City of

Santa Monica

1633 26th Street Office Project

Final Environmental Impact Report

SCH# 2020050142

Volume I

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PREFACE

CEQA REQUIREMENTS

In accordance with the California Environmental Quality Act (CEQA), specifically CEQA Guidelines Sections 15088, 15089 and 15132, the City of Santa Monica has prepared the Final Environmental Impact Report (EIR) for the proposed 1633 26th Street Office project (the Project). A Final EIR is defined by Section 15362(b) of the CEQA Guidelines as "…containing the information contained in the Draft EIR; comments, either in verbatim or in summary received in the review process; a list of persons commenting; and the responses of the Lead Agency to the comments received."

Section XI of this document contains all comments received on the Draft EIR during the document's 60-day public review period of November 19, 2020 to January 18, 2021. Responses to comments received by all interested parties have been prepared and are included in this document. Also, as necessary, corrections and additions are included in response to comments received on the document, or as initiated by the Lead Agency (City of Santa Monica) on the Draft EIR.

This document, along with the Draft EIR (incorporated by reference), make up the Final EIR as defined in the State CEQA Guidelines, Section 15132, which states that:

"The Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies comment on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency."

USES OF THE FINAL EIR

As defined by Section 21087 of the California Environmental Quality Act (CEQA), the City of Santa Monica is the Lead Agency for the Project. The Project was reviewed by the City of Santa Monica, which determined that the Project required the preparation of an Environmental Impact Report (EIR).

Comments from identified responsible and trustee agencies, as well as interested parties, on the scope of the EIR were solicited through a Notice of Preparation (NOP) process. In consideration of the Coronavirus (COVID-19) pandemic, the City circulated the NOP for this project for 60 days from May 6, 2020 to July 6, 2020. A virtual teleconference public scoping meeting presenting the project and to receive public input on the scope of the EIR was held by the City on May 19, 2020. A total of three comment letters were received in response to the NOP. The Draft EIR was released for public comment on November 19, 2020. Due to the COVID-19 pandemic, the comment period was extended for 60 days and ended on January 18, 2021, exceeding the minimum 45-day review period required by the CEQA. During that time, the Planning Department received comments on the Draft EIR from one public agency and one individual, in the form of two comment letters.

Before approving a project, CEQA requires the Lead Agency to prepare and certify a Final Environmental Impact Report (Final EIR). This Final EIR will be submitted to the Planning Commission for certification in connection with action on the Project.

The Final EIR is available online on the City's website:
https://www.smgov.net/Departments/PCD/Environmental-Reports/1633-26th-Street-Project-EIR/

CEQA requires that the lead agency provide each agency that commented on the Draft EIR with a copy of the lead agency's proposed response at least 10 days before certifying the Final EIR.

ORGANIZATION OF THE FINAL EIR

In accordance with CEQA Guidelines Section 15132, this Final EIR is composed of two (2) volumes as follows:

Volume 1

Volume 1 includes all of the following:

- The Draft EIR (Chapters I through X) with revisions in underline or strikeout to the Draft EIR resulting from public comments received during the 60-day public review period or as initiated by the Lead Agency (City of Santa Monica).
- Chapter XI, *Reponses to Comments on the Draft EIR*, consists of comments received by interested parties on the Draft EIR during the review period. This chapter also includes a response to each of the comments and a discussion of their relevance to the EIR.
- Chapter XII, Corrections and Additions to the Draft EIR, provides a summary of the revisions to the Draft EIR resulting from public comments received during the public review period, or as initiate by the Lead Agency, in underline or ~~strikeout~~.
- Chapter XIII, *Mitigation Monitoring and Reporting Program (MMRP)*, consists of the MMRP for the Project.

Volume 2

Volume 2 includes the appendices to the Draft EIR (Appendix A – L) which are incorporated herein by reference to this Final EIR and available by request at the City of Santa Monica, City Planning Department. The appendices include the following:

A. NOP and Initial Study
B. NOP Comment Letters
C. Air Quality and Greenhouse Gas Emissions Data
D. Energy Data
E. Cultural Resources Information
F. Geotechnical Report and Paleontological Resources
G. Hazards and Hazardous Materials Reports
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I. Traffic Report
J. Tribal Cultural Resources Information
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EXECUTIVE SUMMARY

1. INTRODUCTION

This chapter of the Environmental Impact Report (EIR) is prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15123, which requires that an EIR include a summary of the Draft EIR. Per Section 15123, the summary shall contain a brief description of the project and the project actions; an identification of potential significant effects and proposed mitigation measures or alternatives that would reduce or avoid those effects; a description of the areas of controversy known to the lead agency; and that presents issues to be resolved.

This EIR evaluates the potential environmental impacts of the 1633 26th Street (Project) in the City of Santa Monica.

2. PROJECT DESCRIPTION

The project would consist of the refurbishment of the project site's existing three-story, 45,429 sf office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 sf of net new floor area. The project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The project's three buildings would total approximately 174,685 ~~174,684~~ sf.

The proposed new buildings (Buildings A and B) would incorporate a contemporary design, utilizing a mass timber super structure, while retaining similarities to the existing building (Building C), with both rising to a maximum height of 54 feet, not including parapets and roof appurtenances. Building A, approximately 69,266 sf, would be rectangular in shape and located on the northeastern portion of the project site. Building B, approximately 59,990 sf, would be "L" shaped and located on the southeastern portion of the project site along Pennsylvania Avenue. Building C, approximately 45,429 sf, 40 feet tall (three stories) is rectangular in shape and located on the western portion of the project site, fronting 26th Street.

The architectural materials will be determined during final design review by the City's Architectural Review Board. The new buildings would contain more windows and less solid wall than the existing building. Facing the courtyard, the new buildings would contain walls of glass windows on all four levels providing transparency into the interior spaces of the buildings and views of the courtyard from within the buildings. Building C would be refurbished with new glass windows within the existing locations and create three large panels framed by blackened metal on the west and east elevations and new glass windows within the existing frame on the north elevation. The massing of the development is softened with three buildings forming a courtyard in the middle providing a campus-like atmosphere.

The building's design will support sustainable technologies. Specific sustainable features will include, photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus. At a minimum, the development will strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. The project will comply with the green building requirements included in the Cal Green Building Code, Energy Code the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. Additionally, as required by the City's Transportation Demand Ordinance, the project will include a robust Transportation Demand Management (TDM) plan that will incorporate trip reduction strategies paid for and implemented by the project applicant.

3. PROJECT OBJECTIVES

Section 15124(b) of the CEQA Guidelines requires a project description to contain a statement of a project's objectives and Section 15124(b) requires that the statement of objectives includes the underlying purpose of the project. The applicant's objectives for the proposed project include:

- Develop an underutilized site with a well-designed and compatible commercial project that is consistent with the character and operational characteristics of surrounding uses in the Bergamot Plan area
- Ensure a financially feasible project that promotes the City's economic well-being, increases the local tax base, and fosters the continued evolution of an active, pedestrian-oriented, mixed-use district.
- Strategically concentrate new commercial development and facilitate employment centers at a location that capitalizes on existing and future infrastructure and services, including the nearby 26th Street/Bergamot Metro E Light Rail station.
- Support the growth and expansion of creative arts, entertainment and related uses in the City of Santa Monica that enhance the economic vitality of the Bergamot Plan area, while adhering to a scale and character of development that is complementary to adjacent and nearby properties.
- Activate the 26th Street and Pennsylvania Avenue street frontages through the construction of streetscape improvements and a perimeter and interior landscaping program that enhances the visual appearance and urban character of the Bergamot Plan area.
- Facilitate safe and convenient pedestrian and bike travel and access to and from the 26th Street/Bergamot Metro E Light Rail Station.
- Support the City's sustainability goals through the refurbishment of an existing office building to reduce consumption of raw materials, material production and the resulting carbon impact. In addition, utilize sustainable building and site design features and construction practices, including mass timber construction and all-electric design for building core and shell, to provide a high-performance and environmentally efficient commercial project that would seek a Leadership in Energy and Environmental Design (LEED)® certification of Platinum.
- Provide community and project benefits consistent with the City's Land Use and Circulation Element, including open space opportunities for employees and visitors, transportation demand management, high-quality architectural design, sustainability, payment of a transportation infrastructure fee and enhanced pedestrian environment.

4. PUBLIC REVIEW PROCESS

The City prepared and circulated a Notice of Preparation (NOP) to the State Clearinghouse, relevant agencies, and interested parties as well as occupants/owners with a 750-foot radius of the project site. In consideration of the current Coronavirus (COVID-19) pandemic, the City circulated the NOP for this project for 60 days from May 6, 2020 to July 6, 2020. A virtual teleconference public scoping meeting presenting the project was held by the City on May 19, 2020. A total of three comment letters were received in response to the NOP. The NOP and Initial Study are provided in Appendix A to this EIR.

The City has prepared and distributed a Notice of Completion/Notice of Availability (NOC/NOA). In recognition of the COVID-19 pandemic, a minimum of 60-day public review period of the Draft EIR has been provided, which began on November 19 2020 and ending, January 18, 2021.

The Draft EIR is available for public review on the City's website at:

https://www.smgov.net/Departments/PCD/Environmental-Reports/1633-26th-Street-Project-EIR/.

Hardcopies can be made available for review at City Hall and all City Libraries (CEQA Guidelines Section 155087) by request.

5. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Section 15123 of the State CEQA Guidelines states that an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agency and the public. During the NOP public review period, three comment letters were received from various parties that raised issues of concern. These comment letters (Appendix C) were used to determine the areas of potential controversy and issues to be resolved. These issues are discussed within the sections of this document, and are summarized below:

- Air Quality
- Energy
- Greenhouse Gas
- Hazards and Hazardous Materials
- Land Use and Planning
- Transportation/Circulation
- Tribal Cultural Resources
- Alternatives

The discussion of environmental effects, mitigation measures, and project alternatives, as evaluated in detail in this EIR, constitutes the identification of issues to be resolved and areas of controversy, as required for compliance with CEQA Guidelines Section 15123(b)(2).

6. PROJECT ALTERNATIVES

As required by CEQA, the EIR examines a reasonable range of alternatives to the proposed project. These alternatives are described and evaluated in Section VI, *Alternatives*. Studied alternatives include:

- **Alternative 1: No Project Alternative** - This alternative assumes that the existing office building would not be refurbished and replacement of the existing surface parking lot with two new professional office buildings would not be developed on the project site, and the project site would remain developed with an office building and a surface parking lot. There would be no publicly accessible open space and courtyard within the interior of the project site, and the existing sidewalk on Pennsylvania would not be improved.

- **Alternative 2: Tier 1 (Reduced Height/Density) Development** - Alternative 2, Tier 1 Development, represents a reduced project alternative with a reduction in floor area and height. Similar to the project, Alternative 2 would retain the existing 45,429 sf office building and construct two new buildings for office use with some ground floor active retail/restaurant use. Under the City's Bergamot Area Plan, the Tier 1 standards allow a maximum building height of 32 feet and 1.75 FAR for a parcel less than 100,000 sf. With consideration to the adaptive reuse of the existing 45,429 office building as well as open space requirements, Alternative 2 would result in two new office buildings providing a net new of 88,564 sf. Up to 5,376 sf of the new ground floor space could alternatively be utilized for active retail/restaurant use. The total floor area when considering the existing office building would be 133,393 sf (1.75 FAR), 23% less than the project.

- **Alternative 3: Tier 3 (Increased Height/Density) Development** - Alternative 3 assumes development of the project at a Tier 3 height and density, which would be greater than the project. As is the case with the project, Alternative 3 would retain the existing 45,429 sf office building and construct two new buildings for office use with some ground floor active retail/restaurant use in a

similar layout as the project. Under the City's Bergamot Area Plan, the Tier 3 standards allow a maximum building height of 80 feet and 2.75 FAR for a parcel less than 100,000 sf. Based on the total project site size of approximately 87,651 sf, the maximum Tier 3 FAR is approximately 241,040 sf. With consideration to the adaptive reuse of the existing 45,429 office building as well as building modulation and open space requirements, Alternative 3 would result in two new office buildings providing a net new of 175,557 sf. The total floor area when considering the existing office building would be 220,986 sf (2.52 FAR), or 27% greater than the project.

- **Alternative 4: Mixed Use Office and Residential Alternative** - Alternative 4 assumes development of a mixed-use office and residential project at a Tier 2 height and density, equivalent to the project. Alternative 4 would retain the existing 45,429 sf office building and construct a new 4-story residential building with some ground floor active retail/restaurant use to the east of the office building. Because this alternative is conceptual for the purposes of the EIR, the exact layout and structural configuration of the proposed development is not determined. However, it is envisioned that the residential building would be oriented with an active restaurant/retail frontage along Pennsylvania Avenue. Under the City's Bergamot Area Plan, the Tier 2 standards allow a maximum building height of 60 feet and 2.00 FAR for a parcel less than 100,000 sf. With consideration to the adaptive reuse of the existing 45,429 office building as well as building modulation and open space requirements, Alternative 4 would result in a new residential building providing a net new of 129,256 sf. The total floor area when considering the existing office building would be 174,685 sf (2.0 FAR).

7. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-1, Summary of Impacts/Mitigation Measures, summarizes the various environmental impacts associated with the construction and operation of the proposed project. Mitigation measures are recommended for significant environmental impacts, and the level of impact after mitigation is also identified.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
B. AIR QUALITY		
Air Quality Management Plan **Impact A-1:** The development of creative office space is consistent with priorities identified in the City's strategy for a Sustainable Local Economy and with the Bergamot Transit Village land use designation. Therefore, the project would be consistent with the standards and policies set forth in AQMP and the impact would be less than significant.	No mitigation measures required.	Less than significant.
Air Quality Standards/Violations – Construction **Impact A-2:** Mass daily emissions generated by project construction activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standards. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Air Quality Standards/Violations – Operation **Impact A-3:** The mass daily emissions generated by project operational activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standards. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Ambient Air Quality Standards for Criteria Pollutants **Impact A-4:** Mass daily and localized emissions generated by project construction and operational	No mitigation measures required.	Less than significant.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, the proposed project would not generate a cumulatively considerable net increase of criteria pollutants. This would be a less than significant cumulative impact.		
Sensitive Receptors – Construction **Impact A-5:** Localized emissions generated by project construction activities would not expose receptors in the vicinity of the project site to substantial pollutant concentrations. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Sensitive Receptors – Operation **Impact A-6:** Localized emissions generated by project operational activities would not expose receptors in the vicinity of the project site to substantial pollutant concentrations. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Sensitive Receptors – Operation (CO) **Impact A-7:** Localized emissions generated by project operational activities would not cause localized CO concentrations at nearby intersections to exceed national or state standards. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Sensitive Receptors – TACs **Impact A-8:** Construction and operation of the proposed project would not expose sensitive receptors to substantial toxic air contaminants (TACs) that would exceed SCAQMD thresholds. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Other Sources of Emissions **Impact A-9:** Construction and operation of the proposed project would not create other sources of	No mitigation measures required.	Less than significant.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
emissions, including objectionable odors affecting a substantial number of people. The impact of the proposed project would be less than significant.		
B. ENERGY		
Consumption of Energy Resources **Impact B-1:** Construction of the project would consume energy resources in the form of electricity and transportation-related fuel but such consumption would be temporary and would represent a fraction of available supplies. Operation of the project would consume energy resources in the form of electricity, natural gas, and transportation-related fuels, but the project would be designed to exceed applicable current energy efficiency standards. Furthermore, the proximity of the project to existing transportation services and infrastructure would reduce energy consumption. In addition, the project would not conflict with an applicable plan for renewable energy or energy efficiency. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
Conflict with Energy Plans **Impact B-2:** The project would consume energy resources in the form of electricity, natural gas, and transportation-related fuel, but would be consistent with state and local plans for renewable energy and energy efficiency. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.
C. GREENHOUSE GAS EMISSIONS		
Greenhouse Gas Emissions **Impact C-1:** Construction and operation of the project would generate greenhouse gas emissions, but would not exceed thresholds of significance. In addition, the project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHG. The impact of the proposed project would be less than significant.	No mitigation measures required.	Less than significant.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures		Level of Impact After Mitigation
Greenhouse Gas Plans, Policies, Regulations **Impact C-2:** The project would generate greenhouse gas emissions, but would be consistent with applicable plans to reduce greenhouse gas emissions in California. The impact of the proposed project would be less than significant.	No mitigation measures required.		Less than significant.
D. HAZARDS AND HAZARDOUS MATERIALS			
Accidental Release of Hazardous Materials **Impact D-1:** The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction. With mitigation measure MM D-1, impacts would be reduced to less than significant. The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during project operation and impacts would be less than significant.	**MM D-1**	**Soil Management Plan.** 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 Regional Water Quality Control Board (RWQCB), DTSC, SMFD) for review and approval. The soils management plan and transportation plan shall include the following tasks: <u>Soils Management Plan</u> Affected soils shall be either directly loaded into awaiting trucks for immediate offsite disposal or temporarily stockpiled on plastic sheeting prior to load-out and offsite disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came. Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following: <u>Soil and Material Segregation</u> Overburden soils shall be screened with an organic vapor analyzer (OVA) in accordance with SCAQMD Rule 1166. Any significant quantities of construction	Less than Significant with Mitigation.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	debris encountered during excavation shall be segregated and disposed of in accordance with federal, state, and local regulations. Soil cuttings during the installation of soldier piles shall be disposed of offsite with any affected soils from the deep excavation. <u>Stockpile Management</u> The stockpiled soils for load-out shall be segregated by waste classification: • Nonhazardous waste. • Volatile Organic Compound (VOC)-contaminated nonhazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm. • VOC-contaminated nonhazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll- off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a tarp for offsite transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan. The temporary stockpiles containing affected soils shall be managed as follows: • The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust. • The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the	

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out. • Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made. • If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations. • During stockpile generation and removal, only the working face of the stockpile shall be uncovered. <u>Decontamination Methods and Procedures</u> 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	

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas. Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out. Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated but shall be packaged for appropriate offsite disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures: • Nonphosphate detergent and tap-water wash, using a brush if necessary. • Tap-water rinse. • Initial deionized/distilled water rinse. • Final deionized/distilled water rinse. <u>Truck Loading</u> 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	

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	soil hauled from the site shall comply with the following: • Materials shall be transported to an approved treatment/disposal facility. • No excavated material shall extend above the sides or rear of the truck/trailer. • Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened. • The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material offsite. <u>Storm Water Management</u> The good housekeeping practices prescribed in the City's Urban Runoff Mitigation Plan (Municipal Code Section 7.10.060) shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with federal, state, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include: • Pumping the standing water into temporary above-ground storage tanks for reuse onsite for dust suppression.	

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	• 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. <u>Transportation Plan</u> 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 Subsurface Investigation.	
Hazardous Materials Sites **Impact D-2:** The project would not emit hazardous emissions and would handle hazardous materials in accordance with regulations and manufacturer's specifications. As a result, the project would not create a significant hazard to schools within 0.25-mile of the project site. Impacts would be less than significant.	No mitigation measures required.	Less than Significant.
E. LAND USE AND PLANNING		
Conflict with Land Use Plan, Policy, or Regulation **Impact E-1:** Implementation of the project would not conflict with applicable land use plans, policy and regulations for the project site, including SCAG's	No mitigation measures required.	Less than significant.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, the LUCE, and the BAP. Impacts would be less than significant.		
F. NOISE		
Construction Noise Increase **Impact F-1:** Based on compliance with Section 4.12.110 the SMMC, impacts with respect to construction noise would not exceed standards established in the City's Noise Ordinance.	No mitigation measures required.	Less than significant.
Operational Noise Increase **Impact F-2:** With regard to noise impacts, operation of the proposed project would not generate a substantial permanent increase in ambient noise levels due to vehicles on roadways in the project vicinity or stationary noise sources.	No mitigation measures required.	Less than significant.
Ground-borne vibration **Impact F-3:** Neither construction nor operation of the proposed project would generate ground-borne vibration levels that would exceed the FTA human annoyance or structural damage thresholds. Impacts associated with ground-borne vibration would be less than significant.	No mitigation measures required.	Less than significant.
Vicinity of Private Airstrip/Airport Land Use Plan **Impact F-4.** The project would not expose people residing or working in the project area to excessive airport-related noise levels.	No mitigation measures required.	Less than significant.
G. TRANSPORTATION AND TRAFFIC		
Consistency with Mobility Plans, Policies, and Programs **Impact G-1:** The project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant.	No mitigation measures are required.	Less than Significant.
Consistency with CEQA Guidelines section 15064.3	No mitigation measures are required.	Less than Significant.

Table ES-1
Summary of Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Impact G-5: The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.		
H. TRIBAL CULTURAL RESOURCES		
Impact H-1: The project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, since no tribal cultural resources were identified as located within the project site, or its immediate adjacency. No impacts to tribal cultural resources would occur.	No mitigation measures are required.	No Impact.

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II. PROJECT DESCRIPTION

1. INTRODUCTION

The proposed 1633 26th Street Project would consist of the refurbishment of the project site's existing three-story, 45,429 square feet (sf) office building, and the development of two new adjacent four-story, creative and business professional office buildings comprising a total of 129,265 sf of new floor area. The project would also include a three-level subterranean garage with 399 parking spaces with vehicular access provided from Pennsylvania Avenue. The project's three buildings would total approximately 174,685 sf.

2. PROJECT LOCATION AND EXISTING SITE CONDITIONS

A. Project Location

The project site is located in the City of Santa Monica, in the western portion of Los Angeles County. The City of Santa Monica is a fully urbanized community and is bounded by the City of Los Angeles on the north, south and east with the Pacific Ocean on the west. Figure II-1, Regional Location and Project Vicinity Map illustrates the location of the project site in its regional context.

The approximately 87,651 square foot (2.01-acre) project site is located at 1633 26th Street, on the east side of 26th Street, between Pennsylvania Avenue and Colorado Avenue in the Bergamot Plan area of the City of Santa Monica. The project site is comprised of two parcels, Assessor Parcel Numbers (APN) 4268-001-025 and 4268-001-026. The site is bordered by a recently constructed 4 story office building on the north, Pennsylvania Avenue on the south, surface parking serving a 4-story office building on the east and 26th Street on the west. Figure II-2, Location Aerial Map, is an aerial photograph that shows the project site boundaries in the context of the immediate vicinity.

B. Existing Site Conditions

The project site consists of an approximately 87,651 square foot (2.01-acre) lot that is currently developed with a 3-story, brick, office building totaling approximately 45,429 sf and approximately 40 feet in height. The project site also includes a surface parking lot serving the office building with 161~~152~~ parking spaces (157~~148~~ standard and 4 handicap).

Vehicle access to and from the existing surface parking lot is provided by two driveways on Pennsylvania Avenue with a gate access ingress at the westerly driveway closest to the building and egress at the easterly driveway. Pedestrian access is provided by sidewalks on 26th Street and a limited portion of Pennsylvania Avenue immediately east of 26th Street, with building entrances on 26th Street, Pennsylvania Avenue and the surface parking lot.

On-site landscaping includes strip of grass and planters in front of the building along 26th Street and Pennsylvania Avenue and planters between the building and the surface parking lot. There are ornamental trees located in grassy strips along 26th Street and Pennsylvania Avenue. There is one street tree on 26th Street, near Pennsylvania Avenue, and approximately eleven trees planted on the

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Project Site

Source: OpenStreetMap, March 2020.

Figure II-1
Regional Location and Project Vicinity Map

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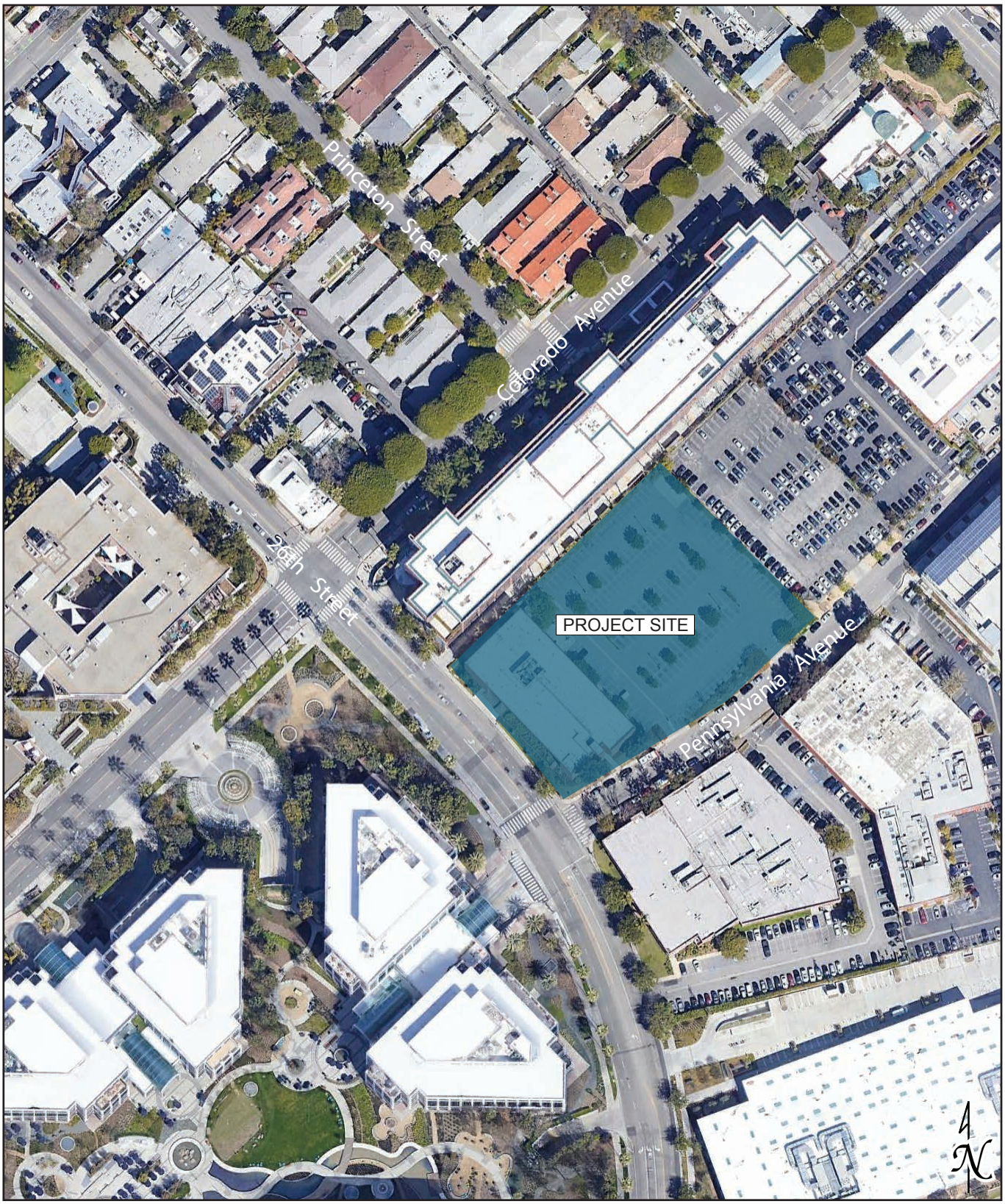

Project Site

Source: Google Earth, March 2020.

Figure II-2
Location Aerial Map

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project site landscape areas along Pennsylvania Avenue in addition to approximately thirteen trees in tree wells in the surface parking lot and approximately six trees along the southern border of the project site (parking lot).

The existing office building was constructed in 1972 and is not listed on the California Register of Historical Resources and is not a designated City Landmark or listed on the City of Santa Monica's Historic Resources Inventory as potential Landmark, Structure of Merit, or contributor to a designated or proposed historic district.

C. Existing Mobility Options and Pedestrian Access

i) Regional Access and Local Street Network

The project site is regionally accessible from Interstate 10 (I-10, or Santa Monica Freeway) via Cloverfield Boulevard and 20th Street. The Santa Monica Freeway is located approximately 0.37 miles south of the project site. The project site is situated between two major boulevards as designated under the City's Land Use and Circulation Element (LUCE): Colorado Avenue and Olympic Boulevard. Colorado Avenue extends from the eastern City limit at Centinela Avenue to Lincoln Boulevard.

Olympic Boulevard is a major transit corridor from Downtown Los Angeles through West L.A. and into Santa Monica, where it transforms from a wide thoroughfare into a green corridor highlighted by mature coral trees in the median extending from the City limits at Centinela Avenue to 10th street. From 10th Street westward, Olympic Boulevard becomes one-way westbound and merges with I-10 ending at 5th Street. Eastbound lanes begin at 4th Street and run along the south edge of the I-10 Freeway from 4th Street and reunites with the main part of the boulevard on the north side of the freeway at 11th Street.

ii) Public Transit

Public transit service is easily accessible to and from the project site, which is within walking distance (0.15 mile south) of the Metropolitan Transportation Authority (Metro) 26th/Bergamot Line E Light Rail Station. The Metro Light Rail E Line provides passenger service between downtown Los Angeles and Santa Monica with headways of approximately 12 minutes in the peak hours.

Additionally, the project site is served by a number of Big Blue Bus (BBB) lines including, route 5 (Olympic Blvd – Century City), 16 (Marina del Rey – Wilshire Blvd/Bundy Dr.) and 43 (San Vicente Blvd 0 26th St – SMC). The closest bus stop is located approximately 2 blocks (0.15 mile) south at 26th Street Olympic Boulevard for BBB routes 5 and 16.

iii) Bicycle and Pedestrian Access

Existing bicycle facilities in the project site area include separated delineated bicycle lanes (Class II Bicycle Lanes), shared bicycle routes (Class III Bicycle Routes), and, in addition, there are citywide bike share stations.

Class II Bicycle Lanes: Class II bicycle lanes are marked bicycle lanes (signed and stripped). These facilities are on the streets but have pavement markings separating the lane from vehicle traffic. On roadways with parking, the bicycle lane is between the parking lane and the outermost travel lane. The following roadway segments have Class II bicycle facilities within one mile of the project site: Arizona Avenue, Broadway, 17th Street, and Pearl Street.

Class III Bicycle Routes: Similar to Class II facilities, Class III bicycle routes are located on the street. Pavement markings may include sharrows and signage indicating that the street is a bicycle route and instructing motorists to share the road is typically provided. The following roadway segments have Class III bicycle facilities within one mile of the project site: Washington Avenue, Yale Street, Arizona Avenue, Stewart Street, Pearl Street, 17th Street, Texas Avenue, Westgate Avenue and Ohio Avenue.

Bike Share: The City also has a citywide Bike Share service (which will be privately operated beginning October 2020), which allows residents, visitors, and employees to ride a public bicycle for their travel needs within the City. There are three bike hubs adjacent to the site at Pennsylvania Avenue and 26th Street, Pennsylvania Avenue and Stewart Street, and on Colorado Avenue west of Stewart Street. There is also a hub at 26th/Bergamot Metro Line E Light Rail Station. The bikeshare program makes several hundred "smart" bicycles available at more than 80 stations Citywide including Downtown, and in Venice in the City of Los Angeles.

Bicycle Locker Facilities: There are bicycle locker facilities located at the closest Metro Line E 26th/Olympic Station. These bicycle locker facilities are also available and located near the closest BBB bus stop on Olympic Boulevard at 26th Street.

Pedestrian Access: Continuous sidewalks are immediately adjacent to the project site along 26th Street and a limited portion of Pennsylvania Avenue immediately east of 26th Street. These sidewalks lead to nearest Bike Share hub stations on 26th Street at Pennsylvania Avenue and 26th Street at Olympic Boulevard at the Metro Line E Station. The sidewalks also lead to the nearest BBB bus stops on Olympic Boulevard at 26th Street and the 26th/Olympic Metro Line E Light Rail Station at 26th Street and Olympic Boulevard.

