines.

State

California Clean Air Act (CCAA). The California Clean Air Act was enacted in 1988 (California Health & Safety Code Section 39000 et seq.). California also has ambient air quality standards (CAAQS), which predate USEPA's formation in 1970 and the original NAAQS. In 1959, California enacted legislation requiring the State Department of Public Health to establish air quality standards and necessary controls for motor vehicle emissions. The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. California law continues to mandate CAAQS, although attainment of the NAAQS has precedence over attainment of the CAAQS. The CAAQS includes more stringent standards than the NAAQS.

CARB. The CARB – a division of the California Environmental Protection Agency (CalEPA) – is responsible for the coordination and administration of both Federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets CAAQS, compiles emission inventories, develops recommended air pollution control measures, provides oversight of local air quality programs, and prepares the SIP for submission to the USEPA. CARB also establishes emissions standards for vehicles, consumer products, and various types of commercial equipment sold in California. It also sets fuel component specifications to further reduce vehicle emissions.

In April 2005, CARB issued a guidance document on air quality and land use, *Air Quality and Land Use Handbook: A Community Health Perspective*, which serves as a general guide for considering impacts to sensitive receptors from facilities that emit TACs. The recommendations provided in the handbook are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TACs. The handbook recommends siting criteria for “sensitive land uses” near specific sources of air pollution. Specifically, CARB siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of freeways and high-traffic roads (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day); (2) avoid siting sensitive receptors within 1,000 feet of a distribution center; and (3) avoid siting sensitive receptors within 300 feet of a dry cleaning facility that uses perchloroethylene. According to CARB, the additional noncancer health risk attributable to proximity to high-volume roadways was seen within 1,000 feet and was strongest within 300 feet. Particulate pollution levels are reduced by approximately 70 percent at

a distance of 500 feet from freeways. However, these recommendations are advisory, and should not be interpreted as defined “buffer zones.” Rather, land use agencies are given discretion to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues. The Project site does not lie within any of these recommended buffers.

California Air Toxics “Hot Spots” Information and Assessment Act. The Air Toxic “Hot Spots” Information and Assessment Act identifies toxic air contaminant hot spots where emissions from specific stationary source facilities may expose individuals to an elevated risk of adverse health effects. It requires that a business or other establishment identified as a significant source of toxic emissions provide the affected population with information about health risks posed by the emissions. Health Risk Assessments (HRAs) would identify the hazard or hazardous material, assess the amount, duration, and pattern of exposure to the hazard or hazardous material, assess the amount it would take to cause negative health effects, and characterize the risk to general population and sensitive receptors from the hazard or hazardous material. The OEHHA provides *A Guide to Health Risk Assessment and The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* to aid California projects’ compliance with the 1987 “Hot Spots” Act.

CARB Off-Road Mobile Sources Emission Reduction Programs. The CCAA mandates the CARB to achieve the maximum degree of emission reductions from all off-road mobile sources to attain the CAAQS. Off-road mobile sources include heavy construction equipment. Tier 1, Tier 2, and Tier 3 standards for large compression-ignition engines used in off-road mobile sources went into effect in California for most engine classes in 1996, 2001, and 2006, respectively. Tier 4 or Tier 4 Interim (4i) standards apply to all off-road diesel engines model year 2012 or newer. In addition, equipment can be retrofitted to achieve lower emissions using retrofit technologies verified by the CARB. The engine standards and ongoing rulemaking jointly address the products of diesel combustion, including emissions and toxic diesel particulate matter. The California Emission Standards for Off-Road Compression-Ignition Engines are as specified in CCR Title 13, Division 3, Chapter 9, Article 4, Section 2423.

Regional

SCAQMD. The SCAQMD is the regional agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all Federal and State government agencies. SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources,

and effectuates ongoing regional air quality improvements through a combination educational and penalty programs, including fines or sanctions when necessary. SCAQMD is directly responsible for reducing emissions from point sources, area sources, and mobile sources.

Air Quality Management Plan (AQMP). The SCAQMD maintains and periodically updates an AQMP for the Basin. The most recent of these is the 2016 AQMP, which was adopted by the Governing Board of SCAQMD on March 3, 2017. The 2016 AQMP was prepared to comply with the CAA and CCAA, to accommodate growth, to reduce air pollutant levels in the Basin, to meet Federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy.

The 2016 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. The 2016 AQMP includes attainment demonstrations for the 2008 8-hour O₃ standard, the 2012 annual PM_{2.5} standard, the 2006 24-hour PM_{2.5} standard, the 1997 8-hour O₃ standard and the 1979 1-hour O₃ standard within the planning horizon (SCAQMD 2017).

The future air quality levels projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by SCAG in the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 7, 2016. The 2016 AQMP also assumes that general development projects will include strategies (i.e., mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations which are designed to address air quality impacts and pollution control measures. The 2016 AQMP identified the control measures that would be implemented to reduce major sources of pollutants. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

SCAQMD Rule Book. The SCAQMD has adopted the SCAQMD Rule Book (originally adopted in 1976), which establishes a set of rules and regulations that address air pollution sources. Some SCAQMD rules are administrative in nature, but many relate to a specific type of operation or source of pollution. Because knowledge about air pollution is constantly growing, these rules and regulations are in a dynamic state, constantly changing. Each regulation is broken down into several rules, each of which deals with a specific topic. SCAQMD rules that may apply to the Project include:

- Rule 402 *Nuisance* – This rule prohibits discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 403 *Fugitive Dust* – The purpose of this rule is to reduce the amount of particulate matter (e.g., PM₁₀) entrained in the ambient air as a result of anthropogenic (i.e., man-made) fugitive dust sources, such as grading and excavation, by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- Rule 445 *Wood Burning Devices* – This rule prohibits any person from permanently installing a wood-burning device (e.g., fire place or wood burning heater) into any new development.
- Rule 1113 *Architectural Coatings* – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. For example, exterior paints and finishes are limited to a VOC emissions rate of 50 grams per liter (g/L).
- Rule 1138 *Control of Emissions from Restaurant Operations* – This rule specifies emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- Rule 1146.2 *Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters* – This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- Rule 1186 *PM₁₀ Emissions from Paved and Unpaved Roads* – This rule applies to owners and owners of paved and unpaved roads. The rule is intended to reduce PM₁₀ emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads.
- Rule 1401 *New Source Review of Toxic Air Contaminants* – This rule specifies limits for maximum individual cancer risk (MICR) cancer burden, and non-cancer acute and chronic hazard index (HI) from new sources which emit TACs.

CEQA Air Quality Handbook (1993). Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within its jurisdiction. In 1993, the SCAQMD prepared its CEQA Air Quality Handbook to assist local government agencies and consultants in preparing environmental compliance documents pursuant to CEQA. The SCAQMD is in the process of developing its Air Quality Analysis Guidance Handbook (Guidance Handbook) to replace the CEQA Air Quality Handbook. The CEQA Air Quality Handbook and the Guidance Handbook describe the criteria that SCAQMD uses when reviewing and commenting on the adequacy of environmental compliance documents pursuant to CEQA. The Guidance Handbook provides the recommended thresholds of significance to determine if a project will have a significant adverse environmental impact. Other important subjects covered in the CEQA Air Quality Handbook and the pending Guidance Handbook include methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts. Although the Governing Board of the SCAQMD has adopted the CEQA Air Quality Handbook, and is in the process of developing the Guidance Handbook, the SCAQMD does not, nor intends to, supersede a local jurisdiction's CEQA procedures.

While the Guidance Handbook is being developed, supplemental information has been adopted by the SCAQMD. These include revisions to the air quality significance thresholds and a procedure referred to as “localized significance thresholds,” which has been added as a significance threshold under the Final Localized Significance Threshold (LST) Methodology (2003). LSTs represent the maximum emissions from a development project that would not cause or contribute to an exceedance of the most stringent applicable Federal or State air quality standard, based on the ambient concentrations of that pollutant for each source receptor area. The Final LST Methodology provides thresholds of significance for NO_x, CO, PM₁₀, and PM_{2.5} to evaluate localized air quality impacts at sensitive receptors near a development project. The Final LST Methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. Further, LSTs are applicable at the project-specific level and are not applicable to regional projects such as General Plans or other long-term planning documents.

In addition, the SCAQMD has recommended that lead agencies not use the screening tables in the Chapter 6 of the CEQA Air Quality Handbook because the tables were derived using an obsolete version of CARB's mobile source emission factor inventory and are also based on outdated trip generation rates from a prior edition of the Institute of Transportation Engineer's Trip Generation Handbook. The SCAQMD has also recommended that lead agencies not use the on-road mobile source emission factors in Table A9-5-J1 through A9-5-L as they are obsolete, and instead recommends using on-road mobile source emission factors approved by CARB. The outdated and

obsolete information were not used in this analysis. The applicable portions of the CEQA Air Quality Handbook, the LST Methodology, and other revised methodologies were used in preparing the air quality analysis in this section.

SCAG. SCAG, founded in 1965, is a Joint Powers Authority under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under Federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. SCAG is the MPO for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties, representing 191 cities and more than 19 million residents. SCAG undertakes a variety of regional planning and policy initiatives to encourage a more sustainable Southern California. Although SCAG is not an air quality management agency, it addresses regional issues relating to transportation, the economy, community development, and the environment resources and constraints. As part of regional planning, SCAG is responsible for developing transportation, land use, and energy conservation measures that affect air quality. The City is one of many jurisdictions comprising the SCAG.

SCAG has adopted strategies and plans to implement Senate Bill (SB) 375, California's Sustainable Communities and Climate Protection Act. As required by SB 375, SCAG was tasked with developing a SCS, 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 2016 RTP/SCS places a greater emphasis on integrated land use and transportation planning, with a vision that encompasses three principles: mobility, economy, and sustainability. In June 2016, the CARB determined that SCAG's 2016 RTP/SCS was consistent with their GHG reduction targets (see Section 3.7.2, *Regulatory Framework* for a discussion of the RTP/SCS and GHG emissions).

Local

City of Santa Monica. The City has the authority to reduce air pollution through land use planning, policy, and regulation consistent with Federal, State, and regional standards. Specifically, the City is responsible for the assessment and mitigation of air emissions generated by development permitted within the City. In accordance with the requirements of CEQA, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces mitigation measure implementation. The City has also adopted standard construction mitigation measure requirements for all development and monitors compliance with these standards. Further, the City

is responsible for the implementation of traffic reduction and Transportation Demand Management (TDM) measures set forth in the AQMP (SCAQMD 2017), such as advanced ramp metering, and expansion and integration of the traffic signal synchronization network to alleviate timing bottlenecks.

\Santa Monica General Plan Land Use and Circulation Element (LUCE). The LUCE, adopted in July 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. The LUCE includes the following applicable policies for air quality management and emissions.

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 LU2.5. 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.

Goal S5: Improve the environmental performance of 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.

Goal T25: Design parking to meet applicable urban design goals and minimize negative impacts on pedestrians, bicyclists, and transit users.

Policy T25.7. Encourage installation of electrical outlets in loading zones, including signage, to reduce vehicle idling associated with operating refrigeration for delivery trucks.

1975 Santa Monica General Plan Conservation Element. The Conservation Element sets forth goals and objectives to ensure proper management and conservation of the City's natural resources, including air resources, including the following:

Goal: An atmosphere free of pollution.

- Objectives:**
1. *Eliminate all detrimental sources of air pollution.*
 2. *Encourage lowest feasible emission from stationary and moving sources.*
 3. *Cooperate with and support Federal, State, and regional efforts to reduce smog and pollution.*
 4. *Reduce the total volume of vehicular traffic.*

The proposed Project builds on these City objectives through integrated land use and transportation planning, as discussed below.

Sustainable City Plan. The City's Sustainable City Plan provides goals and strategies for the City to follow to enhance the City's sustainability, inclusive of reducing GHG emissions. It includes nine goal areas, four of which address the amount of air quality emissions associated with City development: Resource Conservation, Environmental and Public Health, Transportation, and Open Space/Land Use. Two of these, Transportation and Open Space/Land Use, address the overall arrangement of development in the City. These topics are addressed further in the discussion of LUCE policies below and in Section 3.7, *Greenhouse Gas Emissions*. Development in the City in accordance with LUCE policies creates a land use pattern that reduces vehicle miles traveled (VMT), thus indirectly reducing energy consumption and the generation of greenhouse gases and criteria pollutant emissions. The Sustainable City Plan goals pertaining to Resource Conservation and Environment and Public Health more directly address air quality emissions. The Resource Conservation goals directly addresses such topics as use of renewable energy and reductions in air, soil and water pollutants. The Resource Conservation Goals also set GHG emissions reduction targets for the City to address climate change impacts.

Other City of Santa Monica Programs. Local jurisdictions, such as the City, have the shared responsibility to help develop and implement some of the control measures of the AQMP. Transportation-related strategies for congestion management, low emission vehicle infrastructure, and transit accessibility and non-transportation-related strategies for energy conservation can be encouraged by policies of local governments. The City has several existing programs that it uses to improve health and sustainability of the community through improved regional air quality and reduced GHG emissions (see Section 3.7, *Greenhouse Gas Emissions*). These programs/regulations include:

- **Urban Forest Master Plan (UFMP)** – The revised 2017 UFMP includes a 5-year Street Tree Planting Priority Plan to increase and expand the urban forest canopy. The planting of trees would increase carbon sequestration and improve air quality. Trees remove gaseous pollutants and particulate matter from the air by absorbing them with normal air components through their leaf surface.
- **Electric Vehicle Action Plan (EVAP)** – The EVAP was adopted in 2017 and seeks to expand the public charging infrastructure in the City to 300 chargers by 2020. By providing additional infrastructure, the EVAP aims to increase the percentage of electric vehicles on the road from 2 percent to 15 percent by 2025. The plan forecasts that replacing 13 percent (~9,000) of the fossil-fuel powered vehicles with electric vehicles (EVs) will save an estimated 26,000 metric tons of CO₂.
- **Clean Big Blue Bus Fleet** – Big Blue Bus operates a fleet of nearly 200 vehicles transporting more than 61,000 passengers daily. The entire fleet operates on alternative fuels, including renewable natural gas (RNG) a form of liquefied and compressed natural gas (LNG/CNG), which helps to cut emissions by up to 90 percent.
- **Clean City Fleet (excluding BBB and Fire Department Vehicles)** – The City is a member of “Clean Cities,” a program sponsored by the U.S. Department of Energy which promotes the use of alternative fuel vehicles. The City’s Fleet Management Division is one of the most innovative and progressive programs in the nation. Approximately, 60 percent of the citywide vehicle fleet and over 70 percent of non-emergency vehicles are fueled alternatively.
- **Renewable Energy Supplier** – Santa Monica purchases its electricity from Clean Power Alliance, a Joint Powers Authority (JPA) made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. Since February 2019 for residential customers (and in May 2019 for commercial customers), Clean Power Alliance purchases clean power for electricity and Southern California Edison (SCE) delivers it. With the Clean Power Alliance, electricity customers in Santa Monica are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting.
- **Ban on Gasoline Powered Leaf Blowers** – SMMC Section 4.08.270 bans the operation of gasoline powered leaf blowers within the City limits.

3.2.3 Impact Assessment and Methodology

Thresholds for Determining Significance

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts on air quality. Specifically, the CEQA Guidelines state that a proposed project may have a significant adverse impact on air quality if:

- a) The project would conflict with or obstruct implementation of the applicable air quality plan;
- b) The project would 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;
- c) The project would expose sensitive receptors to substantial pollutant concentrations; and/or
- d) The project would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

In determining whether an effect is significant, State CEQA Guidelines (Section 15064.7) state that a Lead Agency may consider thresholds of significance previously adopted or recommended by other public agencies, provided that the decision to use such thresholds is supported by substantial evidence. Furthermore, with regard to air quality, State CEQA Guidelines Section 15064.7 and Appendix G checklist's air quality section preamble reads:

"Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make ... determinations."

In a February 2018 CEQA Guidance document released by SCAQMD, the SCAQMD further states that:

"Air districts' thresholds provide a clear quantitative benchmark to determine the significance of project and project alternative air quality impacts. They also help identify the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures. Since one of the basic purposes of CEQA is to inform government decision makers and the public about the potential significant environmental effects of any proposed activities (CEQA Guidelines Section 15002[a][1]), use of air district thresholds is a best practice for CEQA impact determinations."

The SCAQMD, the air pollution control agency in the Basin, has developed specific regional and local significance thresholds for air quality, and recommends that projects in the Basin be evaluated in terms of these thresholds. The City uses these SCAQMD thresholds to assess whether air pollution effects of proposed projects are significant. The following thresholds are currently recommended by the SCAQMD and have been used to determine the significance of air quality impacts associated with the proposed Project.

Conflict with Air Quality Plan

The threshold used for determining whether the proposed Project would conflict with or obstruct an applicable air quality plan is qualitative and is based on whether the project is consistent with the assumed growth, applicable control measures and air emission reduction policies in the AQMP. Therefore, the proposed Project would have a significant impact if it would:

- Conflict with or obstruct implementation of the AQMP or any other adopted regional and local plans adopted for reducing air quality impacts.

Cumulatively Considerable Net Increase in Criteria Pollutants

Construction Emissions Thresholds

The SCAQMD's thresholds recommend that projects with construction-related emissions that exceed any of the following regional (mass daily) emissions should be considered potentially significant.

- 550 pounds per day of CO
- 100 pounds per day of NO_x
- 150 pounds per day of SO_x
- 75 pounds per day of VOC
- 150 pounds per day of PM₁₀
- 55 pounds per day of PM_{2.5}
- 3 pounds per day of Pb

Operational Emissions Thresholds

The SCAQMD's thresholds recommend that projects with operational emissions that exceed any of the following regional (mass daily) emissions should be considered potentially significant.

- 550 pounds per day of CO

- 55 pounds per day of NO_x
- 150 pounds per day of SO_x
- 55 pounds per day of VOC
- 150 pounds per day of PM₁₀
- 55 pounds per day of PM_{2.5}
- 3 pounds per day of Pb

Impacts to Sensitive Receptors

Localized Significance Thresholds (LSTs)

LSTs were developed for construction phases in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative (I-4). The Final LST Methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds. If receptors are within 25 meters (or 82 feet) of the site, the methodology document says that the threshold for the 25-meter distance should be used. If the proposed Project would result in exceedance of the screening criteria LSTs for the applicable pollutants, this would constitute a significant impact, unless dispersion modeling demonstrates no exceedance of the concentration-based standards. For project sites larger than 5 acres, the SCAQMD recommends that dispersion modeling be performed for CO, NO_x, PM₁₀, and PM_{2.5}; however, because the Project site is less than 2 acres in size, dispersion modeling was not required for this analysis.

The Project site is located in SRA 2. The nearest sensitive receptors to the Project site are located within 25 meters, including the residential uses located directly across 1st Court to the north of the Project site. Palisades Park, west of the Project site, is located within approximately 30.5 meters. As previously described, residents and visitors transiting within Palisades Park or Project vicinity are considered sensitive receptors but are not likely to be exposed to Project related air pollutants for extended periods of time. The Project site is a 1.89-acre site; however, this analysis uses LSTs for a 2-acre site to provide a conservative analysis of off-site Project construction emissions. The LSTs for a 2-acre site within 25, 50, 100, 200, and 500 meters of sensitive receptors in SRA 2 are shown in Table 3.2-5 below.

Table 3.2-5. Localized Significance Thresholds (LSTs) for Construction

Distance (meters)	Pollutant Threshold (pounds/day)			
	CO	NO _x	PM ₁₀	PM _{2.5}
25	827	147	6	4
50	1,213	143	19	5
100	1,695	156	34	10
200	2,961	186	64	21
500	8,446	262	154	82

Notes: LST based in SRA-2 for a 2-acre site.

Source: SCAQMD, Appendix C – Mass Rate LST Look-up Table, revised October 2009.

Toxic Air Contaminants

The CARB indicates that one of the highest public health priorities is the reduction of DPM generated by vehicles on California's freeways and highways, as it is one of the primary TACs with the most direct and common implications for respiratory health problems. Per CARB criteria, heavily traveled roadways where annual average daily trips (AADT) exceed 100,000 can be sources of particulate emissions from diesel-fueled engines. Interstate (I-) 10 (Santa Monica Freeway) is the only roadway near the Project site to generate high traffic levels that exceed 100,000 AADT. As of 2017, AADT along I-10 are approximately 188,000 AADT at Cloverfield Boulevard decreasing to 150,000 AADT at the State Highway 1 (i.e., Pacific Coast Highway [PCH]) junction (California Department of Transportation [Caltrans] 2019). However, I-10 is located over 1,400 feet south of the Project site. The nearest freeway to the Project site is PCH, which is located approximately 260 feet east of the Project site and an elevation of approximately 100 feet lower than the Project site due to its location at the base of the Palisades Bluffs. PCH generates an estimated 73,000 AADT at Ocean Avenue and therefore, is not considered a potential source of TACs for the Project site. Other potential sources of TACs within the Downtown are associated with specific types of facilities, such as gas stations, dry cleaners, and auto body repair shops, and are the focus of local control efforts (City of Santa Monica 2017).

The CARB has made specific recommendations with respect to considering existing sensitive uses when siting new TAC-emitting facilities or with respect to TAC-emitting sources when siting sensitive receptors. The CARB recommends the following buffer distances be observed when locating these types of TAC emitters or sensitive land uses:

- Freeways or major roadways – 500 feet
- Dry cleaners – 500 feet

- Auto body repair services – 500 feet
- Gasoline dispensing stations with an annual throughput of less than 3.6 million gallons – 50 feet; gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet

The SCAQMD recommends that site-specific HRAs be performed to document potential cancer risk when siting sensitive land uses within the above buffer zones. Based on the methodology established by OEHHA and the SCAQMD, the following significance thresholds have been established to determine the maximum individual cancer risk (MICR), and hazard index (HI) from Project emissions:

- MICR – cancer risk greater than or equal to 10 in one million ($<10 \times 10^{-6}$);
- HI – highest chronic health index greater than or equal to 1.0.

The proposed Project does not place sensitive land uses within the above buffer zones and is not an operational point-source of TACs. However, construction emissions from diesel-fueled equipment could cause TAC exposure for surrounding sensitive receptors, as further described below in *Methodology*; therefore, a construction-phase HRA has been prepared to assess health risks associated with the Project.

CO Hotspots

With respect to the formation of CO hotspots, a project's localized air quality impact is considered significant if CO emissions create a hotspot where either the California 1-hour standard of 20 ppm or the Federal and State 8-hour standard of 9.0 ppm is exceeded. In general, this only occurs at severely congested intersections (i.e., LOS E or worse).

SCAQMD conducted CO modeling for the attainment demonstration in the Federal Attainment Plan for Carbon Monoxide (*CO Plan* for the SCAQMD's 2003 *Air Quality Management Plan*). SCAQMD modeled the four most congested intersections in the Basin, including: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day (SCAQMD 2003). This intersection is located near the on- and off-ramps to I-405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (maximum 1-hour concentration) and 3.2 (maximum 8-hour

concentration) at Wilshire Boulevard and Veteran Avenue, exclusive of ambient background CO concentrations, which is well below the Federal and State CO standards. This indicates that intersections operating with less than 100,000 vehicles per day would not create a CO hot spot.

Other Emissions

With respect to other emissions such as those leading to odors, the threshold is qualitative. An impact associated with the proposed Project would be considered significant:

- If it created other adverse emissions affecting a substantial number of people.

Methodology

Conflict with Applicable Air Quality Plan

SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., O₃ and PM_{2.5}). The SCAQMD's AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by SCAG. Thus, projects, uses, and activities that are consistent with the assumed growth projections and control strategies assumed in the development of the AQMP would not conflict with or obstruct implementation of the AQMP, even if they exceed the SCAQMD's numeric thresholds for criteria air pollutants.

Cumulatively Considerable Net Increase in Criteria Pollutants

This analysis focuses on the air quality impacts that could occur from air pollutant emissions associated with the construction and operation of the proposed Project, including impacts from Project-related traffic volumes. Project-related construction and operational emissions were estimated using CalEEMod Version 2016.3.2 computer model developed for SCAQMD, and then compared to the thresholds of significance defined above. Calculation details are provided in the CalEEMod worksheet results in Appendix C.

Construction Emissions

Construction emissions are forecasted by estimating construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod, which estimates emissions from each phase of Project construction, including demolition, excavation and site preparation, building construction, and architectural coating. CalEEMod is based on outputs from the OFFROAD model and Emission FACtors (EMFAC) model, which are emissions estimation models developed by

the CARB and used to calculate emissions from construction activities, heavy-duty off-road equipment, and on-road vehicles. Emission estimates are based on the anticipated types and amount of equipment that would be used in construction activities associated with the proposed Project, the amount of demolition debris and excavated soil to be removed from the Project site, the size and type of new construction, anticipated construction schedule, and the number of vehicle trips generated by construction workers (refer to Section 2.7, *Construction Activities*). Daily truck trips and default trip length data were used to assess roadway emissions from truck exhaust, as well as idling emissions based on typical idling activities in CalEEMod. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the analysis to generate criteria pollutant emissions values for each construction activity.

Project construction would temporarily increase diesel emissions and would generate particulate matter (i.e., fugitive dust). Construction equipment within the Project site that would generate VOCs and NO_x emissions could include graders, excavators, dump trucks, cranes, and bulldozers. It is assumed that all construction equipment used would be diesel powered. The precise construction timeline for the proposed Project depends on the timing of entitlements and permit processing. For the purposes of studying the worst-case emissions for this EIR, construction activity for the proposed Project is assumed to begin as early as late 2021 with occupancy and operation commencing in late 2024. The construction activities associated with the proposed Project 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/Grading – 3 months
- Building construction – 25 months
 - Paving
 - Architectural Coating

The maximum daily regional emissions from these construction activities are estimated by construction phase for the potential worst-case maximum daily emissions of a construction day, which does not represent the emissions that would typically occur during every day of construction associated with the proposed Project. The estimated maximum daily construction emissions are then compared to the SCAQMD daily significance thresholds to identify any exceedances of thresholds, which could result in a significant impact.

Operational Emissions

Operational emissions associated with the proposed Project are estimated using CalEEMod for mobile source, area, and energy emissions. Operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline conditions. Under CEQA, the baseline environmental setting for an EIR is established at or around the time that the Notice of Preparation (NOP) for the EIR is published. As discussed previously, the Project site is currently occupied by restaurants, office buildings, a medical spa, a hair salon, and associated surface parking lots. The parking lots do not generate air pollutant emissions; however, operation of the buildings onsite generate air pollutant emissions.

Mobile emissions would be generated by the vehicle trips to and from the mixed-use hotel, residential, and commercial buildings and are calculated based on the Transportation Study estimates and other default traffic assumptions (see Appendix K). Area source emissions would be generated by consumer products, architectural coating, and landscape maintenance equipment. Energy source emissions are generated by emissions resulting from electricity and natural gas consumption for space and water heating. To determine if an air quality impact would occur, the maximum daily emissions from Project operation are compared with SCAQMD's regional (mass daily) thresholds. The default emissions were used for area and energy sources with consideration of SCAQMD rules and regulations that would be required of the proposed Project related to the Project's operations.

Impacts to Sensitive Receptors

Health Effects from Air Pollutant Emissions

In December 2018, the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed-use development with over 2,500 senior residential units, 250,000 square feet (sf) of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they connect to adverse human health effects. Federal and State ambient air quality standards (NAAQS and CAAQS) are designed to prevent the harmful effects of air pollution. These standards are continually updated based on evolving research, including research which relates air quality impacts with health effects. At the regional level, plans such as the SCAQMD's AQMP and SCAG's RTP/SCS work to ensure that the South Coast Air Basin reaches and maintains attainment with these federal and state standards. Locally, the City's EIRs evaluate a plan or project's consistency with applicable policies identified in the SCAQMD's AQMP and SCAG's RTP/SCS intended to protect human health.

As discussed in the City of Los Angeles' publication *Air Quality and Health Effects* (October 2019), the connect between air pollutant emissions and human health is different for a site-specific project, such as for the proposed Project or local area plan, than it is for a larger regional scale analysis of an area-wide project, such as an analysis for a regulation change for the entire Air Coast Basin. At this time, there are no scientifically available models or methodologies available to correlate regional emissions from local projects or plans to quantified human health consequences in any reliable or meaningful way.

For local plans or projects that exceed any identified SCAQMD air quality threshold, City EIRs typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or project and a particular health effect. In addition, no expert agency has yet to approve a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for this EIR to directly link a plan's or project's significant air quality impacts with a specific health effect.

Localized Significance Thresholds for Construction

The potential for construction emissions associated with the proposed Project to cause localized impacts for certain criteria pollutants were calculated using SCAQMD's LSTs methodology (SCAQMD 2008). According to the SCAQMD LST assessment methodology, the assessment of localized impacts addresses only those emissions that are generated "onsite," that is for the purposes of this Project, emissions generated from within or along the boundaries of the Project site. Therefore, for this localized analysis, only the onsite emissions reported for each phase in the CalEEMod worksheets are examined.

Toxic Air Contaminants

The greatest potential for TAC impacts during Project construction would be related to DPM emissions associated with heavy-duty equipment during demolition, excavation, and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature. Although Project construction would be temporary, construction impacts associated with TACs are addressed quantitatively in an HRA prepared by Wood Environment & Infrastructure, Inc. (Wood) (see Appendix D).