3. PROJECT OBJECTIVES

Section 15124(b) of the CEQA Guidelines requires a project description to contain a statement of a project's objectives and Section 15124(b) requires that the statement of objectives includes the underlying purpose of the project. The applicant's objectives for the proposed project include:

- Develop an underutilized site with a well-designed compatible commercial project that is consistent with the character and operational characteristics of surrounding uses in the Bergamot Plan area
- Ensure a financially feasible project that promotes the City's economic well-being, increases the local tax base, and fosters the continued evolution of an active, pedestrian-oriented, mixed-use district.
- Strategically concentrate new commercial development and facilitate employment centers at a location that capitalizes on existing and future infrastructure and services, including the nearby 26th Street/Bergamot Metro E Light Rail station.
- Support the growth and expansion of creative arts, entertainment and related uses in the City of Santa Monica that enhance the economic vitality of the Bergamot Plan area, while adhering to a scale and character of development that is complementary to adjacent and nearby properties.
- Activate the 26th Street and Pennsylvania Avenue street frontages through the construction of streetscape improvements and a perimeter and interior landscaping program that enhances the visual appearance and urban character of the Bergamot Plan area.
- Facilitate safe and convenient pedestrian and bike travel and access to and from the 26th Street/Bergamot Metro E Light Rail Station.
- Support the City's sustainability goals through the refurbishment of an existing office building to reduce consumption of raw materials, material production and the resulting carbon impact. In addition, utilize sustainable building and site design features and construction practices, including mass timber construction and all-electric design for building core and shell, to provide a high-performance and environmentally efficient commercial project that would seek a Leadership in Energy and Environmental Design (LEED)® certification of Platinum.
- Provide community and project benefits consistent with the City's Land Use and Circulation Element, including open space opportunities for employees and visitors, transportation demand

management, high-quality architectural design, sustainability, payment of a transportation infrastructure fee and enhanced pedestrian environment.

4. PROJECT CHARACTERISTICS

A. Proposed Project

The project would consist of the refurbishment of the project site's existing three-story, 45,429 square feet (sf) office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 sf of new floor area. The project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The project's three buildings would total approximately 174,685 sf. Specific components of the project are summarized in Table II-1, Proposed Project Components.

Figures II-3 through II-13 provide project site plans for site plan, subterranean parking levels (1 – 3), ground floor, second floor, third floor, fourth floor and roof plans. In addition, Figures II-14 through II-19 provide elevation and sections of the project site of the existing building and proposed buildings. Figures II-20 through II-23 provide photo montages of the existing building and proposed buildings, both pre and post development conditions. All of these figures are presented at the end of this section.

Table II-1
Proposed Project Components

Building Components	Building A	Building B	Building C[a]	Total
Floor Area (in square feet [sf])	69,266	59,990	45,429	174,685
Restaurant/Retail (included in sf above)	--	5,400	--	
Stories	4	4	3	N/A
Height	54 feet	54 feet	40 feet	N/A
Floor Area Ratio (FAR)				
BTV Tier 2 Allowable FAR				2.0
Max. Allowable FAR (87,696 sf x 2)				175,392 sf
Proposed Floor Area				174,685 sf
Proposed Floor Area				1.99
Open Space				
Minimum Required per Bergamot Area Plan (% of Site)				20 %
Proposed Open Space				33 %
Vehicle Parking				
~~*Existing Parking to be Relocated*~~				~~50 spaces~~
Required Parking for Commercial				349 spaces
Total Parking Provided				399 spaces
Required/Provided Carpool/Vanpool				16/16
Required/Provided EV Parking				9/25
Bicycle Parking				
Required/Provided Short Term[b]				35/35
Required/Provided Long Term				194/194
Required Showers for Office				8/8
Required/Provided Personal Lockers				146/146

NOTES:
a = Existing building to remain
b = The Project will comply with retail/restaurant short-term bike parking standards (1:1000) in the event that any ground floor space is used as such.
Source: Belzberg Architects and RELM, August 5, 2019

B. Proposed Design

The massing of the proposed development is broken up into three buildings, with two new buildings constructed to the west of the existing building. The proposed new buildings (Buildings A and B) would incorporate a contemporary design, utilizing a mass timber super structure, while retaining similarities to the existing building (Building C), with both rising to a maximum height of 54 feet, not including parapets and roof appurtenances. The two new buildings would replace the surface parking lot to the east of the existing building and the three buildings would form a campus-like area leaving open space in the middle as a courtyard, as shown in both Figure II-3, Illustrated Site Plan and Figure II-4, 3D Model Massing Strategy. Building A, approximately 69,266 sf, would be rectangular in shape and located on the northeastern portion of the project site. Building B, approximately 59,990 sf, would be "L" shaped and located on the southeastern portion of the project site along Pennsylvania Avenue. Building C, approximately 45,429 sf, 40 feet tall (three stories) is rectangular in shape and located on the western portion of the project site, fronting 26th Street. No additional interior floor area is proposed for Building C.

Proposed Buildings A and B would incorporate a contemporary design, similar to Building C. The materials used would integrate mass timber, metal panels, and red brick with large windows on the north, west and south elevations. The new buildings would contain more windows and less solid wall than the existing building. Facing the courtyard, the new buildings would contain walls of glass windows on all four levels providing transparency into the interior spaces of the buildings and views of the courtyard from within the buildings. Building C would be refurbished with new glass windows within the existing locations and create three large panels framed by blackened metal on the west and east elevations and new glass windows within the existing frame on the north elevation. The south elevation currently does not contain any windows, and, under refurbishment, this elevation would not include any new windows. The change in windows and refurbishment can be viewed in Figures II-20, Photo Montage A and II-23, Photo Montage D, demonstrating before and after renovation of the building as viewed from 26th Street and the north elevation.

The elevation drawings (Figures II-14 through II-16) provide views of the building demonstrating the use of glass that serves to bring more natural light to the interior building spaces and break up the solid walls. Figure II-24, Rendering A, 26th Street at Pennsylvania Avenue Vantage (Buildings C and B, Looking Northeast); Figure II-25, Rendering B, Pennsylvania Avenue (Building B, Looking North); and Figure II-26, Rendering C, Pennsylvania Avenue (Buildings B and A, Looking Northwest). These figures are presented at the end of this section.

As previously identified, the massing of the development is softened with three buildings forming a courtyard in the middle providing a campus-like atmosphere. Figure II-27, Rendering D, provides a view of the courtyard landscaped and hardscape with a mature tree as a focal point and areas for gathering. To further reduce massing, Buildings A and B, both contain outdoor terraces/decks on the third and fourth levels that also provide additional common open space areas for gathering. The two new buildings are connected on levels 2 through 4 with a metal frame bridge which is viewed in the project photo montage, Figure II-22, Photo Montage, East Elevation.

C. Access, Parking and Circulation

Primary vehicle access for the project would be provided via one approximately 24-foot driveway on Pennsylvania Avenue that leads directly into the subterranean parking garage as shown in Figure II-20, Vehicle, Bicycle and Pedestrian Access. Queuing for the vehicle parking would be provided within the garage. Additionally, entrance via an approximately 22-foot driveway would provide access to an enclosed loading dock area immediately west of the parking garage driveway.

All parking associated with the project would be contained onsite in a 3-level subterranean parking garage that would provide up to 399 vehicular parking spaces, not including motorcycle parking. The vehicle parking facilities would include 16 carpool/vanpool spaces and nine electrical vehicle (EV) charging stations/spaces on the first level of parking (Level A). The project would also provide parking for

a minimum of 229 bicycle spaces for employees and visitors. Of these, 194 would be long-term bicycle parking that would be located within enclosed/secure facilities on Level A of the parking garage. Access to these spaces would be provided with a shared driveway and ramp with vehicles on Pennsylvania Avenue. Bicycle facilities would also include showers accommodating up to eight individuals and locker facilities with up to 146 personal lockers all located in the parking garage on Level A. In addition, the project would include 35 short-term parking spaces on the exterior areas of the building. There would be approximately 20 parking spots on 26th Street in front of Building C, with the balance provided along Pennsylvania Avenue.

Pedestrian access from public sidewalks on 26th Street would be provided directly to Building C. Additional pedestrian access would be provided from public sidewalks on Pennsylvania Avenue to the courtyard. From the courtyard, pedestrian access would be provided to all three buildings.

D. Open Space and Landscaping

The project includes a ground level courtyard surrounded by the three project buildings, with a large mature specimen tree that would establish a focal point of the courtyard. The proposed courtyard would total 10,436 sf, exceeding the City's minimum requirement. Access to the courtyard is provided between Buildings B and C from the public sidewalk on Pennsylvania Avenue as shown in Figure II-26, Rendering C. A view of the courtyard is provided in Figure II-28, Rendering D. In this view, the courtyard provides space for gathering and provides landscape views from all three buildings. The mature large mature specimen tree would be planted in landscaped raised planters.

Additional open space for project tenants is provided on two terraces, one in Building A and one in Building B, each on the fourth level. Building B terrace would afford views of both the courtyard and Pennsylvania Avenue. Building A terrace would provide view of the courtyard. The terraces would be bordered by walls of glass providing transparency into the buildings. These spaces also would be available for tenant gathering. Landscaping

The project would include landscape buffers between Buildings C and B to 26th Street and Pennsylvania Avenue, respectively. The project would be required to provide a minimum of 17,542.55 sf of minimum open space surrounding the project buildings. The project proposes a total of 28,976 sf, exceeding the requirement. Landscaping would include grass, planters with shrubs and trees. The project would include the planting of street trees along 26th Street and Pennsylvania Avenue. The project's design team would work closely with the City of Santa Monica's Urban Forester and the City's Urban Forest Task Force to prepare and implement a plan for the selection and maintenance of the street trees surrounding the site. Any street trees to be removed, relocated, or planted would require the approval of the City's Urban Forester.

E. Sustainability Features

Sustainability has been an integral part of the project's architectural and landscape design concept to ensure the project implements the City's sustainable goals and objects and to integrate LEED principles into the project's infrastructure, design and operation. Specific focus was given to conserving natural resources in line with the City's conservation priorities in reducing water usage and energy usage as well as incorporating sustainable mass timber construction. The project would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Some of the other key sustainability features would include photovoltaic panels on the roofs of the three buildings, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging

stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

F. Transportation Demand Management Plan

Additionally, the project would be required to implement a Transportation Demand Management (TDM) plan in accordance with the City's TDM Ordinance (SMMC Section 9.53.130). TDM measures to be provided by the project include the following:

- On-site transportation information in an on-site physical location, such as a bulletin board or kiosk, or through other media, such as on a website or other digital means.
- A designated Project Transportation Coordinator.
- New employee orientation.
- Parking cash out.
- Incentives for employees that live within one-half mile of workplace.
- Information regarding availability of bike commute training offered either on-site or by a third party.
- If, in the future, citywide bikeshare is not available within a two-block radius of the project, the project shall then provide on-site shared bicycles intended for employee use during the workday.
- Commuter matching services for all employees on an annual basis, and for all new employees upon hiring.
- Information regarding the benefits of measures to reduce trips including compressed work schedules, flex-time schedules, telecommuting, and guaranteed ride home services.
- A transportation allowance equivalent to at least 75% of the cost of a monthly regional transit pass, in accordance with SMMC Section 9.53.130(B)(2)(b)(viii).
- Bike valet, free of charge, during all automobile valet operating hours.

G. Employment

The proposed project is estimated to generate 713 employees based on the data and profile of the tenants in the existing building.[1]

5. CONSTRUCTION GRADING AND SCHEDULE

Construction of the proposed project is anticipated to be conducted in one phase. The estimated duration for construction is approximately 24 months beginning 2022 and ending in the 2nd quarter of 2024. It is estimated, respectful of market conditions, that construction would begin 2022 and the project would be operational by the 2nd/3rd quarter of 2024. Construction activities associated with the proposed project

[1] *The City provided the number of employees via the project applicant. The generation factor used included 4 employees per thousand sf for office (677 office employees) and 10 employees per 1,500 sf for restaurant (36 restaurant employees) for a total of 713 employees.*

would be undertaken in three main steps: (1) demolition of existing uses, 2) grading/site preparation/excavation, and (3) building construction.

Demolition would occur for approximately 3 months and would require the demolition and removal of the existing 161-space surface parking lot. The demolition would generate approximately 2,500 cubic yards (cy) of material, primarily concrete. Depending on the type of haul truck used, demolition could require up to approximately 275 truck trips to haul debris off-site.

Grading, site preparation and excavation would occur for approximately 2 months and would require the export of approximately 55,000 cy of soil export for excavation for the subterranean project components. Soil export activities could require up to 3,200 truck trips to haul soil off-site. The depth of excavation would be approximately 37 feet below surface grade.

Building construction would occur for approximately 19 months and would include the construction of the proposed structures (Buildings A and B), refurbishment of the existing building (Building C), connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the project site.

Construction worker parking would be provided via the use of City parking structures and agreements with neighboring lots and, if required, a shuttle service would be employed to deliver construction workers from parking areas to the site. All required equipment and material staging would be provided on site and all work shall be subject to a Construction Mitigation Plan to be approved by the City. The Construction Mitigation Plan would address street and sidewalk closures, truck hauling routes, construction hours, etc.

6. REQUIRED APPROVALS AND PERMITS

Consistent with CEQA Guidelines Section 15065 (b), the City of Santa Monica (the City) is the lead agency for the proposed project. As such, this EIR will be used by the City to both evaluate the potential environmental impacts that would result from the proposed project, and develop conditions of approval, which would those impacts for which mitigation measures are proposed in the EIR. The Planning Commission Council will consider approval of the project as part of the City's development review process and would certify the project's Final EIR concurrently with project approval. In order to construct the proposed project, the applicant is requesting the following discretionary approvals from the City:

- Certification of the Final EIR (Planning Commission)
- ~~Approval of a Statement of Overriding Considerations if necessary (Planning Commission)~~
- Approval of a Development Review Permit, Conditional Use Permit for business and professional office use, and Vesting Tentative Tract Map (Planning Commission)
- Approval of Building Design, Materials, and Colors (Architectural Review Board)
- Any other incidental discretionary or administrative approvals needed for the construction and operation of the proposed project.

7. INTENDED USES OF THE EIR

The proposed project would require the discretionary approval of the City of Santa Monica's Planning Commission. This document evaluates potential environmental impacts associated with implementation of the proposed project and provides information regarding environmental effects of the proposed project. The EIR shall also serve to inform the public, decision-makers, elected officials, and other stakeholders regarding the proposed project, and to solicit input on the nature and scope of potential environmental effects. The EIR provides the City of Santa Monica decision-makers with a technically and legally adequate source of information to be used in the decision-making process in considering the proposed project.

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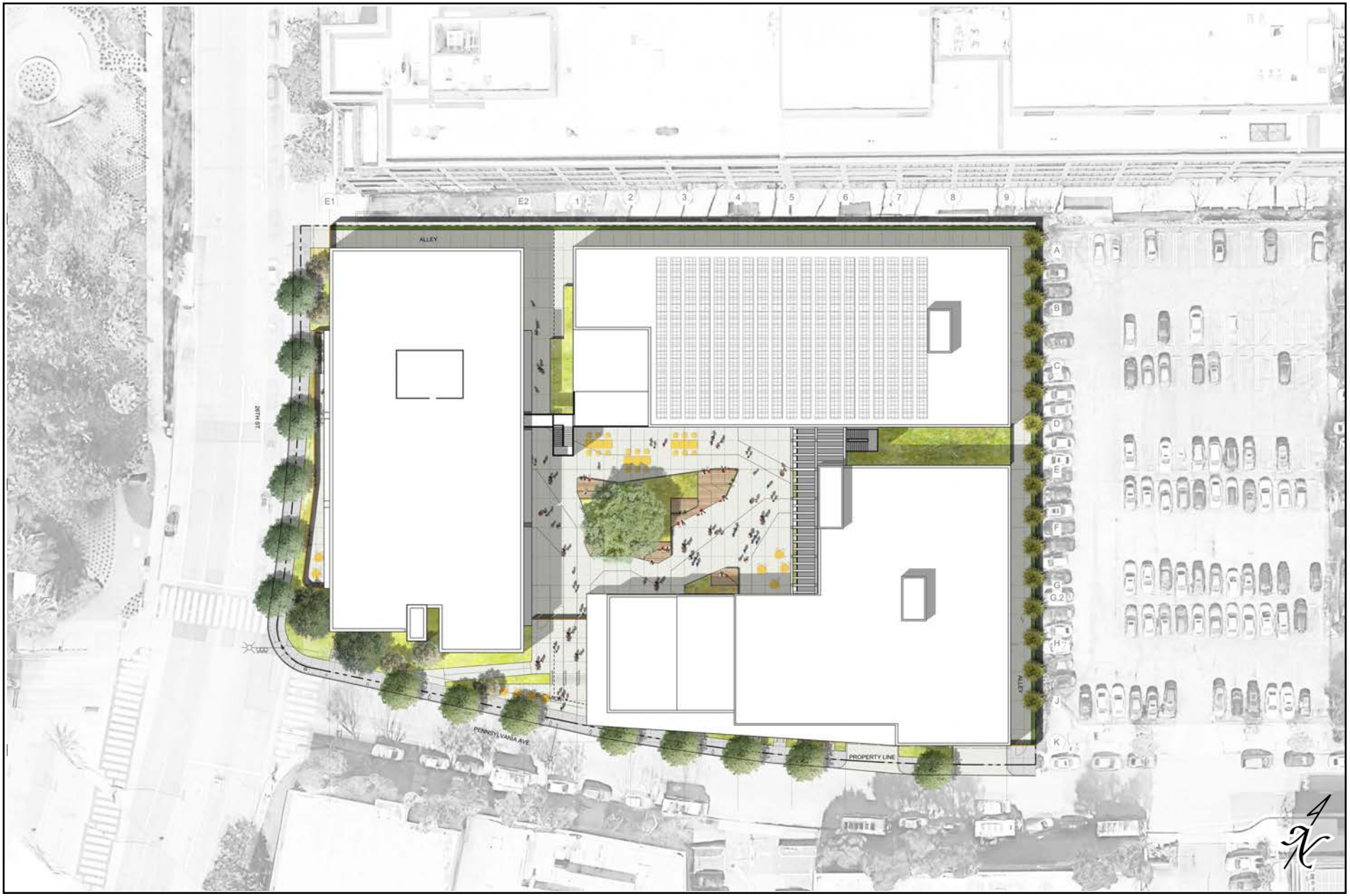

Source: Belzberg Architects, August 2019.

Figure II-3
Illustrated Site Plan

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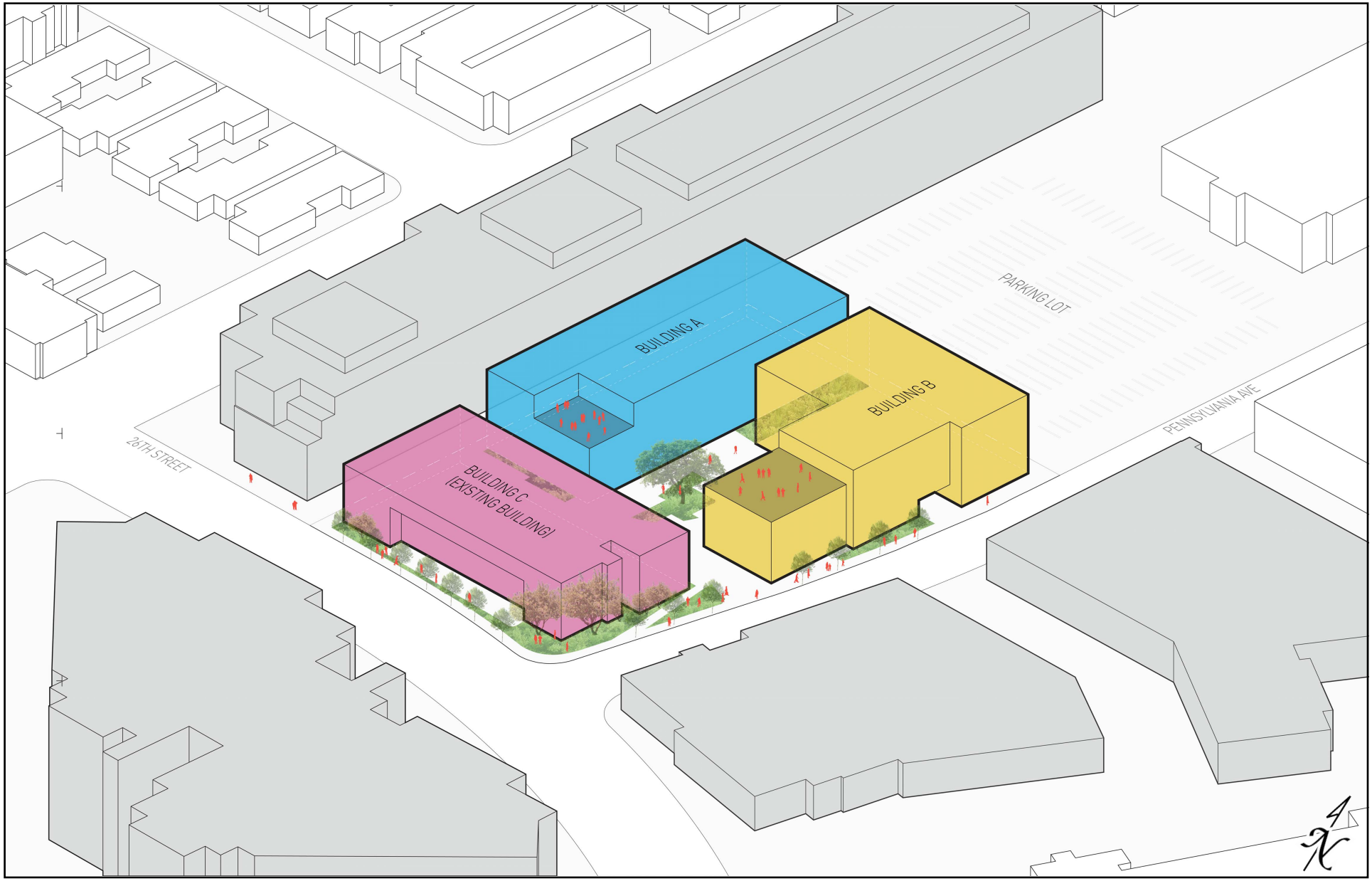

Source: Belzberg Architects, August 2019.

Figure II-4
3D Model Massing Strategy

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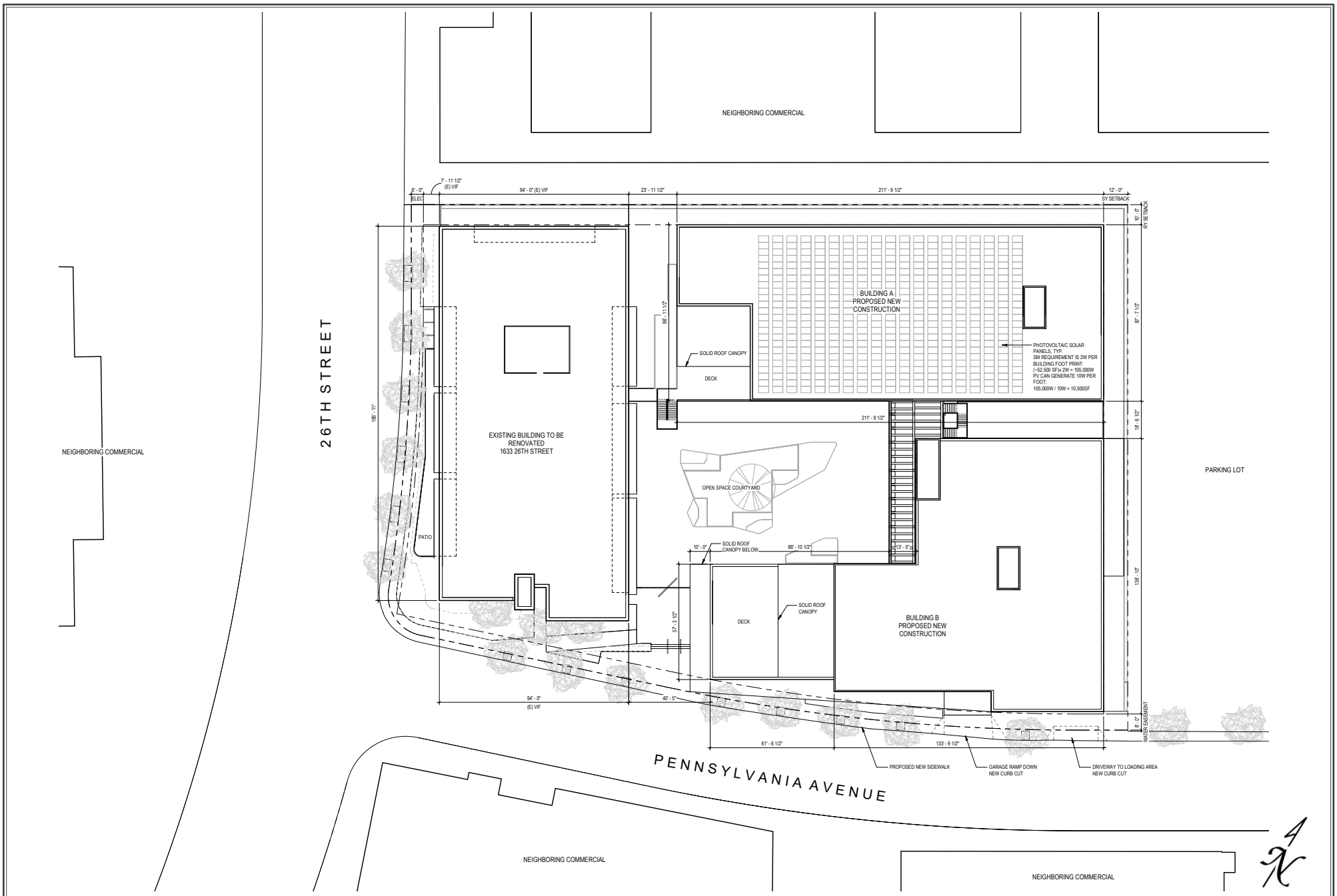

Source: Belzberg Architects, August 2019.

Figure II-5
Site Plan

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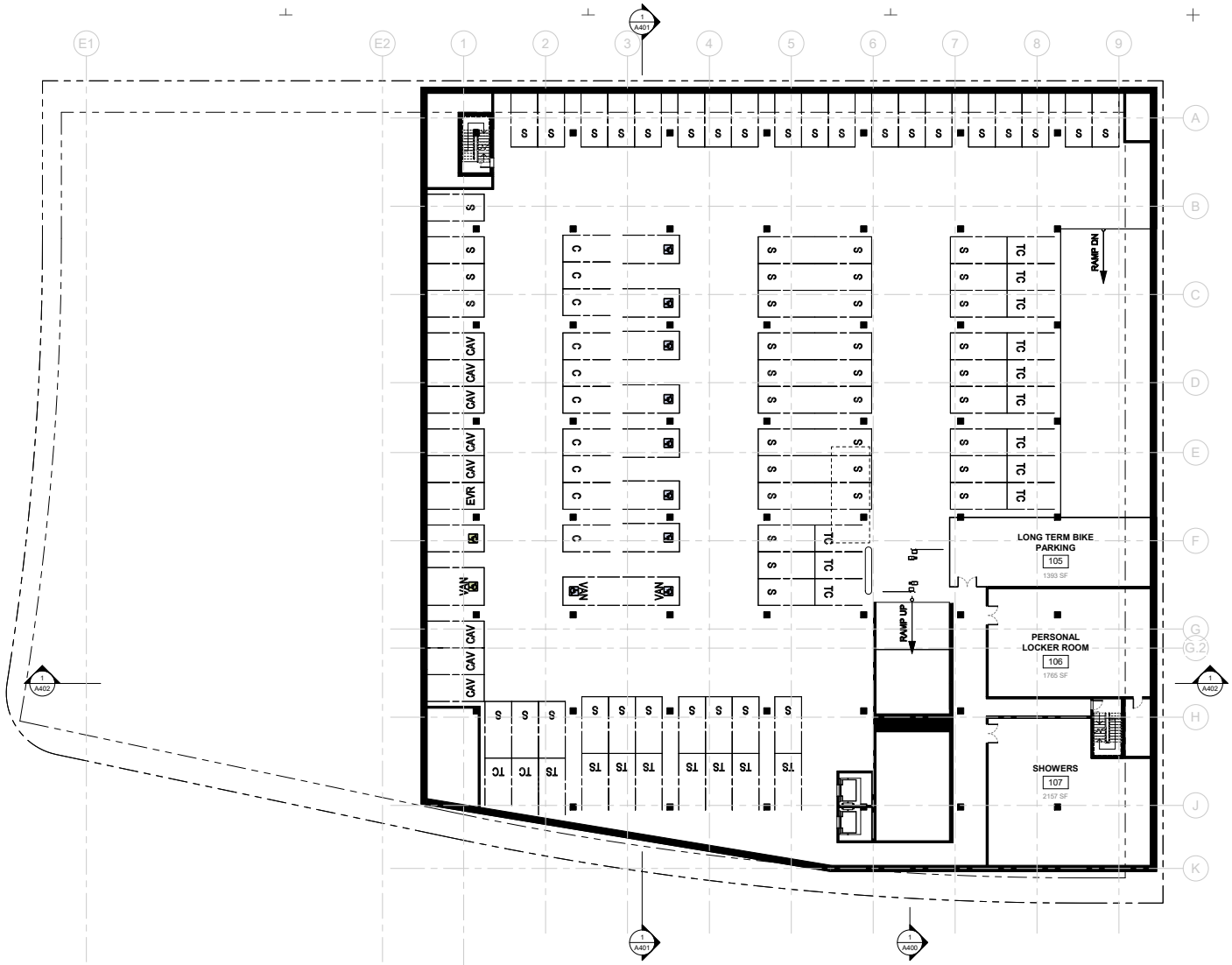

B1 PARKING LEVEL 1	115 SPACES
B2 PARKING LEVEL 2	141 SPACES
B3 PARKING LEVEL 3	143 SPACES
TOTAL PARKING SPACES	399 SPACES

Source: Belzberg Architects, August 2019.

Figure II-6
Parking Level 1

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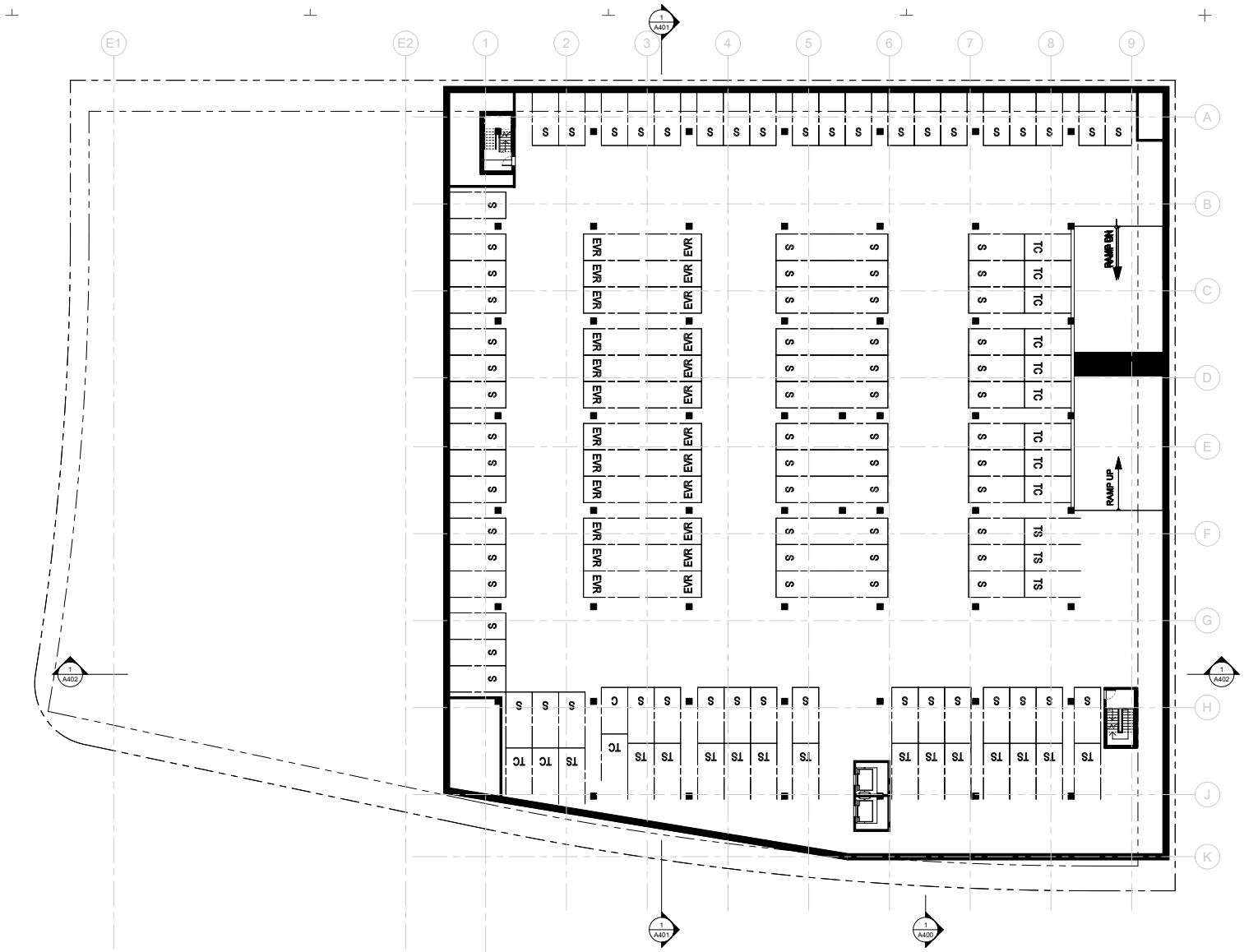

B1 PARKING LEVEL 1	115 SPACES
B2 PARKING LEVEL 2	141 SPACES
B3 PARKING LEVEL 3	143 SPACES
TOTAL PARKING SPACES	399 SPACES

Source: Belzberg Architects, August 2019.