Health risk calculations were performed using the OEHHA methodologies and exposure parameters, and the corresponding SCAQMD guidance documents. In March 2015, OEHHA

updated the methods for estimating cancer risks to use higher estimates of cancer potency during early life exposures and to use different assumptions for breathing rates and length of residential exposures. The new guidance, *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments*, incorporates advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF) (OEHHA 2015). These updated exposure factors can result in numeric life-time health risk values to be approximately two to three times higher than those calculated under the previous OEHHA guidelines. The HRA was prepared in accordance with the 2015 OEHHA guidance. Detailed methodologies and assumptions utilized in the HRA are described further in Appendix D.

For the purposes of the assessing TACs during construction, the HRA quantifies health risk effects at the point of maximum impact (PMI) for cancer/chronic effects and for the maximum exposed individual resident (MEIR). The PMI is identified as the point at the northern property line of the Project site, adjacent to the Flower Child/Élephante building located at 1332 2nd Street. This location will not be permanently occupied by a receptor so that is why it is referred to as the PMI. It should be noted that the health risks at the PMI were modeled as a residential receptor as an initial default, even though no actual person will occupy that spot long-term. The PMI for acute effects was predicted at the southeastern property line of the proposed Project, located adjacent to Santa Monica Boulevard. The MEIR was identified as a residential receptor on the southwestern side of the StepUp on Second apartments located at 1328 2nd Street, which is adjacent to the northern side of the proposed Project.

CO Hotspots

Localized air quality impacts and respiratory health risks could occur as a result of CO hotspots. Areas with high vehicle volumes, such as congested intersections (i.e., LOS E or worse), have the potential to create high concentrations of CO, known as CO hot spots. This analysis considers the Project's potential generation of 3,479 vehicle trips per day and 259 maximum peak hour trips (see Section 3.13, *Transportation*) and its contribution to the most congested intersections affected by the Project. The most heavily trafficked intersection within the vicinity of the Project site that would be affected by the proposed Project is Palisades Beach Road/California Incline, which experiences a peak of 6,872 vehicles during the morning (A.M.) peak hour.

3.2.4 Applicable Mitigation Measures from the DCP

Several air quality mitigation measures were identified and adopted as part of the Mitigation Monitoring and Reporting Program (MMRP) for the Downtown Community Plan (DCP) Program EIR. For example, MM AQ-2, requiring all new development occurring within the Downtown to

comply with the SCAQMD Construction Emissions Management Plan, which would require development projects in the Downtown to utilize diesel particulate filters or catalysts on construction equipment, use of low NO_x diesel fuel, use of a minimum 30 percent USEPA Tier 4 engine-compliant equipment, use of architectural coatings with low VOC ratings [i.e., no more than 125 grams per liter (g/L)], and other construction best management practices (BMPs). MM AQ-5a and MM AQ-5b from the DCP Program EIR MMRP would require applicants for new projects located in higher risk locations within 100 feet of an intersection operating at or projected to operate at LOS E or LOS F to prepare a HRA and incorporate measures to protect interior air quality, such as installation of air purifying and circulation systems.

However, as presented in the impact analyses below, the mitigation measures from the DCP Program EIR would not apply to the proposed Project, or the proposed Project would implement Project elements or BMPs that would meet or achieve greater emissions reductions than those specified in DCP Program EIR. For instance, the proposed Project is not located within 100 feet of an intersection of LOS E or F and would not be located in sensitive location that would be subject to substantial TAC emissions (e.g., freeways that generates more than 100,000 AADT, gas stations, dry cleaners, etc.) and, therefore, would not require preparation of an operational HRA. In addition, the Project would comply with applicable State, SCAQMD and City requirements, and would implement construction BMPs that would exceed the requirements of DCP MM AQ-2, such as the 100 percent use of USEPA Tier 4-compliant equipment. In addition, though not required to reduce Project impacts, DCP MM AQ-1 is identified as a recommended mitigation measure for the proposed Project to reduce construction architectural coating VOC emissions by requiring the use of coatings with VOC ratings of no more than 50 g/L, as described further below.

3.2.5 Project Impacts and Mitigation Measures

<i>Would the project conflict with or obstruct implementation of the applicable air quality plan?</i>

AQ-1	Construction and operation of the proposed Project would contribute to basin-wide criteria pollutant emissions. However, criteria pollutant emissions associated with the proposed Project would not increase the severity of or cause existing air quality violations and would not exceed the AQMP's forecasts. Therefore, the project would not conflict with the AQMP and this impact would be <i>less than significant</i>.
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Impact Description (AQ-1)

The proposed Project would conflict with or potentially obstruct implementation of the SCAQMD's adopted 2016 AQMP if it would contribute to population growth that would exceed current population growth forecasts. The 2016 AQMP relies upon growth projections adopted by SCAG's RTP/SCS, which in turn, relies upon cities' adopted general plan growth projections. Consequently, compliance with the LUCE, DCP, and RTP/SCS would result in compliance with the 2016 AQMP. In addition, the SCAQMD's CEQA Air Quality Handbook states that a consistency finding should be based on identifying whether a development project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations.

A comprehensive analysis of consistency with applicable long-range planning documents including SCAG's RTP/SCS and policies is provided in Section 3.10, *Land Use and Planning*. In addition, the Project's consistency the Sustainable City Plan and Climate Action Plan & Adaptation Plan is provided in Section 3.7, *Greenhouse Gas Emissions*. This analysis includes a rigorous discussion of consistency with development standards, including design guidelines and vehicle trip reduction strategies, to reduce operational and mobile-source emissions. As discussed therein, the proposed Project is consistent with the development standards, design guidelines, and strategies identified to reduce operational emissions. For example, the RTP/SCS aims to maximize mobility and accessibility for all people by incorporating smart land use strategies such as concentrating housing, employment, and a mix of retail and services near each other and in a manner that maximizes non-vehicular mobility and multimodal accessibility. The proposed Project supports these goals by including a mix of hotel, residential, retail/restaurant, cultural uses, and open space in proximity to transit services within the Downtown, including the Downtown Santa Monica Station and various Big Blue Bus and Metro service routes within walking distance of the Project site.

The proposed Project would generate temporary employment opportunities during construction and long-term employment during operation of the hotel, commercial restaurant and retail uses, and Cultural Use Campus associated with the proposed Project. While these uses would increase employment opportunities in the City, most of these employees are expected to come from the existing City or regional workforce and would not increase regional population.

The proposed Project would develop 100 new residential units, including replacement of 19 existing rent-controlled units. As described in Section 3.13, *Transportation*, to calculate the total number of residents associated with the proposed Project, the average household size data from the Citywide 2017 American Community Survey 5-Year Estimates for Santa Monica and

empirical household size data from existing affordable housing developments were used. Based on this data, the proposed Project would result in a City population of 180 residents. 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 2017). This negligible increase in the regional population would be consistent with adopted City growth forecasts, which informs regional population estimates for SCAG and the 2016 AQMP. Therefore, the proposed Project would not exceed the 2016 AQMP's population forecast.

Criteria pollutant emissions from operation of the proposed Project that could create or contribute to air quality violations are discussed in Impact AQ-3 below, and would be *less than significant*; therefore, the proposed Project would not result in, cause, or contribute to air quality violations. Therefore, the proposed Project would not conflict with the 2016 AQMP, and impacts would be *less than significant*.

Would the project would 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?

AQ-2 The South Coast Air Basin is designated as non-attainment for O₃, PM₁₀, and PM_{2.5} under Federal and/or State ambient air quality standards. Construction activity for the proposed Project would generate air pollutant emissions to the Basin. Construction emissions of CO, NO_x, SO_x, PM₁₀, and PM_{2.5} would not exceed SCAQMD regional thresholds, and with implementation of recommended mitigation measure, VOC emissions would be less than regional thresholds. Therefore, this impact would be *less than significant*.

Impact Description (AQ-2)

Construction of the proposed Project would last over a 3 year period including: 2 months for demolition; 4 to 6 months for the relocation of the City-designated Landmarks; 3 months for excavation; and 25 months for construction from foundations to occupancy. It is anticipated that existing tenants would vacate the existing structures and construction work would begin in late 2021 with future occupancy and operation of the proposed Project commencing in late 2024.

Construction activities would include demolition of approximately 44,450 sf of existing buildings, relocation of two City-designated Landmarks, excavation of 108,000 cubic yards (cy) of soil, and approximately 248,570 sf of above-grade new building construction as well as construction of a

three-level subterranean parking garage (refer to Section 2.7, *Construction Activities*). During these activities, construction pollutant emissions, such as NO_x and PM₁₀, would be generated from heavy-duty construction equipment onsite, heavy haul trucks used to remove demolition debris and excavated soils off-site, traveling along haul routes, and vehicle trips generated from construction workers traveling to and from the Project site. Most fugitive dust emissions (i.e., PM₁₀ and PM_{2.5}) would result during demolition and excavation activities. During the architectural



finishing phase, the application of architectural coatings (i.e., paints) and other building materials would also release VOC emissions. The assessment of construction air quality impacts provided in detail below considers and quantifies each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, prevailing weather conditions. Compliance with several existing State and local regulations, such as SCAQMD rules would substantially limit the generation of construction emissions related to the proposed Project, including those from construction vehicles, excavation, building construction, and architectural coatings. A summary of these regulations and their objectives is provided below.

- As required by the USEPA beginning in 2000, and the CARB beginning in 2006, and as specified in the CCR Title 13, Division 3, Chapter 9, Article 4, Sec. 2423(b)(1), all off-road diesel engines are required to meet at a minimum the Tier 3 Emission Standards for Off-Road Compression-Ignition Engines (with proper diesel particulate controls). As described in Section 2.7.6, *Construction*, construction activities associated with the proposed Project would use Tier 4 construction equipment only, which can reduce diesel particulate emissions from combustion by 85 to 95 percent. For example, Tier 4 engines with horsepower ratings between 175 and 750 generate 90 percent less exhaust emissions, including particulate matter, than Tier 2 or 3 engines. Tier 4 vehicles operate with significantly less emissions than Tier 1, Tier 2, or Tier 3 as regulated by the USEPA.
- During construction, an estimated 6 heavy haul trucks per day for 3 months would be used to export demolition debris, and approximately 80 long belly dump trucks per day for 3 months used to export the 108,000 cy of soil from excavation of the subterranean parking structure. During construction of the proposed structures, additional concrete trucks would

also be used to import cement. During these periods of construction, these trucks would be prohibited from idling pursuant to California Idling Regulations as defined by CARB, which prohibits heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than 5 minutes, which would result in minor, intermittent sources of air emissions).

- Specific construction haul routes would be determined in coordination with City staff prior to issuance of a demolition permit; however, residential streets would be avoided. As such, construction activities associated with the proposed Project would use roadways along the inbound and outbound haul routes that generally carry substantial volumes of traffic (e.g., PCH, I-10). The proposed Project's haul truck trips associated with the proposed Project would incrementally increase mobile source emissions along these routes.
- SCAQMD Rule 403 requires management of all fugitive dust (PM₁₀) generated during project construction. All heavy-haul trucks would be required to be covered to contain dirt, sand, soil, or other loose materials during transport. Wheel washers would be installed where vehicles enter and exit the construction site onto paved roads and/or wash-off trucks would be required for any equipment leaving the site each trip to prevent tracking of construction dust/dirt offsite. The proposed Project would be required to control dust during construction, including application of water two times daily, or by application of non-toxic soil stabilizers to all unpaved parking or staging areas or unpaved road surfaces, as well as application of non-toxic soil stabilizers to all inactive construction areas.
- The proposed Project would also be required to comply with SCAQMD Rule 1186, which requires certified street sweepers or roadway washing trucks if visible soil materials are carried onto adjacent streets. Compliance with these requirements would ensure that fugitive dust and NO_x emissions would be minimized during the demolition, excavation, paving, and building construction phases of the Project.
- Most of the VOC emissions associated with the proposed Project would be generated from the application of architecture coatings, including paints, stains, and other finishes that off-gas VOCs during the drying/curing process. However, in compliance with the SCAQMD Rule 1113, the proposed Project is required to use "No VOC" or "Low VOC" finishes, with VOC emission ratings of up to 50 g/L. Use of No VOC or Low VOC finishes reduces VOC emissions during the architectural finishing phase of construction.

Total pollutant emissions for Project construction (accounting for compliance with the above regulations) were estimated using CalEEMod for each stage of construction, including demolition,

relocation of the City-designated Landmarks, grading/excavation, construction, paving, and architectural coating, from late 2021 to late 2024. The maximum daily emission levels for each pollutant are compared to SCAQMD thresholds in Table 3.2-6. These CalEEMod construction emissions estimates assume that the construction procedures associated with the proposed Project would comply with SCAQMD and State rules (e.g., SCAQMD Rule 403 and SCAQMD Rule 1113) with no further mitigation. As indicated in the Table 3.2-6, overall construction emissions would not exceed SCAQMD thresholds for CO, VOCs, NO_x, SO_x, PM₁₀ or PM_{2.5}. These results indicate that the Project would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, air quality impacts related to construction emissions would be *less than significant*.

Table 3.2-6. Maximum Estimated Construction Emissions for the Proposed Project by Construction Phase (Unmitigated)

Emission Source	Construction Emissions (pounds/day)					
	CO	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Demolition (2021-2022)	33.0	1.3	4.3	<0.1	4.4	1.1
Pre-Excavation and Landmark Relocation (2022)	13.2	0.8	1.0	<0.1	1.8	0.5
Boring and Trenching for Landmark Site (2022)	27.8	1.0	2.2	<0.1	1.9	0.5
Permanent Relocation of Landmarks (2022)	13.2	0.8	1.0	<0.1	1.8	0.5
Grading / Excavation (2022)	52.3	2.6	43.3	0.2	6.7	2.5
Building Construction (2022-2024)	25.6	1.1	6.4	<0.1	2.0	0.6
Paving (2024)	18.6	0.8	1.4	<0.1	1.8	0.5
Architectural Coating (2024)	8.8	74.5	0.6	<0.1	1.8	0.5
Peak Daily Total	52.3	74.5	43.3	0.2	6.7	2.5
<i>SCAQMD Thresholds of Significance</i>	<i>550</i>	<i>75</i>	<i>100</i>	<i>150</i>	<i>150</i>	<i>55</i>
Above Thresholds?	No	No	No	No	No	No

Notes: Bold text indicates the highest potential daily emission level from onsite and offsite sources over the assumed project construction period (i.e., late 2021 – late 2024).

Source: See Appendix C; SCAQMD 2019.

Project construction emissions estimates shown in Table 3.2-6 would not exceed SCAQMD thresholds; however, the maximum estimated VOC emissions are only approximately 1 pound/day below the threshold. CalEEMod is an air pollutant emissions estimator model that includes a margin of error based on modeling assumptions. Projected VOC emissions for construction of the proposed Project are within that the margin of error. To ensure construction emissions would be less than significant, mitigation is recommended to further reduce Project construction VOC emissions during the architectural coating phase. Mitigation Measure (MM) AQ-1 requires the use of “super compliant” architectural coatings, as identified by SCAQMD, with VOC emission

ratings of 10 g/L or less. Implementation of these super compliant coatings would reduce the Project's construction VOC emissions to levels well below the threshold of significance as shown in Table 3.2-7.

Table 3.2-7. Maximum Estimated Construction Emissions for the Proposed Project by Construction Phase (Mitigated)

Emission Source	Construction Emissions (pounds/day)					
	CO	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Demolition (2021-2022)	33.0	1.3	4.3	<0.1	4.3	1.1
Pre-Excavation and Landmark Relocation (2022)	12.6	0.9	1.1	<0.1	1.8	0.5
Boring and Trenching for Landmark Site (2022)	27.3	1.1	2.2	<0.1	1.9	0.5
Permanent Relocation of Landmarks (2022)	12.6	0.9	1.1	<0.1	1.8	0.5
Grading / Excavation (2022)	52.3	2.7	43.7	0.2	6.7	2.5
Building Construction (2022-2024)	24.7	1.2	6.5	<0.1	2.0	0.6
Paving (2024)	19.7	0.9	1.4	<0.1	1.8	0.5
Architectural Coating (2024)	8.3	16.9	0.6	0.2	1.8	0.5
Peak Daily Total	52.3	16.9	43.7	0.2	6.7	2.5
SCAQMD Thresholds of Significance	550	75	100	150	150	55
Above Thresholds?	No	No	No	No	No	No

Notes: Bold text indicates the highest potential daily emission level from onsite and offsite sources over the assumed project construction period (late 2021 – late 2024).

Source: See Appendix C; SCAQMD 2019.

Mitigation Measures

Implementation of the following recommended mitigation measure would ensure that potential air quality impacts from VOC emissions would remain less than significant.

MM AQ-1 ***Super Compliant Coatings.** To reduce VOC levels during the architectural coating phase, low VOC-emission paint shall be used with levels of 10 g/L or less (e.g., paints from the SCAQMD's list of Super Compliant Architectural Coatings, such as Benjamin Moore Natural Odorless, Zero VOC Paint). The Applicant or construction contractor shall also utilize high-pressure low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent. The Applicant or construction contractor shall implement additional measures to reduce daily and quarterly VOC levels related to architectural coatings to the extent determined feasible by the City and APCD, such as extending coating applications by limiting daily coating activities. City staff shall ensure measures are depicted on all*

submitted building and construction plans submitted to City prior to the issuance of building permits. City building inspectors shall ensure compliance.

Would the project would 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?

AQ-3 Operation of the proposed Project would generate air pollutant emissions that would be below SCAQMD mass daily thresholds; therefore, this impact would be less than significant.

Impact Description (AQ-3)

Operational emissions of the proposed Project include those generated by vehicle trips (mobile emissions), the use of natural gas (point source energy emissions), use of consumer products and appliances, and the use of landscaping maintenance equipment (area emissions). The proposed Project does not include gas or wood burning fireplaces, consistent with SCAQMD's Rule 445 for new construction and therefore, would not generate pollutant emission associated with such use. Operation of the proposed Project would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Further, truck trips associated with the proposed Project would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NO_x emissions from existing diesel trucks. Therefore, Project operations would not be considered a substantial source of diesel particulates.

Pollutant emissions would be generated from proposed Project vehicle trips associated with hotel and commercial employees, visitors, and residents. The proximity of transit services (e.g., Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line, Big Blue Bus, Metro Rapid, etc.) would allow employees, residents, and/or patrons to rely on more sustainable modes of transportation to travel to and from the Project site and thus would minimize operational emissions.

Maximum daily operational emissions of the proposed Project were estimated using CalEEMod. For modeling purposes, no mitigation measures were considered in this analysis; however, CalEEMod assumes the proposed Project's operational procedures would comply with applicable SCAQMD and State rules (e.g., Rule 1113). As indicated in Table 3.2-8, the maximum operational emissions anticipated during operation of the proposed Project would not exceed SCAQMD

thresholds for CO, NO_x, SO_x, VOCs, PM₁₀, or PM_{2.5}. These results indicate that the Project would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, this impact would be *less than significant*.

Table 3.2-8. Maximum Estimated Operational Emissions for the Proposed Project (Unmitigated)

Air Pollutant	Operational Emissions ¹ (pounds/day)				SCAQMD Thresholds	Exceeds Threshold
	Area	Energy	Mobile	Overall		
CO	8.3	2.3	24.6	35.2	550	No
VOC	7.4	0.3	3.5	11.2	55	No
NO _x	0.1	2.9	13.7	16.7	55	No
SO _x	<0.1	<0.1	<0.1	<0.1	150	No
PM ₁₀	<0.1	0.2	5.8	6.1	150	No
PM _{2.5}	<0.1	0.2	1.6	1.9	55	No

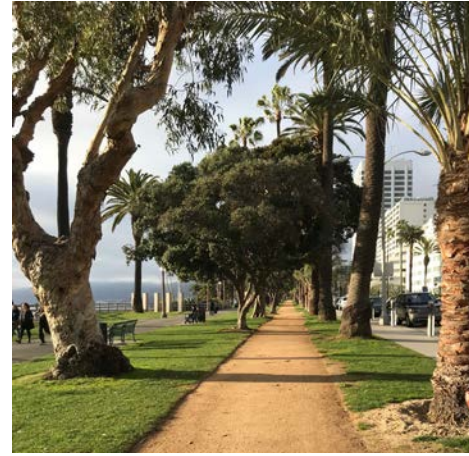
Source: See Appendix C; SCAQMD 2019.

Would the project expose sensitive receptors to substantial pollutant concentrations?

AQ-4 Onsite and offsite emissions associated with the proposed Project would not exceed the SCAQMD localized significance thresholds (LSTs), would not generate substantial Toxic Air Contaminants (TACs) or place sensitive receptors within buffer zones of potential TAC emitters, and would not generate CO hotspots. Therefore, this impact would be *less than significant*.

Impact Description (AQ-4)

The Project site is located within 100 feet of sensitive receptors, including residences in the mixed-use buildings located immediately to the northeast of the Project site on 2nd Street. Palisades Park is located approximately 100 feet west of the Project site, across Ocean Avenue. Nearby residents and those using the recreational facilities located near the Project site, particularly the elderly and children, could experience adverse health effects from PM₁₀, PM_{2.5}, CO, or NO_x if concentrations exceed the LSTs. For example, fugitive dust (PM) would be generated due to the amount of earthwork required to facilitate excavation of the three-level subterranean parking garage. NO_x emissions and fugitive dust from engine exhaust would be generated by



While Palisades Park is a sensitive receptor, recreational activities at the Park are transitory in nature; therefore, sensitive receptors at the Park are not likely to be exposed to Project related construction emissions for an extended period.

diesel trucks and construction equipment. Although these construction-related emissions would be temporary, they could expose sensitive receptors to substantial pollutant concentrations during the estimated 3-year construction period. As discussed in Impact AQ-2, compliance with CARB regulations and SCAQMD rules would control fugitive dust and construction vehicle emissions.

Air Pollutant Emissions and Human Health Effects

Health-based ambient air quality standards for O₃ are measured as concentrations of O₃ and not as tonnages of their precursor pollutants (e.g. VOCs). Additionally, the tonnage of the precursor pollutants is not necessarily the cause of human health effects. Instead, the concentration of resulting O₃ or particulate matter may result in negative health-related impacts. The complexity of O₃ formation and the non-linear relationship of O₃ concentration with precursor gases, as well as the state of environmental science modeling used to date, result in infeasibility to convert specific emissions levels of NO_x or VOCs emitted in a particular area to a particular concentration of O₃. Meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of O₃.

As expressed in the *amicus curiae* brief submitted for the *Sierra Club v. County of Fresno* case (*Friant Ranch Case*), the CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status. Emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA projects must use feasible mitigations, and significance thresholds are not intended to be indicative

of any localized human health impact that a project may have. Exceedance of a mass regional emissions threshold from project-related activities does not necessarily indicate that a project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels (SCAQMD 2014; San Joaquin Valley Air Pollution Control District [SJVAPCD] 2014).

The primary health concern with exposure to VOC emissions is the secondary formation of O₃. Based on discussions with air quality management district staff, and as the *amicus curiae* briefs submitted for the Friant Ranch Case suggested, because of the complexity of O₃ formation and given the state of environmental science modeling in use at this time, it is infeasible to determine if a single project's precursor emissions would result in the formation of secondary ground-level O₃ secondary emissions. Available models are designed to determine regional, population-wide health impacts and cannot accurately quantify O₃-related health impacts caused by NO_x and VOC emissions from the local project level. However, since construction of the proposed Project would not exceed the localized significance thresholds, the proposed Project is not anticipated to contribute to localized health impacts related to these pollutants including O₃.

Localized Construction Emissions

The LSTs listed in Table 3.2-5 only apply to those emissions generated by onsite construction activities and do not apply to offsite mobile emissions (i.e., heavy-haul trucks). Total pollutant emissions were estimated using CalEEMod for the key stages of construction, including demolition, relocation of the City-designation Landmarks, grading/excavation, paving, construction, and architectural coating (refer to Table 3.2-6 and Table 3.2-7). The maximum emissions levels for each pollutant daily were also estimated using CalEEMod for each year of the construction phase from late 2021 through late 2024. The LSTs for sensitive receptors within 25 meters of the Project site were used to represent the distance to the closest receptors and are the most conservative LST thresholds. LSTs and estimates of onsite construction-related Project emissions for the proposed Project are shown in Table 3.2-9.

The highest daily construction emissions of CO, NO_x, PM₁₀, and PM_{2.5} are expected to occur during grading and excavation activities, which would last a total of approximately 3 months. As demonstrated in Table 3.2-9, the Project's construction emissions would not exceed LSTs for CO, NO_x, PM₁₀ and PM_{2.5}. These results indicate that the Project would not generate levels of construction emissions that would adversely affect local air quality and public health. Therefore, this impact would *less than significant*.

Table 3.2-9. Onsite Construction Emissions Compared to Localized Significance Thresholds for 25 Meter Receptors (Unmitigated)

Emission Source	Onsite Construction Emissions (pounds/day)			
	CO	NO _x	PM ₁₀	PM _{2.5}
Demolition (2021-2022)	6.3	2.1	3.9	1.0
Pre-Excavation and Landmark Relocation (2022)	5.9	0.4	1.8	0.5
Boring and Trenching for Landmark Site (2022)	5.9	0.14	1.8	0.5
Permanent Relocation of Landmarks (2022)	5.9	0.4	1.8	0.5
Grading / Excavation (2022)	15.4	38.4	4.6	1.3
Building Construction (2022-2024)	6.6	3.1	2.0	0.5
Paving (2024)	5.1	0.4	1.8	0.5
Architectural Coating (2024)	5.1	0.4	1.8	0.5
Peak Daily Total	15.4	38.4	4.6	1.3
LSTs (2-acre site at 25 meters)	827	147	6	4
Exceeds Threshold?	No	No	No	No

Notes: Bold text indicates the highest potential daily emission level over the construction phases (late 2021 – late 2024).

Construction maximum daily emissions are taken from each construction phase, not from the sum of all phases, due to scheduling of the phases throughout the entire 36-month construction period.

Source: See Appendix C; SCAQMD 2009.

Localized Operational Emissions

Similar to construction, the LSTs listed in Table 3.2-5 only apply to those emissions generated by onsite operational activities and do not apply to most of mobile emissions as these would occur largely offsite. The LSTs for sensitive receptors within 25 meters of the Project site were used to represent the distance to the closest receptors and are the most conservative LST thresholds. LSTs and estimates of onsite construction-related Project emissions for the proposed Project are shown in Table 3.2-10. As presented therein, the operational emissions associated with the proposed Project would not exceed LSTs for CO, NO_x, PM₁₀ and PM_{2.5}. These results indicate that the Project would not generate levels of operational emissions that would adversely affect local air quality and public health. Therefore, this impact would *less than significant*.

Table 3.2-10. Onsite Operational Emissions Compared to Localized Significance Thresholds for 25 Meter Receptors (Unmitigated)

Emission Source	Onsite Operational Emissions (pounds/day)			
	CO	NO _x	PM ₁₀	PM _{2.5}
Area	8.30	0.10	0.05	0.05
Energy	2.31	2.86	0.22	0.22
Mobile*	24.61	13.72	5.79	1.59
Peak Daily Total	35.22	16.67	6.06	1.86
Existing	28.07	11.37	5.56	1.61
Net Emissions	7.15	5.30	0.50	0.25
LSTs (2-acre site at 25 meters)	827	147	6	4
Exceeds Threshold?	No	No	No	No

Notes: Bold text indicates the highest potential daily emission.

*Mobile emissions are primarily generated offsite; however, they are included here because CalEEMod does not distinguish onsite from offsite mobile emissions.

Source: See Appendix C; SCAQMD 2009.

Toxic Air Contaminants Emissions

The receptors listed in Table 3.2-5 would be exposed to construction and operational TAC emissions generated by the Project during construction phases. Sensitive receptors along construction haul routes would also be exposed to TAC emissions during construction activities. Construction health risks have been quantified during preparation of a Project-specific construction phase HRA. As the Project is an urban infill development project that 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 and operational health risks are discussed qualitatively in this document.

Construction

Impacts of the proposed Project to the neighboring sensitive receptors were estimated from construction equipment, onsite truck traffic, asphalt paving, and architectural coatings over the 4-year Project duration using HARP software and following OEHHA and CARB guidance. Cancer and chronic noncancer hazards were evaluated for annual average exposure from 2021 through 2024, while acute noncancer hazards were evaluated for the worst-case year (2022). The chronic noncarcinogenic, acute noncarcinogenic, and carcinogenic risk resulting from onsite construction emissions are summarized in the following discussions and in Table 3.2-11 (see Appendix D).

Chronic Noncarcinogenic Risk. Based on the HRA prepared for onsite construction emissions associated with the proposed Project, the highest target organ-specific chronic HI was 0.006 for

the MEIR and 0.009 at the PMI, which is well below the established SCAQMD threshold of 1.0. The organ/system endpoint with the highest HI was the respiratory system for both receptors, with DPM contributing over 99 percent of the hazard index. Therefore, TAC emissions from construction activities associated with the proposed Project would not pose significant chronic noncarcinogenic health hazards for sensitive receptors near the Project site.

Acute Noncarcinogenic Risk. Based on the HRA prepared for onsite construction emissions associated with the proposed Project, the highest predicted target organ specific acute HIs were 0.03 for the MEIR and 0.05 at the PMI, which is well below the established SCAQMD threshold of 1.0. The organ/system endpoint with the highest HIs was the eye. Therefore, TAC emissions from construction activities associated with the proposed Project would not pose significant acute noncarcinogenic health hazards for sensitive receptors near the Project site.

Carcinogenic Health Effects. The theoretical carcinogenic risk for the MEIR based on the 4 years of exposure to Project-related emissions averaged over the age-specific intervals evaluated was 7×10^{-6} . The theoretical carcinogenic risk at the PMI, which is located adjacent to a commercial property (i.e., Flower Child/Élephante), was evaluated as a commercial worker because this location will not be permanently occupied by a receptor (i.e., resident). The theoretical carcinogenic risk for the PMI was estimated at 2×10^{-7} , which is well below the CEQA significance threshold. The predicted risks for both the MEIR and PMI do not exceed the SCAQMD threshold of 10×10^{-6} . Therefore, TAC emissions from Project activities are not expected to cause significant carcinogenic health effects for sensitive receptors near the Project site.

The results of the HRA indicate that unmitigated Project-related emissions would not increase chronic health hazards or maximum cancer risk in exceedance of SCAQMD's thresholds and, therefore, impacts of Project construction from generation of TAC emissions are *less than significant*.

Table 3.2-11. Unmitigated Maximum Health Impacts for Offsite Sensitive Receptors

Risk	Chronic Hazard Index		Maximum Cancer Risk (No. in 1 million)	
	PMI	MEIR	PMI	MEIR
Chronic Noncarcinogenic Risk	0.009	0.006	-	-
Acute Noncarcinogenic Risk	0.05	0.03	-	-
Carcinogenic Health Effects	-	-	2×10^{-7}	7×10^{-6}
<i>Threshold</i>	<i>1.0</i>		<i>10×10^{-6}</i>	
Exceeds Threshold?	No		No	

Source: See Appendix D.

Operation

The potential for TACs to have an operational effect on sensitive receptors would occur if the Project is located near an existing significant source of TACs or if it would generate TACs in quantities that may have an adverse effect on sensitive receptors. CARB identifies high-volume freeways and roads, dry cleaners, and large gas stations as potential sources of TACs, while typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities.

The proposed Project would provide hotel, residential, commercial restaurant and retail, and cultural uses, which are all considered to be uses that would not generate substantial amounts of TACs and would not pose a risk to sensitive receptors in the vicinity of the Project site. Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or application of cleaning solutions. The land uses associated with the proposed Project would not include installation of industrial-sized paint booths or involve the extensive use of commercial or household cleaning products. Therefore, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with Project operation.

In addition to typical operations, the SCAQMD recommends that operational HRAs be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities. These activities would not meet or exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Further, as previously described, truck trips associated with the proposed Project are required to comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce DPM and NO_x emissions from existing diesel trucks. Therefore, operation of the proposed Project would not be considered a substantial source of diesel particulates.

Typical sources of TACs that may affect future users of the proposed Project involve those same uses and activities identified above. According to the 2005 CARB's *Air Quality and Land Use Handbook*, it is recommended to maintain 500 feet of separation between residences and dry cleaners using perchloroethylene, 500 feet between residences and a major freeway that generates more than 100,000 AADT, and more than 50 feet from a typical gas station. The Project site is not located within these buffer zones from dry cleaners or gas stations. The Project site is located

within the recommended 500-foot buffer zone of PCH; however, PCH does not meet the CARB's criteria for a TAC emitter as the highway generates only 73,000 AADT near the Project.

Therefore, the proposed Project would not release substantial amounts of TACs, and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from offsite. TAC pollution controls would not be required for the proposed Project, and *less than significant* impacts on human health would occur.

AQ-5 Project-generated traffic, together with other cumulative traffic in the area, would incrementally increase CO levels near local intersections. However, Federal and State CO standards would not be exceeded with implementation of the proposed Project and this impact would be *less than significant*.

Impact Description (AQ-5)

The potential for the proposed Project to cause or contribute to CO hotspots has been evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the proposed Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the air quality standards, and that no further CO analysis is warranted or required.

As shown in Table 3.2-2, CO levels near the Project site are substantially below the Federal and State standards. Maximum CO levels in recent years are 2.2 ppm (1-hour average) and 1.4 ppm (8-hour average), where are well below the CAAQS of 20 ppm (1-hour average) and 9.0 ppm (8-hour average). CO levels decreased dramatically in the Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is unlikely that CO levels at Project-impacted intersections would result in an exceedance of these standards.

Additionally, SCAQMD conducted CO modeling for the attainment demonstration in the 2003 AQMP for the four worst-case intersections in the Basin, including:

- Wilshire Boulevard and Veteran Avenue;
- Sunset Boulevard and Highland Avenue;
- La Cienega Boulevard and Century Boulevard; and

- Long Beach Boulevard and Imperial Highway.

In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an AADT volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to I-405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 (8-hour average) at Wilshire Boulevard and Veteran Avenue, exclusive of ambient background CO concentrations. When added to the existing background CO concentrations, the screening values would be 7.6 ppm (1-hour average) and 5 ppm (8-hour average), which are still well below the CAAQS of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).

As discussed in Section 3.13, *Transportation*, six intersections would be significantly impacted by the proposed Project under future operational year (2025) plus Project conditions (see Appendix K). These include:

- Palisades Beach Road & California Incline (LOS E in the AM peak hour)
- Ocean Avenue & California Avenue (LOS E in the AM, F in the PM & weekend peak hours)
- 2nd Street & Arizona Avenue (LOS D in the weekend peak hour)
- 2nd Street & Santa Monica Boulevard (LOS F in the PM and weekend peak hours)
- Main Street & Olympic Drive (LOS F in the AM and weekend peak hours)
- 4th Street & Santa Monica Boulevard (LOS E in the PM, F in the weekend peak hour)

The most heavily trafficked intersection within the vicinity of the Project site that would be affected by the proposed Project is Palisades Beach Road/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 and Veteran Avenue intersection evaluated in the *CO Plan* for the SCAQMD's 2003 *Air Quality Management Plan* (see Appendix D). The Project would increase average daily trips by approximately 2,110 compared to existing trip generation from the Project site. These additional trips would nominally contribute CO emissions to the six intersections identified above, which do not produce CO hot spots from existing traffic. With the conservative assumption that all 3,479 vehicle trips per day generated by the proposed Project would pass through the Palisades Beach Road/California Incline intersection,

this intersection would experience approximately 89,379 vehicle trips per day. This would be approximately 89 percent of the 100,000 vehicles per day experienced at the Wilshire Boulevard and Veteran Avenue intersection, which does not generate a CO hot spot. As a result, CO concentrations are expected 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 concentrations. Therefore, the proposed Project would neither directly result in or substantially contribute to a CO hotspot and impacts would be *less than significant*.

Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?

AQ-6 None of the land uses included in the proposed Project would result in other emissions including odors that would affect a substantial number of people. Therefore, this impact would be *less than significant*.

Impact Description (AQ-6)

According to the SCAQMD CEQA Air Quality Handbook, objectionable odors are typically associated with industrial uses such as agricultural facilities (e.g., farms and dairies), refineries, wastewater treatment facilities, and landfills. The proposed Project would include construction and operation of hotel, residential, cultural/arts, restaurant, and retail uses, which do not typically generate nuisance odors perceptible to sensitive receptors. During construction, short-term, temporary odors would be expected over the approximately 4-year construction period from construction equipment and paving activities. Any odors that may be generated would be localized and temporary in nature, and would not affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.

Operationally, odors that would be expected from the proposed Project would be typically associated with food smells (e.g., from the outdoor dining areas) and solid waste (refuse) storage typical of urban uses. However, refuse associated with the proposed Project would be consistent with that generated by surrounding uses (e.g., Shangri-La Hotel and existing residential, restaurant, and commercial uses on Ocean Avenue and 2nd Street). Similar to existing conditions, trash and recycling collection facilities for commercial tenants and residents would be provided within enclosures along the 1st Court driveway. All refuse would be stored in covered containers and removed regularly consistent with the City's solid waste and recycling pick-up requirements. Therefore, odors would not be a substantially perceptible by sensitive receptors and impacts associated with generation of objectionable odors would be *less than significant*.

3.2.6 Cumulative Impacts

Development of the proposed Project in conjunction with future projects would potentially result in a cumulative increase in construction-related and traffic-related air emissions, as well as onsite stationary sources of air pollution in the City. Such development could result in significant air quality impacts throughout the duration of the proposed Project in the SCAQMD and would generate emissions during both the construction and operation phases that would result in cumulative impacts to local and regional air quality.

The DCP Program EIR assessed existing air quality conditions within the City and the DCP's potential to increase air pollutant emissions in the Basin, based on projected development and traffic conditions. Construction and operation of future projects evaluated in the DCP Program EIR would result in air pollutant emissions that could potentially result in an exceedance of recommended air quality thresholds. The DCP Program EIR stated that while emissions would be reduced through DCP mitigation measures and project-specific mitigation measures, it is unknown if an individual project's emissions could be reduced to below significance thresholds since construction and operation details are unknown.

Applicable Guidelines

SCAQMD has requirements for assessing cumulative impacts of a project on air quality. SCAQMD's approach is to first determine whether the proposed project would result in a significant project-level impact to regional air quality based on SCAQMD significance thresholds. If the project exceeds SCAQMD thresholds, then the Lead Agency needs to consider the additive effects of cumulative projects only if the proposed Project is part of an ongoing regulatory program or is contemplated in a Program EIR, and the cumulative projects are located within approximately 1 mile of the proposed Project site. If there are cumulative projects within a 1-mile radius of the proposed Project site that are part of an ongoing regulatory program or are contemplated in a Program EIR, then additive effects of the cumulative projects should be considered.

According to CEQA Guidelines Sections 15064(h)(3):

A project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including an air quality attainment or management plan) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.

As discussed in Impact AQ-1, the proposed Project would not conflict with the 2016 AQMP; therefore, it would not be cumulatively considerable under CEQA.

Construction Emissions

SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the Federal CAA mandates to address short-term construction related cumulative conditions. Construction of the Project would comply with SCAQMD including but not limited to Rule 403 fugitive dust control requirements and the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any location. These measures would also be applied to all construction projects in the Air Basin, which would include the cumulative projects in the Project area.

Construction-period emissions 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, there are 19 pending projects near the proposed Project site that would result in temporary cumulative increases in construction emission levels at the same sensitive receptors as the proposed Project. Project-specific construction emissions would not exceed SCAQMD maximum emissions thresholds or LSTs. Therefore, the proposed Project's contribution to cumulative construction emissions impacts would be *less than significant*.

Operational Emissions

The SCAQMD standards for attainment of ambient air quality related to long-term project implementation are in accordance with the Federal CAA and the CAAA. The SCAQMD's AQMP addresses the region's cumulative air quality conditions. The Basin is a nonattainment area for the State standards of O₃, NO₂, PM₁₀, and PM_{2.5}. In addition, the Basin is in nonattainment for the Federal standards of O₃ and PM₁₀. Any growth within the Los Angeles metropolitan area would contribute to existing exceedances of air quality standards when taken as a whole with existing development. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and SCAQMD. As discussed under Impact AQ-3, long-term operational emissions included in the proposed Project would not exceed SCAQMD significance thresholds and cumulative impacts would be *less than significant*.

Traffic generated by the proposed Project would not create a CO "hotspot" at congested intersections and impacts would be less than significant, as described in Impact AQ-5. As SCAQMD thresholds would not be exceeded, the proposed Project would not result in a cumulatively considerable contribution regarding criteria pollutants and cumulative impacts would be *less than significant*.

3.2.7 Residual Impacts

Project emissions would not exceed local thresholds established by the SCAQMD to protect air quality and public health. Compliance with the SCAQMD and State rules ensure that Project emissions are minimized. Therefore, air quality impacts would be *less than significant*. Further, MM AQ-1, requiring the use of super compliant architectural coatings, would ensure Project impacts associated with VOC emissions would remain *less than significant* to account for the known margins of error in emissions modeling software.

3.3 CONSTRUCTION EFFECTS

This section of the Environmental Impact Report (EIR) summarizes and evaluates the construction-related effects of the proposed Project on the sensitive land uses (e.g., multi-family residential) near the Project site. Construction can have a range of adverse effects on sensitive receptors, including noise, air pollution, and reduced visual quality. Construction can also have direct adverse effects on cultural and tribal cultural resources, soils, hazards, and transportation, including reduced multimodal access to and around the construction site. Project construction activities have the potential to result in temporary impacts to air quality and noise, impacts related to ground disturbance, and rerouting of vehicle, bicycle, and pedestrian traffic. Construction-related effects associated with the proposed Project are analyzed fully in the individual sections of this EIR, as appropriate (Sections 3.1, *Aesthetics and Shade/Shadow Effects*; 3.2, *Air Quality*; 3.12, *Noise*; and 3.13, *Transportation*). The conclusions are summarized here for ease of understanding the full range of the construction-related impacts of the proposed Project.

3.3.1 Environmental Setting

Project Site

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 Project site, which is bisected by 1st Court, has a total size of approximately 82,500 square feet (sf) (1.89 acres) with approximately 350 feet of frontage on Ocean Avenue, 320 feet of frontage on Santa Monica Boulevard, and 200 feet of frontage on 2nd Street. Site access is provided via 1st Court from Santa Monica Boulevard and a driveway on both Santa Monica Boulevard and Ocean Avenue providing access to onsite surface parking lots. Sidewalks border the site along these roadways and pedestrian access is also available via 1st Court.

As described in Section 2.2.2, *Existing Project Site*, existing development includes a mixed-use commercial and residential building at the northwest corner of Ocean Avenue and Santa Monica Boulevard and three commercial buildings along Ocean Avenue (refer to Tables 2-1 and 2-2). The front building located at 1333 Ocean Avenue was originally constructed in 1906 and is a City-designated Landmark (LC-01LM-001). The front building located at 1337 Ocean Avenue was originally built in 1926 and is also a City-designated Landmark (LC-04-LM-005). Additionally, two privately operated surface parking lots are also located onsite with driveways off Ocean Avenue, Santa Monica Boulevard, and 1st Court.

Surrounding Land Uses

The Downtown is one of the most densely developed areas in the City and includes multiple high-rise buildings, particularly in its western portion and along Ocean Avenue (refer to Figure 2-2). As previously described, the Project site is located at the western edge of the Downtown, an urban area with a broad mix of hotel, restaurant and retail, and entertainment uses, as well as office and multi-family residential uses. Popular destinations near the Project site include Third Street Promenade (a major retail district providing pedestrian-only shopping, dining, and services) located approximately 0.1 miles to the east, Palisades Park located directly across Ocean Avenue to the west, the Santa Monica Pier located approximately 0.4 miles to the south, and the open-air Santa Monica Place shopping center located approximately 0.3 miles southeast.

Existing development along Ocean Avenue primarily includes commercial and residential uses. Prominent buildings include the Gussie Moran House, which is a two-story commercial use Queen Anne-style building (City-designated Landmark) immediately north of the Project site; the eight-story Hotel Shangri-La (City-designated Landmark) at the corner of Ocean Avenue and Arizona Avenue; 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, which is a mixed-use building with ground floor retail and apartments on the upper floors. Palisades Park (City-designated Landmark) is located west of the Project site across Ocean Avenue. State Highway 1 (i.e., Pacific Coast Highway) and Santa Monica State Beach are located at the base of the Palisades Bluffs immediately to the west of the Project site.

Existing development along 2nd Street includes a two-story theater (Laemmle Monica Film Center) and restaurants (Flower Child/Elephanté); StepUp on Second, a permanent supportive housing facility; a four-story mixed-use building with ground floor restaurant uses and upper floor office and multi-family residential uses (i.e., apartments); a three-story office building; and a one-story church. A six-story commercial building, a seven-story mixed-use office building with ground floor retail and fitness uses, and an eight-story City parking structure (Parking Structure #4, which provides nine levels of above ground parking, including rooftop parking) are located across 2nd Street from the Project site (refer to Figure 2-2).

Across Santa Monica Boulevard, development includes a one-story commercial building with restaurant and commercial tenants; a three-story mixed-use office building with ground floor retail and restaurant 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 (refer to Figure 2-2).

Table 3.3-1. Existing Development Immediately Adjacent to the Project Site

Direction Relative to the Project Site	Surrounding Land Use and Development
North	Existing two-story commercial use City-designated Landmark building Gussie Moran House (1323 Ocean Avenue) and three-story mixed-use commercial building (1332 2 nd Street)
South (across Santa Monica Boulevard)	Existing one-story commercial building with restaurant and commercial tenants; and a three-story mixed-use office building with ground floor retail and restaurant uses
East (across 2 nd Street)	Existing six-story commercial building and a seven-story mixed-use office building with ground floor retail and fitness uses
West (across Ocean Avenue)	Palisades Park

Sensitive Land Uses

Several land use types are considered more sensitive to construction-related effects due to the types of population groups (e.g., children, elderly, acutely or chronically ill, etc.) or activities (e.g., recreation or activities requiring quiet conditions, accessibility, and/or clear air). Residential uses are sensitive because residents – including children and elderly individuals – tend to be at home for extended periods of time, resulting in prolonged exposure constructed-related effects. Recreational and active transportation uses are sensitive as they relate to outdoor activities, resulting in temporary exposure to construction related effects (e.g., air quality, noise, etc.). Commercial and light-industrial uses, on the other hand, are much less sensitive because employees tend to avoid the outdoors and do not typically reside for extended periods of time (e.g., overnight), thereby reducing their exposure to construction-related effects.

Sensitive land uses in the City include long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds and parks with active recreational uses, churches, childcare centers, libraries, and athletic facilities. Sensitive uses in the vicinity of the Project site include the several residential complexes, two schools, two churches, and Palisades Park (see Table 3.3-2). Due to their proximity to the Project site, these uses may be significantly impacted by construction of the proposed Project. Commercial uses (i.e., office, retail, and restaurant) immediately adjacent to the Project site are not considered to be sensitive uses.

Table 3.3-2. Existing Sensitive Receptors within 1,000 Feet of the Project Site

Sensitive Receptor	Distance from the Project Site	Direction
Luxury Apartments	25 feet	North and East
Palisades Park	100 feet	West
StepUp on Second (permanent supportive housing)	120 feet	North and East
Chelsea Santa Monica (residences)	160 feet	North and East
The Christian Institute	200 feet	North
Mayfair Residences	215 feet	East
Pacific Plaza Apartments	350 feet	South
Residences along Pacific Coast Highway/Ocean Front Walk	350 feet	West
Westside Villas	360 feet	Northwest
Criterion Promenade (residences)	600 feet	Northeast
1221 Ocean Avenue (residences)	620 feet	Northwest
First Presbyterian Church	620 feet	Northwest
British American School	630 feet	Northwest
Emeritus College	740 feet	North
Knowledge Universe (day care center)	860 feet	Northeast

Notes: This table identifies the existing sensitive receptors within 1,000 feet of the Project site, which are also presented in Table 3.2-5.

Existing Setting by Issue Area

This section provides a summary of the existing setting for each environmental issue area as it pertains to construction-related effects. More in-depth descriptions of the existing settings are provided in the following sections of the EIR:

- Section 3.1, *Aesthetics and Shade/Shadow Effects*;
- Section 3.2, *Air Quality*;
- Section 3.4, *Cultural Resources*;
- Section 3.6, *Geology and Soils*;
- Section 3.8, *Hazards and Hazardous Materials*;
- Section 3.12, *Noise*;
- Section 3.13, *Transportation*; and
- Section 3.14, *Tribal Cultural Resources*.

Aesthetics and Shade/Shadow Effects

The 1.89-acre Project site encompasses almost a half of a City block and is bounded by and visible from public streets on three sides: Ocean Avenue to the west; Santa Monica Boulevard to the south; and 2nd Street to the east. 1st Court bisects the Project site and provides southbound connectivity from Arizona Avenue to Santa Monica Boulevard. As previously described, the Project site is currently occupied by a mixed-use commercial and residential building at the northwest corner of Ocean Avenue and Santa Monica Boulevard (101 Santa Monica Boulevard) and three commercial buildings along Ocean Avenue, including a Queen Anne-style City-designated Landmark and a Spanish Colonial Revival-style City-designated Landmark (see Section 3.4, *Cultural Resources*). The existing buildings on the Project site range from approximately one to three stories in height. Additionally, two privately operated surface parking lots with driveways off Ocean Avenue, Santa Monica Boulevard, and 1st Court are located onsite. The mixed-use restaurant and residential building is finished with tan paint and blue trim details and balconettes on the building's second floor windows. The external façades of the commercial buildings are finished with white paint along Ocean Avenue. All the Project site's street frontages feature windows and transparency to the public sidewalk. The Ocean Avenue façade is lined with established short shrubs and hedges (refer to Section 3.1, *Aesthetics and Shade/Shadow Effects*).

Air Quality

The City is located in the western coastal portion of Los Angeles County, which is within the South Coast Air Basin (Basin). The Basin is bounded by mountains to the north and east that trap air and its pollutants in the valleys below, making the Basin an area of high air pollution potential. At the Federal level, the Basin is designated as a nonattainment area for ozone (O₃), lead (Pb), and fine particulate matter (PM_{2.5}) (U.S. Environmental Protection Agency [USEPA] 2019). The Basin is in attainment for sulfur dioxide (SO₂) and nitrogen dioxide (NO₂), a subcategory of nitrogen oxides (NO_x) (USEPA 2019). At the state level, the Basin, including the Los Angeles County portion of the Basin, is designated as a nonattainment area for O₃, PM_{2.5}, and suspended or respirable particulate matter (PM₁₀) (California Air Resources Board [CARB] 2018).

Passenger vehicles and trucks are the primary source of criteria air pollutant emissions in the vicinity of the Project site. Traffic-congested streets and intersections have the potential for localized high levels of carbon monoxide (CO). Localized areas where ambient concentrations exceed Federal and/or state standards for CO are termed CO "hotspots." The South Coast Air Quality Management District (SCAQMD) considers CO as a localized problem that could adversely affect sensitive receptors. Based on the Transportation Study prepared for the proposed Project (see Appendix K), there are five intersections in the vicinity of the Project site that

experience congested conditions (i.e., Level of Service [LOS] E or F): 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 Section 3.14, *Transportation*). Nevertheless, as shown Table 3.2-2, CO levels near the Project site are substantially below the Federal and State standards (refer to Section 3.2, *Air Quality*).

Cultural Resources

As described in Section 3.4, *Cultural Resources*, a Phase I Cultural Resources Survey was prepared to assess potential archaeological resources in the vicinity of the Project site. The Phase I Cultural Resources Survey included a literature and record search that identified 52 previous cultural resource investigations that recorded seven historic-period archaeological resources within a 1-mile radius of the Project site. These investigations recorded seven historic period archaeological resources including four historic-period archaeological sites, two isolated historic-period artifacts, and one historic-period structure (see Table 3.4-1). These historic-period refuse deposits and isolated historic-period artifacts are not unique and, by themselves, cannot provide information regarding trends in the City's history. No archaeological resources have been recorded at the Project site; however, the lack of previously recorded archaeological sites is not a reliable indicator of archaeological sensitivity. In highly developed urban settings, the original prehistoric and/or historic-period ground surface is often buried by subsequent fill and development; therefore, prehistoric and historic archaeological deposits may be preserved beneath more recent earth materials. During prehistory, the area within the vicinity of the Project site would have provided a favorable environment for Native American settlement given its proximity to the Pacific Ocean (see Section 3.14, *Tribal Cultural Resources*).

Prior to the 1920s, much of the Downtown contained dwellings on residential lots. Historic research indicates that portions of the Project site had been developed for residential use since at least 1906; by 1926, two other dwellings were located on the Project site. Therefore, it is possible that buried archaeological deposits such as privies and refuse dumps from these residences may be encountered below the Project site. Archaeological deposits from the early-20th century could provide important information about the economy, consumer practices, product availability, and household lifestyles of residents during the early history of the City.

As described in Section 3.4, *Cultural Resources* and the Historic Resources Assessment prepared by Ostashay & Associates Consulting (2020) (see Appendix E), two City-designated Landmarks, 1333 Ocean Avenue (i.e., the 1906 Queen Anne Landmark) and 1337 Ocean Avenue (i.e., the 1926 Spanish Colonial Revival Landmark), are located within the Project site. The building at 101

Santa Monica Boulevard, which was originally constructed in 1925, has the potential to be designated as a City Landmark; however, this building was ultimately determined to be not significant for its Spanish Colonial Revival architecture, because it has been extensively altered and therefore, does not provide a good example of the style (Ostashay & Associated Consulting 2020). The Historic Resources Assessment also described that the subject property is not significant as an example of the historical mixed-use commercial building property type, as there are other better examples in the City such as the Georgian Hotel on Ocean Avenue, the Embassy Hotel-Apartments on 3rd Street, and the Lido Hotel on 4th Street (Ostashay & Associated Consulting 2020).

Geology and Soils

The 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. 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. 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. Along the coastline west of the City's Downtown, vertical cliffs and bluffs below Palisades Park average approximately 100 feet in height (see Section 3.6, *Geology and Soils*).

Southern California is seismically active with a range of faults present in the region. No known active or potentially active faults are located within the Downtown; however, there are numerous faults in the Los Angeles area that are categorized as active or potentially active (California Geology Survey [CGS] 2010). 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). The fault passing closest to the Project site is the Santa Monica Fault, located approximately 1.14 miles (see Table 3.6-1 and Figure 3.6-1). 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 (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 (refer to Table 3.6-2).

A site-specific Geology and Soils Investigation was prepared for the proposed Project by Geotechnologies, Inc. (2019) (see Appendix F) and determined that the Project site is generally flat

with stiff soils that are relatively stable. 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 findings of the adjacent subsurface soil investigations and Phase I Environmental Site Assessment (ESA) prepared for a nearby property, the depth to groundwater at the Project site is likely between 47 and 62.5 feet below ground surface (bgs). Due to threat of bluff instability at the adjacent Santa Monica Palisades Bluffs and associated Palisades Park, the Project site is located within the City's "Downtown Drainage and Infiltration Device Prohibition Zone" and no percolation of surface water occurs onsite (see Section 3.9, *Hydrology and Water Quality*). However, the risk of subsidence onsite is considered very low (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 make it highly unlikely that liquefaction would occur (Geotechnologies, Inc. 2019).

A search of the 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 found no known paleontological localities recorded within the Project site (McLeod 2019). The geotechnical investigation describes that 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 disturbance associated with the proposed Project. 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.

Hazards and Hazardous Materials

A Phase I ESA was prepared by SCS Engineers (2019) (see Appendix G) to assess potentially hazardous conditions at the Project site. The Phase I ESA did not inspect the mixed-use building at 101 Santa Monica Boulevard for asbestos containing materials (ACM); however, given the age

of the building, it is assumed that non-friable ACM could be present (SCS Engineers 2019). A previous Phase I ESA, conducted at 1327, 1333, and 1337 Ocean Avenue, identified no friable ACM in readily accessible areas of the three properties and all suspect ACM were in good condition. Additionally, based on the age of the buildings, lead-based paint (LBP) may be present. No visual or olfactory signs of active mold growth were observed or reported by the building maintenance coordinator during the assessment (SCS Engineers 2019).

A review of Federal and State databases determined that the Project site is identified on three databases. The property at 1333 Ocean Avenue within the Project site was listed on HAZNET Database for disposal of 0.16 tons of ACM in 2003. However, no violations were listed, and the disposal of ACM is not considered to represent a recognized environmental condition (REC). Two properties, located at 133 and 135 Santa Monica Boulevard, historically operated as a dry cleaning facilities in operation from 1928 to 1982. It is likely that these facilities used petroleum hydrocarbon-solvents. It is also 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. 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).

The Project site slopes gently down to the south and southwest. 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. Offsite hazardous materials release adjacent to or hydraulically upgradient of the Project site may have resulted in a REC due to potential contaminant migration to the Project site. 122 and 134 Santa Monica Boulevard, located adjacent to the east of the Project site, previously operated as dry cleaning facilities. 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. The property located adjacent to the north of the Project site (1347 2nd Street) was also operated as a dry cleaning facility. 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, if 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 historically operated as gasoline service station. 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.

With the exception of the sites described above, 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).

Noise

Land uses within the Downtown include a range of residential, commercial, institutional, and recreational open space areas. The primary source of noise in the Downtown is vehicle traffic. 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 EIR as major streets that carry high traffic volumes and are primary contributors to the ambient noise environment as they generate a majority of the traffic noise within the Downtown.

Noise in the Downtown also occurs from various stationary sources, such as mechanical equipment associated with building structures, the operation of various types of businesses, and sources at residential locations (e.g., amplified music). Further, construction activities in the Downtown – including the ongoing construction at the corner of 2nd Street and Arizona Avenue to the northeast of the Project site – contributes to the existing noise setting.

Measurements of ambient noise of the existing noise environment indicate that average noise levels over 10-minute intervals at peak times range from 53 A-weighted decibels (dBA) to 86 dBA (see Section 3.12, *Noise*). These daytime noise levels are characteristic of a high activity urban area (see Section 3.12, *Noise*).

Transportation

Regional 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]), and Santa Monica Boulevard. I-10 is located approximately 0.3 miles south of the Project site and provides access across the City of Santa Monica to the City of Los Angeles to the east. I-405 is located approximately 3.6 miles to the east of the Project site and provides north-south access throughout the west Los Angeles Basin. PCH is located approximately 0.1 miles west of the Project site and provides north-south access along the coast. Santa Monica Boulevard provides east-west access across the City of Santa Monica and City of Los Angeles.

The Project site is bound by Ocean Avenue to the west, Santa Monica Boulevard to the south, and 2nd Street to the east, and is bisected by 1st Court. Ocean Avenue is a five-lane street with protected

bicycle lanes on both sides and metered parallel on-street parking. Santa Monica Boulevard along the Project site's southern boundary is a four-lane street, consisting of one eastbound vehicle lane bordered by a bus lane, two westbound vehicle lanes, and no on-street metered parking. 2nd Street is a two-lane road consisting of one northbound and one southbound vehicle lane running parallel to Ocean Avenue, with Class II (i.e., striped) bicycle lanes and on-street metered parking on both sides of the street. A Metro layover zone is located at the southeastern corner of the Project site along 2nd Street. 1st Court is a one-way southbound public alley with an approximately 18-foot-wide entrance along Arizona Avenue that is sufficient to permit westbound Class WB-50 trucks (i.e., 5-axes and 55 feet in length) turning left onto the alley.