Figure II-7
Parking Level 2

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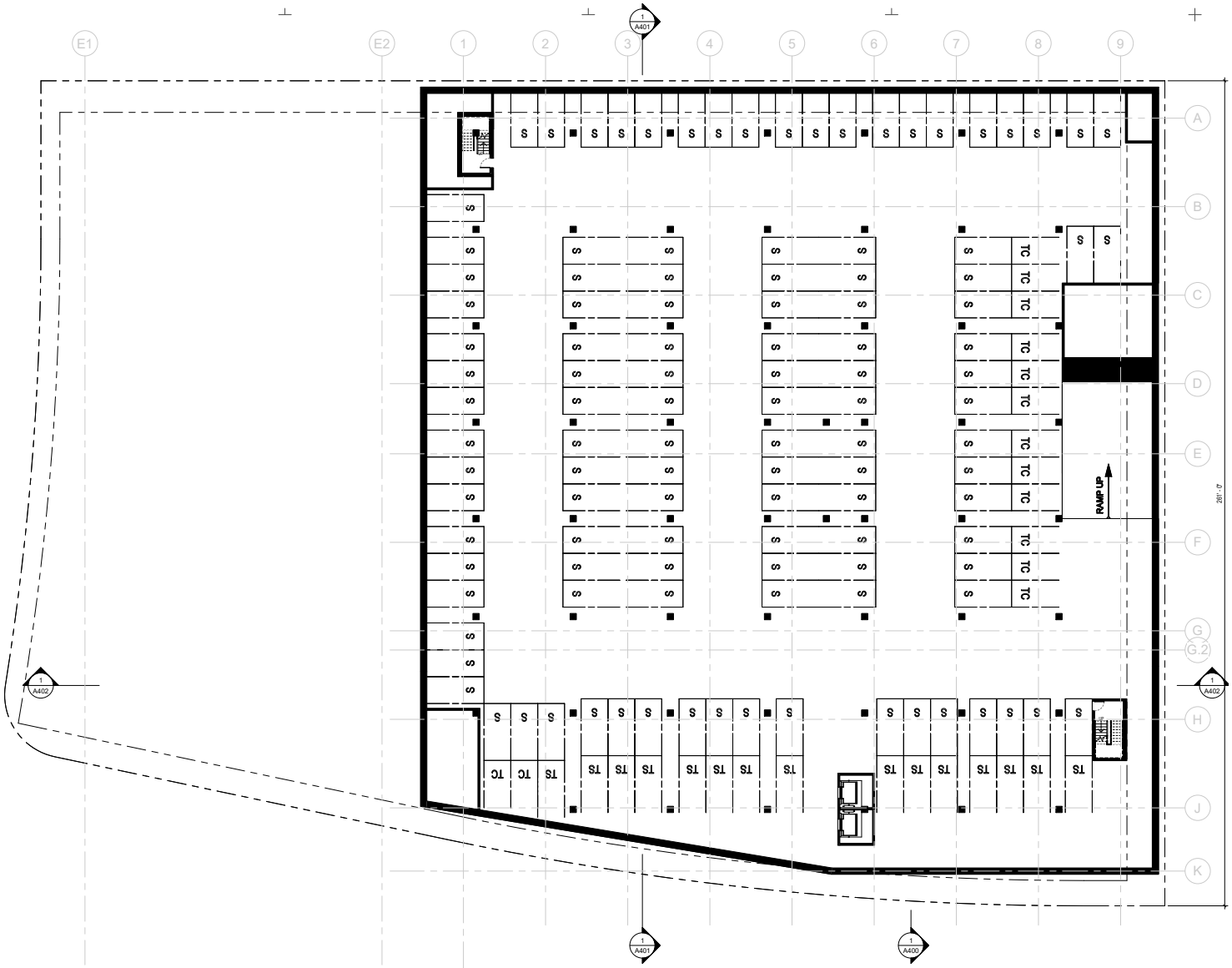

B1 PARKING LEVEL 1	115 SPACES
B2 PARKING LEVEL 2	141 SPACES
B3 PARKING LEVEL 3	143 SPACES
TOTAL PARKING SPACES	399 SPACES

Source: Belzberg Architects, August 2019.

Figure II-8
Parking Level 3

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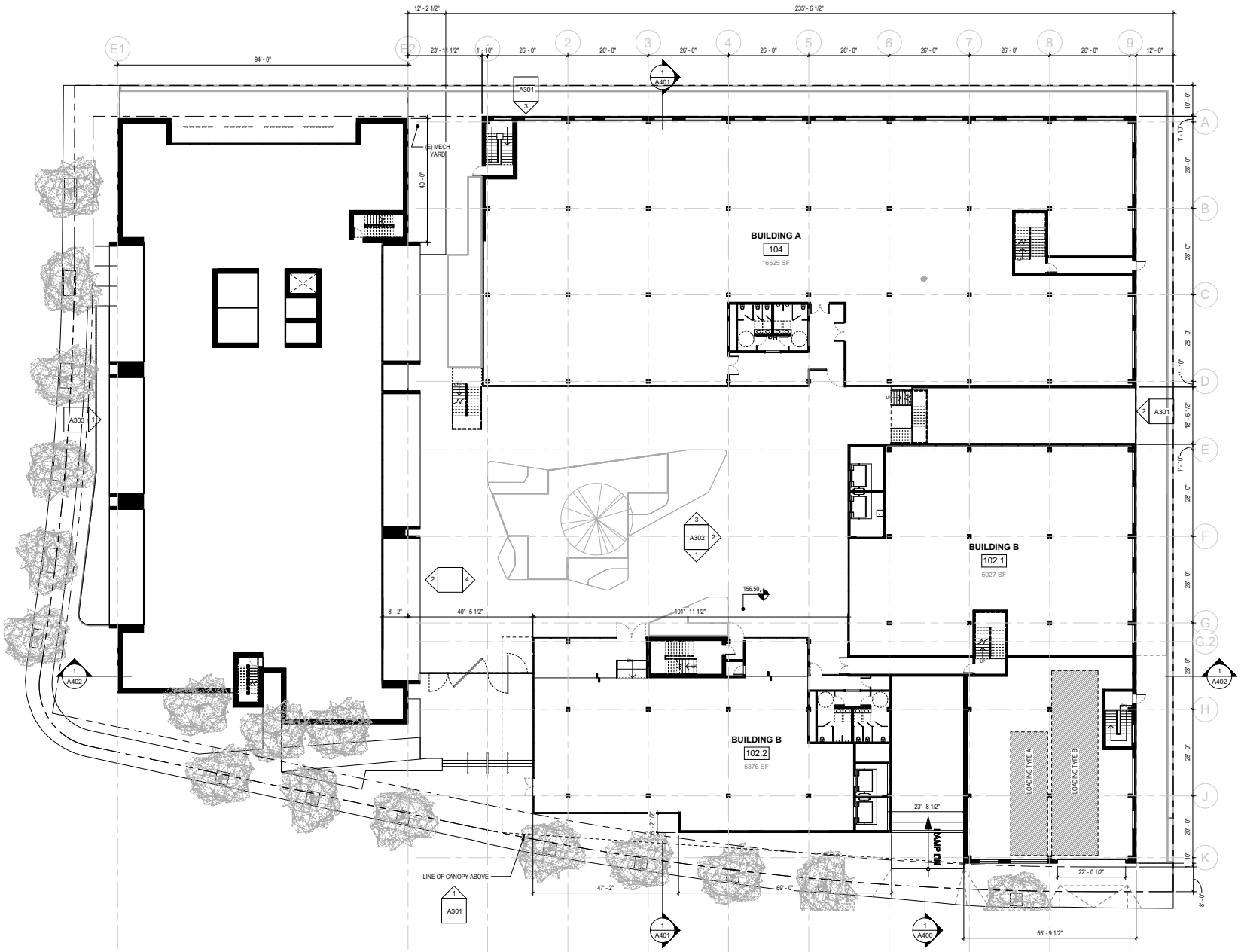

Source: Belzberg Architects, August 2019.

Figure II-9
Ground Floor Plan

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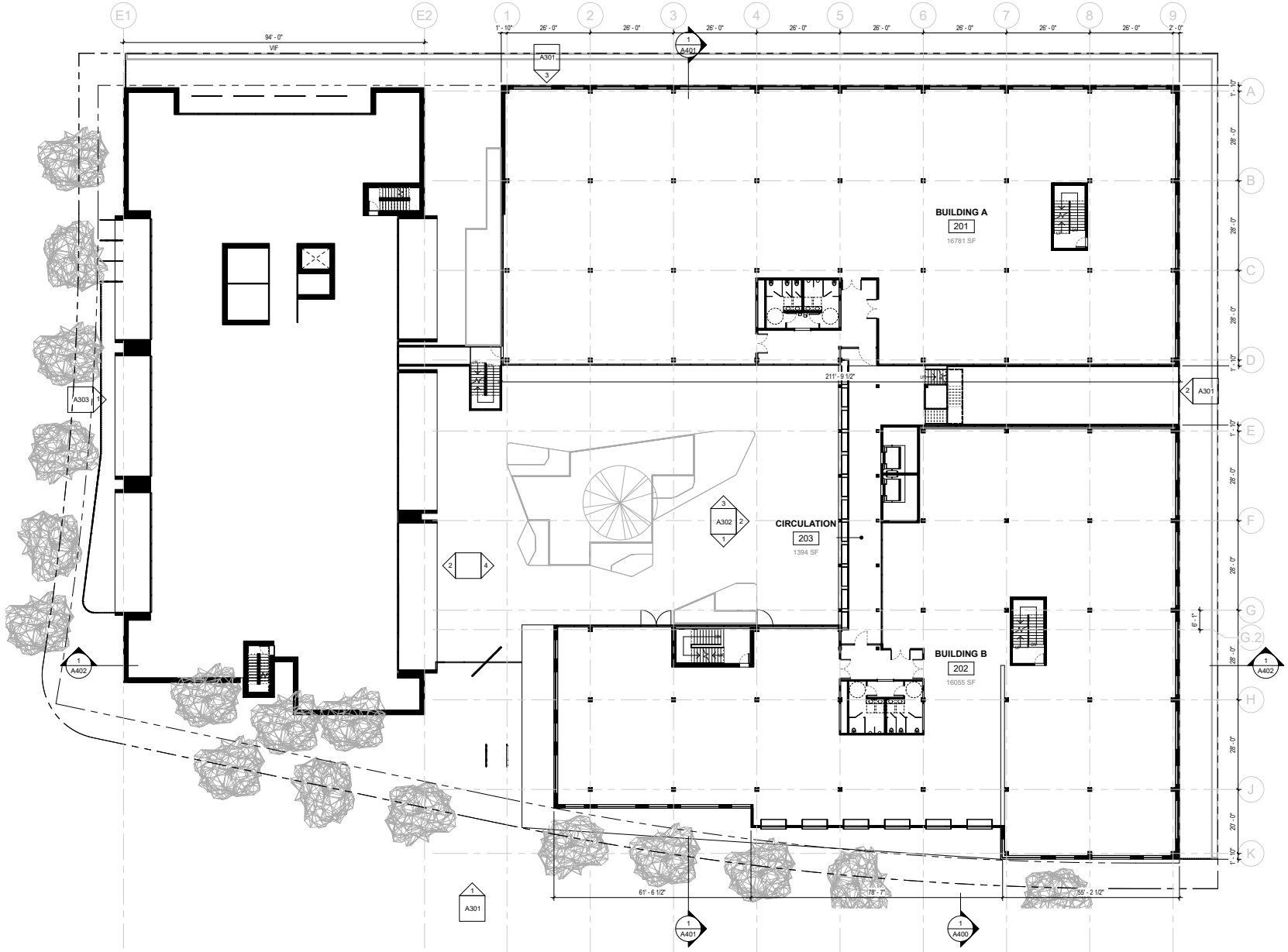

Source: Belzberg Architects, August 2019.

Figure II-10
Second Floor Plan

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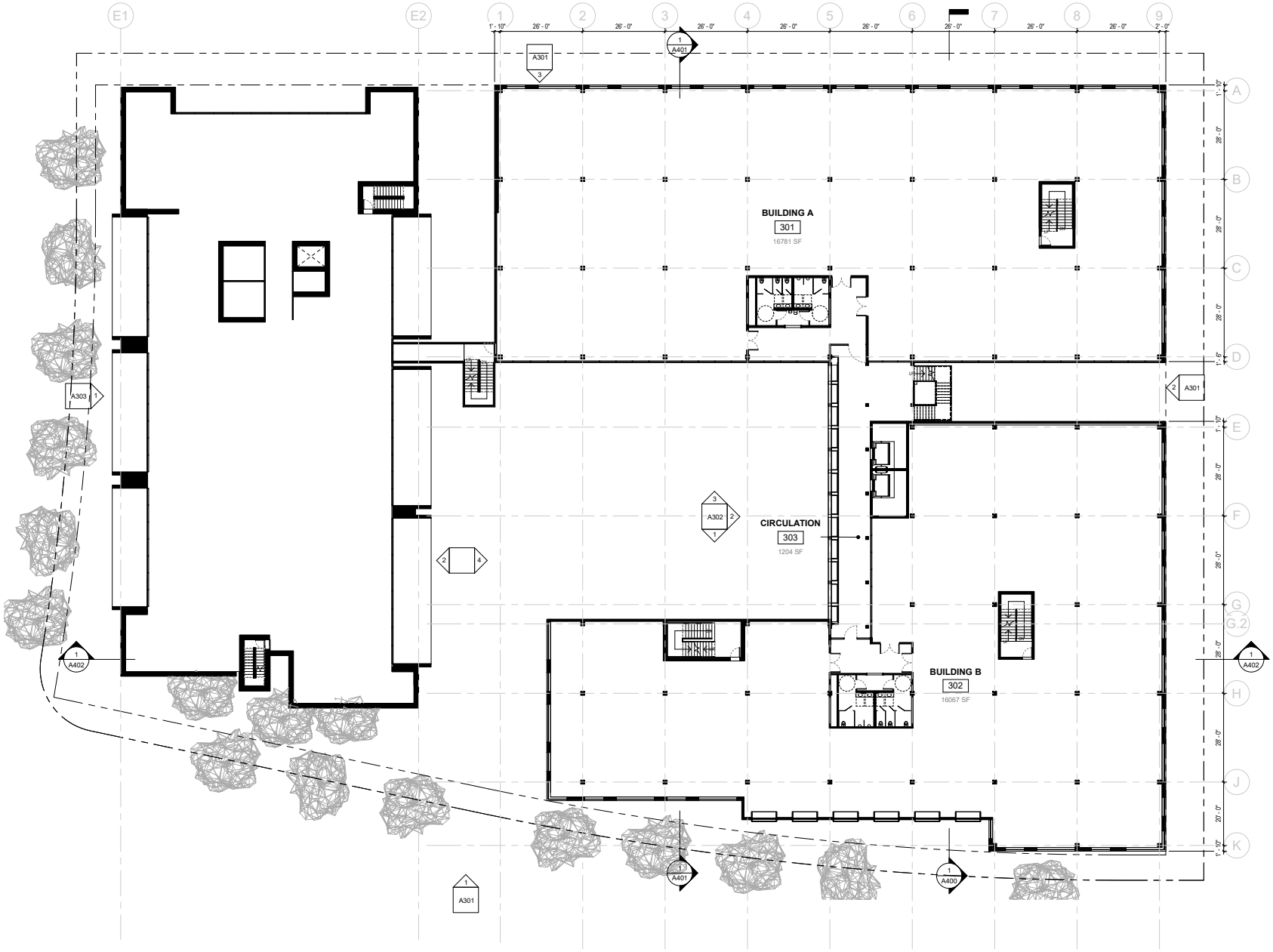

Source: Belzberg Architects, August 2019.

Figure II-11
Third Floor Plan

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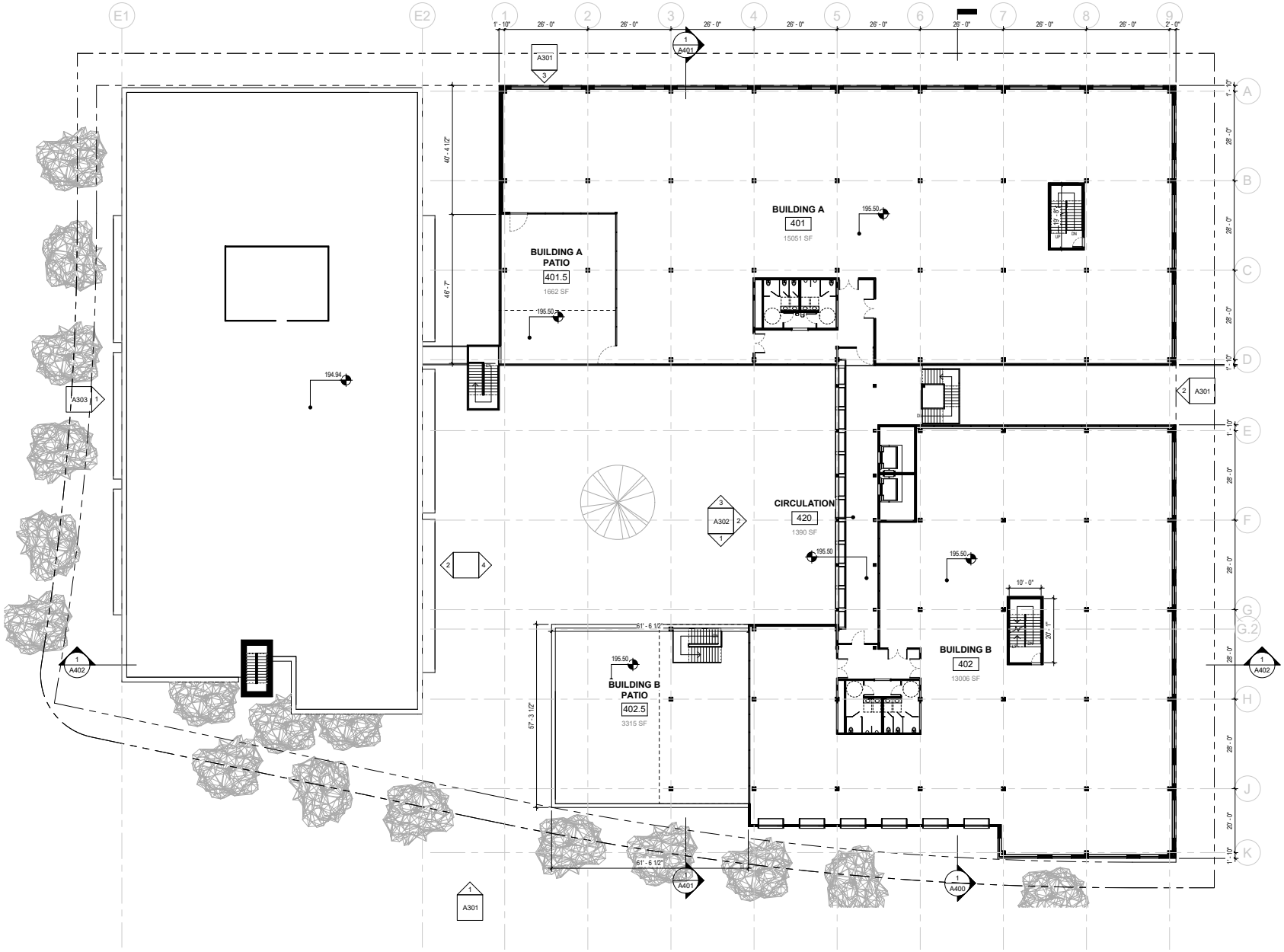

Source: Belzberg Architects, August 2019.

Figure II-12
Fourth Floor Plan

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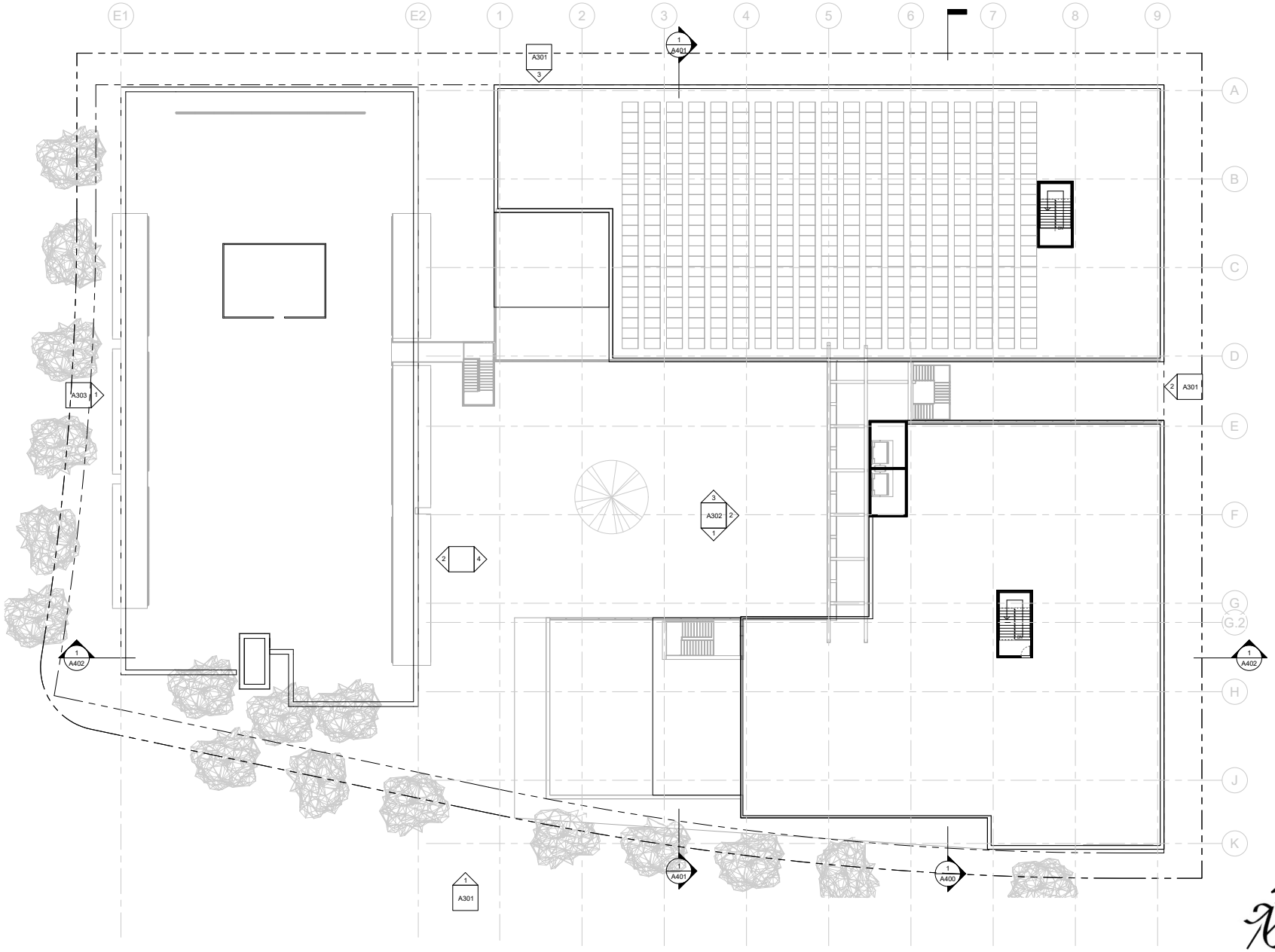

Source: Belzberg Architects, August 2019.

Figure II-13
Roof Plan

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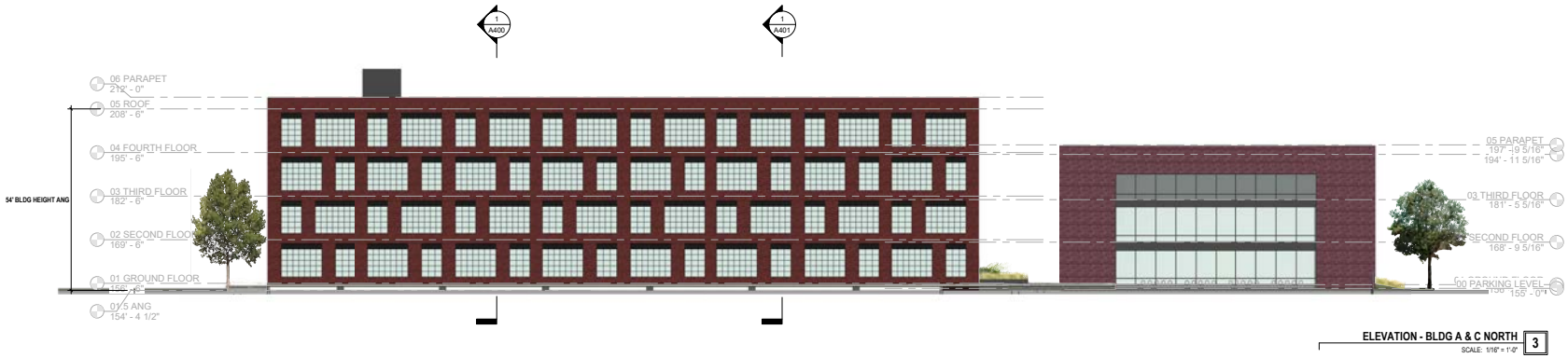

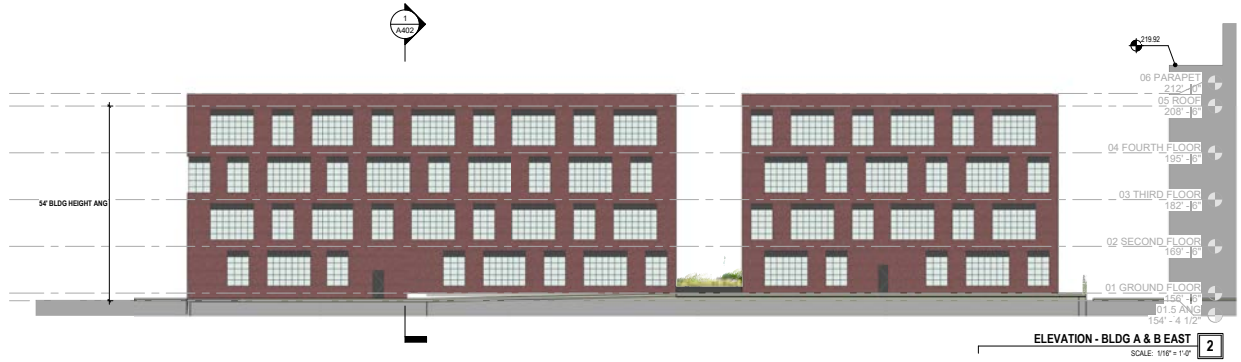

Source: Belzberg Architects, August 2019.

Figure II-14
Exterior Elevations A

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Source: Belzberg Architects, August 2019.

Figure II-15
Exterior Elevations B

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Source: Belzberg Architects, August 2019.

Figure II-16
Exterior Elevations C

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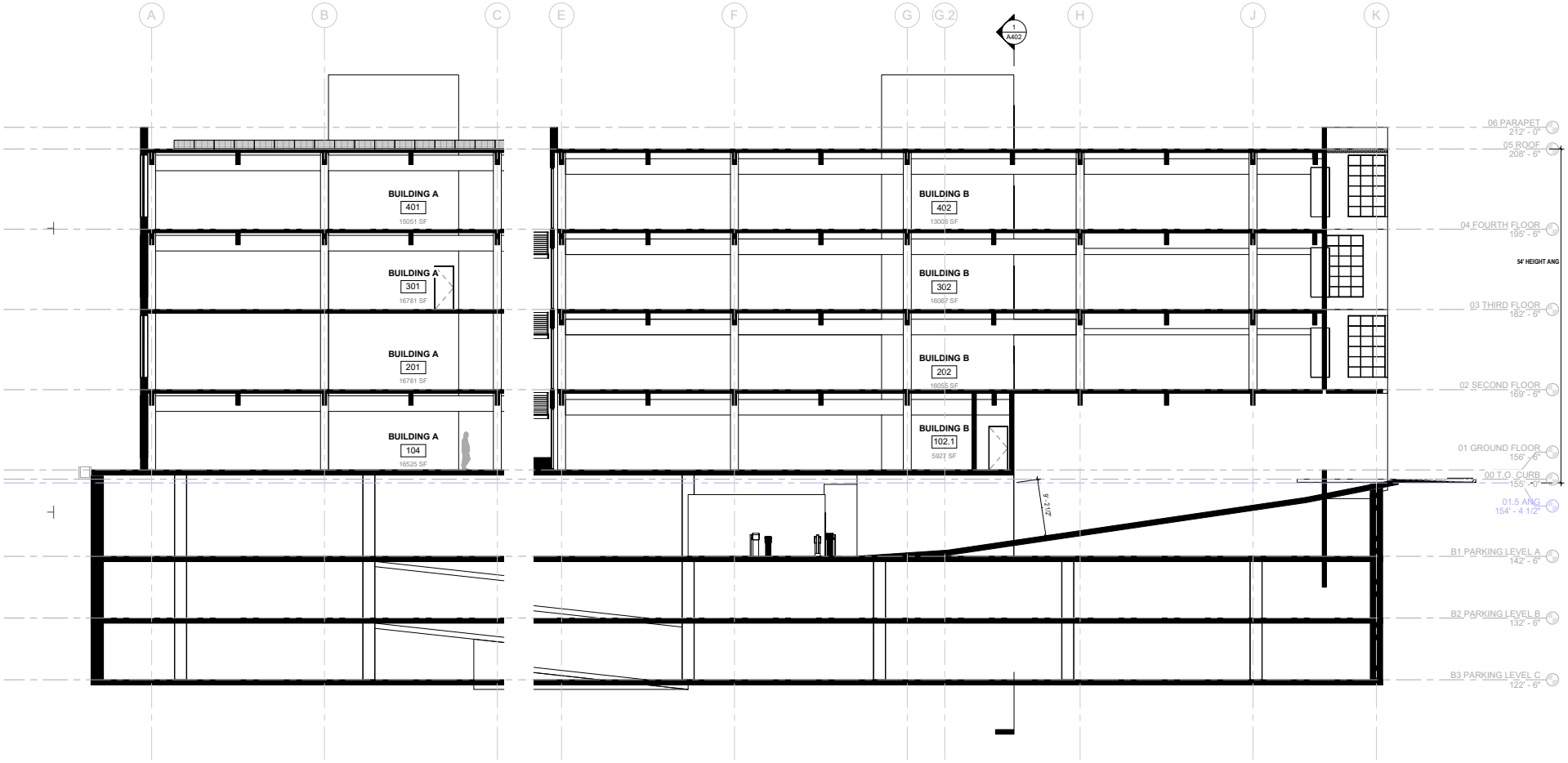

Source: Belzberg Architects, August 2019.