Tribal 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.

As part of the tribal consultation process required by Assembly Bill 52 (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 Kizh Nation, responded explaining the Kizh Nation's concerns regarding potential impacts to tribal cultural resources and requesting the incorporation of suggested mitigation measures. The Kizh Nation 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, which are considered cultural landscapes according to California Environmental Quality Act (CEQA) Section 21074. Due to the proximity of these cultural landscapes to the proposed Project, the Kizh Nation requested tribal monitoring by a representative of the Kizh Nation during all ground disturbances associated with the proposed Project, to reduce potentially significant impacts to cultural landscapes. The tribe 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.

3.3.2 Regulatory Framework

Applicable regulatory framework discussion is incorporated by reference from the individual and associated environmental issue areas and is not repeated here. Please see the following sections for specific regulations pertaining to the issue areas: Section 3.1, *Aesthetics and Shade/Shadow Effects*; Section 3.2, *Air Quality*, Section 3.4, *Cultural Resources*, Section 3.6, *Geology and Soils*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.12, *Noise*, Section 3.13, *Transportation*, and Section 3.14, *Tribal Cultural Resources*.

3.3.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The City's Initial Study Checklist includes the following question to assess construction effects:

- Would the project would have considerable construction-period impacts due to the scope or location of construction activities.

Methodology

The following impact analysis summarizes the potential construction-related effects of the proposed Project. The major impacts associated with construction analyzed in this section include aesthetics and shade/shadow effects, air quality, cultural resources, geology and soils, hazards and hazardous materials, noise, transportation, and tribal cultural resources. Some of the analyses are based on 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 construction-specific 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 3.4, *Cultural Resources*, Section 3.6, *Geology and Soils*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.12, *Noise*, Section 3.13, *Transportation*, and Section 3.13, *Tribal Cultural Resources*.

3.3.4 Applicable Mitigation Measures from the DCP Program EIR

Applicable mitigation measures are incorporated by reference from the individual and associated environmental issue areas and are not repeated here. Please see the following sections for specific DCP Program EIR mitigation measures pertaining to the issue areas: Section 3.1, *Aesthetics and Shade/Shadow Effects*; Section 3.2, *Air Quality*, Section 3.4, *Cultural Resources*, Section 3.6, *Geology and Soils*, Section 3.8, *Hazards and Hazardous Materials*, Section 3.12, *Noise*, Section 3.13, *Transportation*, and Section 3.14, *Tribal Cultural Resources*.

3.3.5 Project Impacts and Mitigation Measures

Would construction of the proposed project result in considerable construction-period impacts due to the scope, or location of construction activities?

Impact Description (CE-1)

CE-1 Construction of the proposed Project would have considerable construction-period-related impacts due to the scope, ~~or~~ and location of construction activities. ~~However, with Implementation of identified mitigation would reduce the majority of these impacts would be to less than significant; however, it has been conservatively concluded that construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House because the consent of the adjacent offsite property owner to conduct mitigation cannot be guaranteed.~~

Construction for the proposed Project would occur in a single phase involving several sequential activities, including: ground disturbance/site preparation; demolition of existing buildings and surface parking lots; relocation of City-designated Landmarks; excavation; construction (including construction of new buildings and rehabilitation of City-designated Landmarks); and building finishing, including architectural coatings, hardscaping, and landscaping. The precise construction timeline for the proposed Project depends on the timing of entitlements and permit processing. For the purposes of the EIR, construction work is assumed to begin in late 2021 with occupancy and operation commencing in late 2024. This construction timeline provides the worst-case analyses of environmental impacts. As described throughout this EIR, construction impacts related to aesthetics, air quality, cultural resources, geological resources, noise, hazards and hazardous materials, transportation, and tribal cultural resources have the potential to affect sensitive uses during construction; however, with mitigation identified as applicable, these impacts would be *less than significant*.

Aesthetics and Shade/Shadow Effects

As discussed in Section 3.1, *Aesthetics and Shade/Shadow Effects*, construction of the proposed Project would require demolition of the existing onsite structures, surface parking lots, and hardscaping, and landscaping. After demolition activities, grading and excavation for the three-level subterranean parking garage would occur followed by construction of the buildings associated with the proposed Project. Temporary, but prolonged, visual effects associated with construction activities would include perimeter construction fencing, exposed soil and staging

areas for grading, the excavation for the subterranean garage, and the general presence of construction workers and construction equipment. Such impacts would primarily affect the viewers adjacent to the Project site, including a small segment of Palisades Park located across Ocean Avenue. For example, the 35-foot-deep excavation associated with the subterranean parking garage be visible from the upper stories of adjacent buildings (e.g., Hotel Shangri-La, Elephanté, etc.). Additionally, construction equipment (e.g., track-crane-mounted vertical drilling rig, rubber-tire rough-terrain hydraulic crane, etc.) and scaffolding associated with the proposed buildings would extend above the perimeter construction fencing. However, this would constitute a temporary visual distraction, typical of construction activities, which are common in the Downtown. This temporary construction-related effect associated with the proposed Project would be *less than significant*.

Air Quality

Regional Emissions

As discussed in Section 3.2, *Air Quality*, construction emissions associated with the proposed Project were estimated using California Emissions Estimator Model (CalEEMod) Version 2016.3.2, and results are summarized in Table 3.2-6. Model results indicate that onsite construction activity would generate criteria air pollutant emissions, but emissions of CO, volatile organic compounds (VOCs), NO_x, SO_x, PM₁₀, and PM_{2.5} would not exceed SCAQMD regional thresholds for construction and this impact would be *less than significant*. Although construction emissions associated with the proposed Project would not exceed SCAQMD thresholds (see Table 3.2-6), the maximum estimated VOC emissions are only approximately 1 pound/day below the threshold. To ensure construction emissions would be *less than significant*, mitigation measure (MM) AQ-1 would require the use of “super compliant” architectural coatings with VOC emission ratings of 10 grams per liter (g/L) or less to further reduce construction-related VOC emissions during the architectural coating phase of the proposed Project. Implementation of these super compliant coatings would reduce construction-related VOC emissions to levels well below the threshold of significance (refer to Table 3.2-7).

Localized Significance Thresholds

The Project site is located within 25 meters (82 feet) of residential uses that qualify as sensitive receptors. Construction of the proposed Project would have the potential to expose sensitive receptors to substantial pollutant concentrations. However, construction emissions would be below Localized Significance Thresholds (LST) thresholds for CO, NO_x, PM₁₀, and PM_{2.5} (refer to Table

3.2-8); therefore, construction-related impacts to localized air quality would be *less than significant*.

Toxic Air Contaminants

Construction impacts associated with Toxic Air Contaminants (TACs) were addressed quantitatively in a construction Health Risk Assessment (HRA) prepared by Wood Environment & Infrastructure, Inc. (Wood) (see Appendix D). The results of the HRA indicate that unmitigated Project-related emissions would not increase chronic health hazards or maximum cancer risk in exceedance of SCAQMD's thresholds (refer to Table 3.2-11); therefore, impacts from generation of TAC emissions would be *less than significant*.

Other Emissions including Odors

Implementation of the proposed Project would not create significant sources of other emissions, including objectionable odors affecting a substantial number of people. Standard construction requirements would be imposed to minimize odors from construction activities. Any construction-related odor emissions would be short-term, and intermittent in nature, and impacts associated with construction-generated odors would be *less than significant*.

Cultural Resources

Historic Resources

As described in Section 2.7.3, *Demolition*, the existing building and paved surface parking lot at 101 Santa Monica Boulevard would be demolished and removed. The paved existing surface parking lot at 129 Santa Monica Boulevard would be demolished and removed. The rear structure at 1327 Ocean Avenue and the rear structure at 1337 Ocean Avenue would be demolished. These buildings are not eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (California Register) and are not identified in the City's Historic Resources Inventory (HRI). Therefore, the proposed demolition of these buildings would not result in a significant impact.

The proposed Project would relocate and rehabilitate the City-designated Landmarks at 1333 and 1337 Ocean Avenue within the proposed Project site, along Ocean Avenue, and incorporate them into the proposed Cultural Use Campus. The City-designated Landmarks would undergo a two-step relocation from their current locations to their proposed new locations on the west side of the new cultural use building, facing Ocean Avenue (refer to Section 2.6.5, *Relocation of the City-Designated Landmarks*). The relocation process would comply with Federal professional standards and guidelines identified in Moving Historic Buildings (National Park Service [NPS]

1979). Rehabilitation of these buildings would include seismic and structural retrofitting, handicap accessibility improvements where feasible, fire-life safety improvements, and upgrades to mechanical, electrical, and plumbing (MEP) equipment; however, the character defining features of the City-designated Landmarks would be retained. All work would be performed in accordance with The Secretary of the Interior's Standards for the Treatment of Historic Properties and the State Historic Building Code (SHBC). Incorporation of these standards and guidelines would ensure that the City-designated Landmarks retain their integrity of location, setting, design, materials, workmanship, feeling, and association essential to their historical significance (see Section 3.4, *Cultural Resources*). Further, implementation of MM CR-1 and MM NOI-2 addressing ground-borne vibration would reduce potential construction impacts to onsite historic architectural resources to *less than significant with mitigation*.

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. 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 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.

Archaeological Resources

According to the Phase I Cultural Resources Survey prepared for the proposed Project, no prehistoric or historic-period archaeological resources have been recorded within the proposed Project site (see Section 3.4, *Cultural Resources*). Historic-period archaeological resources including subsurface refuse deposits and isolated artifacts, which are recorded within 1 mile of the Project site (see Table 3.4-1), confirm the potential for similar historic-period archaeological resources to be present within the proposed Project site below presently developed structures and paving and fill soils. Project construction would require grading and an excavation depth up to 35 feet bgs for the subterranean parking garage that could encounter unknown, potentially significant subsurface archaeological remains. Implementation of DCP MM CR-3a and MM CR-3b, which would require archaeological construction monitoring and protocols in the event of inadvertent

discoveries of archaeological resources, would ensure that any unknown resources encountered during ground disturbances associated with the proposed Project would be analyzed, protected, and curated. Accordingly, this impact would be *less than significant with mitigation*.

Human Remains

Although prehistoric village resources and associated human remains have not been recorded within and in the vicinity of the Project site, they could be present beneath the existing buildings and surface parking lots onsite. California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery (see Section 3.4, *Cultural Resources*). With compliance with existing regulations prescribed in California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98, impacts to human remains would be *less than significant*.

Geology and Soils

Bluff Stability

Construction of the proposed Project would involve the excavation of approximately 108,000 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 collapse of unsupported soil walls (see Section 2.0, *Project Description*). Due to the depth of excavation, proximity to adjacent property lines, and existing structures, shoring would be required to provide adequate structural support to the subterranean parking garage walls neighboring properties and buildings. This would ensure that soils would not collapse or become unstable resulting in structural damage. The use of heavy equipment (e.g., pile drivers, excavators, bulldozers, 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 would not affect coastal bluff stability (Geotechnologies, Inc. 2019). Additionally, stormwater would be directed to storm drains throughout construction, 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*.

Soil Stability

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) and all requirements of Section 1541 of Title 8 of the California Code of Regulations (CCR). All

excavation activities would also be required to adhere with all provisions of the Santa Monica Municipal Code (SMMC) and California Building Code (CBC), including Section 3304 of Chapter 33 of the CBC (see 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*.

Paleontological Resources

As previously described, the proposed Project would involve excavation of soil and earth materials up to a depth of 35 feet bgs to facilitate construction of the underground parking garage. Construction activities including grading and excavation could potentially uncover previously unknown paleontological resources. 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 MM CR-4a and MM CR-4b, which would require paleontological monitoring and protocol for inadvertent discoveries, would ensure that any potential impacts to fossil resources would be *less than significant with mitigation*.

Hazards and Hazardous Materials

As discussed further in Section 3.8, *Hazards and Hazardous Materials*, hazardous materials could potentially be released from construction activities at the Project site. Potentially hazardous materials, such as vehicle fuels, oils, and transmission fluids, would be utilized during construction. However, such materials would be in limited quantities and would be handled in compliance with all applicable Federal, State, and local regulations (see Section 3.8.2, *Regulatory Framework*). The proposed Project would involve the demolition of the existing onsite buildings at 1327 Ocean Avenue, the rear structures at 1333 and 1337 Ocean Avenue, and 101 Santa Monica Boulevard. As such, the potential exists for workers or the public to be potentially exposed to ACM and LBP materials during demolition of the onsite building and hauling of debris materials. Mold growth within interior or inaccessible areas of buildings may be released during demolition or renovation activities and result in exposure to construction workers and adjacent sensitive uses. Implementation of DCP MM HAZ-2a.a would ensure construction material testing to identify the presence of ACM, LBP, and mold onsite prior to demolition. If encountered during demolition and/or construction, the construction contractor would remove using methods intended to minimize potential exposure to hazardous materials, consistent with applicable regulations, such

as SCAQMD Rule 1403 and CCR Title 8, Industrial Relations. Compliance with existing mandatory regulations and best management practices (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*.

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 due to historical onsite and offsite uses. A historical dry cleaning facility occupied the northeastern portion of the Project site from 1928 to 1980 and may have released petroleum hydrocarbon-based and PCE solvents into the underlying soil, soil vapor, and groundwater. Additionally, residential uses located on the Project site as early as 1887, may have resulted in burned or incinerated ash from backyard burn pits as well as metal-bearing fill material in the soil with unsafe concentrations copper, lead, zinc, or other metals. Another dry cleaning facility located hydrologically upgradient of the Project site may have resulted in contaminant (e.g., PCEs) migration in the underlying soils and groundwater in the event that a hazardous materials release occurred at this property.

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. 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. Project mitigation and mandatory compliance with Federal, State, and local policies and regulations would ensure that impacts would be *less than significant with mitigation*.

Noise

Exterior Noise

As discussed in Section 3.12, *Noise*, all phases of construction (e.g., demolition, excavation, building construction) would involve the use of heavy equipment that would produce noise. Construction activities would also involve the use of smaller power tools, generators, and other equipment that are sources of noise. Haul trucks using the local streets would generate noise as

they move along the street. 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.

Although construction activities associated with 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 discussed above so long as it occurs between the hours of 10:00 A.M. and 3:00 P.M.. MM NOI-1 would require that the noisiest construction 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). Under MM NOI-1, the implementation of noise attenuation measures may include the use of noise barriers (e.g., sound walls) or noise blankets. In addition, MM NOI-1 would serve to further reduce these impacts as it would ensure that haul trucks associated with construction activities are routed away from residential streets. Compliance with existing City noise regulations along with MM NOI-1 would reduce potential noise impacts to *less than significant with mitigation*.

Vibration

Table 3.12-11 identifies various vibration velocity levels for the types of construction equipment that would operate at the project site during construction. As identified in SMMC Section 4.12.070, vibration associated with construction is considered exempt from City regulation; however, vibration is regulated under CEQA. 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 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.

Transportation

Construction of the proposed Project would occur in a single phase involving several sequential activities, including: site preparation; demolition of existing buildings and surface parking lots;

relocation of City-designated Landmarks; excavation; construction, including rehabilitation of City-designated Landmarks; and building finishing, including architectural coatings, landscaping, and rehabilitation. Total construction time is anticipated to last for a period of up to 3 years, including: 2 months for demolition; 4 to 6 months for the relocation of the City-designated Landmarks; 3 months for excavation; and 25 months for construction from foundations to occupancy.

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 to a City-approved mixed construction and demolition debris recycling facility.

During the excavation phase, heavy haul trucks would export an estimated 108,000 cubic yards (cy) of soil at a rate of approximately 80 trucks per day (10 trucks per hour, 8 hours per day, 14 cubic yards per load). The timing and frequency of heavy haul trucks would be dictated by the rate of shoring installation within the excavated areas. This phase would also involve delivery trucks trips, construction worker vehicle trips, and other construction-related trips that would add dozens of additional trips per day the surrounding street network throughout the construction period. However, construction-related increases in traffic would be short-term in nature and lower in volume than the operational vehicle trips associated with the proposed project. Therefore, it would not contribute significantly to long-term traffic congestion.



Increased construction traffic on Downtown streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit

operations and disrupt bicycle and pedestrian circulation. For example, construction activities associated with the proposed Project may require the temporary or extended closure of adjacent traffic lanes and sidewalks on surrounding streets (i.e., Ocean Avenue, Santa Monica Boulevard, 2nd Street, and Arizona Avenue) to accommodate sidewalk widening along 2nd Street, excavation for utilities, operation of construction equipment, etc. Other potential construction-related impacts include idling, parked or queued heavy trucks that could potentially obstruct visibility.

As a result, construction activities and potential conflicts between vehicles, bicycles, and pedestrian would be potentially significant. Implementation of MM CE-1 would require preparation of a Construction Impact Mitigation Plan (CIMP) to address construction traffic routing and control, safety, construction parking, and vehicle, bicycle, and pedestrian safety. The CIMP would address temporary traffic impacts that could occur during each construction activity. With the implementation of MM CE-1, construction-related hazards would be reduced to *less than significant with mitigation*.

Mitigation Measures

The following mitigations would be implemented under the proposed Project to effectively mitigate impacts associated with Impact CE-1 to less than significant levels:

MM CE-1 The Applicant shall prepare, implement and maintain a Construction Impact Mitigation Plan (CIMP) for review and approval prior to issuance of a building permit to address manage traffic during construction and shall be designed to:

- *Prevent traffic impacts on the surrounding street network*
- *Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable*
- *Ensure safety for both those constructing the proposed Project and the surrounding community*
- *Prevent substantial truck traffic through residential neighborhoods*
- *Provide for coordination with the Metro regarding the Metro layover zone on 2nd Street regarding traffic controls.*
- *Provide for coordination with adjacent or nearby construction projects*

The CIMP shall be subject to review and approval by the following City departments: Public Works, Fire, Community Development, and Police to ensure that the Plan has been designed in accordance with this mitigation measure and meets City standards. This review shall occur prior to issuance of grading or building permits. It shall, at a minimum, include the following:

Ongoing Requirements throughout the Duration of Construction

- *A detailed CIMP for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans shall be reviewed and approved by the Strategic and Transportation Planning Division prior to commencement of construction and implemented in accordance with this approval.*
- *Work within the public right-of-way shall be performed between 9:00 A.M. and 4:00 P.M. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an after-hours construction permit.*
- *An Applicant-funded onsite monitor shall be present to ensure safety when Metro workers are in the immediate vicinity, or when more dangerous activities are occurring (e.g., raising of heavy equipment to roof levels). The CIMP shall identify the activities that would prompt the presence of an onsite monitor.*
- *Streets and equipment shall be cleaned in accordance with established Public Works Department requirements.*
- *Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on City streets. Limited queuing may occur on the construction site itself.*
- *Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit.*
- *Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division.*
- *Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City.*

Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction

- *The Applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved CIMP).*
- *The Applicant shall obtain a Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits*

required, for any construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way.

- *The Applicant shall provide timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Metro, Police Department, Fire Department, Public Works Department, and Community Development Department), and all owners and residential and commercial tenants of property within a radius of 500 feet.*
- *The Applicant shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks per each submittal. Coordination with Metro regarding construction activities that may impact Metro bus lines (e.g., Metro layover zone) or result in closures lasting over 6 months shall be initiated at least 30 days in advance of construction activities.*
- *The Applicant shall obtain Mobility Division approval of any haul routes for earth, concrete, or construction materials and equipment hauling.*

Tribal Cultural Resources

According to a review of the NAHC's SLF and outreach with the Native American representatives of the Gabrieleño Band of Mission Indians – Kizh Nation, no known tribal cultural resources have been previously identified at the Project site or within the immediate vicinity. However, 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 cultural landscapes to the proposed Project and the proposed excavation depth to 35 feet bgs, the Kizh Nation indicated that there is a potential for the proposed Project to impact tribal cultural resources. However, as agreed to by the Kizh Nation during the Assembly Bill (AB) 52 consultation process, a Kizh Nation Native American monitor would be present during excavation activities associated with Project construction as required by MM TCR-1. Consistent with DCP MM CR-3a and MM CR-3b, any discovery of resources would trigger an immediate stop in construction while the resource is evaluated. Depending on the resource value, treatment plans would be developed in consultation with the City, tribal representatives, and qualified archaeologists. With the implementation of MM TCR-1, DCP MM CR-3a and CR-3b (see Section 3.4, *Cultural Resources*), impacts to tribal cultural resources would be *less than significant with mitigation*.

3.3.6 Cumulative Impacts

A project's construction activities can result in cumulative construction impacts when construction from other development is located in the immediate vicinity of the Project site and/or along the same roadways that are used by construction workers and vehicles. As previously described, Table 3.0-1 provides a list of past, approved, and pending development projects located throughout the City. Construction activities associated with development projects in the Downtown would create temporary impacts to aesthetic, air quality, geology and soils, noise, and transportation impacts generally similar to those described for the proposed Project. Cultural and tribal cultural resources may also be affected due to cumulative development projects in the City's Downtown.

It would be too speculative to estimate the construction schedule/timing of pending development projects as their schedule/timing are dependent on several other factors including the ability of a developer to obtain entitlement and economic considerations/market demand. However, it can be anticipated that construction of the proposed Project would potentially overlap with other future projects in the immediate vicinity, resulting in potentially significant cumulative construction impacts throughout the duration of the proposed Project. However, with the implementation of all applicable Federal, State, and local regulations, applicable mitigation measures from the DCP Program EIR, Project-specific mitigation measures, and standard BMPs, the contribution of the proposed Project to would be less than significant. Additionally, as described in Section 3.12, 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 vibration impacts would be less than significant.

Refer to the individual impact ~~sections~~ analyses for full discussion of potential cumulative impacts associated with the construction and implementation of the proposed Project.

3.3.7 Residual Impacts

With implementation of all applicable Federal, State, and local regulations, applicable mitigation measures from the DCP Program EIR, Project-specific mitigation measures, and standard BMPs, the majority of construction-related impacts associated with the proposed Project would be less than significant with mitigation; however, because the consent of the adjacent 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.

3.4 CULTURAL RESOURCES

This section of the Environmental Impact Report (EIR) analyzes impacts to cultural resources that could result from implementation of the proposed Ocean Avenue Project (Project). Cultural resources are defined as archaeological sites dating from either the prehistoric or historic period, or historic architectural resources, including buildings, structures, and objects of historic importance. This section describes known or anticipated cultural resources within or near the proposed Project site, assesses the potential impacts to cultural resources that could result from implementation of the proposed Project, and identifies mitigation measures, if necessary.

3.4.1 Environmental Setting

This section describes the cultural resource setting of the proposed Project site. The cultural resource setting overlaps several different prehistoric and historic eras, as described below.

Prehistory

There is evidence for human occupation of mainland Southern California for as long as 13,000 years or possibly more. Population densities along the coast may have been low initially, judging from the small number of sites dated to this period. However, many ancient sites may have been lost, inundated, or deeply buried as a result of rising sea levels, marine transgression, erosion, aggradation, and other natural forces. No prehistoric sites are known within the proposed Project vicinity.

Prehistoric human occupation and cultures within coastal Southern California evolved significantly over more than 10,000 years based on changes in climate, food availability, technological innovations, and utilization and changes in population densities and cultural characteristics. Although prehistoric remains that could potentially exist in the proposed Project vicinity could be from any of the various past cultural epochs, they would most likely represent past occupation by the Gabrieleño/Tongva or other Takic people. The Gabrieleño/Tongva occupied territory that included the Los Angeles Basin south to parts of Orange County and north to Topanga Canyon and the southern Channel Islands. The total Gabrieleño/Tongva territory covered more than 1,500 square miles and included the watersheds of the Los Angeles, San Gabriel and Santa Ana Rivers and the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 villages 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 Gabrieleño/Tongva exhibited a complex culture, social

organization, religious beliefs, and art and material production (see Section 3.14, *Tribal Cultural Resources*, for further information regarding the Gabrieleño/Tongva tribes and tribal cultural resources).

Due to the substantial extent of urban development within the City of Santa Monica (City), the full extent and density of Gabrieleño/Tongva or other prehistoric culture occupation of the proposed Project vicinity 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 proposed 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 2012). See Section 3.14, *Tribal Cultural Resources*, for additional background information regarding the Gabrieleño/Tongva tribes.

History

Downtown Santa Monica

The area in what is now referred to as “Downtown” Santa Monica includes the southern portion of the original township. Only a few residential areas remain in this section of the City. Nine months after the original land auction, Santa Monica had a population of approximately 1,000 people. However, following the initial influx, permanent residential development was slow in the years leading up to the turn of the 20th century. What residential development there was in Santa Monica was primarily concentrated within the blocks of Washington Avenue on the north, 7th Street on the east, Oregon Avenue (Santa Monica Boulevard) on the south, and Ocean Avenue on the west. The area south of Santa Monica Boulevard was more commercial in nature, with a cluster of small homes east of 2nd Street on Utah (Broadway) Avenue and Railroad (Colorado) Avenue. Santa Monica’s small commercial Downtown centered predominantly on 3rd Street (see Appendix E).

Between 1893 and the 1920s, the community operated primarily as a tourist attraction/destination, visited by mostly wealthy patrons. A review of early U.S. Census records reveal that the residents of the time were primarily working class, with occupations in the tourism industry, along with trades people, retailers, railroad industry workers, and retirees. Typical of the Southern California migration patterns of the period they were usually either from the Midwest or were European immigrants.

Generally, houses that occupied blocks in the southern half of the township were smaller and more modest. Larger residential structures were built by early, prominent pioneers in what is now the Downtown area, along Ocean Avenue, and in the northern part of the township. It was not

uncommon for the most distinguished houses of this era to occupy large, choice corner lots and feature a carriage barn, which connoted the relative wealth and status of their owners. Construction to the eastern part of the township was generally slower to develop. Those areas just outside of the incorporated City limits were semi-rural in setting and were populated with scattered residences. The commercial district featured boarding houses and rooming houses, apartment hotels, and other types of more transient lodging.

The arrival of the Pacific Electric cars in 1905 sparked a period of renewed residential development within the grid of the early township. The 1918 Sanborn maps of the area confirm the prevalence of motorcars with the appearance of detached automobile garages located at the rear of numerous residential parcels. Within the township, modest single-family residences were still the dominant building type. The area's lots, most 50 feet by 150 feet in size, provided ample space for each property (lots at the north and south ends of the blocks were slightly smaller in length). Some larger residences were built on multiple parcels and prominent corners, indicating wealthy residents had established themselves in Santa Monica. These bigger houses were designed in a variety of period architectural styles including Queen Anne, Eastlake, Shingle, and the occasional Mission Revival. During this period, Nevada Avenue (present-day Wilshire Boulevard) was primarily a residential street generously landscaped and lined with Victorian era large homes, Craftsman style bungalows, and modest cottages.

After the advent of the automobile in the 1920s, Santa Monica experienced a significant building boom, with homes being constructed in the tracts north of Montana Avenue and east of 7th Street for year-round residents. Commercial buildings, primarily one- or two-story in height, initially concentrated along 2nd Street and 3rd Street between Colorado Avenue and Santa Monica Boulevard also began to expand north and eastward at this time. The impetus for this change occurred as a result of the continuing resident and tourist population growth of the City and associated demand for consumer goods. Homes of this period were designed and built in a variety of styles including Craftsman, Colonial Revival, Mission Revival, Tudor Revival, and other period revival styles. Minimal Traditional, Streamline Moderne. Early Modern styles began to appear during the 1930s, as well. By the time the U.S. entered World War II, the original township of Santa Monica was largely built out.

The Downtown area where the Project site is located has changed over the years due to redevelopment. The area is now an assemblage of multi-story eclectic mixed-use, residential, and commercial properties that reflect varied architectural styles and dates of construction. However, along some of the core streets of Downtown are a few extant remaining examples of early

residential and commercial architecture. These rare, intact property types help reflect the City's diverse and unique architectural history.

Central Business District Vicinity

The Project site is located on the western edge of the City's Central Business District (CBD). This commercial area is roughly bounded by Wilshire Boulevard to the north; 2nd Street to the west; Colorado Avenue/Santa Monica Freeway to the south; 4th Street (south of Santa Monica Boulevard) and 7th Street (north of Santa Monica Boulevard) to the east. Most of the development is commercial in function with a small scattering of residential properties and churches (see Appendix E).

The CBD developed early in the history of the City as the location of commercial businesses catering to both local residents and the City's many visitors. 2nd Street, one of the oldest commercial streets in Santa Monica, and adjacent to the proposed Project site, was supplanted by 3rd Street as the City's main commercial thoroughfare in the early 20th century.¹ A three-block stretch of 3rd Street was eventually closed to vehicle traffic decades later and became a pedestrian shopping area in 1965. 4th Street between Wilshire Boulevard and Colorado Avenue evolved from a primarily residential neighborhood at the turn-of-the-20th-century to a predominately commercial area by the early 1920s. The impetus for this evolution from residential to commercial was the continuing growth of the residential and tourist populations as well as the subsequent demand for consumer goods.

Buildings of each period of development, from 1875 to present day, still stand in the commercial area with their styling and historic associations as physical document of the commercial history of the City. Architecture from the 1900s and 1910s was small-scale, usually one or two-stories of masonry construction and reflected a vernacular commercial style typical of the day. The most prevalent architectural styles in the area are those associated with the 1920s and 1930s, which include Spanish Colonial, Renaissance Revival, Art Deco, Streamline Moderne, and classically influenced vernacular properties. Commercial buildings located within the CBD range from one to twelve stories in height and are clad in a variety of materials, including stucco, rusticated brick, terra cotta, glazed brick, and concrete. Within the Project site are two Revival style commercial buildings that were built in the 1920s. Located at 1337 Ocean Avenue is a two-story Spanish Colonial Revival style structure constructed in 1926. This building was identified as a City-designated Landmark in 2004 for its distinctive architecture. At the northeast corner of Ocean

¹ Santa Monica Historic Resources Inventory, 1985-1986: Final Report.