Figure II-17
Building Sections A

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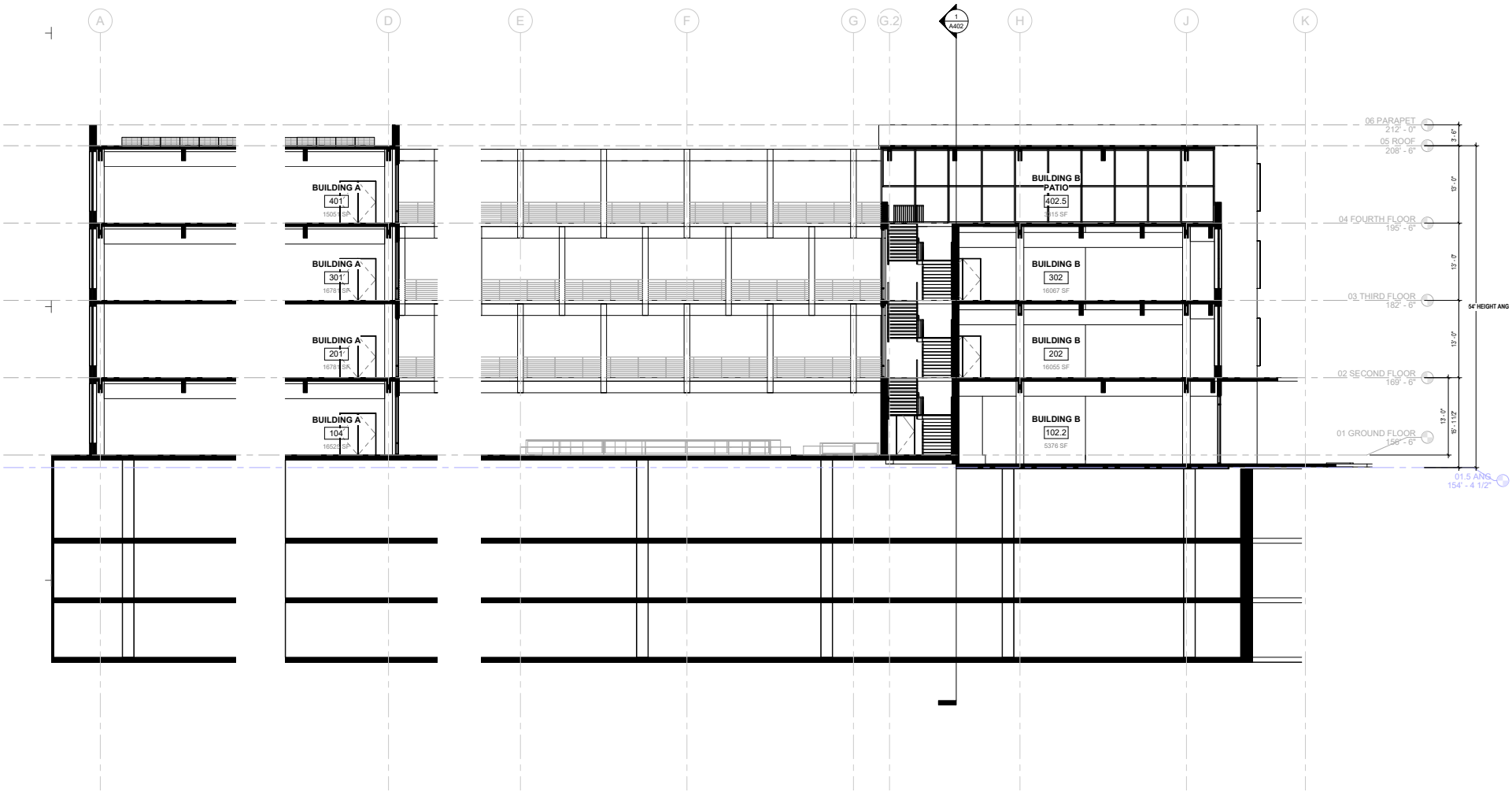

Source: Belzberg Architects, August 2019.

Figure II-18
Building Sections B

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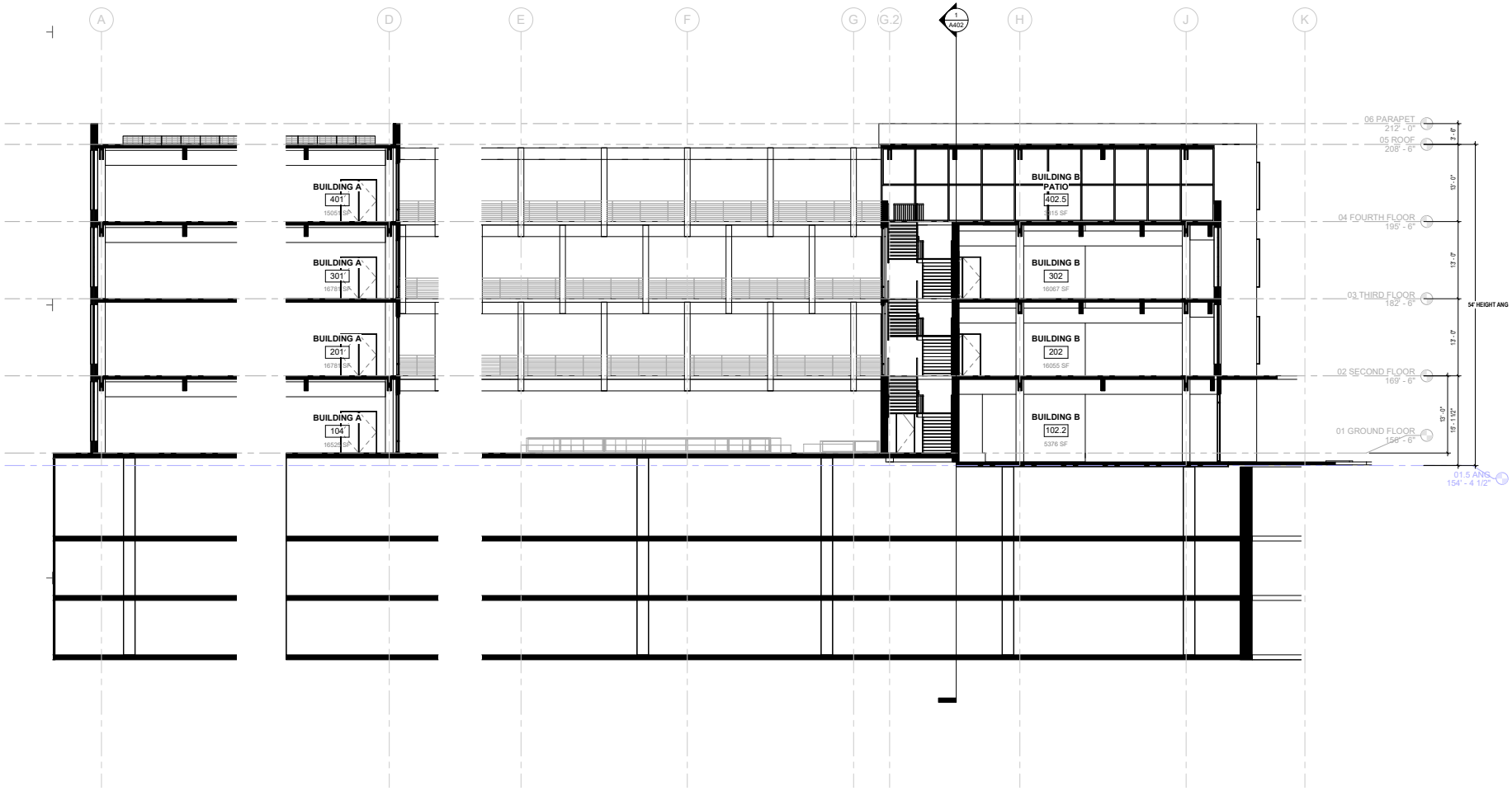

Source: Belzberg Architects, August 2019.

Figure II-19
Building Sections C

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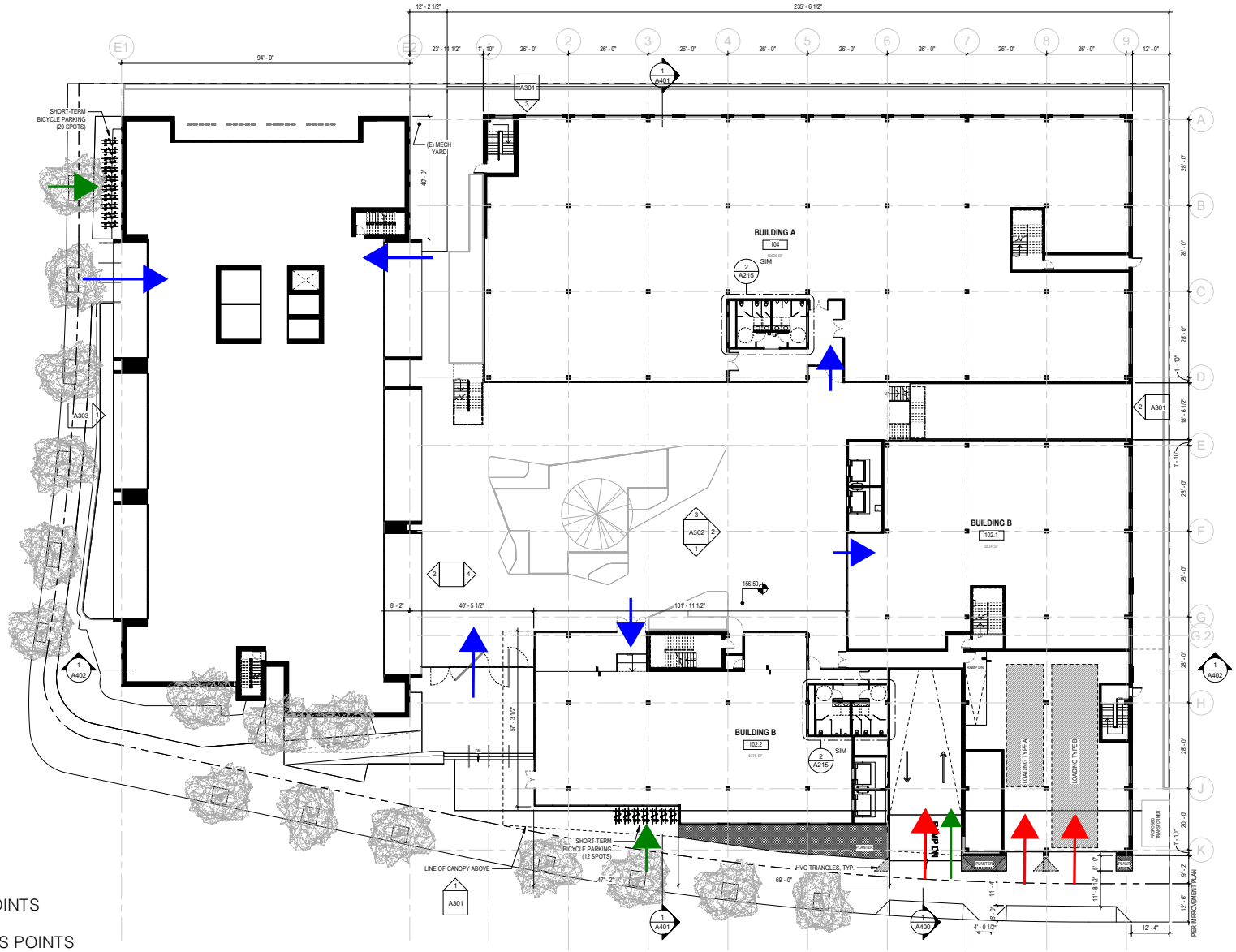

Source: Belzberg Architects, August 2019.

Figure II-20
Vehicle, Bicycle and Pedestrian Access

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Source: Belzberg Architects, August 2019.

Figure II-21
Photo Montage A

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Source: Belzberg Architects, August 2019.

Figure II-22
Photo Montage B

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Source: Belzberg Architects, August 2019.

Figure II-23
Photo Montage C

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Source: Belzberg Architects, August 2019.

Figure II-24
Photo Montage D

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26TH/ PENNSYLVANIA VANTAGE (LOOKING NORTHEAST)

Source: Belzberg Architects, August 2019.

Figure II-25
Rendering A, 26th Street at Pennsylvania Avenue (Building B, Looking North)

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Source: Belzberg Architects, August 2019.

Figure II-26
Rendering B, Pennsylvania Avenue (Building B, Looking North)

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PENNSYLVANIA AVENUE VANTAGE

Source: Belzberg Architects, August 2019.

Figure II-27
Rendering C, Pennsylvania Avenue (Buildings B and A, Looking Northwest)

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OPEN SPACE COURTYARD, SOUTH VIEW

Source: Belzberg Architects, August 2019.

Figure II-28
Rendering D, Open Space Courtyard (South View)

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III. ENVIRONMENTAL SETTING

1. INTRODUCTION

This section provides a brief overview of the project site's regional and local setting. Additional descriptions of the environmental setting as it relates to each of the environmental issues analyzed in this EIR are included in the environmental setting discussions contained within Sections IV.A through IV.M. A list of cumulative projects, which is used as the basis for the discussion of cumulative impacts in Section IV (Environmental Impact Analysis), is also provided below.

2. BASELINE EXISTING CONDITIONS

According to CEQA Guidelines Section 15125, an EIR must include a description of the existing physical environmental conditions in the vicinity of the proposed project to provide the "baseline condition" against which project-related impacts are compared. Normally, the baseline condition is the physical condition that exists when the Notice of Preparation (NOP) is published or when environmental analysis begins. The NOP for the proposed project was published on May 6, 2020 ~~January 16, 2017~~.

However, the CEQA Guidelines and the Courts have recognized that the date for establishing an environmental baseline cannot be rigid. The California Supreme Court determined that "[n]either CEQA nor the CEQA Guidelines mandate a uniform, inflexible rule for determination of the existing conditions baseline. Rather, an agency enjoys the discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence." (Communities for a Better Environment v. South Coast Air Quality Management Dist. (2010) 48 Cal.4th 310, 320). The Supreme Court further stated that "Environmental conditions may vary from year to year and in some cases it is necessary to consider conditions over a range of time periods. In some circumstances, peak impacts or recurring periods of resource scarcity may be as important environmentally as average conditions. Where environmental conditions are expected to change quickly during the period of environmental review for reasons other than the proposed project, project effects might reasonably be compared to predicted conditions at the expected date of approval, rather than to conditions at the time analysis is begun." (Communities for a Better Environment, supra, 48 Cal.4th at p. 328.)

The NOP year for existing conditions (2020) is generally used as the baseline environmental setting for analyzing most of the project's impact areas in this EIR.

3. OVERVIEW OF EXISTING CONDITIONS

A. Regional Setting

The project site is located in the City of Santa Monica, in western Los Angeles County, within the greater Los Angeles metropolitan area (refer to Figure II-1, Regional Location and Project Vicinity Map in Section II, Project Description). Santa Monica is approximately 15~~10~~ miles west of downtown Los Angeles. The City is bound to the north, east, and south by communities within the City of Los Angeles and to the west by the Pacific Ocean. The Mediterranean climate of the region and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months.

B. Project Site Setting

The 87,651 square foot (approximately 2.01 acre) project site is located in the City of Santa Monica, in the western portion of Los Angeles County. The City of Santa Monica is a fully urbanized community and is bounded by the City of Los Angeles on the north, south and east with the Pacific Ocean on the west. Figure II-1, in Section II. Project Description illustrates the location of the project site in its regional context.

The project site is located at 1633 26th Street, in the Bergamot Area Plan's Bergamot Transit Village, an urbanized, mainly commercial/office area. The project site is located on the block bounded by 26th Street to the south and southwest, Colorado Avenue to the north and northwest, Stewart Street to the north and northeast, and Pennsylvania Avenue to the east and southeast. The project site is situated on the east side of 26th Street between Pennsylvania Avenue and Colorado Avenue. The project site is currently developed with a 3-story, brick-faced office building totaling approximately 45,529 square feet, constructed in 1972. The building houses a variety of creative office and office tenants. The project site also includes a surface parking lot serving the office building with 161 (157 standard and 4 handicap)~~152~~ parking spaces.

The project area is predominantly characterized by a mix of commercial/office buildings that range in height from low to mid rise (2- and 6-stories). Immediately north of the project site is a 6-story office building (on 26th Street at Colorado Avenue) and northeast, a 2-story office building (Penn Station on Stewart Street at Pennsylvania Avenue). Across Pennsylvania Avenue to the northeast is Santa Monica College's Center for Media & Design campus (including KCRW) that includes buildings ranging in height of 2- to 5-stories (including parking structure). Immediately west of the project site on Pennsylvania Avenue are two office buildings, both 2-stories. Located across 26th Street from the project site is the Water Garden office complex consisting of a cluster of 8 buildings rising 6-stories in height.

In addition, there single to 2-story residential uses located along the west side of Colorado between 26th Street and Stewart Street and a single story pre-school (Evergreen Community School) located on the project block, west side of Colorado, south of Stewart Street. Figure II-1 in Section II, Project Description, illustrates the location of the project site in its regional context and shows the immediate project vicinity. Figures III-1 through III-10 depict views of the project site and surrounding uses and are found at the end of this section.

C. Circulation/Transportation Setting

The project site is regionally accessible from Interstate-10 (I-10, or Santa Monica Freeway) via Cloverfield Boulevard and 20th Street. The Santa Monica Freeway is located approximately 0.37 miles south of the project site. The project site is situated between two major boulevards as defined by the Land Use and Circulation Element (LUCE): Colorado Avenue and Olympic Boulevard.

The project site is within walking distance (0.15 mile south) of 26th/Bergamot Metro Line E Light Rail Station. The Metro Line E Light Rail provides light-rail passenger service between downtown Los Angeles and Santa Monica with headways of approximately 12 minutes in the peak hours.

Additionally, the project site is served by a number of Big Blue Bus (BBB) lines including, route 5 (Olympic Blvd – Century City), 16 (Marina del Rey–Wilshire Blvd/Bundy Dr.) and 43 (San Vicente Blvd 0 26th St–SMC). The closest bus stop is approximately 2 blocks (0.15 mile) south at 26th Street/Olympic Boulevard. This bus stop serves BBB routes 5 and 16

The streets adjacent to the project site that form the project block are described as follows:

- Pennsylvania Avenue is a short two-lane (one vehicle lane in each direction) east-west roadway that runs between 26th Street and Stewart Street. It is classified as an Avenue: Industrial. Pennsylvania Avenue currently has a 6 foot wide sidewalk on the north side of the street adjacent to the project site. There is also an 18 foot wide sidewalk on the south side of the street fronting Santa Monica College. Neither side of Pennsylvania Avenue has a continuous sidewalk that extends over the entire block.

- 26th Street is a north-south roadway that runs between the project area and the Brentwood neighborhood in Los Angeles. South of Colorado Avenue one to two lanes are provided in each direction and parking is not permitted. North of Colorado Avenue 26th Street provides one lane in each direction and, north of Broadway, parking is allowed. To the South, 26th Street at Olympic Boulevard provides access to 26th Street/Bergamot Station on the Metro E Line. It is classified as an Avenue: Major south of Broadway and as an Avenue: Secondary south of Broadway and is

signed as a bicycle route. Sidewalks are generally present along both sides of the street and are approximately 8 foot wide.

- Colorado Avenue is an east-west roadway that provides surface street access to Downtown Santa Monica and connects with nearby Los Angeles neighborhoods such as West LA and Sawtelle. In Los Angeles, Colorado Avenue continues as Idaho Avenue. West of 26th Street Colorado Avenue provides two travel lanes in each direction with left-turn lanes at intersections and parking generally allowed. East of 26th Street the roadway narrows to a one lane in each direction with raised planted medians. Sidewalks are present along both sides of the street and are approximately 6 feet wide.

- Stewart Street is a four-lane north-south roadway located east of the site between Colorado Avenue and Pico Boulevard. Stewart Street also provides access to Santa Monica College and crosses the Metro E Line at Olympic Boulevard. Sidewalks are present on both sides of the street and are approximately 6 to 8 feet wide

4. CUMULATIVE PROJECTS

CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual actions that, when considered together, are considerable or which compound or increase other environmental impacts". "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 the effects of probable future projects (as defined by Section 15130). Section 15355 defines cumulative impacts as "two or more individual actions that, when considered together, are considerable or which compound or increase other environmental impacts." For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

For the purposes of this EIR, the potential cumulative effects of the proposed project are based upon a list of recently completed, approved, under construction, and pending projects identified by the City and neighboring jurisdictions, as well as reasonably foreseeable development as anticipated in the LUCE through 2025, depending upon the specific impact being analyzed. The EIR conservatively assumes that all approved and pending projects will be completed and operational. Accordingly, the cumulative analysis provides a highly conservative estimate of future conditions since it includes both elements listed in CEQA Guidelines Section 15130(b) for the purposes of developing the forecast.

Table III-1, Cumulative Projects List, provides a list of recently completed, approved, under construction, and pending development projects included in the City's Travel Demand Forecasting Model (TDFM). These projects are considered in the cumulative analysis in Section IV. Environmental Impact Analysis.

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
1.	Conversion of residential to office, retail	1305 2nd St	residential	-48	DU	Under construction
			office	25.292	KSF	Under construction
2.	Conversion of Shore hotel conference space to restaurant	1530 2nd St	restaurant	3	KSF	Under construction
11.	8-Unit Condominium	1444 11th St	residential	2	DU	Under construction

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
12.	5-Unit Condos	1518 11th St	residential	5	DU	Under construction
13.	5-Unit Condos	1533 11th St	residential	2	DU	Under construction
16.	Residential (5 condos/1 low income)	1807 17th St	residential	4	DU	Under construction
17.	3-Unit Condos	1136 18th St	residential	1	DU	Final
18.	Residential	1433 18th St	residential	5	DU	Final
19.	3-Unit Condos	1927 18th St	residential	2	DU	Under construction
20.	Medical Office addition	1419 19th St	medical office	5.3	DU	Under construction
21.	3-Unit Condos	1927 19th St	residential	0	DU	Under construction
			creative office	1.8	KSF	Final
22.	Auto Shop addition	1718 20th St	autobody shop	0.443	KSF	Under construction
26.	500 Broadway DA (Fred Segal) Site	500 Broadway	residential	249	DU	Under construction
			affordable housing	60	DU	Under construction
			retail	22.997	KSF	Under construction
27.	4-Unit residential	3004 Broadway	residential	4	DU	Under construction
28.	3-Unit Condos	1329 California Ave	residential	3	DU	Under construction
29.	Adaptive Reuse of Sears	302 Colorado Ave	retail	7.365	KSF	Under construction
30.	Village Trailer Park - mixed use	2930 Colorado Ave	residential	324	DU	Under construction
			affordable housing	-70	DU	Under construction
			retail	24.94	KSF	Under construction
			creative office	4.2	KSF	Under construction
32.	1550 Euclid Mixed Use retail/office	1550 Euclid St	office	33.946	KSF	Under construction
			restaurant	4.13	KSF	Under construction
33.	6-Unit Condos	3214 Highland	residential	-2	DU	Final
34.	Mixed Use DA (Denny's site)	1560 Lincoln Blvd	residential	80	DU	Under construction

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
			affordable housing	20	DU	Under construction
			retail/restaurant	9.402	KSF	Under construction
35.	Mixed Use DA (Norm's site)	1601 Lincoln Blvd	residential	72	DU	Under construction
			affordable housing	18	DU	Under construction
			retail/restaurant	6.448	KSF	Under construction
36.	Mixed Use DRP (Wertz Bros & Joanns Fabric site)	1613-1637 Lincoln Blvd	residential	184	DU	Under construction
			affordable housing	9	DU	Under construction
			retail	-8.784	KSF	Under construction
37.	Mixed Use DRP (Aarons brothers)	1641-1645 Lincoln Blvd	residential	68	DU	Under construction
			affordable housing	10	DU	Under construction
			retail	-0.11	KSF	Under construction
38.	2919 Lincoln/802 Ashland	2919 Lincoln Blvd	residential	10	DU	Under construction
39.	City Services Building	1685 Main St	government office	45	KSF	Under construction
40.	3-Unit Condos	723 Pier Ave	residential	1	DU	Under construction
41.	Residential	1112-1122 Pico Blvd	residential	28	DU	Under construction
			affordable housing	4	DU	Under construction
	Office	3205 Pico Blvd	office	4.81	KSF	Under construction
42.	Mixed Use	3008 Santa Monica Blvd	residential	22	DU	Under construction
			affordable housing	4	DU	Under construction
			retail	-0.504	KSF	Under construction
43.	Conversion of retail to restaurant	214 Wilshire Blvd	retail	-7.986	KSF	Final
			restaurant	7.986	KSF	Final
44.	City of LA	1414 Main Street	Residential, Retail	26	DU	Under construction
45.	City of LA	811 Ocean Front Walk	Residential, Restaurant	2.7	KSF	Under construction

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
46.	City of LA	12431 Rochester Ave	Residential	50	DU	Under construction
47.	City of LA	12414 W Exposition Blvd	Office	70.844	KSF	Under construction
48.	City of LA	1449 Wellesley Ave	Hotel	88	ROOMS	Under construction
49.	Commercial addition	1201 3rd St	retail	3.154	KSF	Under construction
50.	Commercial addition	1437 3rd St	retail	6	KSF	Approved
51.	SM Post Office Adaptive Reuse	1248 5th St	creative office	46.82	KSF	Approved
52.	Mixed Use DA	1415-1423 5th St	residential	50	DU	Approved
			affordable housing	14	DU	Approved
			retail	-5.304	KSF	Approved
53.	100% affordable housing	1437 5th St	affordable housing	43	DU	Approved
			retail/restaurant	-6.499	KSF	Approved
54.	3-Unit Condos	2102 5th St	residential	1	DU	Approved
55.	2-Unit Condo	2215 5th St	residential	1	DU	Approved
56.	Mixed Use DA	1313-1325 6th St	residential	56	DU	Approved
			affordable housing	5	DU	Approved
			retail	4.86	KSF	Approved
57.	3-Unit Condos	2512 7th St	residential	3	DU	Approved
58.	15-Unit Condominium (Turtle Villas)	1211 12th St	residential	13	DU	Approved
59.	5-Unit Condos	1244 14th St	residential	4	DU	Approved
60.	6-Unit Condos	1434 14th St	residential	5	DU	Approved
61.	3-Unit Condos	817 16th St	residential	1	DU	Approved
62.	100% Affordable Housing	1820-1826 14th St	residential	39	DU	Approved
63.			office	-5.3	KSF	Approved
64.	5-Unit Condos	1949 17th St	residential	5	DU	Approved
65.	5-Unit Condos	1840 17th St	residential	4	DU	Approved
66.	Condos	1443 18th St	residential	10	DU	Approved
67.	3-Unit Condos	1420 20th St	residential	-2	DU	Approved
68.	3-Unit Condos	1422 20th St	residential	-2	DU	Approved
69.	3-Unit Condos	1900 20th St	residential	3	DU	Approved

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
70.	3-Unit Condos	1035 21st St	residential	2	DU	Approved
71.	3-Unit Condos	1121 22nd St	residential	2	DU	Approved
72.	2-Unit Condo	1216 Arizona Ave	residential	1	DU	Approved
73.	3-Unit Condos	212 Bay St	residential	3	DU	Approved
74.	3-Unit Condos	1014 Bay St	residential	2	DU	Approved
75.	100% affordable housing	1342 Berkeley	affordable housing	8	DU	Approved
76.	Mixed Use	2225 Broadway	residential	13	DU	Approved
77.		1452 23rd St	retail/restaurant	2.751	KSF	Approved
			office	-1.7	KSF	Approved
78.	3-Unit Condos	1649 Centinela Ave	residential	2	DU	Approved
79.	Creative office addition	2041-2043 Colorado Ave	creative office	15	KSF	Under construction
80.	Mixed Use	1450 Cloverfield	residential	31	DU	Approved
			affordable housing	3	DU	Approved
			retail	7.384	KSF	Approved
81.	Mixed Use	1707 Cloverfield	residential	58	DU	Approved
			affordable housing	5	DU	Approved
			retail	74.665	KSF	Approved
83.	Mixed Use DA	1318 Lincoln Blvd	residential	39	DU	Approved
			affordable housing	4	DU	Approved
			retail	3.437	KSF	Approved
84.	Mixed Use DA	1430-1444 Lincoln Blvd	residential	92	DU	Approved
			affordable housing	8	DU	Approved
			retail	5.878	KSF	Approved
85.	Mixed Use (Upscale furniture building)	1437-1443 Lincoln Blvd	residential	23	DU	Approved
			affordable housing	6	DU	Approved
			retail	-8.5	KSF	Approved
86.	Commercial Building addition	1447 Lincoln Blvd	retail	4	KSF	Approved
			residential	1	DU	Approved

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
87.	Mixed-Use DRP	1650-1660 Lincoln Blvd	residential	90	DU	Under construction
			affordable housing	8	DU	Under construction
			retail	-14.808	KSF	Under construction
88.	2903-2931 Lincoln Boulevard Mixed Use	2903 Lincoln Blvd	residential	43	DU	Approved
			affordable housing	4	DU	Approved
			retail	14.475	KSF	Approved
89.	423 Ocean Avenue Adaptive Reuse	423 Ocean Ave	residential	4	DU	Approved
90.	1828 Ocean Avenue	1828 Ocean Ave	residential	83	DU	Approved
91.	Conversion of retail to restaurant	1736 Ocean Front Walk	retail	-1.792	KSF	Approved
			restaurant	2.044	KSF	Approved
92.	1921 Ocean Front Walk	1921 Ocean Front Walk	residential	23	DU	Approved
			retail	1.97	KSF	Approved
93.	Mixed Use DA (bowling alley)	216-234 Pico Blvd	residential	97	DU	Approved
			affordable housing	8	DU	Approved
			retail	-13.041	KSF	Approved
94.	Office	2929 Pico Blvd	office	12.066	KSF	Approved
			retail	6.284	KSF	Approved
			auto service	-1.224	KSF	Approved
95.	2-Unit Condo	1514 Princeton	residential	2	DU	Approved
96.	Auto Dealership	1802 Santa Monica Blvd	residential	-18	DU	Approved
			retail	1.39	KSF	Approved
			auto dealership	15.1	KSF	Approved
97.	Mixed Use	2822 Santa Monica Blvd	residential	46	DU	Approved
			affordable housing	4	DU	Approved
			retail	-3.405	KSF	Approved
98.	Mixed Use Apartment (addressed as	2901 Santa Monica Blvd	residential	49	DU	Approved

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
	1349/1347 Yale St)					
			affordable housing	3	DU	Approved
			retail	1.3	KSF	Approved
99.	Mixed Use	1618 Stanford	residential	43	DU	Approved
			affordable housing	4	DU	Approved
			office	-11.055	KSF	Approved
			retail/restaurant	15.987	KSF	Approved
100.	3-Unit Condos	122 Strand St	residential	-1	DU	Approved
101.	Mixed Use DRP	601-611 Wilshire Blvd	residential	37	DU	Approved
			affordable housing	3	DU	Approved
			retail	-1.779	KSF	Approved
102.	Retail	2919 Wilshire Blvd	retail	9.799	KSF	Approved
103.	3-Unit Condos	2219 Virginia Ave	residential	2	DU	Approved
104.	Airport Park Expansion	3201 Airport Avenue	park	12	acre	Approved
105.	Cadillac Mixed Use Development (City of Los Angeles)	12101 West Olympic Blvd	residential	516	DU	Approved
			creative office	200	KSF	Approved
			retail	67	KSF	Approved
106.	Residential, Restaurant (City of Los Angeles)	825 Hampton Drive	Residential, Restaurant	6.5	KSF	Approved
107.	Supportive Housing (City of Los Angeles)	100 Sunset Avenue	Supportive Housing	154	BEDS	Approved
108.	4th/Arizona - Plaza at Santa Monica Project	1301 4th St	affordable housing	48	DU	Pending
			office	209	KSF	Pending
			retail	21.03	KSF	Pending
			hotel	117	KSF	Pending
			museum	12	KSF	Pending
109.	Mixed Use	1235 5th St	residential	18	DU	Approved
			affordable housing	5	DU	Approved
			retail	1.873	KSF	Approved