Avenue and Santa Monica Boulevard, 101 Santa Monica Boulevard is a two-story vernacular, altered Spanish Colonial Revival style mixed-use commercial building dating from 1925.

A review of the 1950 Sanborn Fire Insurance map shows the area transformed from primarily residential to a broad mix of primarily commercial properties interspersed with the remnants of its residential past. By the 1950s, many of the initial residential structures along the streets within the CBD, including those adjacent the Project site, were removed and redeveloped as large surface parking areas or multi-level hotels or commercial office buildings. Eventually, most of the older single-family residential structures that remained extant were converted to multi-family units or commercial use. The Downtown area has continued to evolve physically and architecturally. A regional retail center (mall) was added to the southern end of Downtown in 1980, referred to as Santa Monica Main Place. Santa Monica Main Place has since been remodeled and expanded. In recent years, the southern section of the Downtown area was further changed by the completion of the Metro E (Expo) Light Rail Transit (LRT) line in 2016, which traverses along Colorado Avenue. Commercial, institutional, and mixed-use buildings of varying heights comprise the majority of the CBD neighborhood today.

Ocean Avenue Area

Sanborn Fire Insurance map from 1895 indicate the majority of parcels along Ocean Avenue were vacant with only a few modest single-family houses having been constructed facing Palisades Park (initially called Linda Vista Park). Ocean Avenue was once a eucalyptus lined street of late 19th and early 20th century residences that faced Palisades Park and the Pacific Ocean. Miramar, the Shingle style home of one of the founders of the City, Senator John P. Jones, was a landmark of the neighborhood in the early years. Located on the northeast corner of Nevada (Wilshire Boulevard) and Ocean Avenue, the site is now occupied by a hotel that perpetuates the Miramar name and is remembered by a large landmark Moreton Bay Fig tree, planted in 1899 on the Jones' estate. Since the start of development, the area was a residential district with a variety of period architectural styles including Queen Anne, Eastlake, Shingle, and the occasional Mission Revival (see Appendix E).

Low-rise apartment buildings were constructed along Ocean Avenue in the early 20th century. As part of the overall commercial expansion of the City after World War II, numerous commercial office buildings were built, many of which were along Ocean Avenue, Wilshire Boulevard, and Santa Monica Boulevard. By the 1960s; however, Ocean Avenue was becoming the focal point for high-rise development in Santa Monica. One of the first developers to see opportunity in developing these commercial corridors was Lawrence Welk (1903-1992). In 1960, he developed the Union Bank Building (Allison and Rible 1961) at 2444 Wilshire Boulevard. In 1968, Welk

developed the General Telephone Company Headquarters building (Mann, Johnson, and Mendenhall 1971) at 100 Wilshire Boulevard (1201 Ocean Avenue). Welk also developed the adjacent building, Champagne Towers; Lawrence Welk Plaza, at 1221 Ocean Avenue (1971, Daniel, Mann, Johnson & Mendenhall). Additional commercial offices were built at 1401 Ocean Avenue (1987) and 1431 Ocean Avenue (1963). In later years, office buildings and contemporary parking structures were also built along 2nd Street near Santa Monica Boulevard and elsewhere in the Downtown and eastward.

Historic Architectural Resources

The historic built environment includes standing buildings, structures, and objects of historic importance, referred to collectively as historic architectural resources. Historic architectural resources amplify the local population's sense of community, enhance perceptions and enjoyment of the community by residents and visitors, and provide an important measure of the physical quality of life in the community. When a significant concentration of such resources occurs within a defined geographic space, a historic district may be defined.

The 1.89-acre Project site is fully developed with one- to three-story buildings and surface parking lots. Existing development includes a mixed-use commercial and residential building at the northwest corner of Ocean Avenue and Santa Monica Boulevard and three commercial buildings along Ocean Avenue. Additionally, two privately operated surface parking lots with driveways off Ocean Avenue, Santa Monica Boulevard, and 1st Court are located onsite. As described below, several buildings within the Project site were constructed over 50 years ago and have been previously assessed for historical significance. Onsite historic architectural resources are described in detail below.

Historic Structures at the Project Site

Two City-designated Landmarks, located at 1333 Ocean Avenue and 1337 Ocean Avenue, are currently within the Project site, described below.

1333 Ocean Avenue. The three-story building located at 1333 Ocean Avenue was constructed in 1906 and established as a City-designated Landmark by the Landmarks Commission on May 14, 2001, under Criteria 1, 4, and 6 (LC-01LM-001). The residence was designated because it is a good example and one of the last surviving examples of the Queen Anne architectural style along Ocean Avenue. The building at 1333 Ocean Avenue, along with the Gussie Moran House located two properties away (north), help illustrate the historic context of Ocean Avenue when it was once a eucalyptus-lined street full of late 19th and early 20th century residences that faced Linda Vista (now Palisades) Park and the Pacific Ocean (City of Santa Monica Landmarks Commission 2001; PCR Services Corporation 2001). Therefore, the structure exemplifies the cultural and architectural history of the City (Criteria 1), embodies distinguishing architectural characteristics valuable to a study of the Queen Anne-style during the turn of the century (Criteria 4), and has a unique location along Ocean Avenue (Criteria 6).



The Queen Anne-style Victorian residence at 1333 Ocean Avenue is currently in use as a commercial office, hair salon, and medical spa.



Left: Queen Anne Landmark, south elevation, view northwest. Right: Queen Anne Landmark tower, south elevation, view north.

The period of significance of the Queen Anne Landmark is 1906, the year of construction. The City-designated Landmark embodies distinguishing qualities as a rare example of Queen Anne-

style Victorian architecture, with many trademarks of its type, including clapboard cladding, roof treatments with boxed eaves and exposed rafter tails, dentils, and a steeply-pitched roof, which creates a two-story shingled tower, another classic feature associated with this idiom.

The City Landmarks Commission Statement of Official Action (STOA) for designation of 1333 Ocean Avenue structure describes the significance of the Queen Anne Landmark:

“The structure exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political, or architectural history of the City in that it was constructed circa 1906 and retains sufficient architectural integrity and historical context to reflect the early residential development of the City. The subject property is one of the sole surviving property types along Ocean Avenue that illustrates the early history of Santa Monica.”

The City Landmarks Commission STOA details of the character-defining features of the Queen Anne Landmark extant features include:

- Location and orientation of building on Ocean Avenue with front façade facing west;
- Asymmetrical composition of front (west) façade and side elevations;
- Steeply pitched multi-gable roof with boxed eaves, exposed rafter tails, dentils, and wide trim band at cornice lines;
- Large side dormers;
- Triangular section with pent roof in top of front (west) gable;
- Horizontal wood clapboard siding and wood shingle siding;
- Fenestration: recessed wood-frame sash, fixed, and fixed-pane with transom (wood material, type, size and shape, placement, casings, sills and wide mold trim surrounds);
- Large bay window at front (west) façade with mold trim surrounds;
- Recessed centrally located main entry with monumental wide door, transom and mold trim surrounds;
- Open front porch (now enclosed) with wood spindle balustrade and ornate column posts;
- Integral second floor open porch on front (west) facade with wood spindle balustrade;
- Multi-story round tower with wood shingle siding;
- Red brick cheek walls with concrete caps and entry stairs centered on front (west) façade; and
- Brick chimney.

However, historical photographs depict several character-defining features that are no longer included in this historical structure, including the full height corner tower with widow’s walk; full length second floor porch, now cut off at the north; open porch on the first floor, now enclosed; first floor porch column capitals; gable ornamentation; and brick chimney.

1337 Ocean Avenue. The two-story Spanish Colonial Revival-style building was originally built in 1926 with ground-level commercial space and upper-level apartments. The structure was identified as a City-designated Landmark on August 9, 2004 under Criteria 1 and 6 (LC-04-LM-005). The property was designated because it retains sufficient historical context and architectural integrity to reflect and manifest the evolutionary urban development of the City's architectural history, particularly along Ocean Avenue (Criteria 1) and it has become an



The Spanish Colonial Revival Landmark building at 1337 Ocean Avenue represents the expansion of commercial development along the residential-dominated Ocean Avenue in the early 20th century.

established feature of the area because it has been situated on Ocean Avenue since its construction circa 1926 (Criteria 6) (PCR Services Corporation 2004). The property is considered an early and excellent example of a mixed-use commercial and residential building that reflects the period of development in the City when commercial development expanded to Ocean Avenue, a primarily residential street at the time. The building was also designated based on its proximity to two other early 20th century City-designated Landmark structures on the block: the Victorian residence located at 1333 Ocean Avenue and Gussie Moran House located at 1323 Ocean Avenue. The period of significance of the Spanish Colonial Revival Landmark is 1926, the year of construction.

The City Landmarks Commission STOA for designation of 1337 Ocean Avenue structure describes the significance of the Spanish Colonial Revival Landmark:

“The subject property manifests elements of the City’s architectural history in that the two-story Spanish Colonial Revival structure was built in 1926 and retains the essential physical features that constitute this style including stuccoed walls, red clay tile roof highlights, wrought iron balconettes, and arched shaped window and door openings. The Spanish Colonial style of structure is especially popular during this



Spanish Colonial Revival Landmark, east elevation, view west.

era of the City's development and was key to the architectural history and character of the City... the property reflects and manifests the evolutionary urban development of the City's architectural history, particularly along Ocean Avenue and maintains sufficient integrity to continue to reflect this development."

Extant character-defining features of the Spanish Colonial Revival Landmark include:

- Location and orientation of building on Ocean Avenue with front façade facing west;
- Rectangular building plan, height (two-story), and massing;
- Symmetrical composition of front (west) façade and side elevations;
- Stucco (non-lacy) sheathed exterior walls;
- Flat roof with red clay barrel tiled parapet;
- Front-facing gable roof element at west end of roof covered with red clay barrel tiles;
- Shed roofs with red clay barrel tiles over front balconies;
- Flanking balcony decks at front (west) façade, second-story;
- Wood-framed French doors on front (west) façade;
- Wrought iron balconettes at front (west) façade, second story;
- Centered arched shaped main entry on front (west) façade;
- Extended wing walls with arched shape openings and red clay tiled cap trim;
- Fenestration: recessed casement, double-hung sash, and fixed-pane along front façade and side elevations (wood material, type, multi-pane, size and shape, placement, casings, and sills); and
- Arched shape window and door openings.

Non-Historic Structures at the Project Site

1327 Ocean Avenue. The building located at 1327 Ocean Avenue at the northern edge of the Project site is a two-story with some minor influences of the Minimal Traditional style evident. The property features a modified "L"-shaped plan for the two-story apartment complex and a rectangular plan for the adjacent small two-story office/apartment structure.

According to a review of the property history, permits to construct the building were issued to property owner James Lewis Rogers (1903-199) of Santa Monica in October of 1950 for the construction of an 11-unit apartment building with office suite. According to the



The commercial building at 1327 Ocean Avenue does not reflect the historical significance of the City in early 1950's.

original permit, the structure was designed by local architect Lawrence B. Clapp (1879-1956). There is very limited information on the professional career of Clapp, though he is recognized as the designer of the Spanish Colonial Revival style Gayley Terrace apartment building in Los Angeles built in 1940. No sufficient evidence was uncovered during this current assessment to indicate Clapp as a master architect or Rogers as an important historical individual. The property does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the property located at 1327 Ocean Avenue does not appear to be eligible for listing in the National Register of Historic Places (National Register), California Register of Historic Resources (California Register), or as a City-designated Landmark. Additionally, a 2006 Cultural Resources Report prepared by Jones & Stokes for a previously proposed hotel project at 1327-1337 Ocean Avenue assessed the structure and concluded that the building is not eligible for listing in the California Register under any criteria. The building is not listed in the California Office of Historic Preservation (OHP) database and is not identified in the City's 2018 Historic Resources Inventory (HRI) Update (City of Santa Monica Planning and Community Development Department 2018). Additionally, the Landmarks Commission reviewed the previously proposed hotel project, which proposed to demolish this structure, at several meetings between 2004 to 2006 and took no action to designate the building as a Landmark or Structure of Merit (City of Santa Monica Planning and Community Development Department 2004; Jones & Stokes 2006). Similarly, the public took no action to designate the building during the 75-day review period for the demolition permit application filed on October 1, 2018 (18BLD-7899).

1333 Ocean Avenue Rear Structure. The rear (east) structure at 1333 Ocean Avenue is a two-story structure that connects to the second floor of the City-designated Landmark by an unenclosed catwalk and staircase. The rear structure was added on to the City-designated Landmark building located at the front of the property in 1941. In 2001, the Landmarks Commission assessed the rear structure at 1333 Ocean Avenue for its historical significance as part of the application to designate the Queen Anne-style Victorian residence on the front of the parcel as a City-designated Landmark. The



The rear structure at 1333 Ocean Avenue, which has been previously assessed for historical significance, is not identified in the City's HRI Update.

Landmarks Commission did not include the rear structure in the Landmark designation because it was constructed 35 years after the Queen Anne-style building was originally constructed in 1906 was therefore built after the period of significance for the City-designated Landmark Victorian residence. The rear structure is not representative of Victorian architecture and has no merit as a historical resource on its own. The 2006 Cultural Resources Report prepared for the previously proposed hotel project at 1327-1337 Ocean Avenue concluded that the rear structure does not contribute to the character, setting, or historic context of the City-designated Landmark. The building is not identified in the City's HRI Update (City of Santa Monica Planning and Community Development Department 2018). The Landmarks Commission reviewed the previous hotel project, which proposed to demolish this structure, at several meetings between 2004 to 2006 and took no action to designate the rear structure as a Landmark or Structure of Merit (City of Santa Monica Planning and Community Development Department 2004; Jones & Stokes 2006). Additionally, the public took no action to designate the building during the 75-day review period for the demolition permit application filed on October 1, 2018 (18BLD-7899).

1337 Ocean Avenue Rear

Structure. The one-story detached commercial structure located at the rear (east) portion of 1337 Ocean Avenue was constructed as a garage at an unknown date, altered with an addition in 1951, and later converted to an office. The Landmarks Commission assessed the rear structure as part of the application to designate the Spanish Colonial



The rear structure at 1337 Ocean Avenue, which was constructed at an unknown date, is also not identified in the City's HRI Update.

Revival building on the front of the parcel as a City-designated Landmark and did not include the rear structure in the Landmark designation because only minor elements (e.g. exterior stuccoed sheathing and a flat roof with tiled parapet) of the Spanish Colonial Revival idiom were incorporated into the architectural style and it was added on to the City-designated Landmark several years after the Landmark structure was built. Several permits from between 1951 and 1988 outline interior alterations and the building converted and modified to office use in 1974 (PCR Services Corporation 2004). Therefore, the rear structure on 1337 Ocean Avenue was built after the period of significance for the Spanish Colonial Revival. The Landmarks Commission reviewed

the previously proposed hotel project, which proposed to demolish this structure, at several meetings between 2004 to 2006 and took no action to designate the building as a Landmark or Structure of Merit (City of Santa Monica Planning and Community Development Department 2004; Jones & Stokes 2006). The 2006 Cultural Resources Report prepared for the previously proposed hotel project at 1327-1337 Ocean Avenue concluded that the rear structure on 1337 Ocean Avenue does not contribute to the character, setting, or historic context of the City-designated Landmark located at the front of the property. A second demolition permit application was filed for the rear structure on October 1, 2018 (18BLD-7917), and no application to identify the building as a City-designated Landmark or Structure of Merit was filed by the public during the 75-day review period pursuant to SMMC Section 9.25.044.

101 Santa Monica Boulevard. The altered Spanish Colonial Revival style commercial building located at 101 Santa Monica Boulevard was constructed in 1925 on the western periphery of the developing Downtown business district. The building was designed by Los Angeles based architect A. H. O'Brien and was constructed by A.V. Perkinson, a Los Angeles contractor. Built with an "E"-shaped plan with two narrow light courts that run north-south, the building is constructed of unreinforced masonry with plaster stucco sheathing the exterior walls of the primary south and west elevations (see Appendix E).

The building has been previously identified and recorded for historical significance under prior City survey efforts. It was first surveyed as part of the reconnaissance level 1983 Citywide survey, published as Phase 1 of the Santa Monica Historical Resources Inventory 1985-1986 Final Report. The 1983 survey identified 101 Santa Monica Boulevard as potentially eligible for individual local designation and assigned a corresponding National Register Status Code of 5 (National Register Status Codes were amended in 2003 to the California Historical Resource Status Codes). It was also identified as a contributor to a potential locally eligible historic district, the Central Business District, and was assigned a National Register Status Code of 5D. Between 1995 and 1998, the property was re-assessed for potential historical significance and its status as a contributor to the Central Business District was reconfirmed. As part of the reconnaissance level 2010 Santa Monica HRI Update the property was once again identified and evaluated as a contributor to the potential CBD historic district. This finding was based on the previous reconnaissance level assessment findings with no reviews of building permits or consideration of historical integrity.

Therefore, as part of this EIR, 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. The most significant physical and visual alterations have been made to the lower half of the building's two-story primary south and west elevations. These two primary elevations do not retain sufficient integrity to articulate their original commercial design intent, which relied on visually distinct individual commercial spaces complemented by highly ornate Spanish Colonial Revival style exteriors and distinguishing storefront assemblies to draw customers in for business. The recorded building permits note significant exterior alterations have been made to the property, particularly the work conducted in the mid-1950s, 1990s, and 2000s has visually and physically altered the structure substantially. In addition, several other alterations that are not explicitly reflected in the permit record for the property are also visually and physically evident.

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. The building has lost much of its historical integrity of design, workmanship, materials, association, and feeling. Because of some of the later changes made to the building, conjectural features have been added to its exterior, primarily along the two primary elevations (south and west). As such, the property now conveys a false sense of historicism. The building, therefore, does not appear to be a significant example of architectural style, period, or type and no important historic associations have been discovered or are evident. 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. Therefore, it does not appear to qualify as an historical resource under CEQA.

Historic Resources within the Project Vicinity

Ostashay & Associates Consulting (2020) conducted a survey of the Project and Project vicinity of potential historically significant properties based on a 45-year threshold. During the survey, nine pre-1974 properties including eight buildings and one public park were observed within the study area (see Table 3.4-1). Several City-designated Landmarks that are located in the immediate vicinity of the proposed Project site including the Gussie Moran House, Hotel Shangri-La, Georgian Hotel, and Palisades Park (refer to Figure 2-2). North of the site along Ocean Avenue are the 1891 Gussie Moran House; Gertrude Moran House, a two-story, Queen Anne style City-designated Landmark building (1323 Ocean Avenue) currently in commercial use and the adjacent eight-story, Streamline Moderne style City-designated Landmark the Hotel Shangri La (1301 Ocean Avenue).

Ostashay & Associates Consulting determined the following properties warranted further review in the Project Vicinity:

Table 3.4-1. Pre-1974 Properties Adjacent to the Project Site

Description	Address/ Location	Built Date
Commercial Building	1401 Ocean Avenue	1987
Commercial Building	1402 2 nd Street	1925
Commercial Building	202 Santa Monica Boulevard	1930
Commercial Building	201 Santa Monica Boulevard	1983
Commercial Building	1333 2 nd Street	1991
Commercial Building	1332 2 nd Street	1969
Commercial Building	1328 2 nd Street	1994
Commercial Building	1323 Ocean Avenue	c. 1887-1891
Public Park	100-1500 blocks of Ocean Avenue (west side)	1892

Commercial Property, 1402 2nd Street

An altered one-story, flat roof commercial building located at the southwest corner of 2nd Street and Santa Monica Boulevard has not been previously assessed for historical significance under existing City surveys. The rectangular shape, unreinforced masonry vernacular structure originally contained individual shop spaces along Santa Monica Boulevard and 2nd Street. In 1974, the entire building was modified for one business, the Ye Olde King's Head Shoppe, a restaurant, pub, and gift shop. The exterior of the building was remodeled with faux Tudor inspired features such as half timbering, shingled mansard roof, quoining details, wood panel bulkhead storefronts with multi-paned windows, and brick veneer trim accents. Though conveying a false sense of historicism, the building continues to reflect the Tudor style architecture that was intentionally designed to match its occupant's business.

The eligibility of the 1402 2nd Street property as a potential historical resource was assessed by evaluating it against the criteria of the National Register and California Register, as well as the criteria for City-designated Landmark and Structure of Merit. The building no longer retains sufficient historical integrity as it has been extensively modified over the years. It does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the commercial property located at 1402 2nd Street does not appear to be eligible for listing in the National Register, California Register, or as a City-designated Landmark. For the purposes of CEQA compliance, it is not considered an historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

Commercial Property, 202 Santa Monica Boulevard

The altered two-story commercial building located on the southeast corner of 2nd Street and Santa Monica Boulevard has not been assessed for historical significance under any existing City surveys. The large, two-story building was initially built with two ground-level shop units fronting Santa Monica Boulevard (202 and 204 Santa Monica Boulevard) and meeting rooms and office space upstairs (204½ Santa Monica Boulevard). The 1950 Sanborn map shows the entire exterior of the building remodeled as well as the interior space reconfigured to include two small shop spaces along 2nd Street (1403 and 1405 2nd Street). In more recent years, the building was “modernized” and extensively remodeled again with an additional shop space added at 1401 2nd Street. The building now features new stucco sheathing, tiled “faux” mansard roof parapet, anodized aluminum storefront assemblies, replaced windows within arched shape insets and engaged planter boxes at the second floor, and a two-story contemporary addition at its south end.

The eligibility of the 202 Santa Monica Boulevard property as a potential historical resource was assessed by evaluating it against the criteria of the National Register, California Register, and City-designated Landmark. The building no longer retains sufficient historical integrity as it has been extensively modified over the years. It does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the commercial property located at 202 Santa Monica Boulevard does not appear to be eligible for listing in the National Register, California Register, or as a City-designated Landmark. For the purposes of CEQA compliance, it is not considered an historical resource pursuant to the CEQA Guidelines Section 15064.5(a).

Commercial Property, 1332 2nd Street

The altered commercial building located adjacent the Project site along the west side of 2nd Street north of Santa Monica Boulevard has not been formally assessed for historical significance under any of the City’s prior survey efforts. The large volume building opened as the “Monica,” a twin screen movie theater, on February 18, 1970 with the showing of the film “Oliver!.” According to the original permit it was built for Laemmle Theatres at a construction valuation cost of \$290,000 and was designed by local architect Stanley Borbals. The building was constructed of concrete masonry block units and sheathed with plaster. With a flat roof with parapet, the building otherwise lacked any decorative or architectural ornamentation. In June 1981, the theatre was converted as a four-plex movie house. Of the two big auditoriums the largest one was converted into three small auditoriums, the interior lobby area was remodeled, and the ticket box and entries along the east elevation were slightly modified at this time. The theater closed in the summer of 2014 for remodeling and re-opened in early 2016 as the Laemmle Monica Film Center with six modernized

theaters, a redesigned and reconfigured contemporary front (east) façade, separate restaurant space approached from the street, and another restaurant on the structure's enhanced rooftop.

The building no longer retains sufficient historical integrity as it has been extensively modified in recent years. It does not appear to be a significant example of architectural style, period, or type and no associations with a notable designer/architect, historic personages, or historical events have been discovered. For these reasons, the commercial property located 1332 2nd Street does not appear to be eligible for listing in the National Register, California Register, or as a City-designated Landmark. For the purposes of CEQA compliance it is not considered an historical resource pursuant to the CEQA Guidelines, Section 15064.5(a).

Commercial Property, 1323 Ocean Avenue

The Queen Anne style building located at 1323 Ocean Avenue was identified as a City-designated Landmark on January 8, 1986. The house is remarkable both for its Victorian-era Queen Anne style and as the longtime residence of tennis champion Gertrude "Gussie" Moran (1923-2013). The building was originally designed as a single-family residence, but decades later it was converted to commercial use.

The building was originally designed as a single-family residence, but decades later it was converted to commercial use. According to the Landmark designation STOA, the Queen Anne style structure satisfied Landmark Criteria 1, 2, 3, and 4. The period of the significance for the Queen Anne Landmark is 1891, the date it was constructed and retained all of its original architectural, stylistic features. The City's 2018 HRI Update also notes the property is eligible for listing in the National Register and California Register for its architectural merit and association with the early residential development of Santa Monica. For the purposes of CEQA compliance this property is considered a historic resource, as defined in the CEQA Guidelines.²

Public Park, 100-1500 blocks of Ocean Avenue

Referred to as Palisades Park, the public park is a cultural landscape that spans 15 blocks along the west side of Ocean Avenue from Colorado Avenue to the northern boundary of the City near San Vicente Boulevard and Adelaide Drive. Palisades Park is located along the west side of Ocean Avenue and west of the Project site. The park occupies the top of the bluff west of Ocean Avenue and is across the street from the Project site. Palisades park looks out over Palisades Beach Road (Pacific Coast Highway) and the beach below. The City acquired the land that would become Palisades Park from the City founders and Nevada Senator John P. Jones and the widow Mrs.

² California Environmental Quality Act, Section 15064.5(a).

Arcadia Bandini de Stearns Baker, and the Santa Monica Land and Water Company in the latter years of the nineteenth century. Once characterized by numerous *Eucalyptus* trees that were replaced over the years, Palisades Park today is landscaped with several types of palm trees, grassy lawns, and meandering concrete pathways. It was previously identified, evaluated, and recorded in 1986. The site is currently a City-designated Landmark. The park, previously known as Linda Vista Park, was found eligible for listing in the National Register as being one of the oldest public parks gifted to the city by early community founders, Senator John P. Jones and Mrs. Arcadia de Baker, in 1892.

The historic cultural landscape was surveyed again in 1998 for National Register eligibility under a Section 106 compliance review and its eligibility for the National Register under Criterion A was reconfirmed. As Palisades Park is considered eligible for listing on the National Register, the park is included in the California Register. Palisades Park was officially identified as a City-designated Landmark in 2007 for its important associations with the cultural, recreational, political, and architectural history of the City, as well as for its direct connection with important personages. Under the 2018 Citywide survey update the park was identified as eligible for listing in the California Register and was reconfirmed as a City-designated Landmark. For the purposes of CEQA compliance this property is considered a historic resource, as defined in the CEQA Guidelines.

Summary of Historical Resources Findings

The survey study area contains four properties that are considered historical resources under CEQA (see Appendix E). Two historic resources are located within the Project site (1333 and 1337 Ocean Avenue) and two are situated adjacent to the Project site (1323 Ocean Avenue and 100-1500 blocks of Ocean Avenue) (refer to Table 3.4-2).

Table 3.4-2. Historic Resources within Project Vicinity

	Address	Description	Year of Construction	CRHR Status Code	Distance to Site
Gussie Moran House	1323 Ocean Avenue	Queen Anne building	1887-1891	3S, 3CS, 5S1	Adjacent to the north
Palisades Park	100-1500 Ocean Avenue	26.4 acres of park to the west of Ocean Avenue	1892	5S1	Adjacent across Ocean Avenue

The Hotel Shangri-La and Georgian Hotel are considered City-designated Landmarks; however, these sites do not lie adjacent to the Project and viewsheds face west towards Ocean Avenue and Santa Monica Beach.

Archaeological Resources

Archaeological resources represent and document activities, accomplishments, and traditions of previous civilizations and link current and former inhabitants of an area. Archaeological resources may date from the prehistoric or historic period, and include deposits of physical remains of the past (e.g., artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained) or areas where prehistoric or historic activity measurably altered the earth.

To identify known archaeological resources and prior studies within the proposed Project vicinity, a Phase I Cultural Resources Survey was prepared by Wood Environmental & Infrastructure Solutions, Inc. in 2019. The Phase I Cultural Resources Survey included a record search conducted on February 12, 2019 at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System at California State University, Fullerton.

The results of the literature and records search indicate that at least 52 previous cultural resource investigations have occurred within a 1-mile radius of the Project site. These studies identified seven historic-period archaeological resources within the search radius, but no archaeological resources have been recorded within the proposed Project site. The seven archaeological resources include four historic-period archaeological sites, two isolated (i.e., found by itself, not associated with other archaeological material) historic-period artifacts, and one historic-period structure (see Table 3.4-3). These historic-period refuse deposits and isolated historic-period artifacts are not unique and, by themselves, cannot provide information regarding trends in the City's history.

Archaeological Resource Potential of the Project Site

Seven historic-period archaeological resources (i.e., four historic-period archaeological sites, two isolated historic-period artifacts, and one historic-period structure) are recorded within the 1-mile search radius of the Project site. No archaeological resources are recorded currently at the Project site, but the lack of previously recorded archaeological sites is not a reliable indicator of archaeological sensitivity. In highly developed urban settings, the original prehistoric and/or historic-period ground surface is often buried by subsequent fill and development; therefore, prehistoric and historic archaeological deposits may be preserved beneath more recent earth materials. During prehistory, the Project vicinity would have provided a favorable environment for Native American settlement given its proximity to the Pacific Ocean.