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
110.	SRO Project with Commercial	1323 5th St	residential	32	DU	Pending
			affordable housing	2	DU	Pending
			retail	3.341	KSF	Pending
111.	SRO Project with Commercial	1338-1342 5th St	residential	69	DU	Pending
			affordable housing	0	DU	Pending
			retail	7.025	KSF	Pending
112.	Mixed Use	1425-1427 5th St	residential	92	DU	Approved
			affordable housing	0	DU	Approved
			retail	-1.188	KSF	Approved
113.	100% SRO Mixed Use with commercial	1437 6th St	residential	40	DU	Pending
			retail/restaurant	1.6	KSF	Pending
114.	100% Affordable Housing with commercial	1238 7th St	affordable housing	37	DU	Pending
			retail	1.444	KSF	Pending
			office	-1.976	KSF	Pending
115.	Mixed Use	1437 7th St	residential	65	DU	Pending
			affordable housing	0	DU	Pending
			retail	-14.86	KSF	Pending
116.	Mixed Use	1543-1547 7th St	residential	100	DU	Pending
			affordable housing	0	DU	Pending
			retail	-11	KSF	Pending
117.	100% Affordable Housing with commercial	1514 7th St	affordable housing	50	DU	Pending
			retail	1	KSF	Pending
118.	SRO Project with Commercial	1557 7th St	residential	32	DU	Pending
			retail		KSF	Pending
119.	Mixed Use	711 Colorado Ave	affordable housing	56	DU	Pending
			retail	2.8	KSF	Pending
			office	-3.9	KSF	Pending
120.	100% Affordable senior housing	1445-1453 10th St	affordable housing	37	DU	Pending

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
130.	1242 20th St Wellness Center	1242 20th St	R&D	65	KSF	Pending
		1925 Arizona Ave	medical office	16.5	KSF	Pending
			ancillary meeting	14	KSF	Pending
121.	21-Unit Condominium/2020 Virginia	2002 21st St	residential	2	DU	Approved
			affordable housing	2	DU	Approved
122.	3-Unit Condos	1665 Appian Way	residential	-1	DU	Pending
123.	Mixed Use DA (63 hotel rooms)	603 Arizona Ave	hotel	27.5	KSF	Pending
			restaurant	-3.64	KSF	Pending
124.	Mixed Use (Performance Bicycles)	501 Broadway	residential	94	DU	Pending
			affordable housing	0	DU	Pending
			retail	-3.58	KSF	Pending
125.	Wyndam Hotel (211 rooms)	120 Colorado Ave	residential	25	DU	Pending
			hotel	104190.647	KSF	Pending
			affordable housing	3	DU	Pending
			meeting space	5.47	KSF	Pending
			retail/restaurant	17.244	KSF	Pending
126.	Mixed Use	525 Colorado Ave	residential	32	DU	Pending
			affordable housing	8	DU	Pending
			retail	1.919	KSF	Pending
127.	Mixed Use	1431 Colorado Ave	residential	42	DU	Pending
			affordable housing	8	DU	Pending
			retail	-6.556	KSF	Pending
128.	Mixed Use (Fritto misto)	601-609 Colorado Ave	residential	140	DU	Pending
			affordable housing	0	DU	Pending
			retail	5	KSF	Pending
129.	Affordable Housing	711 Colorado Ave	residential	56	DU	Pending
			retail	2	KSF	Pending

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
130.	Creative office	1645 Euclid St	creative office	23	KSF	Pending
131.	Mixed Use	1427 Lincoln Blvd	residential	15	DU	Pending
			retail	-3.746	KSF	Pending
132.	100% Affordable Housing	2120 Lincoln Blvd	affordable housing	37	DU	Approved
			retail	0.5	KSF	Approved
			gas station	0.5	KSF	Approved
133.	Commercial building	3280 Lincoln Blvd	retail	4	KSF	Pending
				0		Pending
134.	Retail	2740-2750 Main St	retail	4.8	KSF	Approved
135.	Mixed Use DRP	3030 Nebraska Ave	residential	164	DU	Approved
			affordable housing	13	DU	Approved
			creative office	66.1	KSF	Approved
136.	Miramar Hotel Revitilization Plan DA	1133 Ocean Ave	residential	120	DU	Pending
137.		1127/1129 2nd St	affordable housing	40	DU	Pending
			hotel	35.056	KSF	Pending
			retail/spa	16.69	KSF	Pending
			restaurant	8.704	KSF	Pending
			meeting space	-7.125	KSF	Pending
138.	3-Unit Condos	436 Pier Ave	residential	2	DU	Pending
139.	Hotel/Mixed Use DA (Ocean Avenue)	101-129 Santa Monica Blvd 1327-1333-1337 Ocean Ave	residential	100	DU	Pending
			affordable housing	5	DU	Pending
			hotel	165	KSF	Pending
			museum/retail	71	ksf	Pending
140.	St Johns Campus Master Plan Phase II	2121 Santa Monica Blvd	hospital and health care	339	KSF	Pending
			medical research	59	KSF	Pending
			health wellness center	41	KSF	Pending
			education/conference center	55	KSF	Pending

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
			child & family development center	25.5	KSF	Pending
			health related services	17	KSF	Pending
			day care	9	KSF	Pending
			restaurants	10	KSF	Pending
			neighborhood commercial	5	KSF	Pending
			visitor housing	40	DU	Pending
			multifamily replacement housing	10	DU	Pending
141.	Mixed Use	2906-2918 Santa Monica Blvd	residential	40	DU	Pending
			affordable housing	4	DU	Pending
			restaurant	11.002	KSF	Pending
142.	SRO Project with Commercial	2729 Wilshire Blvd	residential	9	DU	Pending
			retail	-2.4	KSF	Pending
143.	Mixed Use	3223 Wilshire Blvd	residential	49	DU	Approved
			affordable housing	4	DU	Approved
			retail/restaurant	-6.169	KSF	Approved
144.	Addition to Rapp Saloon Hostel	1436 2nd St	hostel	37	rooms	Pending
145.	New commercial building	1408 3rd St Promenade	retail	20.625	KSF	Pending
146.	Studios/office	1448 7th St	retail		KSF	Pending
			office	14.26	KSF	Pending
			residential	8	DU	Pending
147.	3-Unit Condos	949 10th St	residential	3	DU	Pending
148.	Office	1348 10th St	office		KSF	Pending
149.	Affordable Housing	1834 14th St	residential	55	DU	Approved
			retail	3.5	KSF	Approved
150.	remodel to 5 of 6 live/work condo	1643 12th St	residential		DU	Pending
151.	3 unit Condos	930 15th St	residential	2	DU	Approved
152.	Condos	1432 17th St	residential	6	DU	Approved
153.	3 Unit Condo	1527 17th St	residential	3	DU	Pending
154.	Mixed Use Creative Office	1820 Broadway	Office		KSF	Pending

Table III-1
Cumulative Projects List

No.	Project	Address	Use	Net New Size	Units	Status
155.	3-Unit Condos	1802 Delaware Ave	residential	-2	DU	Approved
156.	Mixed use	1512 Euclid St	office	1.6	KSF	Pending
157.	Creative office	1643-1645 Euclid St	residential	10	du	Pending
			creative office	23	KSF	Pending
158.	Creative office	1650 Euclid St	creative office	39.38	KSF	Pending
159.	Apartments	1541 Franklin St	residential	5	DU	Under construction
160.	Shore Hotel additional rooms	1515 Ocean Ave	hotel	14	DU	Pending
161.	Mixed Use AA	825 Santa Monica Blvd	retail	4.044	KSF	Pending
			residential	48	DU	Pending

This list of cumulative projects, which reflects known projects and information at the time of the project's NOP, includes completed, approved, and pending projects.

Approved = Project has been approved by the City but has not yet began construction.
Pending = Project is pending approvals by the City.
Under construction = Project has obtained building permits and is under construction.

Source:
City of Santa Monica and Fehr & Peers, August 2020

View 1: View of front side of existing building looking southeast from 26th Street.

View 2: View of front side of existing building looking northwest from 26th Street.

View 3: View of rear side of existing building and surface parking lot looking west from Pennsylvania Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-1
Project Site
Views 1, 2, and 3

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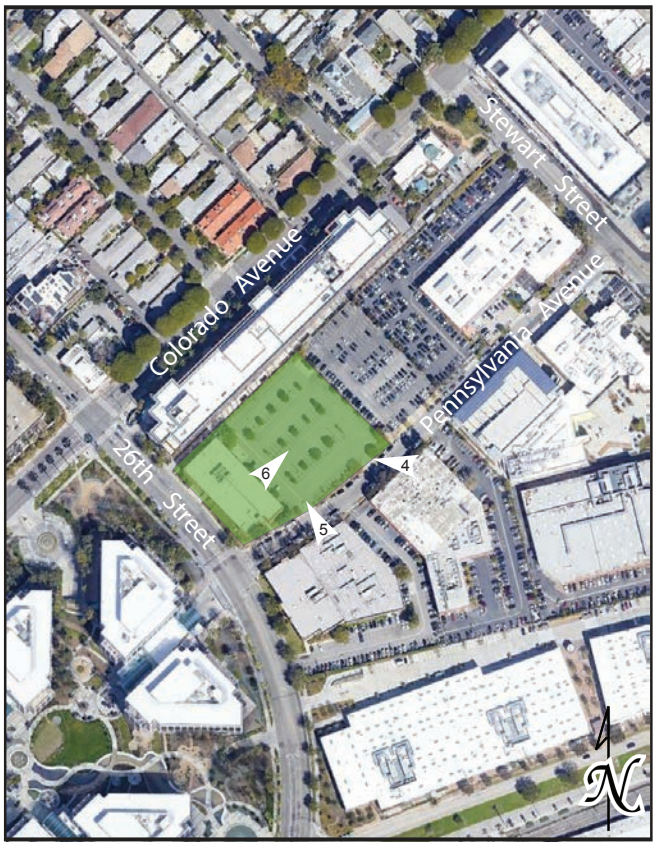
View 4: View of rear side of existing building looking west from Pennsylvania Avenue.

View 5: View of rear side of existing building looking north from Pennsylvania Avenue.

View 6: View of the surface parking lot looking east.



PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-2
Project Site
Views 4, 5, and 6

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View 1: View of parking lot east of the Project Site looking north from Pennsylvania Avenue.

View 2: View of the southern elevation of a 2-story office building (Penn Station, 1650 Stewart Street) east of the Project Site looking north from Pennsylvania Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-3
Surrounding Uses
Views 1 and 2

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View 3: View of the northern elevation of a 1- to 2-story office building (Leaf Group, 1655 26th Street) south of Project Site looking south from Pennsylvania Avenue.

View 4: View of the northern elevation of a 2-story office building (2700 Pennsylvania Avenue) southeast of Project Site looking southwest from Pennsylvania Avenue.

View 5: View of Santa Monica College, Center for Media and Design campus, the northern elevation of a 2-story building and multi-story parking structure southeast of Project Site looking southwest from Pennsylvania Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-4
Surrounding Uses
Views 3, 4, and 5

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View 6: View of the eastern elevation of a 2-story office building (Penn Station, 1650 Stewart Street) east of the Project Site looking west from Stewart Street.

View 7: View of the western elevation of a 4-story office building (Starz, Lionsgate, 1647 Stewart Street) east of the Project Site looking east from Stewart Street.

View 8: View of the western elevation of a 4-story office building (2834 Colorado Avenue) east of the Project Site looking north from Stewart Street.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-5
Surrounding Uses
Views 6, 7, and 8

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View 9: View of the northern elevation of a single story preschool (Evergreen Community School, 2800 Colorado Avenue) northeast of the Project Site looking south from Colorado Avenue.

View 10: View of the northern elevation of a garden patio restaurant and single story market (2700 Colorado Avenue) northeast of the Project Site looking south from Colorado Avenue.

View 11: View of the northern elevation of a 5-story office building (Lionsgate, 2700 Colorado Avenue) north/northeast of the Project Site looking south/southwest from Colorado Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-6
Surrounding Uses
Views 9, 10, and 11

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View 12: View of the southern elevation of a single story residential uses north of the Project Site looking west from Colorado Avenue.

View 13: View of the southern elevation of a single story and 2-story residential uses north of the Project Site looking west from Colorado Avenue.

View 14: View of the southern elevation of a 2-story residential uses north of the Project Site looking north from Colorado Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-7
Surrounding Uses
Views 12, 13, and 14

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View 15: View of the western elevation of a 4-story office building (Oracle, part of the 2700 Colorado Avenue building) north of the Project Site looking east from 26th Street.

View 16: View of the southwestern elevation of the Water Garden office building complex (group of eight office buildings, 6-stories in height, 1620 26th Street) west of the Project Site looking southwest from 26th Street at Colorado Avenue.

View 17: View of the southern/eastern elevation of a 3-story office building (Colorado Center, 2450 Broadway) northwest of the Project Site looking west from 26th Street at Colorado Avenue.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-8
Surrounding Uses
Views 15, 16, and 17

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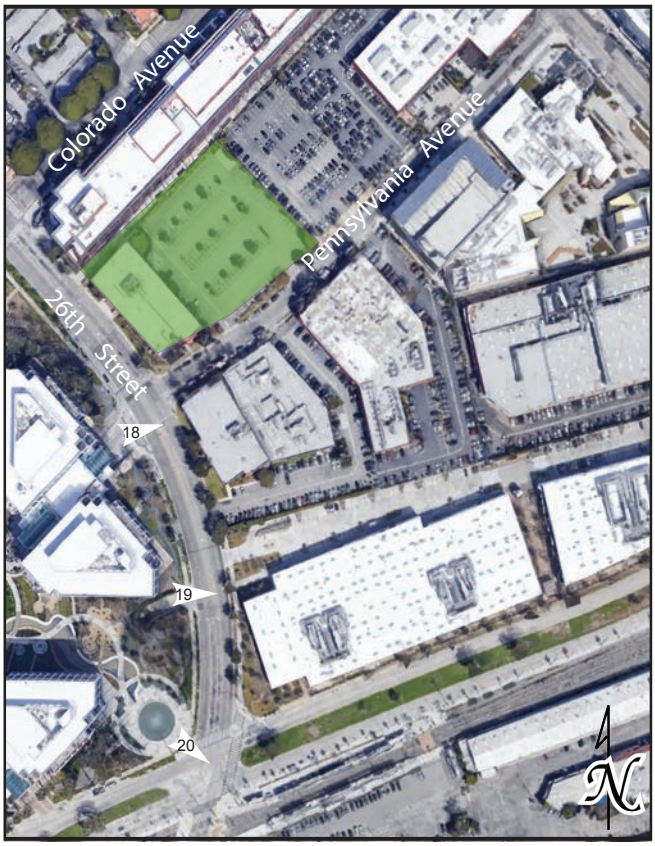
View 18: View of the western elevation of a 1- to 2-story office building (Leaf Group, 1655 26th Street) south of the Project Site looking east from 26th Street at Pennsylvania Avenue.

View 19: View of the western elevation of a 2-story office building (The Pen Factory, 2701 Olympic Boulevard Street) south of the Project Site looking southeast from 26th Street.

View 20: View of the northern elevation of the Metro Line E 26th Street/Bergamot station south of the Project Site looking south from 26th Street at Olympic Boulevard.



PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-9
Surrounding Uses
Views 18, 19, and 20

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View 21: View of uses along 26th Street looking north at Olympic Boulevard.

View 22: View of uses along Pennsylvania Avenue looking north at 26th Street.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, August 2020.

Figure III-10
Surrounding Uses
Views 21 and 22

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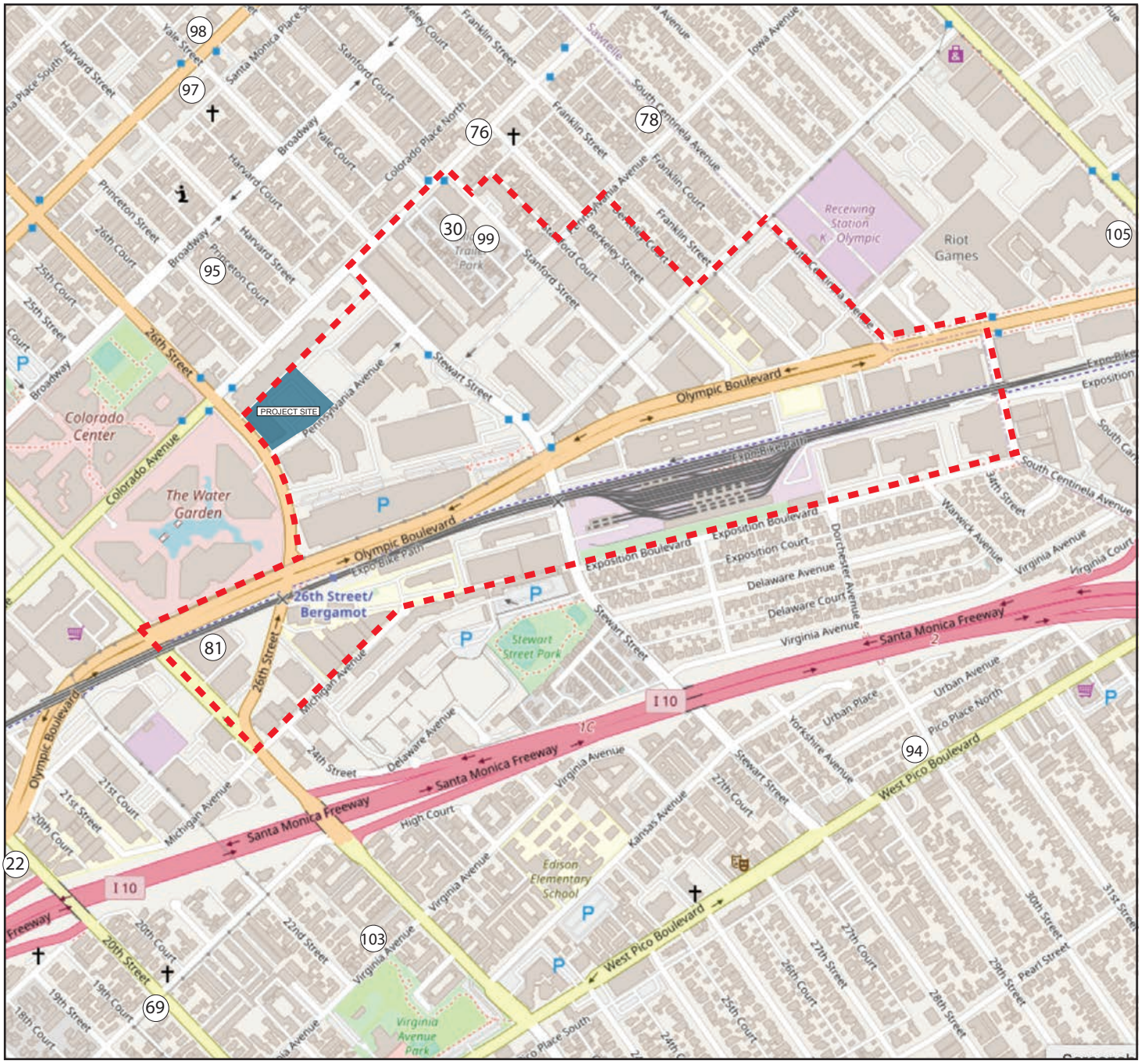

PROJECT SITE

BERGAMOT AREA PLAN

(#) CUMULATIVE PROJECT

Source: Ooen Street Maps, September 2020.

Figure III-11
Cumulative Projects Located in the Bergamot Area Plan

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IV. ENVIRONMENTAL IMPACT ANALYSIS
A. AIR QUALITY

1. INTRODUCTION

This section of the EIR assesses the existing air quality conditions in the South Coast Air Basin and evaluates the potential construction and operational air quality impacts of the proposed project. The purpose of this analysis is to identify the construction-related and operational emissions that would be generated by the proposed project and compare them with the established standards, including the thresholds of significance recommended by the South Coast Air Quality Management District (SCAQMD). Air Quality data and modeling results are included in Appendix C to this EIR.

2. ENVIRONMENTAL SETTING

A. Climate and Meteorological Setting

The City of Santa Monica is located within the South Coast Air Basin (Basin), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys below. The Basin in an approximately 6,745 square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. This Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. 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 air quality within the Basin is primarily influenced by a wide range of factors such as meteorological conditions (such as wind, sunlight, temperature, humidity, rainfall, and topography and emissions sources from population centers, heavy vehicular traffic, and industry. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of ozone, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.

B. Potential Health Effects of Air Pollutants

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples are boilers or combustion equipment that produces electricity or generates heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbecue lighter fluid and hair spray. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, agricultural equipment, race cars, and self-propelled construction equipment. Mobile sources account for the majority of the air pollutant emissions within the Basin. Air pollutants can also be generated by the natural environment such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Certain air pollutants are recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants are identified as criteria air pollutants and are regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in the prevalent

air quality. Both the federal and state governments establish ambient air quality standards for outdoor concentrations of criteria air pollutants in order to protect public health. The federal and state standards, known as the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), are set at levels at which concentrations could be generally harmful to human health and welfare, and to protect the most sensitive persons from illness or discomfort with a margin of safety.

The criteria air pollutants for which national and State standards are promulgated and which are most relevant to air quality planning and regulation in the Basin include ozone, carbon monoxide (CO), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. In addition, toxic air contaminants emissions are of concern in the Basin. Each of these is described briefly below.

Ozone (O_3) is a gas that is formed when volatile organic compounds (VOC) and nitrogen oxides (NOx) – both byproducts of internal combustion engine exhaust – undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable.

An elevated level of ozone irritates the lungs and breathing passages, causing coughing, and pain in the chest and throat thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Carbon Monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the Basin, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of moderate levels of carbon monoxide can cause nausea, dizziness, and headaches, and can be fatal at high concentrations.

Nitrogen Dioxide (NO_2) is byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NOx. NO_2 absorbs blue light and result is a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. Major sources of NOx include power plants, large industrial facilities, and motor vehicles.

Nitrogen oxides irritate the nose and throat. It increases susceptibility to respiratory infections, especially in people with asthma. The principal concern of NOx is as a precursor to the formation of ozone.

Lead occurs in the atmosphere as particulate matter. The combustion of leaded gasoline was the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles so most such combustion emissions are associated with off-road vehicles such as race cars. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters.

Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

Sulfur Dioxide (SO_2) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters.

Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of particulate appear to worsen

the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Respirable Particulate Matter (PM_{10}) and **Fine Particulate Matter** ($PM_{2.5}$) consists of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. In agricultural areas, large amount of airborne particulates are generated by plowing and other field work. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

The human body naturally prevents the entry of larger particles into the body. However, PM_{10} and even smaller $PM_{2.5}$ are trapped in the nose, throat, and upper respiratory tract. These small particulates enter the body and could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulate could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Toxic Air Contaminants (TACs) refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code defines a TAC 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.” A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 United States Code § 7412[b]) is a toxic air contaminant.

Volatile Organic Compounds are organic compounds that can evaporate into an organic gas. VOCs can either be reactive or non-reactive. VOC emissions often result from the evaporation of solvents in architectural coatings. Reactive Organic Gases are organic gases that undergo a photochemical reaction, thus are reactive. ROG emissions are generated from the exhaust of mobile sources. Both VOC and ROGs are precursors to ozone and the terms can be used interchangeably. Health effects from high VOC exposure include irritation of the eyes and respiratory tract, headaches, dizziness, visual disorders and memory impairment.

C. Existing Regional Air Quality

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. The average daily emissions inventory for the entire Basin and the Los Angeles County portion of the Basin is summarized in Table IV.A-1, Regional Average Emissions in 2013, which is the most recent regional data available from the ARB. As shown, exhaust emissions from mobile sources generate the majority of ROG, NOx, and CO in the Basin. Area-wide sources generate the most airborne particulates (i.e., PM_{10} and $PM_{2.5}$).

Table IV.A-1
Regional Average Emissions in 2013

Emissions Source	Emissions in Tons Per Day					
	ROG	CO	NOx	SOx	PM10	PM2.5
South Coast Air Basin						
Stationary Sources	115.0	58.6	54.2	9.4	23.6	15.4
Areawide Sources	122.5	101.9	18.0	1	106.3	34.5
Mobile Sources	162.5	1492.6	284.5	6.2	31.4	17.1
Natural Sources	96.7	301.1	4.4	2.3	30.1	25.5
Total Emissions	496.6	1954.2	361.1	18.9	191.5	92.6
Los Angeles County - SCAQMD Jurisdiction						

Table IV.A-1
Regional Average Emissions in 2013

Emissions Source	Emissions in Tons Per Day					
	ROG	CO	NOx	SOx	PM10	PM2.5
Stationary Sources	72.9	43.1	43.7	8.2	24.3	13.1
Areawide Sources	75.0	47.4	11.0	0.5	63.7	19.7
Mobile Sources	95.0	900.7	198.8	5.5	19.3	10.9
Natural Sources	49.2	186.1	2.7	1.4	18.6	15.7
Total Emissions	292.2	1177.2	256.2	15.6	125.9	59.4

Source: California Air Resources Board, Emission Inventory Data, https://www.arb.ca.gov/app/emsinv/2013/emssumcat.php; accessed: August 2020.

D. Existing Local Air Quality

The SCAQMD divides the Basin into source receptor areas (SRAs) in which monitoring stations operate to monitor the various concentrations of air pollutants in the region. The City of Santa Monica is located within SRA 2, which covers the Northwest Coastal Los Angeles County area. Ambient air quality within SRA 2 is monitored at the West Los Angeles – VA Hospital (SCAQMD Station No. 91). As of data year 2019, this station monitors for O_3, CO, and NO_2. As this station does not currently monitor for SO_2, Pb, PM_{10} and $PM_{2.5}$, ambient air quality data for these pollutants is based on data from neighboring SRA 3, which covers the Southwest Coastal Los Angeles County area (SCAQMD Station No. 820), and neighboring SRA 1 which covers the Central Los Angeles area (SCAQMD Station No. 087). Table IV.A-2, Summary of Ambient Air Quality in the Project Vicinity, identifies the ambient pollutant concentrations that were measured at SCAQMD Station Nos. 091, 820, and 087 from 2017 to 2019 (2019 is the latest year of available data).

Table IV.A-2
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants Monitored Within SRA 2 Northwest Coastal Los Angeles County (SCAQMD Station No. 091)	Year		
	2017	2018	2019
Ozone (O_3)			
Maximum 1-hour concentration measured	0.099 ppm	0.094 ppm	0.085 ppm
Number of days exceeding previous national 0.124 ppm 1-hour standard	0	0	0
Number of days exceeding State 0.09 ppm 1-hour standard	1	0	0
Maximum 8-hour concentration measured	0.077 ppm	0.073 ppm	0.075 ppm
Number of days exceeding national 0.07 ppm 8-hour standard	3	2	1
Number of days exceeding State 0.07 ppm 8-hour standard	3	2	1
Carbon Monoxide (CO)			
Maximum 1-hour concentration measured	2.0	1.6	1.9
Days exceeding national 35.0 ppm 1-hour standard	0	0	0
Days exceeding State 20.0 ppm 1-hour standard	0	0	0
Maximum 8-hour concentration measured	1.2 ppm	1.3 ppm	1.2 ppm
Number of days exceeding national 9.0 ppm 8-hour standard	0	0	0
Number of days exceeding State 9.0 ppm 8-hour standard	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour concentration measured	55.7 ppb	64.7 ppb	48.8 ppb
Number of days exceeding State 180 ppb 1-hour standard	0	0	0
Annual average	10.2 ppb	12.6 ppb	9.7 ppb
Does measured annual average exceed national 100 ppb annual average standard?	No	No	No
Does measured annual average exceed State 30 ppb annual average standard?	No	No	No

Table IV.A-2
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants Monitored Within SRA 2 Northwest Coastal Los Angeles County (SCAQMD Station No. 091)	Year		
	2017	2018	2019
Air Pollutants Monitored Within SRA 3 – Southwest Coastal Los Angeles County (SCAQMD Station No. 820)			
PM_{10}			
Maximum 24-hour concentration measured	46 µg/m^3	45 µg/m^3	62 µg/m^3
Number of days exceeding national 150 µg/m^3 24-hour standard	0	0	0
Number of days exceeding State 50 µg/m^3 24-hour standard	0	0	3
Annual Arithmetic Mean (AAM)	19.8 µg/m^3	20.5 µg/m^3	19.2 µg/m^3
Does measured AAM exceed State 20 µg/m^3 AAM standard?	No	Yes	No
SO_2			
Maximum 1-hour concentration measured	9.5 ppb	11.5 ppb	8.2 ppb
Pb			
Maximum 30-day average concentration measured	0.005 µg/m^3	0.005 µg/m^3	0.004 µg/m^3
Maximum quarterly average concentration measured	0.0 µg/m^3	0.004 µg/m^3	0.004 µg/m^3
Air Pollutants Monitored Within SRA 1 - Central Los Angeles (SCAQMD Station No. 087)			
$PM_{2.5}$			
Maximum 24-hour concentration measured	49.2 µg/m3	43.8 µg/m3	43.5 µg/m3
Number of days exceeding national 35.0 µg/m^3 24-hour standard	5	3	1
Annual Arithmetic Mean (AAM)	11.94 µg/m3	12.58 µg/m3	10.85 µg/m3
Does measured AAM exceed national 15 µg/m^3 AAM standard?	No	No	No
Does measured AAM exceed State 12 µg/m^3 AAM standard?	No	Yes	No

ppm = parts by volume per million of air
ppb = parts by volume per billion of air
µg/m^3=micrograms per cubic meter
n/a = data not available or not collected by the District
Source: SCAQMD Historical Data by Year, website: http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed: August 2020.

E. Toxic Air Contaminant Sources

In addition to the pollutants outlined in Table IV.A-2, the project site vicinity is also subject to elevated TACs due to mobile and other TAC sources. As disclosed in the Multiple Air Toxics Exposure Study IV (MATES IV), Carcinogenic Risk Interactive Map, the existing carcinogenic risk for the project area is approximately 1,114.2 incidents per one million.[1] By comparison, the estimated population weighted risk across the Basin from the MATES IV Study is 367 per one million with the OEHHA 2003 calculation methodology. Applying the revised OEHHA (February 2015) methodology to the modeled air toxics levels, the MATES IV estimated population weighed risk across the Basin is 897 per million.

F. Existing Project Site

The project site consists of an approximately 87,651 square foot (2.01-acre) lot that is currently developed with a 3-story, brick, office building totaling approximately 45,429 sf and approximately 40 feet in height that was constructed in 1972. The project site also includes a surface parking lot serving the office building with

[1] *MATES-IV Final Report, May 1, 2015. Website: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv,http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv, accessed: August 2020.*

161 (157 standard and 4 handicap) ~~152~~ parking spaces. As such, air pollutant emissions are currently generated at the project site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the project site. The average daily emissions generated by the existing uses of the project site have been estimated utilizing the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 recommended by the SCAQMD (see Table IV.A-3, Existing Daily Operational Emissions of the Project Site). Emissions were modeled for year 2022, since this is when demolition/construction/re-use of the existing building would commence. Emissions reported are the higher of either the summer or winter emissions.

Table IV.A-3
Existing Daily Operational Emissions of the Project Site

Emissions Source	Maximum Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Sources	1.02	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	0.01	0.13	0.11	<0.01	0.01	0.01
Mobile (Motor Vehicles)	0.76	3.69	10.1	0.04	3.00	0.82
Total Existing Emissions	**1.79**	**3.82**	**10.21**	**0.04**	**3.01**	**0.83**

Note: Column totals may not add due to model rounding.
CalEEMod data provided in Appendix C to this Draft EIR.

G. Sensitive Uses

Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. As discussed above, the SCAQMD CEQA Air Quality Handbook provides examples of typical sensitive receptors and includes long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The project site is surrounded by commercial, general/professional office and creative office uses on all sides. These uses are located within relatively large floorplate office buildings, with accessory retail, restaurant, childcare, and health club uses.