Table 3.4-3. Archaeological Resources Recorded Within the Project Vicinity

Site Number	Description	Location Relative to Project
CA-LAN-2392H/ P-19-002392	1920s to 1930s domestic refuse and structural debris including ceramics (i.e., earthenware, porcelain, unglazed floor tile), glass (i.e., clear, brown, and green bottles), and bricks scattered over an 81-sf area	Approximately 0.25 miles (1,475 feet) northeast 1422 6 th Street
CA-LAN-4728H/ P-19-04728	Three historic-period refuse deposits from 1870 to 1920 covering a roughly 2,025-sf area; deposits measured 25 x 25 feet, 6.5 x 3.5 feet, and 16 x 11 feet in size, and were identified 3.5 feet, 7.5 feet, and 0.5 feet bgs, respectively; refuse was primarily household items including ceramic tableware, food and beverage glass, shell, and bone that represented multiple episodes of residential dumping.	Approximately 0.3 miles (1,575 feet) east 1554 5 th Street
CA-LAN-4729H/ P-19-004729	Historic-period refuse deposit from the late-19 th to early-20 th centuries; recovered approximately 5.5 feet bgs; consisted of predominantly architectural and building materials (i.e., brick and nails) but also included consumer, household, and kitchen items such as ceramics, glass, shell, and bone.	Approximately 0.3 miles (1,575 feet) east 501 Colorado Avenue
CA-LAN-4731H/ P-19-004731	“Concentrated deposit and a wide scatter” of late-19 th to early-20 th century refuse; from 7- to 10-feet bgs; representing daily household objects, including glass bottles, ceramics (i.e., earthenware and porcelain), porcelain doll fragments, and bone.	Adjacent to north 1320 2 nd Street
P-19-101025	Isolated olive-green glass bottle recovered approximately 20 feet bgs; dated to roughly 1890 to 1920.	Approximately 0.5 miles (2,640 feet) southeast
P-19-101026	Isolated historic-period “James Soda Works” glass bottle recovered during backhoe excavations approximately 25 feet bgs.	Approximately 0.5 miles (2,640 feet) southeast
P-19-101027	Historic-period brick and mortar storm drain approximately 20 feet bgs; with an inside diameter of 7 feet wide and 3 feet tall and an outside diameter of 9 feet wide and 5 feet tall.	Approximately 0.5 miles (2,640 feet) southeast

Sources: Albanese 2012a, 2012b, 2012c; Selverston 1996; Slawson and Kay 2015; Von der Porten 2016a, 2016b.

Prior to the 1920s, much of the Downtown contained dwellings on residential lots. Historic research indicates that portions of the Project site had been developed for residential use since at least 1906; by 1926, two other dwellings were located on the property. Therefore, it is possible that buried archaeological deposits such as privies and refuse dumps from these residential occupations may be encountered below the Project site. Archaeological deposits from the early-20th century could provide important information about the economy, consumer practices, product availability, and household lifestyles of residents during the early history of Santa Monica.

3.4.2 Regulatory Setting

Several Federal, State, and local laws guide address the preservation and protection of cultural resources. These include the National Historic Preservation Act, Public Resources Code, and the Public Health and Safety Code. At the local level, the City of Santa Monica Landmark and Historic Preservation Ordinance requires protection of historical resources to the greatest extent feasible. The following regulations apply to the proposed Project.

Federal Policies and Regulations

National Register of Historic Places (NRHP). The National Register was established by the National Historic Preservation Act of 1966 (NHPA) to help identify and protect properties that are significant cultural resources at the Federal, State, and/or local levels. The National Register employs four criteria to determine if a resource is significant to U.S. history, architecture, archaeology, engineering, or culture and should be listed in the National Register. These criteria include:

1. It is associated with events that have made a significant contribution to the broad patterns of our history;
2. It is associated with the lives of persons significant in our past;
3. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
4. It yields, or may be likely to yield, information important in prehistory or history.³

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years in age must meet one or more of the above criteria to be eligible for listing in the National Register. However, the National Register does not prohibit the consideration of properties less than 50 years in age whose exceptional contribution to the development of U.S. history, architecture, archaeology, engineering, or culture can be clearly demonstrated under National Register Criteria Consideration G.

In addition to meeting the Criteria for Evaluation, a property must have integrity. “Integrity is the ability of a property to convey its significance.” According to National Register Bulletin 15, the

³“Guidelines for Completing National Register Forms,” National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the National Register of Historic Places.

National Register recognizes seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling and association.

In assessing a property's integrity, the National Register criteria recognize that properties change over time, therefore, it is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.

State Policies and Regulations

The OHP, as an office of the California Department of Parks and Recreation, implements the policies of the National Historic Preservation Act on a Statewide level. The OHP also carries out the duties as set forth in the Public Resources Code and maintains the California Historic Resources Inventory and the California Register. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State's jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

California Register of Historic Resources (CRHR) of Historical Resources. The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change." Based on the criteria of eligibility for the California Register, a historic resource may be eligible for listing if it:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

A historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance

to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

The California Register automatically includes “all properties formally determined eligible for, or listed in, the National Register of Historic Places,” and certain specific California Historical Landmarks, and California Points of Historical Interests that have been evaluated and recommended for inclusion on the California Register. Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for the California Register. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources, or identified in an historical resources survey, does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

The California Register does not provide criteria for historic districts. California OHP Technical Assistance Series #7: How to Nominate a Resource to the California Register of Historical Resources bulletin describes historic districts:

“Historic districts are unified geographic entities which contain a concentration of historic buildings, structures, or sites united historically, culturally, or architecturally. Historic districts are defined by precise geographic boundaries. Therefore, districts with unusual boundaries require a description of what lies outside the area, in order to define the edge of the district and to explain the exclusion of adjoining areas. The district must meet at least one of the criteria for significance discussed in Section 4852 (b)(1)-(4) of the regulations.”

California Environmental Quality Act. CEQA includes regulations that address historical resources. Specifically, according to Public Resources Code §5020.1(j), “historical resources,” include, but are not limited to, “any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (OHP 2005). Resources included in a local register of historical resources (pursuant to Public Resources Code Section 5020.1[k]), or identified as significant in an historical resources survey (meeting the criteria in Public Resources Code Section 5024.1[g]), also are considered “historical resources” for the purposes of CEQA. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources, or identified in an historical resources survey, does not preclude a lead agency

from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

State Historical Building Code. Created in 1975, the State Historical Building Code (SHBC) provides regulations and standards for the preservation, restoration, rehabilitation, or relocation of historic buildings, structures, and properties that have been determined by an appropriate local or State governmental jurisdiction to be significant in the history, architecture, or culture of an area. Rather than being prescriptive, the SHBC constitutes a set of performance criteria. The SHBC is designed to help facilitate restoration or change of occupancy in such a way as to preserve original or restored elements and features of a resource; to encourage energy conservation and a cost-effective approach to preservation; and to provide for reasonable safety from earthquake, fire, or other hazards for occupants and users of such “buildings, structures and properties.” The SHBC also serves as a guide for providing reasonable availability, access, and usability by the physically disabled.

Codes Governing Human Remains. The disposition of human remains is governed by Public Health and Safety Code Section 7050.5 and Public Resources Code Sections 5097.94 and 5097.98, and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified immediately and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Public Resources Code Section 5097.98, will immediately notify the Most Likely Descendant (MLD) from the deceased Native American(s) so they can inspect the burial site and make recommendations for treatment or disposal. CEQA Guidelines Section 15064.5 also assigns special importance to human remains and specifies procedures to be used when Native American human remains are discovered.

Local Policies and Regulations

City of Santa Monica Landmarks and Historic District Ordinance. The Santa Monica Landmarks and Historic Districts Ordinance (City of Santa Monica Municipal Code [SMMC] Chapter 9.56) was adopted by the City in 1976 and amended in 1987, 1991, and 2015. The ordinance established the City’s Landmarks Commission with the power to designate Landmarks, Structures of Merit, or Historic Districts. The ordinance established criteria and procedures for designating these historic resources.

Section 9.56.100 of the City of Santa Monica Landmarks and Historic Districts Ordinance sets forth the criteria for designation of Landmarks and Historic Districts. A geographic area or a

noncontiguous grouping of thematically related properties may be designated a Historic District. An individually significant property may be designated a Landmark. Landmarks may include structures, natural features, or any type of improvement to a property that is found to have particular historic or architectural significance to the City. Such designations may be made provided that the subject property meets one or more of the following criteria outlined in the SMMC Section 9.56.100(A):

1. It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.
2. It has aesthetic or artistic interest or value, or other noteworthy interest or value.
3. It is identified with historic personages or with important events in local, State or national history.
4. It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.
5. It is significant or a representative example of the work or product of a notable builder, designer or architect.
6. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community, or the City.

An historic district is defined by the City of Santa Monica as “a geographic area or noncontiguous grouping of thematically related properties that may be designated a Historic District if the City Council finds such area meets one of the following criteria, outlined in the SMMC Section 9.56.100(B):

1. Any of the criteria identified in SMMC Section 9.56.100(A)(1) through (6).
2. It is a noncontiguous grouping of thematically related properties or a definable area possessing a concentration of historic, scenic or thematic sites, which contribute to each other and are unified aesthetically by plan, physical development or architectural quality.
3. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.

4. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

Section 9.56.080 of this ordinance recognizes the significance of Structures of Merit and empowers the City Landmarks Commission to designate such structures. The City Landmarks Commission may designate Structures of Merit if the structure possesses one of the following characteristics:

- A. The structure has been identified in the City's HRI.
- B. The structure is a minimum of 50 years of age and meets one of the following criteria:
 1. The structure is a unique or rare example of an architectural design, detail or historical type.
 2. The structure is representative of a style in the City that is no longer prevalent.
 3. The structure contributes to a potential Historic District.

Other sections of the ordinance include an economic hardship provision, requirements and exemptions for maintenance and repair of resources, and procedures to respond to unsafe conditions. In addition to regulatory requirements, the ordinance provides for preservation incentives including waivers of fees and zoning regulations, use of the SHBC, and the Mills Act property tax reduction contracts.

The ordinance requires a Certificate of Appropriateness for any proposed alterations, restorations, construction, removal, relocation, or demolition, in whole or in part, of or to a Structure of Merit, Landmark or Landmark Parcel, or to a building or structure located within a Historic District. Certificates are issued by the Landmarks Commission or the City Council if a determination can be made in accordance with any of the criteria stated in the ordinance. Generally, the proposed work should not detrimentally change, destroy, or adversely affect any exterior features of a protected resource and should be compatible with the character of the resource.

SMMC Requirements for Demolition. SMMC Chapter 9.25 establishes regulations that address the demolition of buildings and structures in the City. An important aspect of this code provision requires that the City cannot issue demolition permits for structures 40 years or older until the application has been sent for review to the Landmarks Commission. The ordinance provides a period of 75 days during which an application for the designation of the structure as a Landmark, historic district, or structure of merit may be filed. If no application for designation is filed, the demolition may proceed subject to all other legal requirements. However, if an application for designation is filed, the structure is then subject to the designation procedures of the City's Landmarks and Historic Districts Ordinance.

Santa Monica General Plan Historic Preservation Element. The purpose of the Historic Preservation Element (2002) is to establish a long-range vision for the protection of historic resources in the City and to provide implementation strategies to achieve that vision. The Historic Preservation Element is part of the Santa Monica General Plan and it is organized into goals, objectives, and policies. Some of the goals include identifying and evaluating historic and cultural resources on a regular basis including conducting additional surveys to identify types and contexts, protecting historic and cultural resources from demolition and inappropriate alterations while ensuring compliance with CEQA and Section 106 of the National Historic Preservation Act, seeking designation for historic resources, and protecting historic views and landscapes.

Santa Monica General Plan Land Use and Circulation Element. The Land Use and Circulation Element (LUCE), adopted in 2010 and last amended in 2020, seeks to ensure that historic preservation is a fundamental community value. The LUCE provides a range of policies to serve as tools for responding to a wide range of requirements for historic preservation, preservation of historically significant attributes, and conservation of neighborhood resources. The LUCE promotes an integrated set of policies and programs in historic preservation, neighborhood conservation, and urban form to reduce impacts to historic resources. All of the policies and programs were designed to build upon and incorporate consistently with the Historic Preservation Element. LUCE policies encourage historic preservation and aim to protect, preserve, and enhance the Downtown residential neighborhood and ensure that structures of historical significance are preserved. Chapter 2.3 of the LUCE includes policies to ensure that the City continues to protect what is unique and valued on a citywide and neighborhood level, including Palisades Park and the bluffs; Santa Monica Pier; and neighborhood streetscapes, architecture, and building scale.

Santa Monica Historical Resources Inventory. The HRI, last updated in 2018, is a database used by the City to identify properties of potential historic significance. Each property listed on the HRI has been evaluated based on a “windshield survey” conducted by preservation professionals using nationwide standards and criteria. The identification of a property on the HRI does not necessarily mean that the property is a designated historic resource. Designation is a separate process undertaken in accordance with the City’s Landmark Ordinance.

3.4.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance for cultural resources are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, the proposed project would have a significant adverse impact on cultural resources if:

- a) The project would cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 of the CEQA Guidelines;
- b) The project would cause a substantial adverse change in the significance of a unique archaeological resource as defined in Section 15064.5 of the CEQA Guidelines; and/or
- c) The project would disturb any human remains, including those interred outside of formal cemeteries.

Historical Resources

Analysis of impacts to historic architectural resources requires that a lead agency first determine whether a building, structure, object, or feature is a historical resource as defined in CEQA Guidelines Section 15064.5. If the lead agency determines a historic architectural resource is a historical resource, its significance may be materially impaired for the reasons outlined below. Typically, the significance of a historical resource of an architectural or structural nature is materially impaired through demolition or alteration. The resource may also be materially impaired by incompatible adjacent new construction that alters the setting of the resource, thereby diminishing its integrity and significance.

According to the CEQA Guidelines Section 15064.5(b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the historical resource (CEQA Guidelines Section 15064.5(b)(1)). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Removal, demolition, or alteration of historical resources can directly impact their significance by destroying the historic fabric of an archaeological site, structure, or historic district. Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project vicinity, assessing the significance of the resources that may be affected, and determining the appropriate mitigation.

The maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction of a historic resource in a manner consistent with The Secretary of the Interior's Standards and Guidelines (Weeks and Grimmer 1995) generally will constitute mitigation of impacts to a less than significant level. Documentation of historic buildings and structures, including documentation to the standards of the Historic American Buildings Survey or Historic American Engineering Record (HABS/HAER), may lessen impacts but may not reduce them to less than significant levels.

The Secretary of the Interior's Standards for the Treatment of Historic Properties (36 Code of Federal Regulations [CFR] Part 68) defines four options for the treatment of historic buildings: (1) preservation; (2) rehabilitation; (3) restoration; and (4) reconstruction. Generally:

1. Preservation involves the application of measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment (Weeks and Grimmer 1995).
2. Rehabilitation entails making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values (Weeks and Grimmer 1995).
3. Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period (Weeks and Grimmer 1995) .
4. Reconstruction involves new construction to recreate the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location (Weeks and Grimmer 1995).

The Secretary of the Interior's Standards for the Treatment of Historic Properties are not prescriptive but instead provide general guidelines and are intended to be flexible and adaptable to specific project conditions, including aspects of adaptive use, functionality, and accessibility. The goal is to balance continuity and change and retain historic building fabric to the maximum extent feasible. The National Park Service (NPS) has compiled a series of bulletins to provide guidance on specific historic preservation topics.

Archaeological Resources and Human Remains

CEQA provides guidelines for mitigating impacts to archaeological resources in Section 15126.4. According to the CEQA Guidelines, public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered for a project involving such an archaeological site:

1. Preservation in place (avoidance) is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
2. Preservation in place may be accomplished by, but is not limited to, the following:
 - Planning construction to avoid archaeological sites;
 - Incorporation of sites within parks, greenspace, or other open space;
 - Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site;
 - Deeding the site into a permanent conservation easement.
3. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code.
4. Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource,

provided that the determination is documented and that the studies are deposited with the California Historical Resources Regional Information Center.

Typically, such measures will reduce impacts on archaeological resources to less than significant levels.

Methodology

Historical Resources

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. Based on CEQA Guidelines Section 15064.5(b)(2) presented above, the Project would have a significant impact on historical resources if it would demolish, destroy, relocate, or alter a historical resource or its setting such that its historical significance or integrity as a historical resource would be materially impaired, rendering it no longer eligible as a historical resource. The analysis of the Project's potential impacts on historic resources is based on a review of information and analysis available in several reports:

- Historic Resources Technical Report – Ocean Avenue Project (2020) prepared by Ostashay & Associates Consulting;
- Phase I Cultural Resources Report prepared by Wood Environment & Infrastructure, Inc.;
- Commercial (Residential) Property, 1333 Ocean Avenue, Santa Monica, California - City Landmark Evaluation Report (2001) prepared by PCR Services Corporation;
- Commercial (Residential) Property, 1337 Ocean Avenue, Santa Monica, California - City Landmark Evaluation Report (2004) prepared by PCR Services Corporation;
- Historic Resource Assessment Comprehensive Update Report: 101 Santa Monica Boulevard (2018) prepared by Chattel;
- Ocean Avenue Project, Santa Monica, California – Conformance Recommendations (2020) prepared by Chattel;
- 101 Santa Monica Boulevard-Comparison with Like Properties Memorandum, prepared by Chattel, June 26, 2018.
- City of Santa Monica General Plan LUCE (2010); and
- City of Santa Monica 2018 HRI Update.

The Historic Resources Technical Report included a records search of the National Register and its annual updates, determinations of eligibility for the National Register, the California Register, and the California Historical Resources Inventory System (CHRIS) maintained by the OHP. The City of Santa Monica Historic Resources Inventory (SMHRI) was also reviewed to identify any

previously surveyed properties within the study area. Site inspections of the Project site were made to assess existing conditions, define the historic resources survey study area, document potential significant properties, and identify character-defining features of those properties evaluated as historically significant. A survey of the study area, including photography and the collection of archival background data, was then performed. Additional background and site-specific research was also conducted in order to evaluate potential historic resources within their proper historic context.

Criteria of the National Register, California Register, and the City of Santa Monica preservation program, as applicable, were employed to evaluate newly identified properties and/or re-confirm the significance of any previously identified properties. In addition, the survey methodology of the OHP was utilized to determine: (i) if known historical resources have previously been recorded within a 1-mile radius of the proposed Project site; (ii) if the proposed Project site has been systematically surveyed by historians prior to the initiation of the study; (iii) whether there is other information that would indicate whether or not the area of the proposed Project site is historically sensitive; and/or (iv) the proposed Project may pose indirect impacts to adjacent historic resources.

Project plans were reviewed for conformance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and compliance with CEQA Guidelines Section 15064.5, particularly regarding proposed changes to historical resources, including the City-designated Landmarks at 1333 and 1337 Ocean Avenue.

Archaeological Resources and Human Remains

Investigation of potential archaeological resources at the Project site was completed via Phase I Cultural Resources Survey prepared by Wood Environmental & Infrastructure Solutions, Inc. in 2019. The Phase I Cultural Resources Survey included a record search conducted on February 12, 2019 at the South Central Coastal Information Center (SCCIC) of the CHRIS at California State University, Fullerton as well as a Project-specific site survey. Additionally, the proposed Project referred to the DCP Program EIR's existing Citywide archaeological investigations for a consistency and a contextual discussion of the Project in the Downtown.

3.4.4 Applicable Mitigation Measures from the DCP Program EIR

This section provides the applicable mitigation measures (MMs) from the adopted Mitigation Monitoring and Reporting Program (MMRP) from the Downtown Community Plan (DCP) Program EIR. These DCP MMs were reviewed and considered as part of preparation of all technical studies and their effectiveness at addressing project impacts evaluated as part of review and consideration potential Project impacts and the need for further mitigation.

MM CR-3a: *Archaeological Data Recovery:* *For projects that inadvertently discovered buried prehistoric or historic-period archaeological resources the City shall apply a program that combines resource identification, significance evaluation, and mitigation efforts into a single combined effort. This approach would combine the discovery of deposits (Phase 1), determination of significance and assessment of the project's impacts on those resources (Phase 2), and implementation of any necessary mitigation (Phase 3) into a single consolidated investigation. This approach must be driven by a Treatment Plan that sets forth explicit criteria for evaluating the significance of resources discovered during construction and identifies appropriate data recovery methods and procedures to mitigate project effects on significant resources. The Treatment Plan shall be prepared prior to issuance of building permits by a Registered Professional Archaeologist (RPA) who is familiar with urban historical resources, and at a minimum shall include:*

- *A review of historic maps, photographs, and other pertinent documents to predict the locations of former buildings, structures, and other historical features and sensitive locations within and adjacent to the specific development area;*
- *A context for evaluating resources that may be encountered during construction;*
- *A research design outlining important prehistoric and historic-period themes and research questions relevant to the known or anticipated sites in the study area;*
- *Specific and well-defined criteria for evaluating the significance of discovered remains; and*
- *Data requirements and the appropriate field and laboratory methods and procedures to be used to treat the effects of the project on significant resources.*

The Treatment Plan shall also provide for a final technical report on all cultural resource studies and for curation of artifacts and other recovered remains at a qualified curation facility, to be funded by the developer. To ensure compliance with City and State preservation laws, this plan shall be reviewed and approved by the Historic Landmarks Commission and the City of Santa Monica Planning Division prior to issuance of building permits.

MM CR-3b: *Inadvertent Discoveries:* *In the event of any inadvertently discovered prehistoric or historic-period archaeological resources during construction, the developer*

shall immediately cease all work within 50 feet of the discovery. The proponent shall immediately notify the City of Santa Monica Planning and Community Development Department and shall retain a Registered Professional Archaeologist (RPA) to evaluate the significance of the discovery prior to resuming any activities that could impact the site. If the archaeologist determines that the find may qualify for listing in the California Register, the site shall be avoided, or a data recovery plan shall be developed pursuant to MM CR-2a. Any required testing or data recovery shall be directed by a RPA prior to construction being resumed in the affected area. Work shall not resume until authorization is received from the City.

The adopted MMRP from the DCP Program EIR also contains DCP MM CR-1: Historic American Building Survey (HABS) Documentation. However, this mitigation measure is not applicable to the proposed Project since it pertains to demolition or alteration of a historic resource that cannot comply with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The City-designated Landmarks on the Project site would be relocated, and rehabilitation of the structures would be completed in accordance with the Rehabilitation Standards, as described further below and in detail in the recommendations provided by Chattel and Ostashay & Associates Consulting, included in Appendix E of this EIR. While the building located at 101 Santa Monica Boulevard was included in the HRI and is proposed for demolition, the 2018 HRA of 101 Santa Monica Boulevard prepared by Chattel concluded that this structure is not a historical resource eligible for listing at the Federal, State, or local level (see Appendix E).

3.4.5 Project Impacts and Mitigation Measures

Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

CR-1 **The proposed Project would retain the integrity of general location context, setting, design, materials, workmanship, feeling, and association of the onsite City-designated Landmarks essential to their historical significance. With implementation of mitigation measures identified in the Historic Resources Technical Report – Ocean Avenue Project (2020), the proposed Project would not result in a substantial adverse change in the significance of a—onsite historical resources, and impacts would be *less than significant with mitigation*. However, it has been conservatively concluded that construction activities could have potentially significant and unavoidable construction vibration**

impacts to the Gussie Moran House because the consent of the adjacent offsite property owner to conduct mitigation cannot be guaranteed.

Impact Description (CR-1)

The proposed Project includes a roughly 35,500 square feet of Cultural Use Campus (e.g. museum, art gallery, event space) located at the north end of the Ocean Avenue side of the Project site. The Cultural Use Campus would consist of three structures, including a new cultural use building and two relocated and adaptively used City-designated Landmark buildings currently located at 1333 and 1337 Ocean Avenue.



The proposed Project would involve the construction of a Cultural Use Campus that would incorporate the two City-designated Landmarks located on the Project site.

The proposed Project would construct five new buildings onsite. The design of the new work is contemporary using set-of-the-art materials and features, which will help to differentiate the historic buildings from the new construction. Within the Project site, a portion of 1st Court is proposed to be rerouted into an “L”-shaped configuration resulting in vehicular access traveling south from Arizona Avenue down 1st Court then turning east to 2nd Street.

Direct Impacts to Onsite Historic Structures (1333 Ocean Avenue and 1337 Ocean Avenue)

Proposed relocation of the two onsite City-designated Landmarks located at 1333 Ocean Avenue (the 1906 Queen Anne Landmark) and 1337 Ocean Avenue (the 1926 Spanish Colonial Revival Landmark) could lead to damage of the structures, loss of character defining features, and alteration of historic context. The relocation of the City-designated Landmarks would occur in two-steps. First, the buildings would be temporarily relocated to the 101 Santa Monica Boulevard property. Second, after the permanent foundations are set, the City-designated Landmarks would be relocated to their permanent locations in support of the Cultural Use Campus (refer to Section 2.7, *Construction Activities*). The relocation process would comply with federal professional standards and guidelines identified in *Moving Historic Buildings* (NPS 1979). Additionally, rehabilitation and adaptive reuse of the City-designated Landmarks could impact key character defining features. Rehabilitation of these buildings would include seismic and structural retrofitting, handicap accessibility improvements where feasible, fire-life safety improvements,

and upgrades to MEP equipment. The character defining features of the City-designated Landmarks, including the west-facing orientation and the exterior materials of the buildings (refer to *Architectural Resources* above), would be retained during Project implementation. This proposed rehabilitation approach is based upon historical documentation, existing physical conditions and preservation recommendations that take both the physical conditions and historic chronology of Ocean Avenue into account. All work would be performed in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and the SHBC. Incorporation of these standards and guidelines, and application of both DCP and new proposed mitigation measures would ensure that the City-designated Landmarks retain their integrity of location, setting, design, materials, workmanship, feeling, and association essential to their historical significance, as further described below.

Relocation

The proposed Project would ultimately relocate both City-designated Landmarks to new locations immediately adjacent to where each were originally constructed. In other words, the two City-designated Landmarks would swap parcel locations upon relocation in order to better facilitate their integration into the Cultural Use Campus. Due to this relocation, the City-designated Landmarks would be subject to alteration of the resource or its immediate surroundings and could all



This photograph, taken in 1931 shows the Spanish Colonial Revival-style Landmark (1337 Ocean Avenue) next to the Queen Anne-style Landmark (1333 Ocean Avenue) at a time when the City was expanding its commercial space.

result in a “substantial adverse change in the significance” of the historic resource. Relocation of the City-designated Landmark could also damage important character-defining features, which in turn could materially alter the physical characteristics of the resource that conveys its historical significance. However, the buildings would be relocated adjacent to their original locations and would remain (i.e., west) facing Ocean Avenue and the Pacific Ocean. The buildings would retain their compass orientation, approximate setbacks from the street, and their proximate relationship to grade through retention of raised foundations. Historically, the buildings have long fronted Ocean Avenue facing Palisades Park, and the slight shift in locations would not substantially alter the historic setting or context of the buildings because they would continue to convey the same

general history and streetscape of residential development along Ocean Avenue as it did prior to the relocation (see Appendix E). .

Further, it also appears that the proposed relocation would not result in an important loss of integrity of design, materials or workmanship of the building as its important character-defining would be preserved, repaired (as necessary), and restored in some instances. The physical removal from and demolition of the foundation as well as the removal of some exterior non-historic material from the building before relocation and its subsequent alteration for adaptive use, rehabilitation, and restoration would not be considered a substantial loss of historical integrity of design, materials, and workmanship because these elements are not character-defining and such work would be conducted in manner consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Important site characteristics of the property to be maintained after relocation would be compass orientation, compatibility of scale, use, and compatible landscape design and elements.

As the new permanent locations of the City-designated Landmarks appear conceptually compatible with the original character use of the historic structures and the resources would retain their listings as City-designated Landmarks, relocation would not be considered significant. Relocation of the City-designated Landmark buildings appears preliminarily compliant with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Nevertheless, to ensure full compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* upon preparation and compliance review of final site plans, mitigation measures are required to reduce any potential impacts to *less than significant*.

Rehabilitation of 1333 and 1337 Ocean Avenue

The proposed rehabilitation of the Queen Anne Landmark would preserve, repair (as necessary), and restore important exterior character-defining features as well as remove incompatible, non-character-defining elements and additions. The interior space of the building would be modified for adaptive use; and such spaces are not considered character-defining. As conceptually proposed, the front (west, primary) façade would be restored based on physical evidence and historical documentation. The original tower, which has been shortened and modified over the years, and its original widow walk would be restored to its full height and would be clad in wood siding as it was historically. The now enclosed front porch with its column capitals on the first floor adjacent the front door would also be restored and opened. The integral porch on the second floor of the front elevation, which has also been altered, would be restored to its full length, extending it in front of the window to the north. The front gable ornamentation previously removed would also be restored in-kind. In addition, the brick chimney would be accurately restored above the roof

plane only (to the extent possible by code) and the roof would be recovered with new flame-retardant wood shingle roofing material as originally sheathed.

The exterior side wall of the north (side) elevation has had little alterations. Under the proposed Project, this elevation would be modified to be incorporated into the new Cultural Use Campus. Centered on the first floor of this side elevation a rectangular-shaped opening would be made which would allow pedestrian passage from the interior of the building to an open entry foyer and lobby space. This opening would be roughly as wide as the eaves of the second floor dormer set just above and would remove four existing windows and an existing door at the first floor. The second floor dormer would be retained and repaired as necessary and all remaining exterior wall finishes would also be retained and rehabilitated.

The east (rear) elevation has been previously altered through the addition of an entry door and bridge at the second floor that connects to a detached non-historic ancillary structure. Under the proposed Project, the door and bridge would be removed and this elevation would be modified to allow construction of a new contemporary two-story addition as part of the Cultural Use Campus improvements. A rectangular shape opening would be cut at the proximate location of the first floor fenestration and would open into a hallway connecting to other portions of the new Cultural Use Campus construction.

The south (side) elevation has been substantially modified over the years through the modification and addition of second floor dormers, non-original porch supports and curved brick stairs, and other features and materials. Currently, the building has three gable dormers at the second floor; however, upon review of historical photographs the building only had one dormer along this elevation (similar to the north roof plane). The one original gable, roughly centered on this elevation, would be restored as part of the proposed Project. In addition, non-original features and materials would be removed and this elevation restored based upon photographic and physical evidence. Most of this elevation would be visible from within the constructed project site though a portion of the eastern end would be incorporated inside the new Cultural Use Campus.

In concept, it appears that the historic character and context of the City-designated Landmark would be retained and the proposed work would be conducted in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Therefore, at the concept design level, the proposed Project should not demolish or materially alter in an adverse manner any character-defining features that convey the historical significance of the building or its formal recognition as a City-designated Landmark. However, as the plans are still conceptual and have not yet been finalized, it is possible that final site plans could include elements that would result in a potentially significant impact to the historic resource. Therefore, mitigation measures are

required to implement this aspect of the proposed Project to ensure that potential impacts to the Landmarks are reduced to *less than significant with mitigation*.

Compatibility of New Construction

The proposed Project would construct five new buildings onsite for use as a multi-story hotel, residential, restaurant retail, and Cultural Use Campus. Landscaped pedestrian-only paseos, breezeway, private deck space, open courtyards, and a rooftop observation deck atop the hotel would provide substantial open space and separation between the historic buildings and new development proposed throughout the Project site. The proposed Project also includes a three-level subterranean parking garage, a portion of which would be built under the site of the relocated Landmark building. A design goal of the built improvements, open space, and Project site is to complement the existing urban patterns found in the downtown area of Santa Monica through siting and orientation; building mass modulation; location of uses and programs; and historic preservation of the two onsite City-designated Landmarks.

The proposed Project has been designed to respect the historic character and qualities of the Landmark buildings. The new construction, exterior alterations, and new additions conceptually proposed would not destroy the Queen Anne or the Spanish Colonial Revival Landmarks or their historic character-defining features. The physical separation between the new improvements and historic buildings on the Project site is generously provided through the use of open pedestrian-only paseos and breezeways as well as concerted building placement on the Project site. This sensitivity allows both historic buildings to stand out and remain the focal points of entry to the proposed Cultural Use Campus. The new buildings would be clearly new and differentiated, yet the Landmark buildings would remain the dominant visual elements of the site and overall streetscape. With the conceptual design and placement of the new construction, the overall historic character and integrity of the historic buildings are retained and protected. Nevertheless, as the site plans are still conceptual and subject to refinement by Council, Architectural Review Board, and/or Landmarks Commission, it is possible that final site plans could include elements that would result in a potentially significant impact to the onsite historic resources. Therefore, mitigation measures are required to implement this aspect of the proposed Project to ensure that potential impacts to the City-designated Landmark are reduced to *less than significant with mitigation*.

Construction Activities

The proposed Project includes extensive demolition, grading, excavation, boring, drilling, and onsite construction-related activities. The placement of these activities below or adjacent to the 1333 Ocean Avenue and 1337 Ocean Avenue Landmark buildings has the potential to result in

inadvertent, indirect damage to these resources. The structures may be susceptible to significant ground-borne vibration and other impacts generated by construction-related activities of the proposed Project. As further discussed in Section 3.12, *Noise*, mitigation measures addressing potential onsite ground-borne vibration impacts to the onsite historic resources are required to reduce such potential adverse effects to *less than significant with mitigation* (see MM CR-1 and MM NOI-2).

Direct Impacts to Onsite Non-Historic Structures

The remaining buildings onsite (i.e., 1327 Ocean Avenue, rear structures at 1333 and 1337 Ocean Avenue, and 101 Santa Monica Boulevard) would be demolished and permanently lost as a result of the Project; however, none are not eligible for listing in the National Register or California Register, and are not listed as City-designated Landmarks.

Since the building at 1327 Ocean Avenue was not owned by a person of historical significance, is not a significant example of Laurence B. Clapp's body of work, and is a low-style example of commercial architecture, the Landmarks Commission and the public did not designate the building as a City Landmark or Structure of Merit. Additionally, this building is not identified in the City's HRI.

The rear structure at 1333 Ocean Avenue was constructed 35 years after the period of significance for the City-designated Landmark located at the front of the property. Because rear structure is not representative of Victorian architecture and has no merit as a historical resource on its own, it was not included in the City's HRI and was not identified as a City-designated Landmark along with the Queen Anne residence at the front of the property.

Similarly, the rear structure at 1337 Ocean Avenue was built at an unknown date several years after the period of significance for the Spanish Colonial Revival building located at the front of the property. The rear structure does not exemplify characteristics of the Spanish Colonial Revival architecture, and therefore, is not designated as a City Landmark or listed in the City's HRI.

The building at 101 Santa Monica Boulevard is identified in the City's HRI; however, a 2018 HRA concluded the building is not eligible for listing for listing at the Federal, State or local level because it is not associated with significant events or persons and alterations to character-defining features, including removal of original storefront windows, infill of triangular recess above main entry, and removal of decorative enframements around storefront entrances have substantially diminished the integrity of the structure.

As the buildings at 1327 Ocean Avenue, rear structures at 1333 and 1337 Ocean Avenue, and 101 Santa Monica Boulevard are not historic resources under the thresholds noted above and the criteria set forth in CEQA Section 15064.5(b)(3), their permanent loss would not be significant. Further, neither of the existing paved asphalt parking lots located at 101 and 129 Santa Monica Boulevard are designated as a City Landmark under the City's Landmarks and Historic District Ordinance. These parking lots do not represent the historical significance of Ocean Avenue's or the City's history. Therefore, the loss of the four non-historic structures onsite and the demolition of the surface parking lots at 101 and 129 Santa Monica Boulevard would have a *less than significant* impact under the thresholds noted above and the criteria set forth in CEQA Section 15064.5(b)(3).

Indirect Impacts to Offsite Historic Resources

Construction of a 1.89-acre mixed-use Project with buildings that range in height from 53 feet to 130 feet would change the visual setting for the vicinity in Downtown, potentially affecting the historic context and significance of nearby offsite identified historical resources including Palisades Park, located to the west and the Gussie Moran House, located to the north both adjacent to the proposed Project. .

The two City-designated Landmarks within the Project site are currently located near the Gussie Moran House to the south and upon their relocation, would retain their placement at the north end of the Project site immediately adjacent to the Gussie Moran House. Therefore, the existing setting, scale and massing, visual continuity of the streetscape and spatial relationship between the three designated Landmarks would remain unimpaired. However, because of the immediate adjacency of the Gussie Moran House to the Project site, construction-related activities associated with the proposed Project would have the potential to significantly impact the historic Gussie Moran House as it may cause structural damage due to ground-borne vibration. Implementation of MM CR-1 and MM NOI-2 would reduce potential ground-borne vibration; 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.

Palisades Park is also a City-designated Landmark adjacent to the west of the Project site. Due to the park's offset distance and its wide separation by Ocean Avenue from the Project site and because the massing and scale associated with the proposed Project would be compatible with the other existing development in the surrounding setting, the proposed Project would result in no

adverse material change to the overall historic character or significance of this City-designated Landmark. In addition, because of the wide separation between the Project site and the historic park locale to the west, and because of its linear property type as a resource the potential impact caused by construction-related ground-borne vibration is considered minimal. After project completion, Palisades Park would still retain integrity from its period of significance (1892-present time), convey its historical significance, and would continue to be a distinctive visual feature of the City. As the park's historic integrity and designation as a City-designated Landmark would not be substantially impaired due to construction of the proposed Project mitigation measures for this historic resource are not required to implement the proposed Project.

Mitigation Measures

MM CR-1 The Applicant shall implement and comply with all of the measures from the Historic Resources Technical Report – Ocean Avenue Project (2020) prepared by Ostashay & Associates Consulting (see Appendix E). These measures shall be formalized as a part of the Development Agreement Process, identified in all final site plans, and implementation shall be confirmed by the City prior to the issuance of any permit, demolition, abatement, grading/excavation, relocation, or rehabilitation work the two City-designated Landmark.

1. ***Archival Recordation Documentation.*** Prior to the issuance of any permit, demolition, abatement, grading/excavation, relocation, or rehabilitation work the two City-designated Landmarks onsite, the Applicant shall have prepared recordation documents similar in format and content to an Historic American Buildings Survey (HABS) Level III recordation document.
2. ***Preparation of a Preservation-Protection Plan.*** The Applicant shall develop a Preservation-Protection Plan to support conformance with applicable *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. At a minimum, a Preservation-Protection Plan shall be prepared for the two historic buildings and their associated character-defining features.
3. ***Historic Preservation Professional Oversight.*** Final site plans for the two City-designated Landmark buildings onsite shall be developed in coordination with a qualified historic preservation professional.
4. ***Santa Monica Landmarks Commission.*** The Applicant shall obtain a Certification of Appropriateness (or equivalent approval pursuant to the Development Agreement) issued by City Landmarks Commission.

5. ***Compliance with The Secretary of the Interior's Standards for the Treatment of Historic Properties.*** Any maintenance, repair, stabilization, rehabilitation, relocation, preservation, conservation, or reconstruction proposed for any exterior portion of the City-designated Landmark Buildings shall comply with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.
6. ***California Historic Building Code Compliance.*** Where applicable, any work for code mitigations such egress, fire safety, railing heights, door widths, ADA accessibility, etc. shall utilize and follow the perspective code of the California Historical Building Code and the relevant guidelines specific in *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and NPS briefs, bulletins, references and guidelines.
7. ***Seismic Retro-Fit Plans and Reviews.*** Any and all seismic plans to stabilize and retro-fit the two City-designated Landmark buildings shall be prepared for the proposed Project and shall comply with the California Historical Building Code and the relevant guidelines specific in *The Secretary of the Interior's Standards for the Treatment of Historic Properties Standards* and NPS briefs, bulletins, references and guidelines. Such plans shall be reviewed and approved by the historic preservation consultant for compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* prior to formal submittal to the City for review, plan check, and building and safety review.
8. ***Project Plans and Reviews.*** Any and all project plans, including but not limited to architectural, structural, mechanical, relocation, landscape plans shall be prepared by the Applicant and reviewed and approved by the qualified historic preservation professional for compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* prior to formal submittal to the City for design review, plan check and building and safety review.
9. ***Historic Material Replacement.*** In compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties Standards*, in cases where the project would replace a distinctive historic feature or material, the new feature shall match the old in design, type, color, texture, profile, material, and overall appearance. Consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, all such work shall be accurately reproduced based on historical, pictorial, and physical documentation and evidence. Such replacement of features shall be supported by investigations and studies conducted as part of the Preservation-Protection Plan prepared for this project.

10. Compatible New Construction. As the current site plans are considered conceptual and such plans have not yet been finalized, it is possible that final site plan could include elements that would result in a potentially significant impact to the historic resources onsite. Therefore, for any new construction proposed, the historic preservation consultant shall consult with the Applicant team during the entire design process to insure that the new permanent built forms are compatible with the historic qualities and characteristics of the historic buildings located within and adjacent to the Project site.

11. Relocation/Construction Monitoring. The Preservation-Protection Plan requires the Applicant to retain a qualified historic preservation professional with at least 7 years of relevant experience who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, and/or Architecture pursuant to 36 CFR Part 61, to provide guidance and oversight for the preservation, relocation, and rehabilitation of the two City-designated Landmark buildings onsite. Once the project has been approved and entitled, the historic preservation professional shall conduct onsite construction monitoring during the relocation, demolition, excavation, and construction phases of the project.

12. Vibration Impact Measures and Monitoring Assessments. in coordination with the City and qualified historic preservation professional the Applicant shall assure avoidance of vibration impacts to such resources and their associated character-defining features, as identified in the Preservation-Protection Plan, by preparing a pre-construction vibration survey report and post-construction damage assessment survey report. These reports shall be prepared by a qualified independent structural engineer with qualifications in completed historic preservation projects that conformed to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. These reports shall be submitted to the City for review and approval prior to initiating any type of construction work activity onsite (pre-construction vibration survey report) and upon completion of such work (post-construction damage assessment survey report).

13. Shoring Plan. A shoring plan shall be implemented as part of the Preservation-Protection Plan by the Applicant to ensure the protection of onsite and adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of soils in and around the location of the onsite Landmark buildings.

14. Unanticipated Discoveries. The Applicant should be aware of the possible encounter of unanticipated discoveries on site upon implementation of the proposed Project, particularly

during excavation, grading, demolition, and relocation activities. In the event that any unusual or distinctive architectural features associated with the design or use of the Landmark buildings are encountered during site preparation, grading, demolition, excavation, relocation, or construction activities around the two sites work shall be immediately stopped and relocated from that area until it can be assessed by the City or qualified onsite historic preservation consultant. Such features, if determined to be important character-defining features of either building, it shall be assessed, possibly salvaged, and reused in the project as directed by the preservation consultant in coordination with the Applicant and City staff.

- 15. Interpretive Educational Program.** To assist the public in understanding the historical, cultural, and architectural significance of the City-designated Landmarks commemorative interpretive signage, displays, and/or plaques shall be created and incorporated into the Project site, particular as part of the Cultural Use Campus. The displays, signage, plaques and exhibits created for the site may incorporate salvaged “period appropriate” items from the historic buildings and any historical information, photographs, postcards, plans and illustrations, maps and brochures, etc. of the buildings, Ocean Avenue, the downtown commercial area in a creative medium accessible or visible to the public.

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?

CR-2 Ground disturbing activities associated with Project construction could uncover significant prehistoric or historic-period archaeological deposits that qualify as cultural resources as defined in Section 15064.5 of the CEQA Guidelines. Damage or destruction of such resources would be a potentially significant impact. This impact would be *less than significant with mitigation*.

Impact Description (CR-2)

According to the 2019 Phase I Cultural Resources Survey prepared for the proposed Project, no prehistoric or historic-period archaeological resources have been recorded within the proposed Project site. Historic-period archaeological resources, including subsurface refuse deposits and isolated artifacts, are recorded north and adjacent to the proposed Project site and within 1 mile of the Project site (refer to Table 3.4-3). The presence of these resources confirms former historic-period occupation within the Project vicinity.

While there are no documented archaeological resources within the Project site, historic research indicates the proposed Project site has been occupied since at least 1906. As a result, there is the potential for similar historic-period archaeological resources to be present within the proposed Project site below presently developed structures and paving and fill soils. Project construction would require grading and an excavation depth up to 35 feet bgs for the subterranean parking garage that could encounter unknown, potentially significant subsurface archaeological remains including trash pits, privies, and wells, as well as structural remains. Disturbance of these buried resources, if present, would result in a potentially significant impact on cultural resources.

Implementation of MM CR-2 as well as applicable DCP MMs, as described above, would require archaeological construction monitoring and protocols in the event of inadvertent discoveries of archaeological resources, would ensure that any unknown resources encountered during proposed Project ground disturbances would be analyzed, protected, and curated. Accordingly, archaeological resources would be protected and preserved and, therefore, this impact would be *less than significant with mitigation*.

Mitigation Measures

MM CR-2 ***Archaeological Construction Monitoring.*** *Archaeological monitoring shall be conducted by a qualified professional archaeologist familiar with the types of prehistoric and historic-period archaeological resources that could be encountered within the Project site. All grading, excavation, trenching, and site preparation including vegetation removal between 2 and 6 feet bgs and existing fill soils shall be monitored. A monitoring program shall be developed and implemented prior to the commencement of construction activities to ensure the effectiveness of monitoring.*

Would the project disturb any human remains, including those interred outside of formal cemeteries?

CR-3 **Unknown, isolated Native American human remains could potentially be inadvertently uncovered during Project construction. In the unlikely event of this occurrence, the Applicant would immediately cease activity in the vicinity of the discovery and comply with existing regulations. Therefore, impacts would be reduced to *less than significant*.**

Impact Description (CR-3)

The nearest cemetery to the Project site is the City of Santa Monica Woodlawn Cemetery, Mausoleum & Mortuary located approximately 1.09 miles southeast of the Project site. Although prehistoric village resources and associated human remains have not been recorded within and near the Project site, they could be present beneath the existing buildings and surface parking lots onsite. California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered within a site, disturbance of the site shall be halted. A qualified professional archaeologist shall inspect the remains and confirm that they are human, and if so, shall immediately notify the Los Angeles County Medical Examiner-Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the Medical Examiner-Coroner determines the remains are Native American, the Medical Examiner-Coroner shall contact the NAHC. As provided in Public Resources Code Section 5097.98, the NAHC shall identify the person or persons believed to be most likely descended from the deceased Native American. The MLD makes recommendations for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.

With compliance with existing regulations prescribed in California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98, impacts to human remains would be *less than significant*.

3.4.6 Cumulative Impacts

A cumulative impact to cultural resources would result if the Project impacts, when combined with other past, present, and future projects, would cumulatively increase the potential for 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.

Historic Resources

The proposed Project is located in the City's Downtown, provides a wide range of historic structures, including City-designated Landmark properties. Redevelopment within the City since its earliest urbanization in the early-20th century has reasonably resulted in removal of substantial historic buildings from that historic period. Cumulative impacts from past projects are considered to have resulted in a significant cumulative impact on historic-period built architectural resources.

As discussed above, the proposed Project would have a less than significant direct impact on historical resources within the Project site and in the surrounding vicinity with the implementation of MM CR-1. The historical resource with the most potential to be affected by the proposed Project is the Queen Anne-style Gussie Moran House, located immediately adjacent and north of the Project site. However, as described under Impact CR-1, relocation of the City-designated Landmarks would site the buildings in closer proximity to the Gussie Moran House. The proximity of the early 20th century Queen Anne-style and Spanish Colonial Revival buildings would improve their historical existing setting context.

Due to the distance of the Project site from the other historical resources and intervening development, the proposed Project would not alter those resources or their immediate surroundings, therefore, the proposed Project would not have an indirect impact on historical buildings. Most cumulative projects are residential infill development in the Downtown that would not adversely impact historical resources. Since the proposed Project itself would have a less than significant direct impact on offsite historical resources, as discussed above, the impacts associated with the proposed Project would not combine with other cumulative project impacts such that they would be cumulatively considerable and significant. Each development proposal received by the City is required to undergo review under existing City regulations and/or CEQA to determine the potential for impacts to an historic resource. If there is a potential for significant impacts on an historic resource, an investigation would be required to determine the nature and extent of the resource and identify appropriate mitigation measures. Implementation of MM CR-1 and NOI-2 would reduce the Project's contribution to cumulative impacts to onsite historical resources to less than significant. Implementation of MM CR-1 and MM NOI-2 would reduce potential ground-borne vibration impacts to onsite historic structures; however, the City does not have the jurisdiction or control to mandate implementation of this mitigation measure by offsite property owners. Therefore, it has been conservatively concluded that construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House because the consent of the adjacent offsite property owner to conduct mitigation cannot be guaranteed. Nevertheless, as described in Section 3.12, 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*.

Archaeological Resources and Human Remains

The Project site also has potential for unknown, buried cultural resources, including archaeological resources and human remains. Project construction would require ground disturbing activities, such as grading and excavation, that could potentially affect archaeological resources or human remains, which could contribute to a collective loss of these cultural resources. However, implementation of DCP MM CR-3a and MM CR-3b as well as Project-specific MM CR-2 would reduce the proposed Project's contribution to cumulative impacts on archaeological resources and human remains to *less than significant*.

3.4.7 Residual Impacts

Historic Resources

The Secretary of the Interior's Standards for the Treatment of Historic Properties and the SHBC include comprehensive standards to ensure that relocation and rehabilitation of the City-designated Landmarks onsite would not adversely affect ~~the onsite~~ historic structures. Implementation of MM CR-1 and NOI-2 would further reduce potentially adverse impacts to onsite historical resources to *less than significant*; however, the City does not have the jurisdiction or control to mandate implementation of MM NOI-2 by offsite property owners. Therefore, it has been conservatively concluded that construction activities could have potentially significant and unavoidable construction vibration impacts to the Gussie Moran House because the consent of the adjacent offsite property owner to conduct mitigation cannot be guaranteed.

Archeological Resources

The implementation of DCP MMs CR-3a and CR-3b as well as the Project-specific MM CR-2 would reduce potentially significant adverse impacts to archaeological resources to a *less than significant* level.

Human Remains

Compliance with California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 would ensure that Project implementation would follow the required process in the event of an inadvertent discovery of any human remains within the Project site. Compliance with California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 would occur under the proposed Project, so potential impacts to human remains would be *less than significant*.

3.5 ENERGY

This section analyzes impacts to energy resources due to construction and operation of the proposed Ocean Avenue Project (Project). The discussion of the proposed Project's anticipated energy demands includes electricity, natural gas, and fuel consumption. The anticipated energy demand and energy conserving features (e.g., development density, location efficiency, mixed uses, transit accessibility, and pedestrian accessibility to reduce vehicle miles traveled [VMT]) are evaluated to determine whether the proposed Project would result in unnecessary or wasteful energy consumption or if the proposed Project would conflict with existing energy-related plans.

3.5.1 Environmental Setting

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for the City of Santa Monica (City). CPA purchases electricity from a mix of renewable sources and partners with the Southern California Edison Company (SoCal Edison) to distribute electricity to residential and commercial customers throughout the City. CPA is a Joint



The City's electricity demands are provided by the Clean Power Alliance, which provides power from renewable resources including wind.

Powers Authority (JPA) made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California.

With the recent switch in energy providers, electricity customers in the City are automatically defaulted to receiving electricity from 100 percent renewable energy sources. Alternatively, customers can opt to have their electric power consist of 50 percent renewable content, or they can opt out of CPA. According to the City's Office of Sustainability and the Environment, in 2019, 92 percent of residents and businesses have opted to receive clean power from the CPA.

For customers opting out of the CPA, SoCal Edison is their electricity service provider. SCE provides electricity to approximately 15 million people, 180 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area across Central and Southern California, an area bounded by Mono County to the north, Ventura

County to the west, San Bernardino County to the east, and Orange County to the south (SoCal Edison 2019). SoCal Edison produces and purchases energy from a mix of conventional and renewable generating sources. Table 3.5-1 shows the electric power mix that was delivered to CPA and SoCal Edison customers by energy resource.

Table 3.5-1. 2018 SoCal Edison and CPA Power Content Label

Energy Resource	SoCal Edison			CPA		
	Power Mix	Green Rate (50%)	Green Rate (100%)	Lean Power (36%)	Clean Power (50%)	Green Power (100%)
Eligible Renewable	36%	68%	100%	36%	61%	100%
Biomass & Biowaste	1%	0%	0%	0%	0%	0%
Geothermal	8%	4%	0%	0%	0%	0%
Hydroelectric	1%	0%	0%	0%	0%	0%
Solar	13%	57%	100%	0%	38%	0%
Wind	13%	7%	0%	36%	23%	100%
Coal	0%	0%	0%	0%	0%	0%
Large Hydroelectric	4%	2%	0%	45%	27%	0%
Natural Gas	17%	8%	0%	0%	0%	0%
Nuclear	6%	3%	0%	0%	0%	0%
Other	0%	0%	0%	0%	0%	0%
Unspecified¹	37%	18%	0%	19%	13%	0%
Total	100%	100%	100%	100%	100%	100%

Notes: Retail customers include residential, commercial, and industrial users.

¹ “Unspecified” means electricity from transactions that are not traceable to specific generation sources.

Source: Clean Power Alliance 2019; SoCal Edison 2019.

In 2018, overall electricity consumption in the City of Santa Monica (City) from the industrial, commercial, and residential sectors was 787,770,753 kilowatt-hours (kWh), approximately 5 percent lower than 2015 and 9 percent higher than 1990 (City of Santa Monica 2018). The City’s total natural gas consumption recorded for these sectors in 2018 was 2,752,489,244 kilo-British thermal units (kBtu), approximately 21 percent lower than 2015 and 37 percent lower than 1990. Electricity and natural gas consumption decreased from 2015 for all three sectors, with the exception of commercial natural gas usage, which increased by 80 percent. The commercial sector, comprised largely of Downtown businesses, dominated energy consumption contributing over 49 percent of total energy demands while the industrial sector accounted for 12 percent and the residential sector accounted for 37 percent. Energy consumption in new buildings is regulated by California Building Energy Standards (California Code of Regulations [CCR] Title 24) and several City ordinances, such as the Green Building Ordinance, Solar Ordinance, and Zero Net Energy

(ZNE) Ordinance. Currently, energy services in the vicinity of the Project site are considered adequate, and no deficiencies in service capacities have been identified (City of Santa Monica 2017).

Electricity

The production of electricity requires the consumption or conversion of energy resources, including natural gas, coal, water, nuclear, and renewable resources such as wind, solar, and geothermal. Electricity, natural gas, and renewable energy production, consumption, research, and conservation within the State of California are managed by the California Energy Commission (CEC). In 2018, Californians consumed 284,436,261,624 kWh (284,436 gigawatt hours [GWh]) of electricity, while future annual electricity consumption is projected to increase to approximately 328,215 GWh by 2027 (CEC 2018b; U.S. Census Bureau 2019; City of Santa Monica 2018). In the County of Los Angeles, 68,486,187,103 kWh (68,486 GWh) were consumed in 2018. Approximately 787,770,753 kWh (788 GWh) were consumed within the City in the same year (CEC 2019a; City of Santa Monica 2018).

Of the electricity generated for California in 2018, 46.54 percent was generated by natural gas-fired power plants, 0.15 percent was generated by coal-fired power plants, 11.34 percent came from large hydroelectric dams, 0.24 percent was generated by oil and other petroleum or waste heat, and 9.38 percent came from nuclear power plants. The remaining 32.35 percent of electricity production in California was supplied by renewable sources including biomass, geothermal, small hydro, solar, and wind power. An additional 30,095 GWh of electricity, or approximately 10.54 percent of California's total power mix, was provided from imported power sources (CEC 2019b).

Facilities and infrastructure providing electric service include transmission, distribution, and communication lines. Facilities within the Downtown include the Santa Monica Substation at Lincoln Boulevard and Colorado Avenue, as well as underground power lines traversing the utilities grid of the Downtown. All areas of the City are served by electric infrastructure, with maintenance and periodic upgrades provided as needed.

Table 3.5-2. 2018 State, County, and City Electricity Demand

	Population	Electricity Demand (kWh)	
		Total	Per Capita
State	39,557,045	284,436,261,624	7,190.5
County	10,105,518	68,486,187,103	6,777.1
City	91,411	787,770,753	8,617.9

Source: CEC 2019a; U.S. Census Bureau 2019; City of Santa Monica 2018.

The estimated electricity demand for operation of the existing residential, restaurant, office, medical office, medical spa, and salon uses on the Project site is 912,176.2 kWh per year, far less than 0.1 percent of the City's total energy demand (see Appendix C).

Natural Gas

Natural gas is a fossil fuel formed when layers of buried organic matter are exposed to intense heat and pressure over thousands of years. The energy is stored in the form of hydrocarbons and can be extracted in the form of natural gas, which can be combusted to generate electricity, enabling this stored energy to be transformed into usable power or to be used directly for heating, cooking, and other use. Californians consumed 1,266,335,862,635 kBTU of natural gas in 2018 (see Table 3.5-3; CEC 2018b). In comparison, approximately 292,074,549,481 kBTU were used throughout the County and 2,752,489,244 kBTU were used in the City in 2018 (CEC 2019a; City of Santa Monica 2018).

Natural gas in the City is provided by the Southern California Gas Company (SoCal Gas), which provides natural gas to 21.8 million consumers through 5.9 million meters in more than 500 communities. The company's service territory includes communities throughout Central and Southern California, from Visalia to the Mexican border (SoCalGas 2019). The City is located in SoCal Gas's Pacific Region, which includes all coastal areas between Long Beach and Ventura. Natural gas is delivered by SoCal Gas from in-state and out-of-state suppliers and delivered to the City through its integrated gas pipeline system. All areas of the City are served by gas infrastructure, with maintenance and periodic upgrades provided as needed.

The annual natural gas sale to SoCal Gas customers in 2018 is shown in Table 3.5-3. Total natural gas sales/usage for SoCal Gas is compared to the statewide natural gas sales/usage from the corresponding year.

Table 3.5-3. 2018 State, County, and City Natural Gas Demand

	Population	Natural Gas Demand (kBTU)	
		Total	Per Capita
State	39,557,045	1,266,335,862,635	32,012.9
County	10,105,518	292,074,549,481	28,902.5
City	91,411	2,752,489,244	30,111.1

Note: Gas consumption data was not available from the CEC for Lake, Mariposa, and Sierra Counties. Therefore, total and per capita gas statewide gas consumption may be slightly more.

Source: CEC 2019a; U.S. Census Bureau 2019.

The estimated natural gas demand for operation of the existing residential, restaurant, office, medical spa, and salon uses on the Project site is 3,349,220 kBTU per year, approximately 0.1 percent of the City's total energy demand (see Appendix C).

Transportation Energy

According to the CEC, the transportation sector accounts for nearly 40 percent of statewide total energy demand and approximately 39 percent of the State's greenhouse gas (GHG) emissions (CEC 2018). In 2018, California consumed 14.24 billion gallons of gasoline (including aviation fuel) and 3.07 billion gallons of diesel fuel (California Department of Tax and Fee Administration 2019). Within the City, approximately 58.26 million gallons of gasoline and 8.67 million gallons of diesel fuel were consumed in 2018 (City of Santa Monica 2018). The California Department of Transportation (Caltrans) reports that approximately 25.5 million automobiles, 5.76 million trucks, and 881,386 motorcycles were registered in the state as of January 1, 2018, resulting in a total estimated 344.3 billion vehicles miles traveled (VMT) in 2017 and 13 billion gallons of transportation fuel consumed (Caltrans 2018a, 2018b). Within the City, almost 1.43 billion gasoline, diesel, and electric vehicle miles were traveled in 2018, accounting for approximately 0.4 percent of the State's total VMT and an estimated 58,261,528 gallons of gasoline were consumed (City of Santa Monica 2018). However, the City has implemented several policies and regulations to reduce VMT, encourage the use of electric vehicles, and prioritize mass transit services. Accordingly, gasoline consumption in the City has declined over the past several years. The City's 2018 GHG Inventory Update predicts that the demand for gasoline will continue to decline over the next 10 years and will be 27 percent lower than 2015 levels by the year 2030 (City of Santa Monica 2018).