The nearest sensitive receptors within 500 feet of the project site include the following: multi-family residential uses located approximately 240 feet from the site boundary, northwest of Colorado Avenue between 26th Street and Harvard Street. In addition, the following educational facilities/schools nearest to the project site include the following:

- Bright Horizons Children's Center (1620 26th Street), a day care, located approximately 220 feet across 26th Street to the southwest (in the Water Garden Business complex) of the project site;
- Evergreen Community School (2800 Colorado Avenue), a pre-school, located approximately 390 feet to the north of the project site; and
- Hill & Dale Family Learning Center (Clover Park), an infant and toddler program in Clover Park, located approximately 530 feet to the northwest of the project site.

Location of these air quality sensitive receptor locations are presented in Figure IV.A-1, Air Quality Sensitive Receptor Locations Map. Other air quality sensitive land uses are located further from the project site and would experience lower impacts.

Figure IV.A-1
Air Quality Sensitive Receptor Location Map

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H. Regulatory Setting

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 Basin are discussed below.

i) Federal Regulations

1) Clean Air Act

The federal Clean Air Act (CAA) establishes national ambient air quality standards. Under the CAA, the U.S. Environmental Protection Agency (U.S. EPA) is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants, known as the National Ambient Air Quality Standards (NAAQS).

The U.S. EPA designate areas, such as air basins or counties, as meeting (attainment) or not meeting (nonattainment) these standards based on air quality monitoring data compared with adopted national standards. Where air quality data indicates pollutant concentrations for an area are below the standards for criteria pollutants, the area is classified an "attainment area." Likewise, where air quality data indicates pollutant concentrations for an area are above the standards for criteria pollutants, the area is classified a "nonattainment area," and can be further categorized as marginal, moderate, serious, severe, or extreme "nonattainment," depending on the magnitude of the air quality standard exceedance. A nonattainment area can reach attainment when NAAQS have been met for a period of 10 consecutive years. During this time period, the area is in transitional attainment, also termed "maintenance."

As part of its enforcement responsibilities under the CAA, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP is a plan for each state which identifies how that state will attain and/or maintain the primary and secondary National Ambient Air Quality Standards (NAAQS) set forth in section 109 of the CAA. These plans are developed through a public process, formally adopted by the state, and submitted by the Governor's designee to the U.S. EPA. The CAA requires the U.S. EPA to review each plan and any plan revisions and to approve the plan or plan revisions if consistent with the CAA.

ii) California Regulations

1) California Clean Air Act

The California Clean Air Act (CCAA) requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The California Air Resources Board (ARB), a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, the ARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. The CAAQS includes more stringent standards than the NAAQS.

The U.S. EPA and the CARB use different standards for determining whether the Basin is in attainment. Federal and state standards are summarized in Table IV.A-4, Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin (Los Angeles County Portion). The attainment status for the Los Angeles portion of the Basin with regard to the NAAQS and CAAQS is also shown in Table IV.A-4. The CCAA designates air basins as either in attainment or nonattainment for each state air quality standard. The South Coast Air Basin (Los Angeles County portion) is designated as a state nonattainment area for O_3, PM_{10} and $PM_{2.5}$. In addition, the South Coast Air Basin (Los Angeles County portion) is designated as a federal nonattainment area for O_3 and $PM_{2.5}$. The Basin is in attainment or designated as unclassified for all other criteria pollutants under national and state standards.

2) California Air Resources Board On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs (Title 13 California Code of Regulations [CCR], Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

In 2008, CARB also approved the Truck and Bus regulation to reduce PM and NOX emissions from existing diesel vehicles operating in California (13 CCR, Section 2025). The requirements were amended to apply to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. For the largest trucks in the fleet, those with a GVWR greater than 26,000 pounds, there are two methods to comply with the requirements. The first way is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over 8 years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would meet or exceed the 2010 engine emission standards for NOX and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters (DPFs) achieving at least 85 percent removal efficiency, so that by January 1, 2016 their entire fleet is equipped with DPFs. However, DPFs do not lower NOX emissions. Thus, fleet owners choosing the second option must still comply with the 2010 engine emission standards for their trucks and busses by 2020.

In addition to limiting exhaust from idling trucks, CARB also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower (hp) such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by CARB on July 26, 2007 aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models (13 CCR, Section 2449). Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with large fleets beginning compliance in 2014, medium fleets in 2017, and small fleets in 2019. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (VDECS) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits (VDECS installation) be fully implemented by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

3) California Air Resources Board Air Quality Land Use Handbook

CARB published the Air Quality and Land Use Handbook in 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions. The recommendations provided therein 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 TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines, and (4) avoid siting sensitive receptors within 300 feet of a large gasoline dispensing facility (3.6

million gallons per year or more) or 50 feet of a typical gasoline dispensing facility (less than 3.6 million gallons per year).[2]

In April 2017, CARB published a Technical Advisory supplement to the Air Quality and Land Use Handbook recognizing that infill developments as promoted by the State can place sensitive individuals in close proximity to high-volume roadways. The Technical Advisory provides planners and other stakeholders involved in land use planning and decision-making with information on scientifically based strategies to reduce exposure to traffic emissions near high volume roadways. The strategies include those that reduce traffic emissions, such as vehicle speed reduction mechanisms, including roundabouts, traffic signal management, and speed limit reductions on high-speed roadways. Strategies also include those that increase the dispersion of traffic emissions, such as implementing designs that promote air flow and pollutant dispersion along street corridors (e.g., wider sidewalks, bicycle lanes, streets characterized by buildings of varying heights), solid barriers such as sound walls, and vegetation for pollutant dispersion. Other strategies include those that remove pollution from the air such as indoor high efficiency filtration. This Technical Advisory is not intended as guidance for any specific project, nor does it create any presumption regarding the feasibility of mitigation measures for purposes of compliance with CEQA.[3].

Table IV.A-4
Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin (Los Angeles County Portion)

Air Pollutant	Averaging Time	State Standard (CAAQS)	Federal Standard (NAAQS)	SCAQMD Attainment Status	
				California Standard	Federal Primary Standard
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Revoked	Non-attainment	Non-attainment (Extreme)
	8 Hour	0.070 ppm (137µg/m^3)	0.070 ppm (137µg/m^3)		
Carbon Monoxide (CO)	1 Hour	20.0 ppm (23,000 µg/m^3)	35.0 ppm (40,000 µg/m^3)	Attainment	Attainment (Maintenance)
	8 Hour	9.0 ppm (10,000 µg/m^3)	9.0 ppm (10,000 µg/m^3)		
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm (188 µg/m^3)	Attainment	Unclassified/ Attainment
	Annual	0.03 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Attainment	Attainment (Maintenance)
Lead (Pb)	30 Day Avg.	1.5 µg/m^3	--	Attainment	Non-attainment (Partial)[1]
	Calendar Qtr.	--	0.15 µg/m^3		
Sulfur Dioxide (SO_2)	1 Hour	0.25 ppm	0.075 ppm	Attainment	(Unclassified/ Attainment)
	24 Hour	0.04 ppm	--		
Particulate Matter 10 (PM_{10})	24 Hour	50.0 µg/m^3	150.0 µg/m^3	Non-attainment	Attainment (Maintenance)
	Annual	20.0 µg/m^3	Revoked	Non-attainment	N/A
Particulate Matter 2.5 ($PM_{2.5}$)	24 Hour	--	35.0 µg/m^3	N/A	Non-attainment (Serious)
	Annual	12.0 µg/m^3	12.0 µg/m^3	Non-attainment	Non-attainment (Moderate)
Sulfates	24 Hour	25 µg/m^3	--	Attainment	N/A

[2] *CARB 2005, California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, https://www.arb.ca.gov/ch/handbook.pdf. Accessed September 2020.*

[3] *CARB 2017b, California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective Technical Advisory, https://www.arb.ca.gov/ch/landuse.htm. Accessed September 2020.*

Table IV.A-4
Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin (Los Angeles County Portion)

Air Pollutant	Averaging Time	State Standard (CAAQS)	Federal Standard (NAAQS)	SCAQMD Attainment Status	
				California Standard	Federal Primary Standard

[1] Los Angeles County portion of the Basin only for near-source monitors; expect to remain in attainment based on current monitoring data; attainment re-designation request pending.
Notes: ppm = parts by volume per million of air; μg/m^3=micrograms per cubic meter
Sources: California Air Resources Board, Ambient Air Quality Standards: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf and: SCAQMD, Air Quality Management Plan Appendix II website: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-ii.pdf?sfvrsn=4 , accessed: August 2020.

iii) Regional Regulations

1) South Coast. Air Quality Management District

The SCAQMD is the agency principally responsible for comprehensive air pollution control within the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

2) Air Quality Management Plan

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans ("AQMPs"). The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants 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. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

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 RTP/SCS. The 2016 AQMP also assumes that general development projects will include strategies 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 AQMP contains control measures for reducing emissions from mobile sources, with an emphasis on NOx and VOC emissions from on-road and off-road sources. Control measures with potential applicability to Project emissions associated with construction and operation include the following:

On-Road Measures

MOB-05-ACCELERATED PENETRATION OF PARTIAL ZERO-EMISSION AND ZERO-EMISSION VEHICLES: This measure proposes to continue incentives for the purchase of zero-emission vehicles and hybrid vehicles with a portion of their operation in an "all-electric range" mode. The State Clean Vehicle Rebate Pilot (CVRP) program is proposed to continue from 2016 to 2030 with proposed funding up to $5,000 per vehicle and for low-income eligible residents, additional funding of up to $1,500 for a total of

$6,500 per vehicle. The California State legislature has appropriated $133 million statewide for the CVRP for Fiscal Year 2016–17. The proposed measure seeks to provide funding rebates for at least 15,000 zero-emission or partial-zero emission vehicles per year.

MOB-06-ACCELERATED RETIREMENT OF OLDER LIGHT-DUTY AND MEDIUMDUTY VEHICLES: This proposed measure calls for promoting the permanent retirement of older eligible vehicles through financial incentives currently offered through local funding incentive programs, and AB 118 Enhanced Fleet Modernization Program (EFMP), and the Greenhouse Gas Reduction Fund (EFMP Plus-Up). The proposed measure seeks to retire up to 2,000 older light and medium-duty vehicles (up to 8,500 pounds GVW) per year. The proposed measure seeks to provide funding assistance for at least 2,000 replacement vehicles per year.

Off-Road Measures

MOB-10-EXTENSION OF THE SOON PROVISION FOR CONSTRUCTION/ INDUSTRIAL EQUIPMENT: To promote turnover (i.e., retire, replace, retrofit, or repower) of older in-use construction and industrial diesel engines, this proposed measure seeks to continue the SOON provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation beyond 2023 through the 2031 timeframe. In order to implement the SOON program in this timeframe, funding of up to $30 million per year would be sought to help fund the repower or replacement of older Tier 0 and Tier 1 equipment to Tier 4 or cleaner equipment, with approximately 2 tons per day (tpd) of NOx reductions.

MOB-11 – EXTENDED EXCHANGE PROGRAM: This measure seeks to continue the successful lawnmower and leaf blower exchange programs in order to increase the penetration of electric equipment or new low emission gasoline-powered equipment used in the region. The proposed extended exchange program will focus on incentives to accelerate the replacement of older equipment with new Tier 4 or cleaner equipment or zero-emission equipment where applicable. In addition, other small off-road equipment (SORE) equipment may also be considered for exchange programs for accelerating the turnover of existing engines.

3) CEQA Air Quality Handbook

Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the South Coast Air Basin. Instead, this is controlled through local jurisdictions in accordance with the California Environmental Quality Act (CEQA). In order to assist local jurisdictions with air quality compliance issues the CEQA Air Quality Handbook (SCAQMD CEQA Handbook) prepared by the SCAQMD (1993) with the most current updates found at http://www.aqmd.gov/ceqa/hdbk.html, was developed in accordance with the projections and programs of the AQMP. The purpose of the SCAQMD CEQA Handbook is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties in evaluating a proposed project's potential air quality impacts. Specifically, the SCAQMD CEQA Handbook explains the procedures that the SCAQMD recommends be followed for the environmental review process required by CEQA. The SCAQMD CEQA Handbook provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. SCAQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" to replace the CEQA Air Quality Handbook approved by the AQMD Governing Board in 1993. The 1993 CEQA Air Quality Handbook is still available but not online. In addition, there are sections of the 1993 Handbook that are obsolete. In order to assist the CEQA practitioner in conducting an air quality analysis while the new Handbook is being prepared, supplemental information regarding significance thresholds and analysis, emissions factors, cumulative impacts emissions analysis, and other useful subjects, are available at the SCAQMD website.[4] The SCAQMD CEQA Handbook and supplemental information is used in this analysis.

The project would comply with SCAQMD Rule 1113 – Architectural Coatings and Rule 1108 – Cutback Asphalt, which reduce the project's VOC emissions. Moreover, appropriate dust control measures would

[4] *http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.*

be implemented as part of the project during each phase of development as required by SCAQMD Rule 403 – Fugitive Dust. In addition, SCAQMD Rule 402 – Nuisance, and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the project's long-term operations phase.

4) SCAQMD Rules and Regulations

Several SCAQMD rules adopted to implement portions of the AQMP may apply to the project. For example, SCAQMD Rule 403 requires implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The project would be subject to the following SCAQMD rules and regulations:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules which may apply to the project:

- Rule 401 – Visible Emissions: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

- Rule 402 – Nuisance: This rule states that a person shall not 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: This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so, determined by the USEPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the project:

- 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.

- Rule 1138 – Control of Emissions from Restaurant Operations: This rule specifies emissions and odor control requirements for commercial cooking operations that use chain-driven char broilers 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 NOX 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, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the clean-up of material deposited onto paved roads (including city street), use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

- Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

Iv) Local Air Quality Control

Local jurisdictions, such as the City of Santa Monica, have the authority and responsibility to reduce air pollution through its police powers and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions.

Most importantly, the City's adopted Land Use & Circulation Element (LUCE) identifies an integrated land use and transportation approach to reduce the city's per capita carbon footprint and its overall impact on the environment. Although the emphasis of the LUCE is the reduction of greenhouse gas (GHG) emissions, the LUCE would also reduce emissions of criteria pollutants. A number of other City's plans/programs also address GHG emissions, as discussed in Section IV.G Greenhouse Gas Emissions. In addition, the City has adopted the following plans and programs to provide for improved regional air quality and reduced greenhouse gas emissions:

- **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** – The EVAP he 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% to 15% by 2025. Replacing 13% (~9,000) of the fossil-fuel powered vehicles with EVs will save an estimated 26,000 metric tons of carbon dioxide.

- **Clean Big Blue Bus (BBB) 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. Santa Monica's Fleet Management Division is one of the most innovative and progressive programs in the nation. Approximately, 60% of the citywide vehicle fleet and over 70% of non-emergency vehicles are fueled alternatively.

- **Ban on Gasoline Powered Leaf Blowers** - Section 4.08.270 of the City Municipal Code bans the operation of gasoline powered leaf blowers within the City limits.

For further discussion of the City's Energy Code and Green Building Ordinance that also reduce air emissions, refer to Section IV.C Greenhouse Gas Emissions. Also refer to Section IV.G Transportation for a discussion of the City's Transportation Demand Management Ordinance which reduces vehicles miles traveled and associated air emissions.

In accordance with CEQA and the CEQA review process, the City of Santa Monica 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 implementation of such mitigation. The City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the city and region will meet federal and state standards. Instead, the City relies upon the expertise of the SCAQMD and utilizes the CEQA Air Quality Handbook and newer

thresholds of significance as the guidance documents for the environmental review of plans and development proposals within the South Coast Air Basin portion of its jurisdiction.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

A. Threshold of Significance

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

a) Conflict with or obstruct implementation of the applicable air quality plan;
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
c) Expose sensitive receptors to substantial pollutant concentrations; or
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Pursuant to the State CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, the significance criteria established by the applicable air quality management district or air pollution control district when making determinations of significance. As the agency principally responsible for comprehensive air pollution control in the Basin, the SCAQMD recommends that projects should be evaluated in terms of air pollution control thresholds established by the SCAQMD and published in the CEQA *Air Quality Handbook* and other guidance documents.

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 § 15002(a)(1)), use of air district thresholds is a best practice for CEQA impact determinations."*

The City of Santa Monica utilizes the recommended SCAQMD thresholds of significance for the environmental review of plans and development proposals within its jurisdiction. Based on the above, the following significance thresholds are utilized by the City:

I) Consistency with the AQMP

The SCAQMD has adopted criteria for consistency with regional plans and the regional AQMP in its CEQA Air Quality Handbook. Specifically, the indicators of consistency are: 1) whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations; and 2) whether the project would exceed the assumptions utilized in preparing the AQMP.

II) Cumulatively Considerable Net Increase of Criteria Pollutants

SCAQMD has developed numerical thresholds for air pollutants that are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality

standards have been promulgated to protect public health. The following thresholds of significance were published by the SCAQMD in April 2019.[5]

Construction

The SCAQMD currently recommends that projects with construction-related mass daily emissions that exceed any of the following emissions thresholds should be considered significant:

- 75 pounds per day of VOC
- 100 pounds per day of NOx
- 550 pounds per day of CO
- 150 pounds per day of SOx
- 150 pounds per day of PM_{10}
- 55 pounds per day of $PM_{2.5}$

Operation

The SCAQMD currently recommends that projects with operational mass daily emissions that exceed any of the following emissions thresholds should be considered significant:

- 55 pounds per day of VOC
- 55 pounds per day of NOx
- 550 pounds per day of CO
- 150 pounds per day of SOx
- 150 pounds per day of PM_{10}
- 55 pounds per day of $PM_{2.5}$

III) Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

1) Localized Significance Thresholds

As discussed previously, the SCAQMD considers residences, schools, daycare centers, playgrounds, and medical facilities to be sensitive receptor land uses.

As described above, the SCAQMD has established localized significance criteria in the form of ambient air quality standards for criteria pollutants. To minimize the need for detailed air quality modeling to assess localized impacts, SCAQMD developed mass-based localized significance thresholds (LSTs) that are the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[6] apply to daily construction areas that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor

The SCAQMD currently recommends that projects with site-specific construction-related and operational emissions that generate the following localized pollutant concentrations at existing human receptors should be considered significant:

- 0.18 ppm NO_2 averaged over a 1-hour period (State standard)

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[5] *SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, revised April 2019 and accessed: August 2020.*

[6] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

- 20 ppm of CO averaged over a 1-hour period (State standard)
- 9.0 ppm of CO averaged over an 8-hour period (national and State standard)
- 10.4 µg/m^3 (construction) and 2.5 µg/m^3 (operation) of PM_{10} averaged over a 24-hour period
- 10.4 µg/m^3 (construction) and 2.5 µg/m^3 meter of $PM_{2.5}$ averaged over a 24-hour period

The SCAQMD has developed LST look-up tables for construction/project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each SRA and various distances from the source of emissions and represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards in the affected area.

In terms of NO_x emissions, the two principal species of NO_x are nitric oxide (NO) and NO_2, with the vast majority (95 percent) of the NO_x emissions being comprised of NO. However, because adverse health effects are associated with NO_2, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels. NO is converted to NO_2 by several processes, the two most important of which are (1) the reaction of NO with ozone, and (2) the photochemical reaction of NO with hydrocarbons. When modeling NO_2 emissions from combustion sources, the SCAQMD assumes that the conversion of NO to NO_2 is complete at a distance of 5,000 meters from the source. For PM_{10} LSTs, the thresholds were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$ LSTs, the thresholds were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions

Construction/project sites that are one acre in size or less use the applicable 1-acre LSTs, and a linear regression of the applicable LSTs can be used for sites that are between 1-acre and 5 acres in size. The LSTs identify lower thresholds for smaller sites since they assume that the emissions would be concentrated over a smaller area whereas emissions generated at larger sites would be dispersed over a larger area; therefore, more emissions would need to be generated at a larger site in order to create the same localized concentrations at a nearby receptor location. The receptor distances in the LST look-up tables are 25, 50, 100, 200, and 500 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters.

The 2.01-acre project site is located within SRA 2 and the nearest sensitive receptors in the vicinity of the project site include the following: multi-family residential uses located approximately 240 feet (73 meters) from the site boundary, northwest of Colorado Avenue and southwest and northeast of Princeton Street. The Evergreen Community School is located approximately 350 feet (106 meters) north of the project boundary. As the nearest sensitive receptors are located between 50-100 meters from the project site, this analysis conservatively uses the 50-meter LSTs. As the project site is 2.01 acres, this analysis uses the applicable LSTs for a two-acre site and receptors located within 50 meters to address potential localized NOx, CO, PM_{10}, and $PM_{2.5}$ impacts to the area surrounding the proposed project site.

The LSTs for construction-related emissions that are applicable to the proposed project are as follows:

- 143 pounds per day of NOx
- 1,213 pounds per day of CO
- 19 pounds per day of PM_{10}
- 5 pounds per day of $PM_{2.5}$

With respect to operational LSTs, LSTs would apply to the operational phase of a project if the project includes major stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology generally applies to operational projects such as warehouse/transfer facilities.[7] As the project would include the development of creative and business professional office uses, an operational analysis against the LST methodology is not applicable and thus has not been included in this analysis.

[7] *SCAQMD, Sample Construction Scenarios for Projects Less than Five Acres in Size, February 2005, page 1-3.*

2) CO Hotspots

The SCAQMD has established the following threshold criteria[8] to determine if a project has the potential to contribute to a CO hotspot due to localized CO emissions from operational mobile sources at an intersection or roadway:

- 20 ppm of CO averaged over a 1-hour period (State standard)
- 9.0 ppm of CO averaged over an 8-hour period (national and State standard)

3) Toxic Air Contaminants

Based on the methodology established by the Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD[8,9], the following thresholds have been established to determine the maximum individual cancer risk (MICR), and hazard index (HI) for development of the proposed project.

- MICR – cancer risk of less than 10 in one million ($<10 \times 10^{-6}$)
- HI – highest chronic health index of less than 1

iv) Exposure to Other Emissions

A significant impact may occur if the project would create other adverse emissions affecting a substantial number of people.

B. Methodology

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the project. Construction activities would generate air pollutant emissions at the project site and on roadways resulting from construction-related traffic, use of construction equipment, and grading/earthwork activities. In addition, air pollutant emissions associated with the project would result from project operations and from project-related traffic volumes. The net increase in air pollutant emissions generated by these activities and other secondary sources have been quantitatively estimated in accordance with SCAQMD recommended methodologies and compared to thresholds of significance.

i) Consistency with Air Quality Management Plan

The 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., ozone and PM2.5). 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 the SCAG. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections used in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in

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[8] *SCAQMD 2019, South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, April 2019), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significancethresholds. pdf?sfvrsn=2. Accessed September 2020.*

[9] *OEHHA 2015, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed September 2020.*

the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's numeric indicators.

ii) Cumulatively Considerable Net Increases in Criteria Pollutants

The SCAQMD's CEQA Air Quality Handbook identifies several methods to determine the cumulative significance of land use projects (i.e., whether the contribution of a project is cumulatively considerable). However, the SCAQMD no longer recommends the use of these methodologies. Instead, the SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[10] The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with the summation of these emissions. Additionally, regional emissions from a project have the potential to affect the Air Basin as a whole and it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the project to results in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

1) Construction Daily Impacts

Daily regional construction emissions associated with project construction were calculated using the California Emissions Estimator Model (CalEEMod 2016.3.2) recommended by the SCAQMD. CalEEMod was developed in collaboration with the air districts of California as a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas emissions associated with both construction and operations from a variety of land use projects.

The precise construction timeline for the project depends on the timing of entitlements and permit processing. At this time, it is estimated that project construction would begin in 2022 and would be built out/operational around the 2nd/3rd quarter of 2024. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the proposed project would be undertaken in three main phases: (1) demolition of existing uses, 2) grading/site preparation/excavation, and (3) building construction. Construction activities associated with demolition, grading/excavation, and building construction would generate pollutant emissions of dusts, fumes, equipment exhaust, and other air contaminants.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The CalEEMod program uses the EMFAC2014 computer program to calculate the emission rates specific for Los Angeles County for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck operations. EMFAC2014 and OFFROAD2011 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of project construction. The maximum daily construction emissions per construction phase are estimated using CalEEMod and were compared to the thresholds

[10] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

established by the SCAQMD presented above. The maximum daily regional emissions are predicted values for the worst-case day and do not represent the emissions that would occur for every day of construction.

2) Operational Daily Impacts

Daily regional operational emissions associated with the project were also calculated using CalEEMod 2016.3.2 and the information provided in the traffic study prepared for the project. To determine if a regional air quality impact would occur, the increase in emissions is compared with the SCAQMD's recommended regional thresholds for operational emissions.

Operational emissions associated with the project would be comprised of mobile source emissions, energy demand, and other area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site area associated with operation of the project. The trip default trip distances[11] were applied to the maximum daily trip estimates, based on the trip rates in the Traffic Impact Analysis (TIA) prepared for the projects and included as Appendix H this EIR (Fehr & Peers, 2020). The trips take into account trip reductions associated with the land use characteristics of the project and the other factors in the City's travel demand forecasting model (TDFM) (such as density of uses, diversity of uses, distance to transit etc.). Weekend rates for the land uses analyzed were obtained from the 10th Edition ITE Trip Generation Manual. Please see the notes in the CalEEMod Output available in Appendix C of this EIR for details.

Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. Emissions are estimated based on the default rates provided in CalEEMod[12].

Operational impacts were assessed for the full Project buildout year of 2024.

ii) Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

1) Localized Significance Thresholds

a) Construction

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be to be a receptor such as residence, hospital, convalescent facility where it is possible that an individual could remain for 24 hours. Thus, according to the SCAQMD, the LSTs for PM_{10} and $PM_{2.5}$, which are based on a 24-hour averaging period, would be appropriate to evaluate the localized air quality impacts of a project on nearby sensitive receptors. Additionally, since a sensitive receptor is considered to be present onsite for 24 hours, LSTs based on shorter averaging times, such as the one-hour NO_2 or the one-hour and eight-hour CO ambient air quality standards, would also apply when evaluating localized air quality impacts on sensitive receptors. However, LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, are applied to receptors such as industrial or commercial facilities since it is reasonable to assume that workers at these sites could be present for periods of one to eight hours.[13] Therefore, this analysis evaluates localized air quality impacts from construction activities associated with the project on sensitive receptors for NO_2, CO, PM_{10}, and $PM_{2.5}$, and on all receptors (e.g., industrial or commercial facilities) for NO_2 and CO.

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[11] *The default trip distances are based on the location and urbanization selected on the project characteristic screen in CalEEMod. These values were supplied by the air districts or use a default average for the state, as such, these distances are greater than those used in the project's local VMT traffic analysis and are considered more conservative.*

[12] *The current versional of CalEEMod software defaults to 2016 Title 24 Standards for energy calculations; however, emissions including reductions for compliance with 2019 Title 24 Standards are shown in the "mitigated" scenario of the CalEEMod Output available in Appendix C of this EIR. To be conservative, no reductions were taken.*

[13] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

b) Operation

As discussed above, the SCAQMD has developed LSTs that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. However, because the LST methodology is applicable to projects where emission sources occupy a fixed location, LST methodology would typically not apply to the operational phase of the project because emissions are primarily generated by mobile sources traveling on local roadways over potentially large distances or areas. LSTs would apply to the operational phase of a project, if the project includes stationary sources (such as on-site emergency generators, or char broilers) or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology applies to operational projects such as warehouse/transfer facilities.[14] As the project would include the development of creative and business professional office uses, an operational analysis against the LST methodology is not applicable and thus has not been included in this analysis.

2) Toxic Air Contaminants

a) Construction

The greatest potential for TAC emissions during construction would be related to diesel particulate matter emissions associated with heavy-duty equipment. Construction activities associated with the project would be short term in nature. Although construction would be temporary, construction impacts associated with TACs were addressed quantitatively in a Construction HRA. In March 2015, OEHHA adopted revised guidelines that update the previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2015). The analysis utilizes dispersion modeling using the USEPA AERMOD model with meteorological data from the closest SCAQMD monitoring station located at the Santa Monica Airport. See Appendix C to this EIR for the modeling files and additional information related to the construction HRA.

c) Operation

The California ARB indicates that one of the highest public health priorities is the reduction of diesel particulate matter (DPM) generated by vehicles on California's highways, as it is one of the primary TACs. Other potential TAC generators within Basin are associated with specific types of facilities such as dry cleaners, gas stations, distribution centers, and ports, and are the focus of local control efforts. The ARB 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 ARB recommends the following buffer distances be observed when locating TAC emitters or sensitive land uses:[15]

- 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
- Other TAC sources including furniture manufacturing and repair services that use Methylene Chloride or other solvents identified as a TAC—300 feet

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[14] *SCAQMD, Sample Construction Scenarios for Projects Less than Five Acres in Size, February 2005, page 1-3.*

[15] *California Environmental Protection Agency, California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.*

- Distribution centers with more than 100 trucks per day; more than 40 trucks with operating transport refrigeration units per day; or where transport refrigeration unit operations exceed 300 hours per week—1,000 feet
- Rail yards for major service and maintenance operations—1,000 feet
- Chrome platers—1,000 feet
- Port developments should not site the heavily impacted areas immediately upwind of sensitive land uses
- Petroleum refineries should not site the heavily impacted areas immediately upwind of sensitive land uses

The SCAQMD recommends that site-specific health risk assessments be performed to document potential cancer risk when siting sensitive land uses within the above buffer zones. However, it should be noted that in September 2015, the California Supreme Court ruled in *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369* that CEQA generally does not require an EIR to consider the effects of environmental conditions on residents of a residential project site. Nonetheless, for informational purposes, this EIR provides an assessment of whether the proposed project would be exposed to TAC-emitting sources.

iii) Health Effects

In *Sierra Club v. County of Fresno* (S219783) (*Friant Ranch Case*), the Supreme Court held that CEQA requires environmental impact reports to either (i) make a "reasonable effort" to substantively connect the estimated amount of a given air pollutant a project will produce, and the health effects associated with that pollutant, or (ii) explain why such an analysis is infeasible (6 Cal.5th at 1165-66). However, the Court also clarified that CEQA "does not mandate" that EIRs include "an in-depth risk assessment" that provides "a detailed comprehensive analysis … to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations and to assess and quantify both the individual and population wide health risks associated with those levels of exposure."[16]

The health-based ambient air quality standards for ozone are measured as concentrations of ozone and not as tonnages of their precursor pollutants (i.e., NO_X and VOCs). It is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting ozone or particulate matter. Meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone. Therefore, correlating a project's criteria air pollutant emissions to specific health impacts, particularly with respect to ozone, is speculative.

SCAQMD agrees that it is very difficult to quantify health impacts with regard to ozone, opining that the only possible means of successfully doing so is for a project so large that emissions would essentially amount to *all* regional increases.[17] As an example, the most recent SCAQMD basin wide emissions inventory shows VOC emissions at 162.4 tons (324,800 pounds) per day and NO_X emissions at 293.1 tons (586,200 pounds) per day for the baseline year of 2012.89[18] SCAQMD's AQMP shows that reducing the baseline 2008 NO_X and VOC emissions by 432 tons per day and 187 tons per day, respectively, would only reduce ozone levels at the monitor with the greatest ozone concentrations by 9 parts per billion (ppb).[19] Additionally, SCAQMD modeling that accounts for increases in emissions due to new or modified sources within the District between 2010 and 2030 show an increase of 6,620 pounds per day of NO_X and 89,947 pounds per

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[16] *Sierra Club v. County of Fresno. 6 Cal.5th 502, 517-522 (2018). Available: https://www.leagle.com/decision/incaco20181224020. Accessed September 2020.*

[17] *SCAQMD, Application of the SCAQMD for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae, April 6, 2015.*

[18] *SCAQMD, 2016 Air Quality Management Plan. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. Accessed September 2020.*

[19] *SCAQMD, 2013. Final 2012 Air Quality Management Plan. February. Available online at:*

http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/main-document-final-2012.pdf. Accessed September, 2020.

day of VOC. The results of this analysis show that this level of daily pollutant increase would only increase ozone concentrations in the Air Basin by 2.6 ppb and less than 1 ppb of NO_2.[20] Therefore, just because a project exceeds the mass regional emissions threshold (i.e., pounds per day VOC or NOx thresholds) 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.