Solar Energy

Currently, less than 2 percent of the City's electricity needs are met by photovoltaic (PV) systems on local rooftops (City of Santa Monica 2019). The City's 2019 Climate Action and Adaptation Plan (CAAP) proposes to work towards zero net carbon buildings by installing 100 megawatts (MW) of local solar energy and includes multiple goals and objectives to expand the City's solar energy sector. In 2018, there were 6.3 MW of solar installed community-wide. Additionally, the revised Energy Code, which took effect on January



The City has installed a number of photovoltaic (PV) solar systems, including at public parking structures.

1, 2020, requires new buildings in the City to achieve one of two design pathways for complying with the City's Energy Code: all-electric design and mixed-fuel design. However, as an incentive to design all-electric buildings, a higher level of energy efficiency would be required for mixed-fuel buildings (see Section 3.5.2, *Regulatory Setting*). Solar Santa Monica is a free service that provides Santa Monica property owners unbiased technical advice to help navigate the changing rules, incentives and financing options of installing solar panels. Solar Santa Monica continues to deploy energy efficiency, solar power, and clean distributed generation in the City.

3.5.2 Regulatory Setting

State Policies and Regulations

Executive Order S-14-08. In 2008, Executive Order S-14-08 expanded the State's Renewable Portfolio Standard (RPS) goal to 33 percent renewable power by 2020. In 2009, Executive Order S-21-09 directed the California Air Resources Board (ARB), under its authority pursuant to Assembly Bill 32 (AB 32) to enact regulations to help the State meet the 2020 goal of 33 percent renewable energy. The 33 percent by 2020 RPS goal was codified with the passage of Senate Bill X1-2 (SB X1-2). This new RPS applied to all electricity retailers in the state, including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators.

Senate Bill 350. SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This objective will increase the use of RPS eligible

resources, including solar, wind, biomass, geothermal and others. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help meet these goals and reduce GHG emissions, large utilities will be required to develop and submit Integrated Resource Plans (IRPs). These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions, and ramp up the use of clean energy resources. SB 350 also transforms the California Independent System Operator, a nonprofit public corporation, into a regional organization, contingent upon approval from the State Legislature. The bill also authorizes utilities to undertake transportation electrification.

Senate Bill 100. In 2018, Senate Bill 100 (SB 100) established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by the end of 2045. SB 100 also creates new standards for the RPS, increasing required energy from renewable sources for both investor-owned utilities and publicly-owned utilities from 50 percent to 60 percent by the end of 2030. Incrementally, these energy providers must also have a renewable energy supply of 44 percent by the end of 2024, and 52 percent by the end of 2027. The updated RPS goals are considered achievable, since many California energy providers are already meeting or exceeding the RPS goals established by SB 350.

California Building Code (Title 24 of the CCR). Title 24 of the CCR is known as the California Building Code, which establishes the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The California Building Code includes the following:

CCR Title 24, Part 6 comprises the California Energy Code, 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. The current California Energy Code references the 2019 Title 24 standards, which became effective in 2020. The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards are in alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 National Standards. 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.

CCR Title 24, Part 11 comprises the California's Green Building Standard Code (CALGreen), which 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.

Local Policies and Regulations

Santa Monica General Plan Land Use and Circulation Element (LUCE). The LUCE, adopted in 2010 and revised in 2017, guides land use and development within the Downtown District with design guidelines, policies, programs, recommended improvements, including policies for resource management and use:

- | | |
|---------------|---|
| Policy LU16.1 | Design Buildings with Consideration of Solar Patterns. In designing new buildings, consider the pattern of the sun, the impact of the building mass throughout the day and the year to create habitable outdoor spaces and protect adjacent structures to minimize shadows on public spaces at times of the day and year when warmth is desired and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties. |
| Policy LU16.2 | Preserve Solar Access to Neighborhoods. The same development standard that is adopted to require a step down building envelope to transition commercial buildings to lower adjacent residential properties also needs to assure solar access to the residential buildings. |
| 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. |
| Policy S3.3 | Continue to promote the retrofitting of existing buildings, including the following programs and actions: <ul style="list-style-type: none">• Weatherization programs• Commercial lighting retrofits and HVAC upgrades• Whole house retrofit programs• Retro commissioning |

Policy S3.4	Explore creating an ordinance to require all buildings sold in Santa Monica to meet minimum energy efficiency requirements with energy efficiency upgrades occurring at the time of resale and prior to the transfer of title.
Policy S4.1	Explore creating an ordinance to require solar installations, both photovoltaic and hot water, on new construction projects.
Policy S4.3	Pursuant to AB 811 (Municipal Clean Energy Program), create a mechanism to finance and help amortize commercial and residential solar installations under the Solar Santa Monica Program.
Policy S4.4	Continue to maintain the Solar Santa Monica Program to help finance and provide technical know-how for residential and commercial solar installations.
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 building code by 2020.
Policy S5.4	Consider a requirement that all new construction utilize solar water heaters.
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 S5.7	Encourage cool paving on new plazas and parking lots.
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.

1975 Santa Monica General Plan Conservation Element. The following policies of the City's existing Conservation Element apply to energy-related impacts:

Policy 25. The Public Works Department shall continuously investigate new materials for street surfacing which will enhance energy conservation of vehicles.

Policy 31. The City shall expand the current building codes to require the use of new, as well as known, energy conserving technology and materials when they become available and are deemed practical in economic terms and functional application as well.

Sustainable City Plan. The 2014 Update of the Sustainable City Plan integrates 10 Guiding Principles that provide the basis from which effective and sustainable decisions can be made for a range of issues in the City, including Resource Conservation, Environmental and Public Health, Transportation, Sustainable Local Economy, Open Space and Land Use, Housing, Community Education and Civic Participation, Human Dignity, and Arts and Culture. The Sustainable City Plan focuses reducing the City's energy needs through increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of alternative transportation. The following City goals were developed to support the achievement of targeted reductions in energy needs 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 Electric Vehicle Action Plan. The City adopted the Electric Vehicle Action Plan (EVAP) in November 2017. The City's vision is to wholly decarbonize their transportation system by replacing non-electrical vehicle use with walking, bicycling, transit, and electric vehicles when driving. The overarching goal of the EVAP is to implement policies, projects, and programs to accelerate the adoption of electric vehicles within the City. The EVAP seeks to expand the public charging infrastructure from 89 to approximately 300 chargers by 2020, with a long-term goal of 1,000 chargers by 2025. By providing additional infrastructure, the EVAP aims to increase the percentage of EVs on the road from 2 percent to 15 percent by 2025.

Energy Code (Section 8.36 of the City of Santa Monica Municipal Code [SMMC]). 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 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 took effect 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 and mixed-fuel design. However, 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 the Clean Power Alliance 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 California Energy Code.
- Mixed-Fuel Building: shall be designed to CALGreen Tier 1 established by the 2019 California Energy Code. 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 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 California Energy Code.
- Mixed-Fuel Building: shall be designed to be 5 percent more efficient than the code established by the 2019 California Energy Code. (The 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 photovoltaic 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 California Energy Code.
- Mixed-Fuel Building: shall be designed to be 10 percent more efficient than the code established by the 2019 California Energy Code.

Green Building Standards Code (SMMC Chapter 8.106). SMMC Chapter 8.106 adopts by reference the CALGreen requirements with the local amendments that require solar pool heating and solar photovoltaic installations. The City's Green Building Standards includes the following energy standards:

- For new pool construction (if the pool is to be heated), renewable energy shall be used for such heating provided that:
 - The surface area of the solar collectors used to generate such renewable energy is equal to or greater than 70 percent of the surface area of the pool; or
 - Renewable energy provides at least 60 percent of the total energy necessary for heating purpose.
- Solar requirements under Section 8.106.055 (Santa Monica Solar Ordinance), which requires rooftop solar systems for all new construction in the City of Santa Monica:
 - New single-family dwellings are required to install a PV system, with a minimum total wattage of 1.5 times the square footage of the dwelling (1.5 watts per square foot [sf]). That means a 2,000-sf home would need a 3-kWh system, which is a typical size already seen on many homes.
 - New multi-family dwellings and non-residential, hotels, motels are required to install a PV system, with a minimum total wattage 2.0 times the square footage of the building footprint (2.0 watts per sf of building footprint). That means a four-story building with a building footprint of 10,000 sf would need a 20-kWh system.
- Electric vehicle (EV) charging shall be provided

Green Building, Landscape Design, Resource Conservation and Construction and Demolition Waste Management Standards (SMMC Chapter 8.108). SMMC Chapter 8.108 provides

requirements for new development projects to comply with Water-Efficient Landscape and Irrigation Standards. Projects must include a submission of plans and reports to the City for review and approval prior to the installation of landscaping and/or irrigation system. This section also requires construction and demolition projects to meet a minimum 70 percent diversion rate and submit a waste management plan for City approval.

Electric Vehicle Charging Stations Ordinance (SMMC Section 9.28.160). The City requires electric recharge stations in new development projects required to provide at least 25 parking spaces and for remodeling and expansion of existing development projects that either have 50 or more existing parking spaces prior to the remodel or expansion or the scope of work adds at least five more parking spaces. Parking lots with 50 to 99 parking spaces are required to provide at least two charging stations, plus one for each additional 50 parking spaces.

3.5.3 Impact Assessment 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 the purposes of this EIR, the proposed Project may have a significant adverse impact related to energy if:

- The project would result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; and/or
- The project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Methodology

This section utilizes data from the CEC and the California Emissions Estimator Model (CalEEMod), consistent with the air quality analysis in Section 3.2, *Air Quality*, and the GHG emissions analysis in Section 3.7, *Greenhouse Gas Emissions*. Potential impacts of the proposed Project were evaluated by reviewing the characteristics of the proposed Project to assess its potential to affect the capacities of energy service utilities. Projected utility demands for the proposed Project were compared with the current energy demand of the Project site. Potential

impacts resulting from the proposed Project were compared with criteria from CEQA Guidelines Appendix G to assess their significance.

The proposed Project would cause a significant impact on energy resources if energy consumption exceeds the projected supply or delivery capacity of either the electric or natural gas systems of the City, or if the proposed Project does not take steps to reduce energy consumption through the use of efficient electric and mechanical systems.

Construction

Construction of the proposed Project would result in energy demand as a result of the use of heavy-duty construction equipment, on-road trucks, and workers commuting to and from the Project site. Heavy-duty construction equipment would be primarily diesel-fueled. Energy demand (specifically fuel consumption) from heavy-duty construction equipment is estimated based on the equipment analyzed in the CalEEMod (see Appendix C), and fuel consumption data from the California ARB OFFROAD2011 model. Calculation details are provided in Appendix M.

Operation

Operation of the proposed Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project site. Annual electricity and natural gas demand for the proposed Project's buildings were estimated using the CalEEMod estimates for the proposed Project based on the size of individual land uses. Building energy use factors and water demand factors are used to estimate building energy use. The energy usage takes into account building energy standards pursuant to the Title 24 Building Standards Code, CALGreen Code, and City's Green Building Standards.

The assessment also includes a discussion of the sustainable design features incorporated as a part of the proposed Project, which would reduce energy and water usage, as well as encourage recycling and waste diversion, above and beyond state regulatory requirements. Physical and operational characteristics of the proposed Project for which sufficient data are available to quantify the reductions from building energy and resource consumption have been included in the quantitative analysis, and include the features (e.g., PV rooftop systems, solar heating on-site pool, and electric vehicle [EV] charging spaces) discussed in Section 2.6.10, *Sustainability Features*.

Gasoline and diesel consumption for transportation from residents, employees, and visitors to the Project site is estimated based on the projected number of trips to and from the Project site and the estimated VMT calculated by Fehr & Peers for the land uses associated with the proposed Project

(see Section 3.13, *Transportation*; see Appendix K). The estimated fuel economy for vehicles is based on fuel consumption factors from the California ARB Emission FACTors model (EMFAC). EMFAC is incorporated into CalEEMod, which is a State-approved emissions model used for the proposed Project's air quality and GHG emissions assessment. Therefore, this energy assessment is consistent with the modeling approach used for other environmental analyses in this EIR and consistent with general CEQA standards.

3.5.4 Applicable Mitigation Measures from the DCP Program EIR

The Downtown Community Plan (DCP) Program EIR does not include any mitigation measures for potential impacts to energy demand.

3.5.5 Project Impacts and Mitigation Measures

Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

EN-1 The proposed Project would increase energy demand, but would not result in wasteful, inefficient, and unnecessary consumption of energy. Incorporation of the Project's sustainability features as well as compliance with standard regulations – including the policies of the City's LUCE, Downtown Community Plan, Energy Code, and Green Building Standards Code – would reduce this impact to *less than significant*.

Impact Description (EN-1)

Construction Energy Use

Construction of the proposed Project would require energy consumption for necessary onsite activities, transport of demolition debris, soil, and construction materials, and commute trips by construction workers.

Electricity would be used during construction to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., hand tools). Electricity use during construction would be variable depending on lighting needs and the use of electric-powered equipment and would be temporary for the duration of construction activities. Energy use during construction would generally not result in a substantial increase in onsite electricity consumption and would be substantially less than the ongoing energy use onsite under existing conditions. Construction electricity use would be temporary and negligible over the long-term.

During the 3-year construction period, diesel fuel would be required to power heavy construction equipment and heavy haul trucks. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for reasonable maximum potential energy use during construction. The total construction fuel consumption is calculated as the sum of total estimated fuel consumption for each piece of equipment used in each phase of construction. Section 3.0, *Construction Detail* in the CalEEMod Worksheets (see Appendix C), provides detailed construction phasing, construction equipment used in each phase, total number of days worked, equipment horsepower, equipment load factor, and equipment quantities based on typical construction equipment and default model assumptions. These assumptions were used to calculate total fuel consumption for specific equipment.

Total fuel consumption is then based on a fuel consumption factor of 0.05 gallons per horsepower per hour (gal/hp/hr) for diesel engines as derived from the South Coast Air Quality Management District CEQA Handbook Table A9-3E.

The total fuel to be required during construction of the Project is estimated to be 285,590 gallons (see Table 3.5-4). As shown in Table 3.5-4, the Project estimates 163,381 gallons of fuel would be required for construction vehicle trips. Total fuel consumption for construction worker vehicle trips is based on average fuel consumptions for light-duty vehicles assuming that 100 percent of construction workers would arrive to the Project site using such vehicles. The average fuel consumption rate for construction vehicle trips is based on light-duty fuel efficiency estimates from 1990 to 2015, as provided by Bureau of Transportation Statistics. Refer to detailed calculations of Project Construction Fuel Consumption in Appendix M.

Table 3.5-4. Estimated Project Construction Fuel Consumption

Fuel Consumption from Construction Equipment (Gallons)	Fuel Consumption from Construction Vehicle Trips (Gallons)	Total (Gallons)
126,209	163,381	289,590

Source: See Appendix M.

For comparison purposes, the proposed Project's construction energy demand from transportation fuel is compared to the Los Angeles County transportation fuel sales. As shown in Table 3.5-5, the proposed Project would represent a very small fraction – far less than 1 percent – of the County's total fuel consumption. Further, construction of the proposed Project would result in short-term and temporary energy demand lasting approximately 3 years.

Table 3.5-5. Comparison of Project Construction and County Diesel Fuel Usage

	Diesel Fuel Consumption (Gallons)
Los Angeles County (2018)	228,000,000
Project Construction	289,590

Source: CEC 2018; see Appendix M.

Compliance with the State and City policies, such as the California State law prohibiting heavy-duty diesel vehicles from idling for longer than 5 minutes, and the temporary nature of construction would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Therefore, construction of the proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Construction energy impacts would be *less than significant*.

Operational Vehicle Fuel Consumption

Operation of the Project would result in the daily consumption of vehicle fuel for trips associated with the proposed Project. The proposed Project would support sustainable mobility options by locating hotel, retail/restaurant, and residential land uses at an infill location close to existing offsite commercial, entertainment, office, retail, and residential destinations, as well as regional destinations such as Palisades Park, Third Street Promenade, and Santa Monica Pier. The Project site is located close to many public transit routes, including transit service provided by Big Blue Bus and Metro, such as the Rapid 7 Route, Route 2, and the Metro Local 20 and Metro Rapid 720. 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. In addition, the proposed Project would include long-term and short-term bicycle parking spaces to encourage employees and residents to use alternative modes of transportation such as bicycling.

As described in Section 3.13, *Transportation*, operation of the Project is anticipated to result in the generation of 25,933 daily VMT. Using vehicle fleet mix data provided in Appendix M and average fuel economy information provided by the Bureau of Transportation Statistics, the Project-generated annual VMT would result in the consumption of approximately 1,452 gallons of fuel per day, or an estimated 529,980 gallons per year (see Table 3.5-6). The proposed Project would represent a very small fraction – far less than 1 percent – of the City’s total fuel consumption (an estimated 58 million gallons). See Section 3.13, *Transportation* for additional discussion regarding VMT associated with the proposed Project. This analysis does not consider the net increase in

operational transportation fuel demand compared to existing conditions, and therefore represents a conservative approach to operational transportation energy impacts.

Although the VMT associated with the proposed Project would necessarily result in the consumption of transportation fuels, the Project site is located in the Downtown close to jobs, housing, shopping and restaurant uses, and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to offsite destinations and public transit stops. Therefore, the proposed Project would not cause wasteful, inefficient, or unnecessary use of energy.

Table 3.5-6. Comparison of Project and City Transportation Fuel Usage

Vehicle Type	Percent of Vehicle Trips ¹	Daily VMT	Average Fuel Economy (miles/gallon) ²	Total Daily Fuel Consumption (gallons)
Passenger Cars	54.5	14,133	23.3	607
Light/Medium Duty Vehicles	37.0	59,595	17.1	561
Heavy Duty Vehicles/Other	8	2,075	7.3	284
Motorcycles	0.5	130	43.4	3
Total	100%	25,933	--	1,452
City 2018 Gasoline VMT		City 2018 Gasoline Fuel Consumption		
Daily	Annual	Daily	Annual	
3,668,929	1,339,159,156	159,621	58,261,528	

¹ Percentage of Vehicle Trips and Fleet Mix information provided in Table 4.4, *Fleet Mix* of Appendix D.

-Passenger Cars is the sum of the light-duty-auto fleet mix trip percentage column.

-Light/Medium Duty Vehicles is the sum of the LDT1, LDT2, and MDV fleet mix trip percentage columns. LDT = light-duty truck; MDV = medium-duty vehicle

-Heavy Duty Vehicles/Other is the sum of the LHD1, LHD2, MHD, HHD, and bus fleet mix trip percentage columns. LHD = light-heavy-duty; MHD = medium-heavy-duty; HHD = heavy-heavy-duty

Motorcycles is the sum of the MCY fleet mix trip percentage column. MCY = motorcycle

² Average fuel economy based on average 2014 U.S. vehicle fuel efficiency (mpg) from Table 4-12: Average Light Duty Vehicle, Long Wheel Base Fuel Consumption and Travel, and Table 4-13: Single-Unit 2-Axle 6-Tire or More Truck Fuel Consumption and Travel of the *National Transportation Statistics*.

Source: See Appendix C, CalEEMod Worksheets, Section 4.2. *Trip Summary Information*; Bureau of Transportation Statistics 2016; City of Santa Monica 2018.

Operational Energy Consumption

As stated above, the existing development at the Project site is estimated to generate 912,176 kWh of electricity per year and 3,349,220 kBtu of natural gas per year. The existing outdated buildings at the Project site were constructed between 1925 and 1941, and therefore, were not designed or constructed to meet current State and local green building and energy efficiency standards.

Operation of the proposed Project would permanently increase the demand for electricity and natural gas. The proposed Project would, at a minimum, comply with the Green Building requirements included in the CALGreen and the City's Green Building Standards Code. Specifically, buildings for the proposed Project would be constructed to comply with the City's Energy Code, which one of the following:

- 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.

Assuming the proposed Project's buildings are designed as mixed-fuel (electric and natural gas), the proposed Project would generate a net new electricity demand of 2,916,781 kWh per year (see Table 3.5-7) and a net new natural gas demand of 7,352,240 kBTU per year (see Table 3.5-8). These estimates correspond with approximately 0.3 percent of both the City's total consumption of electricity and natural gas.

It should be noted; however, that the estimated energy demand is highly conservative as the proposed Project's mixed fuel buildings would be required to be 5 percent more energy efficient, with features to reduce the power demand associated with the proposed Project (refer to Section 2.6.10, *Sustainability Features*).

Table 3.5-7. Estimated Annual Electricity Demand of the Proposed Project

Land Use	Area (sf /unit)	Annual Usage (kWh/year)
Hotel	122,400 sf	966,988
Restaurants	24,070 sf	1,280,180
Retail	12,040 sf	229,120
Residential	100 units	395,992
Cultural Use Campus	35,500 sf	306,467
Parking Garage	110,960 sf	650,210
Total	-	3,828,957
<i>Existing Site Demand</i>		<i>912,176</i>
<i>Project Net Generation</i>		<i>2,916,781</i>

Note: The areas for each proposed land use listed above and in Section 2.0, *Project Description*, do not align perfectly with the land use areas included in CalEEMod due to incorporation of the mechanical, electrical, and plumbing (MEP) areas across the Project site.

Source: See Appendix C.

Table 3.5-8. Estimated Annual Natural Gas Demand of the Proposed Project

Land Use	Area (sf /unit)	Annual Usage (kBTU/year)
Hotel	122,400 sf	3,059,200
Restaurants	24,070 sf	6,692,730
Retail	12,040 sf	27,836
Residential	100 units	921,694
Cultural Use Campus	35,500 sf	0
Parking Garage	110,960 sf	0
Total	-	10,701,460
<i>Existing Site Demand</i>		3,349,220
<i>Project Net Generation</i>		7,352,240

Note: The areas for each proposed land use listed above and in Section 2.0, *Project Description*, do not align perfectly with the land use areas included in CalEEMod due to incorporation of the MEP areas across the Project site.

Source: See Appendix C.

Sustainable design features that would reduce the power demand associated with the proposed Project would include the installation of 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. Additionally, the proposed Project design 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. Lastly, the proposed Project would install an onsite PV system in compliance with the City's Green Building Code, which at a minimum requires wattage of 2.0 times the square footage of the building footprint. This results in a minimum of an approximately 125-kWh system that could be used to partially offset the electricity demand associated with the proposed Project. While the proposed Project would consume renewable energy, it would not generate all of the energy onsite (i.e. PV solar systems), and therefore the proposed Project would still be pulling power from CPA or SoCal Edison's electricity resources.

As previously discussed, since May 2019, all residential and commercial users in the City receive electricity from the CPA. The CPA buys electricity from renewable sources and partners with SoCal Edison to distribute electricity to residential and commercial customers throughout the City. The City has chosen 100 percent Green Power as a step to reaching carbon neutrality. However, the City and CPA allow for the individual user's selection of lower percent renewable power or to stay with SoCal Edison's renewable generation percentage.

Additionally, a minimum of six electric vehicle charging stations shall be included in the proposed Project - the final number would be determined as part of the Development Agreement process. However, as the total number installed and annual use of the charging stations is not known, all vehicles accessing the proposed Project are conservatively assumed to be either gasoline or diesel fueled.

The combination of energy-saving and energy-generating features demonstrates the commitment of the proposed Project to renewable energy supplies and ensures that the proposed Project would not use energy in a wasteful or inefficient manner. The incorporation of the energy requirements established within local regulations, which go above and beyond typical State requirements, would ensure that the proposed Project would be consistent with the City's energy use goals. Therefore, the proposed Project would not constrain local or regional energy supplies, would not require the expansion or construction of new electricity generation and/or transmission facilities. As such, implementation of the proposed Project would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner. Impacts would be *less than significant*.

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

EN-2 The proposed Project would conform with the policies of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City's LUCE, DCP, Energy Code, and Green Building Standards Code; therefore, this impact would be *less than significant*.

Impact Description (EN-2)

The proposed Project would support the City's energy conservation and GHG reduction goals and policies established in the LUCE, Sustainable City Plan, Energy Code, and Green Building Standards Code. The proposed Project incorporates green building design features intended to reduce overall energy impacts. For example, the proposed Project includes the installation of solar PV systems with a minimum total wattage of 2.0 times the square footage of the building footprint (i.e., 2.0 watts per sf), as required by the City's Green Building Code Solar Ordinance (SMMC Section 8.106.080). With a building footprint of 62,727 sf, the proposed Project would provide a minimum of 125-kilowatt solar PV systems for the Project site. The Project would also install energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use (see Section 2.6.10, *Sustainability Features*). As required by the City's Energy Code, the proposed Project 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. Implementation of these sustainable Project design features demonstrate the proposed Project's commitment to reduced power demand, reliance on renewable energy supplies, and efficient and non-wasteful energy use, as called for in the City's LUCE, Sustainable City Plan, and Climate Action and Adaptation Plan.

With regard to transportation energy, the proposed Project represents an energy efficient sustainable development as it is located within the Downtown, which is characterized by compact urban development, high levels of public transit service and walkable and bike-friendly streets. The Project site is in a Transit Priority Area, given the proximity of the Downtown Santa Monica Station for the Metro E line (within approximately 0.5 miles of the Project site) and the high number of bus routes in the Project area. Further, the implementation of a Transportation Demand Management program (to be negotiated with the City) as well as the provision of bicycle facilities (i.e., parking, lockers, showers) would minimize vehicle trips and VMT; therefore, the proposed Project would be consistent with and support the goals and benefits of SCAG's RTP/SCS, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them" (SCAG 2016). As a result, the proposed Project would support State, regional, and City efforts to improve transportation energy efficiency and would not conflict with or obstruct plans for renewable energy or energy efficiency. Impacts would be *less than significant*.

See Table 3.7-5 in Section 3.7, *Greenhouse Gas Emissions* for a summary of the proposed Project's consistency with the goals and policies established in SCAG's RTP/SCS and the City's LUCE, Sustainable City Plan, Energy Code, and Green Building Standards Code.

3.5.6 Cumulative Impacts

Electricity and Natural Gas

Potential future development within the City and Downtown inclusive of the proposed Project would incrementally contribute to the need for regional energy production and distribution facilities. As discussed above, these facilities are operated and maintained by private utility companies that plan for and accommodate anticipated growth. Electric and natural gas services are provided upon demand from consumers and expanded as needed to meet demand, consistent with applicable local, state, and federal regulations. With respect to electricity, the City requires that all new buildings comply with the City's Energy Code, which is more stringent than the State requirements, and implement the prescriptive solar PV requirement described in the City's Solar Ordinance. As such, cumulative projects would also be required to be more energy efficient than

the California Energy Code. Additionally, as previously described, the City receives electricity from the CPA and therefore, the Project and cumulative projects would consume electricity that would be generated by some percentage of renewable energy sources (e.g., solar, solid waste conversion, etc.).

With regard to natural gas consumption, California natural gas demand is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035 as a result of stricter codes/standards, energy efficiency improvements, and the State's transition away from fossil fuel-generated electricity to increased renewable energy. The 2018 SoCalGas California Gas Report predicts a decline in every sector (residential, industrial, commercial, electricity generation, and vehicular), with the exception of wholesale and international gas sales to Mexico. While cumulative projects would result in the use of nonrenewable natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCalGas's service area. Further, like the Project, other future development projects would be expected to comply with the City's Energy Code, which incentivizes the building of all-electric buildings. While initially cumulative projects could result in increased natural gas demand compared to existing uses on each specific project site, the overall demand for natural gas over time is expected to decline.

Given that all recent past, present, and reasonably foreseeable future projects within the City would be required to meet at minimum state and local energy requirements; the proposed Project would not result in a substantial contribution to cumulatively considerable impacts.

Transportation Energy

The proposed Project along with future growth within the City would cumulatively increase the demand for transportation-related fuel in the State and region. However, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle fuel economy, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years and that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. Locally, the City expects to see the number of EVs increase and a decrease in the consumption of non-renewable fossil fuels for transportation. By providing additional EV infrastructure, the City's EVAP aims to increase the percentage of EVs on the road from 2 percent to 15 percent by 2025.

Additionally, as discussed previously, the Project would support Citywide goals and policies in the LUCE and the Downtown Community Plan to improve transportation energy efficiency by locating hotel, retail, restaurant, cultural, and residential uses near major transit facilities, including the Downtown Santa Monica Station. The proposed Project is also consistent State's overall goals to reduce VMT pursuant to SB 375, and as outlined in the SCAG 2016 RTP/SCS for the region, which seeks improved access and mobility by placing "*destinations closer together, thereby decreasing the time and cost of traveling between them.*" Similarly, cumulative projects would also be required to be consistent with the City's LUCE and Downtown Community Plan and SCAG's RTP/SCS. These local and regional plans encourage the development of new uses in proximity to transit to reduce overall VMT. Therefore, the proposed Project would not result in a substantial contribution to cumulatively considerable impacts.

3.5.7 Residual Impacts

With implementation of the Project's sustainable design features (refer to Section 2.6.10, *Sustainability Features*), the proposed Project's energy impacts would be *less than significant*.