USEPA and CARB have established Ambient Air Quality Standards (AAQS) at levels above which concentrations could be harmful to human health and welfare, with an adequate margin of safety. Further, California air districts, like SCAQMD, have established emission-based thresholds that provide project-level estimates of criteria air pollutant quantities that air basins can accommodate without affecting the attainment dates for the AAQS, and therefore providing indicators of significance for regional and localized air quality impacts from both construction and operation of projects. These thresholds are based on "scientific and factual data that is contained in the federal and state Clean Air Acts" and recommends "that these thresholds be used by lead agencies in making a determination of significance."[21] SCAQMD localized thresholds take into account that the Air Basin is a distinct geographic area that has critical air pollution problems for which AAQS have been established to protect human health and welfare.93 Therefore, analyzing a project against these thresholds assesses whether these emissions directly contribute to local exceedances of AAQS and assesses their potential to be harmful to human health. Thus, in order to determine the potential for adverse health effects, project emissions are compared to the SCAQMD's LST regulatory thresholds.

C. Project Impacts and Mitigation Measures

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis:

Impact A-1: The development of a creative office space and employment in the area is an important economic generator for the City of Santa Monica and the jobs base is consistent with priorities identified in the City's strategy for a Sustainable Local Economy and with the Bergamot Transit Village land use designation. Therefore, the project would be consistent with the standards and policies set forth in AQMP and the impact would be less than significant.

This analysis evaluates the two criteria for consistency with the AQMP adopted by the SCAQMD:

1) Will the project increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?

2) Will the project exceed the assumptions utilized in preparing the AQMP?

With respect to the first criterion, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may actually contribute to the attainment of applicable air quality standards within the Basin. As discussed herein, the project would not result in construction air quality emissions that exceed the SCAQMD thresholds of significance. In addition, it should be noted that construction-related emissions would be temporary in nature, lasting only for the duration of the construction period. Furthermore, the project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. By meeting

[20] *SCAQMD, 2011. Final Program Environmental Assessment for Re-Adoption of Proposed Rule 1315, 2011 (pg. 1-11). https://www.aqmd.gov/home/research/documents-reports/lead-agency-scaqmd-projects/aqmd-projects---year-2011/re-adoption-of-proposed-rule-1315*

[21] *SCAQMD, 1993. CEQA Air Quality Handbook. November. Available online at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed December 27, 2019.*

SCAQMD rules and regulations, project construction activities would be consistent with the goals and objectives of the AQMP to improve air quality in the Basin. With respect to operations, the project would not result in air quality emissions that exceed the SCAQMD thresholds of significance. Therefore, the project would not increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations.

With respect to the second criterion, the AQMP was prepared to achieve national and state air pollution standards within the region. A project that is considered to be consistent with the AQMP would not interfere with attainment of AQMP goals because the growth from the project is included in the regional projections used to formulate the AQMP. Therefore, projects, land uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP (i.e., the RTP/SCS) would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's project-level daily emissions thresholds.

The City's Land Use and Circulation Element (LUCE) has designated the project site, as well as the properties immediately to the east and south, as Bergamot Transit Village (BTV). Properties to the north and west are designated as Office Campus. The BTV is envisioned as a mixed-use creative arts/entertainment center focusing on the 26th/Olympic Metro Line E Light Rail Station. The LUCE identified the need for an Area Plan to refine the vision of this area as well as to establish development standards, design guidelines and implementation measures. The LUCE states that the Bergamot Transit Village is one of the areas of the City where creative office uses should be concentrated and acknowledges that "given the large number of residents currently employed in [creative industries], this type of employment can be viewed as local-serving in character." (LUCE pp. 3.4-13 to 14. The Bergamot Area Plan ("BAP") is a community-based planning document that provides guidance on transitioning the former industrial lands into an arts-focused, mixed use, pedestrian-oriented neighborhood. As stated in BAP Goal LU1, "[t]he Bergamot Plan area is a high quality, mixed-use, creative-sector district offering opportunities for jobs, housing, arts and culture and community-serving retail, and which benefits from access to the Metro Line E (Exposition) Light Rail Station and the area's creativity and innovation." Moreover, the Plan Area "is a strong office location and is particularly known for its entertainment, design and technology industries. The creative office space and employment in the area is an important economic generator for the City of Santa Monica and the jobs base is consistent with priorities identified in the City's strategy for a Sustainable Local Economy." (BAP, p. 32.) The Bergamot Transit Village is identified in the LUCE as one of the focus areas for new creative office employment. (BAP, p. 32.) Therefore, the project would not exceed the assumptions utilized in preparing the AQMP and would not have the potential to impair implementation of the AQMP. As such, impacts with respect to regional plans and AQMP consistency would be less than significant.

Mitigation Measures:

None required.

Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact Analysis:

Impact A-2: Mass daily emissions generated by project construction activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standards. The impact of the proposed project would be less than significant.

For purposes of analyzing impacts associated with air quality at the project site, this analysis assumes a construction schedule of approximately 24 months. The precise construction timeline for the project depends on the timing of entitlements and permit processing. At this time, it is estimated that construction would begin in 2022 and would be operational around the 2nd/3rd quarter of 2024. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the proposed

project would be undertaken in three main phases: (1) demolition of existing uses, 2) grading/site preparation/excavation, and (3) building construction.

Demolition would occur for approximately 3 months and would require the demolition and removal of the existing 161-space surface parking lot. The demolition would generate approximately 2,500 cubic yards (cy) of material, primarily concrete. Depending on the type of haul truck used, demolition could require up to approximately 275 truck trips to haul debris off-site. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one ram-hoe/hydraulic, three rubber tired or track dozer, one dumper/tender, one air compressor, one generator, and four tractors/loaders/backhoes

Grading, site preparation and excavation would occur for approximately 2 months and would require the export of approximately 55,000 cy of soil export for excavation for the subterranean project components. Soil export activities could require up to 3,200 truck trips to haul soil off-site. The depth of excavation would be approximately 37 feet below surface grade. This analysis assumes daily grading, site preparation, and excavation activities would require the following equipment: one air compressor, two compactors, two drilling rigs, one generator, one grader, two-three excavators, one dumpers/tender, one street sweeper, and -three-four tractors/loaders/backhoes.

Building construction would occur for approximately 19 months and would include the construction of the proposed structures (Buildings A and B), refurbishment of the existing building (Building C), connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the project site. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two-four forklifts, two dumpers/tenders, multiple hydraulic/electric man lifts, two generator sets, one-two tractors/loaders/backhoes, two welders, and two-three air compressor.

Construction activities would produce combustion emissions from various sources, such as onsite heavy-duty construction equipment, vehicles hauling debris, soils and building materials to and from the site, and motor vehicles transporting the construction workers. Demolition, site preparation and excavation activities would produce fugitive dust emissions (PM_{10} and $PM_{2.5}$) as a result of soil-disturbing activities. The project would be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the project area (approximately 2 acres) a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures is used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur. Compliance with Rule 403 has been included in the CalEEMod modeling for the proposed project.

Per SCAQMD Rule 1113 as amended on June 3, 2011, the architectural coatings that would be applied to buildings after January 1, 2014 will be limited to an average of 50 grams per liter or less. CalEEMod defaults have been adjusted accordingly.

The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emission calculations are provided in Appendix C to this EIR. As shown in Table IV.A-5, Construction-Related Regional Pollutant Emissions, the peak daily emissions generated during the construction of the project would not exceed any of the regional emission thresholds recommended by the SCAQMD.

Mitigation Measures:

None required.

Table IV.A-5
Construction-Related Regional Pollutant Emissions

Activity		Pollutant Emissions (pounds/day)					
		ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition	On-Site[1]	1.50	13.76	14.90	0.02	0.71	0.68
	Off-Site[2]	0.15	1.24	1.33	0.01	0.40	0.11
	Subtotal	1.65	15.00	16.23	0.03	1.11	0.79
Site Preparation	On-Site[1]	1.08	11.51	11.21	0.02	0.80	0.49
	Off-Site[2]	2.57	77.93	20.31	0.24	5.95	1.78
	Subtotal	3.66	89.44	31.52	0.26	6.75	2.27
Building Construction	On-Site[1]	1.56	13.45	15.26	0.03	0.65	0.62
	Off-Site[2]	0.59	4.82	5.38	0.02	1.60	0.44
	Subtotal	2.15	18.28	20.64	0.05	2.24	1.06
Architectural Coating	On-Site[1]	32.72	3.66	5.43	0.01	0.18	0.18
	Off-Site[2]	0.08	0.05	0.73	0.00	0.26	0.07
	Subtotal	32.80	3.71	6.16	0.01	0.44	0.25
Total for overlapping phases[3]		34.95	21.99	26.80	0.06	2.68	1.31
SCAQMD Thresholds		75	100	550	150	150	55
Exceeds Thresholds?		No	No	No	No	No	No

Notes:

Source: CalEEMod Version 2016.3.2.
(1) On-site emissions from equipment operated on-site that is not operated on public roads. On-site demolition and site preparation PM-10 and PM-2.5 emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.
(2) Off-site emissions from equipment operated on public roads.
(3) Construction and painting phases may overlap.
CalEEMod data provided in Appendix C to this EIR.

Impact A-3: The mass daily emissions generated by project operational activities_would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standards. The impact of the proposed project would be less than significant.

The project would consist of the refurbishment of the project site's existing three-story, 45,429 square feet (sf) office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 sf of new floor area. The project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The project's three buildings would total approximately 174,685 ~~174,684~~ sf.

The project's operational regional air quality emissions associated with area sources (e.g., use of consumer products and maintenance equipment), energy demand (use of natural gas), and mobile sources (motor vehicles) at the project site have been calculated with CalEEMod. The existing uses were subtracted from the overall project total and the net increase in project emissions are presented in Table IV.A-6, Daily Operational Emissions. As shown, even before emissions from existing uses are subtracted, the project's operational air quality emissions would not exceed the regional thresholds of significance set by the SCAQMD.

Table IV.A-6
Daily Operational Emissions[a]

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions						
Area Sources	3.98	0.00	0.06	0.00	0.00	0.00
Energy Demand	0.09	0.81	0.68	0.00	0.06	0.06
Mobile (Motor Vehicles)	3.33	14.14	40.66	0.16	13.38	3.66
Total Project Emissions	**7.40**	**14.95**	**41.40**	**0.16**	**13.44**	**3.72**
Less Existing Site Emissions	-1.79	-3.82	-10.21	-0.04	-3.00	-0.83
Net Increase Project Emissions	**5.61**	**11.13**	**31.19**	**0.12**	**10.44**	**2.89**
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No

[a] Air quality emissions reflect development at the project site minus emission from existing use.
Column totals may not add due to model rounding. CalEEMod data provided in Appendix C to this EIR.

Mitigation Measures:

None required.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

Impact A-4: Localized emissions generated by project construction activities would not expose receptors in the vicinity of the project site to substantial pollutant concentrations. The impact of the proposed project would be less than significant.

As detailed in the thresholds and methodology previously, the SCAQMD has developed localized significance thresholds (LST) for construction areas that are one, two, and five acres in size to simplify the evaluation of localized emissions. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the applicable federal or State ambient air quality standard. LSTs are provided for each source receptor area (SRA) and various distances from the source of emissions. The receptor distances in the LST look-up tables are 25, 50, 100, 200, and 500 meters.

Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. As described previously, the nearest sensitive receptors in the vicinity of the project site include the following: multi-family residential uses located approximately 235 feet (71 meters) from the site boundary, northwest of Colorado Avenue, southwest and northeast of Princeton Street. The Evergreen Community School is located approximately 350 feet (106 meters) north of the project boundary.

The 2.01-acre project site is located within SRA 2 and the nearest sensitive receptor are the Bright Horizons Children's Center located in the business complex approximately 220 feet (67 meters) southwest of the site, and the residential uses located approximately 235 feet (71 meters) northwest from the project site. Other air quality sensitive land uses are located further from the project site and would experience lower impacts. As shown in Table IV.A-7, Localized On-Site Peak Daily Construction Emissions, at the project site would not exceed any of the identified localized thresholds of significance during construction.

Table IV.A-7
Localized On-Site Peak Daily Construction Emissions at the Nearest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Demolition	13.76	14.90	0.71	0.68
Site Preparation	11.51	11.21	0.80	0.49
Building Construction	13.45	15.26	0.65	0.62
Architectural Coating	3.66	5.43	0.18	0.18
SCAQMD Thresholds[1]	**143**	**1,213**	**19**	**5**
Exceeds Threshold?	No	No	No	No

Notes:
Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 2 acres, at a distance of 50 m in SRA 2 Northwest Los Angeles County Coastal.
(1) The nearest sensitive receptors are the multi-family residential dwelling units located northwest of northwest of Colorado Avenue, southwest and northeast of Princeton Street, approximately 235 feet (71 meters) northwest of the project boundary; therefore, the 50-meter threshold was used.

Mitigation Measures:

None required.

Impact A-5: Localized emissions generated by project operational activities would not expose receptors in the vicinity of the project site to substantial pollutant concentrations. The impact of the proposed project would be less than significant.

As discussed previously, because the LST methodology is generally applicable to projects where emission sources occupy a fixed location, LST methodology would typically not apply to the operational phase of a creative and business professional office building use project because emissions for these projects are primarily generated by mobile sources traveling on local roadways over generally large distances or areas. LSTs would apply to the operational phase of a project if the project includes stationary sources (such as on-site emergency generator, char broilers, etc.) or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology applies to operational projects such as warehouse/transfer facilities. As such, an operational LST analysis is not warranted and these impacts would be considered less than significant.

Mitigation Measures:

None required.

Impact A-6: Localized emissions generated by project operational activities would not cause localized CO concentrations at nearby intersections to exceed national or state standards. The impact of the proposed project would be less than significant.

The project would not result in potentially significant CO "hot spots" and a project-specific CO hotspots analysis is not required to reach this conclusion. It has long been recognized that CO exceedance ("hot spots") are caused by vehicular emissions, primarily when idling at intersections. Vehicle emissions standards have become increasingly more stringent in the last twenty years. With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the project vicinity have achieved state and federal attainment status with the air quality standards. As noted previously in Table IV.A-2, in SRA 2 (Northwest Coastal Los Angeles County) the maximum 1-hour CO concentration in 2016 was 2.2 ppm and the maximum 8-hour CO concentration in 2016 was 1.1 ppm. Based on these measured concentrations, CO concentrations in SRA 2 are substantially below the state standards for 1-hour (20 ppm) and 8-hour (9 ppm), and CO concentrations in SRA 2 are substantially below the federal standards for 1-hour (35 ppm) and 8-hour (9 ppm). Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections, such as Colorado Avenue at 26th Street, with an average daily traffic (ADT) road segment volume of 10,690, for future with Project buildout scenario, would not result in exceedance of the CO standard. Therefore, as the project would only generate 1,604 net new trips that would be distributed across intersections, the project would not have the potential to cause or contribute to an exceedance of the state or federal 1-hour or 8-hour CO standards. Impacts with respect to localized CO concentrations would be less than significant.

Mitigation Measures:

None required.

Impact A-7: Construction and operation of the proposed project would not expose sensitive receptors to substantial toxic air contaminants (TACs) that would exceed SCAQMD thresholds. The impact of the proposed project would be less than significant.

The construction activities associated with the project could result in the generation of TACs, including diesel particulate matter. An analysis of potential health risks associated with construction of the project was performed based on the OEHHA guidance and incorporation of the results from the AERMOD dispersion model, as described above. Table IV.A-8, Summary of Maximum Carcinogenic Risks, summarizes the carcinogenic risk for the maximum impacted sensitive receptor. As discussed previously, the lifetime exposure under the OEHHA Guidance takes into account early life (3rd trimester, infant and child) exposure. It should be noted that the calculated cancer risk is conservative as it is estimated for outdoor exposure over the entire construction period (i.e., 24 months), which assumes that sensitive receptors (residential and school uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. The maximum impact occurred at the SMC Center for Media and Design, located approximately 357 feet northeast of the site, and would be less than the risk threshold of 10.0 in 1 million. The closest residential receptor, located approximately 235 feet (71 meters) northwest from the project site, could have infant receptors[22] at that location exposed to a cancer risk of 5.4 in a million, which is also less than 10.0 in a million. Impacts at locations farther than this receptor would be further reduced, and thus impacts would be less than significant.

Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard. As shown in greater detail in Appendix C to this Draft EIR,

[22] *Infants are the most-impacted residential receptor due to length of exposure (0-2 years) and their high daily breathing rate (1090 l/kg of body weight per day versus children, 572 l/kg of bodyweight per day and 3rd trimester, 361 l/kg of body weight per day). See Appendix C of this EIR for details.*

non-cancer effects at the maximally impacted receptor (i.e., SMC Center for Media and Design, located approximately 357 feet northeast of the site) would be 0.0093, which is less than the 1.0 health hazard threshold. Impacts at locations farther than this receptor would be further reduced, and thus non-cancer effects would be less than significant.

Table IV.A-8
Summary of Maximum Carcinogenic Risks

Risk Scenario	Carcinogenic Risk Per One Million	Maximum Individual Cancer Risk Threshold	Exceeds Threshold?
3rd trimester exposure (0.25 years)	0.27	10.0	No
Infant exposure (0-2 years)	7.09	10.0	No
See Appendix C to this EIR for more details on the Construction HRA.			

With respect to operations, potential TAC generators are associated with specific types of facilities such as dry cleaners, gas stations, warehouses, and chrome plating facilities, and are the focus of local control efforts. SCAQMD recommends that operational health risk assessments 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. The project would not include the operations of any land uses routinely involving the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks. Thus, no appreciable operational-related toxic airborne emissions would result from project implementation, and the project would not be considered a significant source of TACs. As such, impacts with respect to TACs would be less than significant.

Mitigation Measures:

None required.

Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?

Impact Analysis:

Impact A-8: Construction and operation of the proposed project would not result in other emissions (such as those leading to odors) affecting a substantial number of people. The impact of the proposed project would be less than significant.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from architectural coatings and solvents, respectively. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from architectural coatings and solvents, respectively. Odors that might occur during construction of the project would be typical of odors associated with construction projects of similar type and size. Construction odors would be intermittent and temporary and would not affect a substantial number of people, if they were to occur.

As such, the project, which includes creative and business professional office uses, would not generate other emissions (such as those leading to odors) affecting a substantial number of people during construction or long-term operation. Therefore, a less-than-significant impact would occur with respect to the creation of other emissions that would generate objectionable odors during construction.

The project does not include any of the uses identified by the SCAQMD as being associated with odors (such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding). In addition, SCAQMD Rule 402 (Nuisance),

and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the project's long-term operations phase. Therefore, a less-than-significant impact would occur with respect to the creation of other emissions that would generate objectionable odors during operation.

Mitigation Measures:

None required.

4. CUMULATIVE IMPACTS

The geographic context for the cumulative analysis of air quality impacts is the South Coast Air Basin.

A. Construction Impacts

Because the Los Angeles County portion of the Basin is currently in non-attainment for O_3, PM_{10}, and $PM_{2.5}$, cumulative development could violate an air quality standard or contribute to an existing or projected air quality violation. This would be considered a significant cumulative impact. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed previously, construction emissions associated with the project would not exceed the SCAQMD's regional thresholds of significance. Therefore, the cumulative impact of the project's construction emissions would be considered less than significant.

With respect to TACs, the greatest potential for TAC emissions at cumulative projects would involve diesel particulate emissions associated with trucks and heavy equipment. The construction activities associated with the project and cumulative projects would be similar to other development projects in the City and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. In addition, and similar to the proposed project, construction activity for cumulative projects would not result in long-term substantial sources of TAC emissions (i.e., 9, 30 or 70 years) and would not combine with the project to generate ongoing TAC emissions. Thus, cumulative TAC emissions would be considered less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings and solvents. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, it is anticipated that construction activities and materials used in the construction of the project and cumulative projects would not combine to create objectionable odors. Thus, cumulative odor impacts are considered less than significant.

B. Operational Impacts

Due to the non-attainment status of O_3, PM_{10}, and $PM_{2.5}$, the generation of daily operational emissions associated with cumulative development would result in a cumulative significant impact associated with the cumulative net increase of any criteria pollutant for which the region is in non-attainment. With respect to operational emissions, the SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants (CO, ROG, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the proposed project region is in non-attainment under an applicable federal or state ambient air quality standard.

As discussed previously, the operational emissions associated with the project would not exceed the established SCAQMD thresholds of significance. Therefore, the cumulative impact of the project's operational emissions would be considered less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to air quality (i.e., regional and localized impacts per SCAQMD thresholds) would be less than significant without mitigation. TAC impacts during construction would be less than significant.

Cumulative impacts related to air quality would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
B. ENERGY

1. INTRODUCTION

This section analyzes impacts on energy resources due to construction and operation of the project. This section provides a summary of the project's anticipated energy needs, impacts, and conservation measures. Information found herein, as well as other aspects of the project's energy implications, are discussed in greater detail elsewhere in this EIR, including in Section II, Project Description; Section IV.A, Air Quality; Section IV.C, Greenhouse Gas Emissions; Section IV.E, Land Use and Planning; and Section IV.G, Transportation. Detailed energy calculations for the project are included as Appendix D to this Draft EIR.

2. ENVIRONMENTAL SETTING

A. Existing Electricity Consumption

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for Santa Monica. CPA is 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. CPA purchases electricity from renewable sources and partners with SCE to distribute electricity to residential and commercial customers throughout the City. With the recent switch in energy providers, electricity customers in Santa Monica are automatically defaulted to have 100% renewable energy serving their electricity needs. Alternatively, customers can opt to have their electrical power consist of 50% renewable content or 36%, or they can opt out of the CPA and have Southern California Edison be their provider.

CPA purchases their energy from a mix of renewable generating sources. Table IV.B-1, Electric Power Mix Delivered to Retail Customers in 2018 (CPA), shows the electric power mix that was delivered to CPA customers by renewable power mix.

Table IV.B-1
Electric Power Mix Delivered to Retail [a] Customers in 2018 (CPA)

Energy Resource	Lean Power (36%)	Clean Power (50%)	100% Green Power
Eligible Renewable	**36%**	**61%**	**100%**
Biomass & Biowaste	0%	0%	0%
Geothermal	0%	0%	0%
Small Hydroelectric	0%	0%	0%
Solar Electric	0%	38%	0%
Wind	36%	23%	100%
Non Renewable	**64%**	**39%**	**0%**
Large Hydroelectric	45%	27%	**0%**
Unspecified sources of power [a]	19%	13%	**0%**
Total Power Mix	**100%**	**100%**	**100%**
Total Electricity Sale/Usage (GWh)			

a Unspecified sources of power mean electricity from transactions that are not traceable to specific generation sources.
Source: Clean Power Alliance https://cleanpoweralliance.org/power-sources/ ; accessed 9/23/20

For customers opting out of the CPA, SCE 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.[1] In 2018, SCE's total electricity sales in the SCE service area was estimated to be 85,276 Gigawatt-hours (GWh).[2]

SCE produces and purchases their energy from a mix of conventional and renewable generating sources. Table IV.B-2, Electric Power Mix Delivered to Retail Customers in 2018 (SCE), shows the electric power mix that was delivered to retail customers for SCE compared to the statewide 2018 power mix. Total electricity sales/usage for SCE is also shown in Table IV.B-2 compared to the statewide electricity sales/usage for 2018.

Table IV.B-2
Electric Power Mix Delivered to Retail [a] Customers in 2018 (SCE)

Energy Resource	2018 SCE [b]	2018 California (for comparison) [b]
Eligible Renewable	**36%**	**31%**
Biomass & Biowaste	1%	2%
Geothermal	8%	5%
Eligible Hydroelectric	1%	2%
Solar	13%	11%
Wind	13%	11%
Coal	**0%**	**3%**
Large Hydroelectric	**4%**	**11%**
Natural Gas	**17%**	**35%**
Nuclear	**6%**	**9%**
Other	**0%**	**<1%**
Unspecified sources of power [c]	**37%**	**11%**
Total Power Mix	**100%**	**100%**
Total Electricity Sale/Usage (GWh)	**85,276 [d]**	**255,224 [e]**

a Retail customers include residential, commercial, and industrial users.
b Percentages are estimated annually by the California Energy Commission based on the electricity sold to California consumers during the previous year.
c "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.
d Source: Southern California Edison, Energy Resource Recovery Account, 2020 Forecast of Operations, June 3, 2019, page 10.
e Source: U.S. Energy Information Administration, Electricity Data, California Electricity Profile 2018, March 23, 2020.
Source (except where noted): California Energy Commission, Power Content Labels for 2018, Southern California Edison, July 2019.

As shown in Table IV.B-2, SCE generates power from a variety of energy sources, including large hydroelectric, natural gas, nuclear, and renewable resources such as biomass and biowaste, geothermal, small hydroelectric, solar, and wind. As detailed in the regulatory framework discussion below, SCE was required by the Renewables Portfolio Standard (RPS) to procure at least 33 percent of its energy portfolio from renewable sources by 2020. In addition, SB 350 (Chapter 547, Statues of 2015) further increased the RPS to 50 percent by 2030. The legislation also includes interim targets of 40 percent by 2024 and 45 percent by 2027. Eligible renewable resources are defined in the Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 Mega Watts [MW] or less); aqueduct hydro power

[1] *Southern California Edison, "Who We Are" website, available at: https://www.sce.com/about-us/who-we-are, accessed: August 2020.*

[2] *Southern California Edison, Energy Resource Recovery Account, 2020 Forecast of Operations, June 3, 2019, page 10.*

plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic (PV); solar thermal electric; wind; and other renewables that may be defined later. As shown in Table IV.B-2, SCE provided approximately 36 percent of its 2018 electric supply from renewable power.[3]

The existing office use at the project site currently receives electric power via underground conduit beneath adjacent public streets. Based on the CalEEMod outputs prepared for the air quality and GHG emissions analyses (see Appendix C of this Draft EIR), the existing use is estimated to consume approximately 727,887 kilowatt hours (kWh) of electricity per year (590,123 kWh/year associated with direct electrical consumption and 137,764 kWh/year associated with water consumption[4]).[5]

B. Existing Natural Gas Consumption

Southern California Gas Company (SoCalGas) is responsible for providing natural gas supply to the City and is regulated by the California Public Utilities Commission and other state agencies. SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[6] Table IV.B-3, Natural Gas Delivered to Retail Customers in 2018, shows the annual natural gas that was delivered to retail customers in 2018. Natural gas sales/usage for SoCalGas is also compared to the statewide natural gas sales/usage for 2018 in Table IV.B-3.

Table IV.B-3
Natural Gas Delivered to Retail Customers in 2018

Energy Resource	2018 SoCalGas [a]	2018 California (for comparison) [b]
Natural Gas Total Sales/Usage (MMcf)	854,830 [c]	2,136,907

Notes: MMcf = million cubic feet.
a Source: California Gas and Electric Utilities, 2019 California Gas Report Supplement, page 26.
b Source: U.S. Energy Information Administration, Natural Gas Data, Natural Gas Consumption by End Use, California 2018, July 31, 2020.
c SoCalGas's 2018 daily sales/usage was 2,342 MMcf per day. This daily rate was multiplied by 365 to estimate the annual sales/usage.

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[7] The traditional southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[8]

The existing office use at the project site currently receives natural gas service from SoCalGas through local distribution lines underneath the adjacent public streets. Based on the CalEEMod outputs prepared

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[3] *California Energy Commission, Power Content Labels for 2018, Southern California Edison, July 2019.*

[4] *Consistent with CalEEMod, electricity usage associated with the delivery, treatment, and distribution of water within Southern California is equivalent to 0.0111 kWh per indoor gallon and 0.009727 kWh per outdoor gallon.*

[5] *Detailed energy calculation sheets are provided in **Appendix D** of this Draft EIR.*

[6] *Southern California Gas Company, Company Profile website, available at: https://www.socalgas.com/about-us/company-profile, accessed: August 2020.*

[7] *California Gas and Electric Utilities, 2018 California Gas Report, page 80.*

[8] *Ibid, page 80-81.*

for the GHG emissions analysis (see Appendix C of this Draft EIR), the existing use is estimated to consume approximately 485,212 cubic feet (cf) of natural gas per year (1,329 cf per day).[9]

C. Existing Transportation Energy Consumption

According to the California Energy Commission (CEC), transportation accounted for 41.1 percent of California's total energy consumption in 2017.[10] Petroleum-based fuels (gasoline and diesel) currently account for 90 percent of California's transportation energy sources.[11] Table IV.B-4, Transportation Fuel Consumption in 2018, shows the annual transportation fuel consumption of gasoline and diesel for Los Angeles County in 2018. Gasoline and diesel consumption for Los Angeles County is also compared to the statewide gasoline and diesel consumption for 2018 in Table IV.B-4.

Table IV.B-4
Transportation Fuel Consumption in 2018

Energy Resource	2018 Los Angeles County	2018 California (for comparison)
Gasoline (million gallons)	3,638	527
Diesel (million gallons) [a]	15,471	3,702

a Diesel is adjusted to account for retail (48%) and non-retail (52%) diesel sales.
Source: California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2018.

As shown in Table IV.B-4, according to fuel sales data from the California Energy Commission, fuel consumption in Los Angeles County was approximately 3,638 million gallons of gasoline and 527 million gallons of diesel fuel in 2018. Gasoline-fueled vehicles accounted for approximately 93.73 percent of the total VMT for 2018 and diesel-fueled vehicles accounted for approximately 5.44 percent of the total VMT.[12] However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT.

The existing office use currently generates a demand for transportation-related fuel use as a result of vehicle trips to and from the project site. Based on the CalEEMod outputs prepared for the GHG emissions analysis (see Appendix C of this Draft EIR), the estimated annual VMT associated with the existing use is 1,056,004 VMT per year. Assuming the same percentages of gasoline- and diesel-fueled VMT as was documented for 2018, this translates to approximately 40,693 gallons of gasoline and 4,384 gallons of diesel consumed per year.[13]

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[9] *Detailed energy calculation sheets are provided in Appendix D of this Draft EIR.*

[10] *California Energy Commission, 2019 Integrated Energy Policy Report, adopted February 20, 2020, Figure ES-2, page 4.*

[11] *California Energy Commission, 2020-2023 Investment Plan Update for the Clean Transportation Program, March 2020, page 9.*

[12] *Based on the California Air Resources Board on-road vehicle emissions factor model, EMFAC2017 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2018). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicle associated with project-related VMT. Other sources of transportation fuel, including electricity and natural gas, accounted for approximately 0.84 percent of the total VMT for 2018.*

[13] *According to the California Air Resources Board on-road vehicle emissions factor (EMFAC2017) model, the average fuel economy (weighted for total VMT) for the fleet-wide mix of vehicles operating in Los Angeles County was approximately 24.32 miles per gallon for gasoline-fueled vehicles and approximately 13.09 miles per gallon for diesel-fueled vehicles in 2018.*

D. Regulatory Framework

i) State

1) California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were first adopted to ensure that building construction, system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[14] The 2019 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the Nonresidential Standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2017 national standards.[15]

2) California Green Building Standards (Title 24, Part 11)

The most recent update for the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is the 2019 CALGreen Code, which went into effect on January 1, 2020.[16] The purpose of the CALGreen Code is to encourage sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The 2019 CALGreen Code includes mandatory measures for residential and non-residential development related to site development; water use; weather resistance and moisture management; construction waste reduction, disposal, and recycling; building maintenance and operation; pollutant control; indoor air quality; environmental comfort; and outdoor air quality.[17] The 2019 CALGreen Code improves upon the 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation.

3) California Renewable Portfolio Standards

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) require retail sellers of electric services to source at least 33 percent of energy from eligible renewable energy resources by 2020.[18] The California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) jointly implement the RPS. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[19] The CEC's

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[14] *California Energy Commission, Building Energy Efficiency Standards for Residential and Nonresidential Buildings, for the 2019 Building Energy Efficiency Standards, Title 24, Part 6, and Associated Administrative Regulations in Part 1, December 2018.*

[15] *California Energy Commission, Building Energy Efficiency Standards for Residential and Nonresidential Buildings, for the 2019 Building Energy Efficiency Standards, Title 24, Part 6, and Associated Administrative Regulations in Part 1, December 2018, Abstract page.*

[16] *California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11.*

[17] *California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017.*

[18] *California Public Utilities Commission, California Renewables Portfolio Standard (RPS) website, available at: https://www.cpuc.ca.gov/rps/, accessed: August 2020.*

[19] *California Public Utilities Commission, California Renewables Portfolio Standard (RPS) website, available at: https://www.cpuc.ca.gov/rps/, accessed: August 2020.*

responsibilities include: (1) certifying renewable facilities as eligible for the RPS; and (2) designing and implementing a tracking and verification system to ensure that renewable energy output is counted only once for the purpose of the RPS and verifying retail product claims in California or other states.

4) Senate Bill 350

Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33 percent to 50 percent by 2030; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030.[20]

5) Senate Bill 100

Senate Bill (SB) 100, signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 updates the goals of California's Renewable Portfolio Standard and SB 350, as discussed above, to the following: achieve 50 percent renewable resources target by December 31, 2026 and achieve a 60 percent target by December 31, 2030. SB 100 also requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.[21]

6) Assembly Bill 32

Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the state to achieving year 1990 GHG levels by 2020. To achieve these goals, AB 32 tasked the CPUC and CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.

7) Senate Bill 32

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (the Global Warming Solutions Act) to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

ii) Regional

1) Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

The Southern California Association of Governments (SCAG)'s 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS, the mission of which is "to foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices."[22] The newly adopted 2020-2045 RTP/SCS encompasses and builds upon and expands land use and transportation strategies established over several

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[20] *Senate Bill 350 (2015-2016 Reg. Session) Stats 2015, Ch. 547.*

[21] *Senate Bill 100 (2017-2018 Reg. Session) Stats 2018, Ch. 312.*

[22] *Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.*

planning cycles to increase mobility options and achieve a more sustainable growth pattern. The plan lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a 25.7 percent decrease in time spent in traffic delay per capita and a five percent decrease in daily miles driven per capita from 2016 to 2045. The 2020–2045 RTP/SCS includes land use strategies that focus growth near destinations and mobility options, promote diverse housing choices, leverage technology innovations, support implementation of sustainability policies, and promote a green region. As with the previous RTP/SCS, the 2020–2045 RTP/SCS focuses on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas. More mixed-use, walkable, and urban infill development would be expected to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial buildings types. Furthermore, the 2020–2045 RTP/SCS includes transportation investments and land use strategies that encourage carpooling, increased transit use, active transportation opportunities, and promoting more walkable and mixed-use communities which would potentially help to offset passenger VMT.

iii) Local

1) Santa Monica General Plan Land Use and Circulation Element (LUCE)

The LUCE includes policies, programs, and objectives that address sustainability, including energy conservation, which are applicable to the project:

- **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 S3.4:** 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 S4.4:** 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 Leadership in Energy and Environmental Design (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.

2) Sustainable City Plan

The Santa Monica City Council initially adopted the Santa Monica Sustainable City Plan (SCP) in September 1994, with updates occurring three times, the last of which occurred in January 2014. The SCP 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 that cover a range of environmental, economic, and cultural activities. Of these, two goal areas are particularly relevant to the City reductions in Energy Conservation: Resource Conservation and Environmental/Public Health.

The SCP goals pertaining to Resource Conservation and Environment and Public Health more directly address the generation of GHG emissions. The Resource Conservation goals directly address 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 in order to address climate change impacts. These targets, if achieved, would result in greater GHG emissions reductions than those set by the State, at least in the short term.

The existing SCP 2014 update includes targets of reducing GHG emissions by 20 percent below 1990 levels Citywide by 2020, by 30 percent below 1990 levels for corporate operations by 2020, and by 80 percent below 1990 levels by 2050. For the 2030 target, this equates to an emissions level of 647,005 metric tons of carbon dioxide equivalents ($MTCO_2e$). The SCP anticipates most reductions will come from increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of alternative transportation.

3) Santa Monica Municipal Code

a. Chapter 8.36 Energy Code

The City recently updated its Energy Code to provide local amendments to Title 24 Part 6 of the California Energy Code and Title 24, Part 11 of the California Green Building Standards Code. The local amendments are part of the City's efforts to achieve carbon neutrality. The revised Energy Code, which is effective on January 1, 2020, requires new buildings in Santa Monica to achieve one of two design pathways for complying with the City's Energy Code: all-electric design or mixed-fuel design. 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 CPA are effectively Zero-Emission Buildings. The energy requirements for new building types are as follows:

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

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

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

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

For all other new non-residential buildings:

- All new buildings shall have a solar 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 CEC.
- Mixed-Fuel Building shall be designed to be 10 percent more efficient than the code established by the 2019 CEC.

b. Chapter 8.106 Green Building Standards Code

Chapter 8.106 of the SMMC establishes the City's Green Building Standards Code. This code adopts by reference the CalGreen requirements with the local amendments that require solar pool heating and solar PV installations. Under the City's Green Building Standards, the following requirements are applicable to the project:

- New multi-family dwellings (3 stories or less), non-residential, high-rise residential, hotel, and motel buildings are required to install a solar electric PV system. The required installation of the PV system shall be implemented by installing a solar PV system with a minimum total wattage 2.0 times the square footage of the building footprint (2.0 watts per square foot). That means a four-story building with a building footprint of 10,000 square feet would need a 20 kilowatt system.
- Electric vehicle charging shall be provided for new electrical services in both multi-family dwellings and non-residential buildings.

c. Chapter 8.108 Green Building, Landscape Design, Resource Conservation, and Construction and Demolition Waste Management Standards

This chapter of the SMMC provides requires new development projects to comply with Water-Efficient Landscape and Irrigation Standards. Project 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.

d. Chapter 9.28.160 Electric Vehicle Charging Stations:

This chapter of the SMMC requires that new development with 25 to 49 parking spaces shall provide a minimum of 1 charging station. For new development with 50 to 99 parking spaces a minimum of 2 charging stations, plus one additional charging station per every 50 parking spaces above 99 spaces.

4) Santa Monica Electric Vehicle Action Plan

The City of Santa Monica 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.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

A. Thresholds of Significance

Appendix G to the CEQA Guidelines provides screening questions addressing impacts related to energy. Specifically, the Guidelines state that a project may have a potentially significant energy impact if it would:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; or
b) Conflict with or obstruct a state or local plan for renewable energy.

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.

B. Methodology

This analysis addresses the project's potential energy usage, including electricity, natural gas, and transportation fuel. Energy consumption during both construction and operation is assessed. Specific analysis methodologies are discussed below. Detailed supporting calculations are provided in Appendix D of this Draft EIR and are based on the same assumptions as are used in Section IV.A, Air Quality, Section IV.C, Greenhouse Gas Emissions, and Section IV.G, Transportation, of this Draft EIR.

i) Construction

Construction electricity was estimated for nighttime lighting, small hand tools, and other construction equipment that would use electricity as an alternative to diesel fuel and for water usage from dust control. Calculations assumptions were based on the California Emissions Estimator Model (CalEEMod Version 2016.3.2) models prepared for the air quality and greenhouse gas emissions analyses presented in Section IV.A, Air Quality, and Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, respectively. CalEEMod is a state-approved emissions model that, in addition to outputting emissions, also provides for estimation of annual electricity, natural gas, and water use. Electricity demand by construction equipment was estimated using default horsepower and load factors from CalEEMod and Project-specific construction schedules and hours for a diesel generator. As SCAQMD recommends the use of electricity from SCE instead of diesel generators, the equivalent use of electrical power was assumed for the project.

Construction activities typically do not involve the consumption of natural gas; therefore, consumption of natural gas during construction is not an energy demand that requires quantification or analysis.

Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor determined by CARB's EMFAC2017 model for 2022 (the construction start year). EMFAC provides the total annual VMT and fuel consumed for each type of vehicle. CalEEMod default trip lengths were used for worker commutes, vendor trips, and haul trips during demolition and grading. Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix D of this Draft EIR for detailed energy calculations.

ii) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas from project operation was calculated using demand factors provided in CalEEMod. Energy consumption was based on the size of the proposed development, energy use factors, and water demand factors. The energy usage accounts for building energy standards pursuant to the 2019 Title 24 Building Standards Code and CALGreen Code. Physical and operational project characteristics 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 LEED® certification, solar panels providing at least 25 percent of the site's electricity, high efficiency lights, Energy Star® appliances, low-flow water fixtures, and water-efficient landscaping. The assessment also includes a discussion of additional sustainability characteristics which would reduce energy and water usage above and beyond State regulatory requirements. Such characteristics include an all-electric core and shell, which would eliminate the consumption of natural gas during operation. However, because some tenants may choose to install natural gas features at some time in the futures, in order to provide a conservative assessment of the project's energy demand, this analysis calculates and analyzes the projected natural gas consumption based on the land use based demand rates as determined by CalEEMod.

The project's estimated energy demands were also analyzed relative to SCE's and SoCalGas' existing and planned energy supplies in 2024 (i.e., the project buildout year) to determine if these two energy utility companies would be able to meet the project's energy demands. All residential and commercial users in the City are defaulted to receive its electricity from the CPA. The CPA buys electricity from renewable sources and partners with Southern California 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. Since the project is anticipated to consume electricity generated from renewable sources, the project would have no impact on SCE's electricity resources. However, the City and CPA allow for customers to purchase varying percentages of renewable power from CPA or to opt out of the CPA altogether. Therefore, for conservative purposes, the project's annual electricity consumption is assumed to be provided from SCE that would utilize a mix of renewable and nonrenewable resources.

Energy impacts (gasoline and diesel consumption) associated with transportation of residents, employees, and visitors to and from the project site during operation were also assessed. Daily trip generation used in this analysis was based on the project-specific Traffic Study (see Appendix I). The daily project-related trips and VMT were then input into CalEEMod, which calculated the annual VMT. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon for 2024 (the project's buildout year) as determined by EMFAC2017. EMFAC is incorporated into CalEEMod, which is a state-approved emissions model used for the 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. The vehicle fleet mix for vehicles anticipated to visit the project site was calculated consistent with the CalEEMod default for Los Angeles County. Supporting calculations are provided in Appendix D of this Draft EIR.

C. Project Characteristics

i) Construction

The project would require the demolition of surface parking areas and associated landscaping. The demolition would generate approximately 2,500 cubic yards (cy) of material, primarily concrete. Depending on the type of haul truck used, demolition could require up to approximately 275 truck trips to haul debris off-site. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one ram-hoe/hydraulic, three rubber tired or track dozer, one dumper/tender, one air compressor, one generator, and four tractors/loaders/backhoes.

Grading, site preparation, and excavation for the subterranean project components would require the export of approximately 55,000 cy of soil export. Soil export activities could require up to 3,200 truck trips to haul soil off-site. The depth of excavation would be approximately 37 feet below surface grade. This analysis assumes daily grading, site preparation, and excavation activities would require the following equipment: one air compressor, two compactors, two drilling rigs, one generator, one grader, two-three excavators, one dumpers/tender, one street sweeper, and -three-four tractors/loaders/backhoes.

Building construction would include the construction of the proposed new office buildings (Buildings A and B), refurbishment of the existing building (Building C), connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the project site. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two-four forklifts, two dumpers/tenders, multiple hydraulic/electric man lifts, two generator sets, one-two tractors/loaders/backhoes, two welders, and two-three air compressor.

Excavation would be performed pursuant to SCAQMD rules which control air pollutant emissions. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling to reduce public exposure to diesel particulate matter and other toxic air contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than 5 minutes at any given time. While intended to reduce construction criteria pollutant emissions, compliance with the anti-idling regulation would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy.

ii) Operation

The project would refurbish an existing office building (Building C) to reduce its consumption of energy, as well as further develop an underutilized site to strategically concentrate new commercial and employment center uses within in close proximity to transit. The project would utilize sustainable building and site design

features and would seek a LEED® certification of Platinum. As required by Santa Monica Municipal Code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable state and City codes. The project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; harvesting of storm-water; carbon neutral operations; 15% embodied carbon reduction; electrical vehicle (EV) charging stations; all electric core and shell; and low-water drought tolerant landscape plant palette.

The project site lies in close proximity to 26th Street/Bergamot Metro Line E Light Rail Station (less than 0.25-mile walk) and a number of BBB lines, and would provide onsite bicycle facilities, including parking, lockers, and showers, to support alternative modes of transportation, which would reduce vehicle trips and VMT compared to a project without these characteristics. Development patterns that reduce VMT, such as those of the project, reduce consumption of energy, and the California Air Pollution Control Officers Association (CAPCOA) has provided guidance for accounting for reductions in emissions with a basis in VMT reductions for land use development projects in its guidance document titled *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA Guidance). Specific CAPCOA Guidance VMT reduction strategies applicable to the project include the following:

Increased Density (LUT-1): Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The project would increase the site density by 129,265 square-feet of new office and restaurant/retail floor area and increase the employment at the project site. Therefore, the project would result in reduced VMT through LUT-1.

Increased Location Efficiency (LUT-2): Location efficiency refers to the location of a project relative to the type of urban landscape, such as an urban area, compact infill, or suburban center. In general, compared to the statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies.[23] Based on descriptions of Land Development Categories utilized by SCAG, the project site is located in an urban area;[24] therefore, the project would result in reduced VMT through LUT-2.

Increased Destination Accessibility (LUT-4): According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the distance to downtown or major job center. The project site is located in the Bergamot Area Plan which is a "…district offering opportunities for jobs, housing, arts and culture and community-serving retail, and which benefits from access to the Metro E Light Rail Station…" in proximity to commercial, office, and residential uses. Therefore, the project would result in reduced VMT through LUT-4.

Increased Transit Accessibility (LUT-5): Locating a project with high density near transit facilitates encourages the use of transit by people traveling to or from a project site. As previously discussed, the project site is located within close proximity to the 26th Street/Bergamot Metro Line E Light Rail Station and a number of BBB lines. Therefore, the project would result in reduced VMT through LUT-5.

Locate Project Near Bike Path/Bike Lane (LUT-8): A project that is designed around an existing or planned bicycle facility encourages alternative mode use. The project design should include a comparable network that connects the project uses to the existing offsite facilities. The project site is located within 1-mile of Class II bicycle lanes along Arizona Avenue, Broadway, 17th Street, and Pearl Street, and Class III

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[23] *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010, page 160.*

[24] *Southern California Association of Governments, Connect SoCal, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Sustainable Communities Strategy Technical Report, September 2020, page 45.*

bicycle routes along Washington Avenue, Yale Street, Arizona Avenue, Stewart Street, Pearl Street, 17th Street, Texas Avenue, Westgate Avenue, and Ohio Avenue. In addition, there are two bike share hubs located within two blocks of the project site at 26th Street/Pennsylvania Avenue and 26th Street/Olympic Metro Line E Line Light Rail Station. The project would further provide onsite bicycle facilities, including parking, lockers, and showers, to support connection to these offsite facilities. Therefore, the project would result in reduced VMT through LUT-8.

In addition to the above land use and design characteristics that would result in a reduction in VMT for the project as compared to a project without these characteristics, the project would implement a TDM plan in accordance with the City's TDM Ordinance that would include numerous measures designed to inform, coordinate, support, and incentivize project employees to utilize alternative forms of transportation for their commutes. The full list of measures is detailed in Section II, Project Description, of this Draft EIR.

D. 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?

Impact Analysis:

Impact B-1: Construction of the project would consume energy resources in the form of electricity and transportation-related fuel but would be temporary and would represent a fraction of available supplies. Operation of the project would consume energy resources in the form of electricity, natural gas, and transportation-related fuels, but the project would be designed to exceed applicable current energy efficiency standards. In addition, and further discussed under Impact B-2, the project would not conflict with an applicable plan for renewable energy or energy efficiency. The impact of the proposed project would be less than significant.

i) Construction

1) Electricity

During project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, hand tools, electronic equipment, or other construction activities necessitating electrical power. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the project's net annual operational electricity. Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the project site and staging areas would also comply with applicable Title 24 requirements, which includes limits on the wattage allowed per specific area, resulting in the conservation of energy.[25] In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[26]

[25] *California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.*

[26] *Energy Independence and Security Act of 2007. (Pub.L. 110-140).*

2) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support project construction activities; thus, there would be no natural gas demand generated by construction.

3) Transportation Fuel

Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). Construction would occur over approximately 24 months and is expected to be completed in 2024. Based on the proposed development program and engineering estimates that form the basis of the construction-related impact analyses, heavy-duty construction equipment would be primarily diesel-fueled. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for maximum potential energy use during construction. Construction worker travel to and from the project is assumed to be gasoline-fueled.

It is estimated that a maximum of approximately 7,188 one-way truck trips would be required to haul material to off-site reuse and disposal facilities during demolition and site preparation. In addition, the project is estimated to generate approximately 56 daily (23,128 total) one-way vendor truck trips for the delivery of building material and supplies to the project site during building construction. Based on CARB's EMFAC2017 vehicle emissions model, heavy duty haul trucks and vendor trucks representative of the types that would service construction of the project would have an estimated average fuel economy of approximately 6.58 miles per gallon (mpg) and 17.28 mpg, respectively, in 2022. Although construction would occur over 2 years, 2022 fuel economy values were used in order to provide the most conservative assessment of fuel consumption as fuel economies would increase each year. The number of construction workers that would be required to travel to and from the project site would vary based on the phase of construction and activity taking place. Based on the engineering estimates provided in the CalEEMod outputs prepared for the air quality and GHG emissions analyses, construction workers would travel a total of approximately 825,582 miles during construction of the project. The EMFAC2017 vehicle emissions model estimates that construction worker vehicles considered to be representative of the types that would be utilized by workers would have an estimated average fuel economy of approximately 26.9 mpg. Table IV.B-5, Summary of Transportation Energy Use During Project Construction, presents the estimated transportation energy (gasoline and diesel) consumption during construction.

Table IV.B-5
Summary of Transportation Energy Use During Project Construction [a]

Source	Total Diesel (gallons)	Total Gasoline (gallons)
Heavy-Duty Construction Equipment [b]	56,454	--
Haul Trucks [c]	21,844	--
Vendor Trucks [c]	9,234	--
Worker Trips [c]	--	30,689
Total 24-Month Consumption	**87,532**	**30,689**

*a Detailed calculation sheets are provided in **Appendix D** of this Draft EIR.*
b Fuel consumption by heavy-duty construction equipment is based on the engineering estimates (equipment list, amount, usage hours, horse-power, load factor, and number of days of use) included in the CalEEMod outputs prepared for the air quality and GHG emissions analyses of the project, as well as an estimated diesel consumption rate of 0.05 gallons/horse-power/hour.
c Consistent with CalEEMod, haul trips are assumed to be heavy-heavy-duty trucks (HHDT), vendor trips are assumed to be a mix of medium-heavy-duty trucks (MHDT) and light-heavy-duty trucks (LHDT1 and LHDT2), and worker trips are assumed to be a mix of light-duty trucks and light-duty-automobiles (LDT1, LDT2, and LDA).
Source: EcoTierra Consulting, Inc., 2020.

As shown in Table IV.B-5, on- and off-road equipment and vehicles would consume an estimated 30,689 gallons of gasoline and approximately 87,532 gallons of diesel fuel throughout the project's 24-month construction period (or approximately 15,345 gallons of gasoline and 43,766 gallons of diesel annually). For comparison purposes, the estimated annual fuel usage during project construction would represent approximately 0.0008 percent of the 2022 annual on-road gasoline-related energy consumption and 0.01 percent of the 2022 annual diesel fuel-related energy consumption in Los Angeles County as projected by CARB's EMFAC2017.[27] Accordingly, construction of the project would represent a very small fraction of the county's total annual fuel consumption. Furthermore, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet 50 years of worldwide consumption.[28]

Construction of the project would comply with state and federal regulations, such as the anti-idling regulation in accordance with Section 2485 in Title 13 of the California Code of Regulations, and fuel requirements in accordance with Section 93115 in Title 17 of the California Code of Regulations, which would reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels, from unnecessary idling fuel combustion. While these required regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations would also result in fuel savings. Compliance with required regulations will be enforced by construction contractors. project-related trips from on-road vehicles (i.e., haul trucks, worker vehicles) would also benefit from Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to compliance with Corporate Average Fuel Economy standards. In addition, the project would seek to hire construction workers from the local workforce, which would minimize commuting distances and overall vehicle miles traveled. Hiring from the local workforce would reduce fuel consumption and reduce the wasteful, inefficient, and unnecessary consumption of energy.

4) Conclusion Regarding Consumption of Energy During Construction

Construction of the project would require the consumption of energy for necessary on-site activities and to transport materials, soil, and debris to and from the project site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. Furthermore, compliance with the previously discussed anti-idling and emissions regulations 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 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, and no mitigation measures would be required.

ii) Operation

1) Electricity

During operation of the project, electricity would be consumed for multiple purposes, including, lighting and the use of electronics, equipment, and appliances. Electricity would also be consumed for the conveyance and treatment of water and wastewater. Table IV.B-6, Operational Electricity Consumption, presents the estimated net annual electricity consumption during project operation.

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[27] *California Air Resources Board, EMFAC2017 on-road vehicle emissions factor model, EMFAC2017 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2022). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with project-related VMT. According to EMFAC2017 modeling, Los Angeles County on-road vehicles will consume 3.78 billion gallons of gasoline and 650 million gallons of diesel in 2022 (the project's construction-start year).*

[28] *BP Global, Statistical Review of World Energy 2020, page 14.*

Table IV.B-6
Operational Electricity Consumption [a]

Source	Annual Electricity Consumption (kWh)
Project Operations	
Building Electricity	*1,918,479*
Water-Related Electricity	*451,128*
Existing Operations	727,887
Project Net Total Electricity	**1,641,720**
SCE Electricity Sales (2024) [b]	97,770,000,000
Project Percentage of SCE Sales	**0.002%**

Notes: kWh = kilowatt-hours; % = percent
a Detailed calculation sheets are provided in Appendix D of this Draft EIR.
b Source: SCE, Integrated Resource Plan of Southern California Edison Company (U 338-E), August 1, 2018, Appendix I.1.
Source (table): EcoTierra Consulting, Inc., 2020.

As shown in Table IV.B-6, operation of the project is estimated to consume electricity at a net annual rate of 1,641,720 kWh. As previously stated, the CPA is the defaulted electricity provider for the City, and all customers are defaulted to receive power from 100% renewable resources. Since the project is anticipated to consume electricity generated from renewable sources, the project would have no impact on SCE's electricity resources. However, since customers may opt of the CPA, the project's annual electricity consumption is conservatively assumed to be provided from SCE. Based on SCE's 2017-2018 Integrated Resource Plan, SCE forecasts that its total energy sales in 2024 will be 97,860 gigawatts (GWh) of electricity.[29] As such, the project-related net annual electricity consumption of 1,641,720 kWh would represent approximately 0.002 percent of SCE's projected sales in 2024.[30] SCE would review the project's estimated electricity consumption in order to ensure that the estimated power requirement would be part of the total load growth forecast for their service area and accounted for in the planned growth of the power system. Based on these factors, it is anticipated that SCE's existing and planned electricity capacity and electricity supplies would be sufficient to serve the project's electricity demand. As previously discussed, with the City's recent change to Clean Power Alliance, it is anticipated that the project would consume electricity from renewable sources and would have no impact on SCE's electricity generation.

As previously detailed, the project's estimated electricity consumption is based on demand factors consistent with 2019 Title 24 standards and applicable CALGreen requirements. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. Specifically, as required by current Title 24 and CALGreen standards, the project would include installation of energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems; LED lighting; low-flow water-use fixtures; water-efficient landscaping; and energy-efficient pumps and motors for waste and storm water conveyance, fire water, and domestic water. In addition, as detailed in the methodology above, the demand factors also accounted for the project's LEED® certification of Platinum and photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~. Furthermore, in addition to these energy savings incorporated into the energy demand factors, the project would include no use of cooling towers to minimize water usage; harvesting of storm-water; and low-water drought tolerant landscape plant palette. These project characteristics would further reduce the estimated electricity demand of the project through water savings, which, in turn, reduce the amount of electricity required to transport, treat, and convey water.

[29] *Southern California Edison, Integrated Resource Plan of Southern California Edison Company (U 338-E), August 1, 2018, Appendix I.1.*

[30] *Electricity supply is defined in terms of sales that will be realized at the meter.*

2) Natural Gas

During operation of the project, natural gas would be consumed for heating/ventilating/air conditioning (HVAC); refrigeration; and water heating. Table IV.B-7, Operational Natural Gas Consumption, presents the estimated net annual electricity consumption during project operation.

Table IV.B-7
Operational Natural Gas Consumption [a]

Source	Annual Natural Gas Consumption (cf)	Daily Natural Gas Consumption (cf)
Project Operations	2,487,855	--
Existing Operations	485,212	--
Project Net Total Natural Gas	**2,002,643**	**5,487**
SoCalGas Natural Gas Consumption (2024) [b]	--	2,444,000,000
Project Percentage of SoCalGas Consumption	**--**	**0.0002%**

Notes: cf = cubic feet; % = percent
a Detailed calculation sheets are provided in Appendix D of this Draft EIR.
b Source: California Gas and Electric Utilities, 2018 California Gas Report, Table 2-SCG, p. 103.
Source (table): EcoTierra Consulting, Inc., 2020.

As shown in Table IV.B-7, operation of the project is estimated to consume natural gas at a net annual rate of 2,002,643 cf. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,444 million cf per day in 2024.[31] Accordingly, the project would account for approximately 0.0002 percent of the forecasted natural gas consumption in the SoCalGas planning area. In addition, the 2018 California Gas Report estimates that there will be an additional supply available within SoCalGas' planning area of 1,331 million cf per day in 2024.[32] Accordingly, the project would account for approximately 0.0004 percent of forecasted surplus of natural gas in the SoCalGas planning area. As such, the project's consumption of natural gas is expected to fall within SoCalGas' projected consumption and supplies for the area. According to the United States Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2018 consumption.[33]

Furthermore, compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. The project would comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Specifically, the project would install energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems, and low-flow water-use fixtures, reducing water consumption and water heating fuel (natural gas). In addition, as previously discussed, the calculation and analysis of the project's natural gas demand during operation is a conservative assessment as the project would include an all-electric core and shell, which would eliminate the natural gas demand of the project.

3) Transportation Fuel

During operation of the project, transportation fuel (gasoline and diesel) would be consumed as a result of vehicle trips to and from the project site by employees, visitors, and delivery trucks to support operations.

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[31] *California Gas and Electric Utilities, 2018 California Gas Report, Table 2-SCG, p. 103.*

[32] *1,331 million cubic feet per day of additional supplies available was derived by subtracting the anticipated consumption (2,444 million cf per day) from the available supplies (3,775 million cf per day).*

[33] *U.S. Energy Information Administration, Frequently Asked Questions, how much natural gas does the United States have, and how long will it last?*

Table IV.B-8, Operational Transportation Fuel Consumption, presents the estimated net annual fuel consumption during project operation.

Table IV.B-8
Operational Transportation Fuel Consumption [a]

Source	Annual Gasoline (gal)	Annual Diesel (gal)
Project Operations	147,404	15,007
Existing Operations	40,693	4,384
Project Net Total Transportation Fuel	**106,711**	**10,623**
Los Angeles County Consumption (2024) [b]	3,580,966,765	642,008,500
Project Percentage of County Consumption	**0.003%**	**0.002%**

Notes: gal = gallons; % = percent
a Detailed calculation sheets are provided in Appendix D of this Draft EIR.
b California Air Resources Board, EMFAC2017 on-road vehicle emissions factor model, EMFAC2017 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with project-related VMT.
Source (table): EcoTierra Consulting, Inc., 2020.

As shown in Table IV.B-8, the project's estimated net annual transportation fuel consumption would be approximately 106,711 gallons of gasoline and 10,623 gallons of diesel. For comparison purposes, the fuel usage during project operation would represent approximately 0.003 percent of the 2024 annual gasoline-related energy consumption and 0.002 percent of the 2024 annual diesel fuel-related energy consumption in Los Angeles County, as projected by CARB's EMFAC on-road vehicle emissions factor model.[34] Accordingly, operation of the project would represent a very small fraction of the county's total annual fuel consumption. Furthermore, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet 50 years of worldwide consumption.[35] As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the project's demand.

The project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The project would support sustainable mobility options by locating office and commercial/retail uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to several public transit routes, including the 26th Street/Bergamot Metro Line E Light Rail station and a number of BBB lines, 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 off-site destinations and public transit stops. In addition, the project would provide onsite bicycle facilities, including parking, lockers, and showers, to support alternative modes of transportation, which would reduce vehicle trips and VMT compared to a project without these characteristics. As previously discussed, the project would also include EV charging stations and bicycle facilities, including parking, lockers, and showers, and would implement a TDM plan in accordance with the City's TDM Ordinance that would include numerous measures designed to inform, coordinate, support, and incentivize project employees to utilize alternative forms of transportation for their commutes. Given that the project site is located in an urban area within proximity to transit such that vehicle trips and VMT would be minimized and given that the project would promote alternative modes of transportation through the provision of EV charging stations, bicycle facilities, the project would be consistent with and support the goals and benefits of SCAG's 2020-2045 RTP/SCS.

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[34] *California Air Resources Board, EMFAC2017 on-road vehicle emissions factor model, EMFAC2017 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with project-related VMT. According to EMFAC2017 modeling, Los Angeles County on-road vehicles will consume 3.58 billion gallons of gasoline and 642 million gallons of diesel in 2024 (i.e., the project's buildout year).*

[35] *BP Global, Statistical Review of World Energy 2020, page 14.*

Furthermore, some percentage of automobiles and trucks driven by project visitors and employees would benefit from CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicles would also benefit from auto manufacturers' compliance with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel savings. Transportation fuel efficiency would improve as future project visitors and employees replace their privately owned or leased older vehicle models with newer vehicle models that achieve greater fuel efficiency.

4) Conclusion Regarding Consumption of Energy During Operation

Operation of the project would result in energy usage from building energy demand and transportation-related energy associated with vehicles traveling to and from the project site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of building energy or transportation fuels and would not increase the need for new energy infrastructure. The project site is located in a transit-rich area such that vehicle trips and VMT would be minimized and the project would be consistent with and support the goals and benefits of SCAG's 2020-2045 RTP/SCS, which seeks improved access and mobility. Furthermore, the project would incorporate green building measures consistent with the City's Energy Code, exceeding the energy efficiency standards in CALGreen. The project would also provide opportunities for improved energy efficiency exceeding regulatory standards by installing solar electric PV systems and providing capacity for electric vehicle recharging. As the project would achieve greater than required energy efficiency (as evidenced through seeking LEED® certification of Platinum, it would not result in the wasteful, inefficient, and unnecessary consumption of building energy or transportation energy usage. Therefore, operation of the project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure or preempt opportunities for future energy conservation. Therefore, operational energy impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures:

None required.

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis:

Impact B-2: The project would consume energy resources in the form of electricity, natural gas, and transportation-related fuel, but would be consistent with state and local plans for renewable energy and energy efficiency. The impact of the proposed project would be less than significant.

i) Electricity and Natural Gas

The project would be subject to state regulations on energy efficiency. Specifically, the project would comply with applicable regulatory requirements for the design of the new building, including the provisions set forth in the CAL Green Code and California's Building Energy Efficiency Standards, both of which are set forth in the California Code of Regulations, Title 24, and are set of prescriptive standards establishing mandatory maximum energy consumption levels for buildings. The standards include regulations for residential and nonresidential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The 2016 CALGreen standards became effective on January 1, 2018. The new 2019 standard became effective on January 1, 2020. The project would comply with these energy conservation standards and would be designed to achieve a LEED® certification of Platinum, which requires energy efficiency above applicable codes and standards.

ii) Transportation Fuel

As previously discussed, CAPCOA has provided guidance on mitigating or reducing emissions from land use development projects within its guidance document titled *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended GHG emission reduction strategies.[36] The project would increase density on a site with access to public transit facilities. Furthermore, the project would install EV charging stations and bicycle facilities, including parking, lockers, and showers, and would implement a TDM plan in accordance with the City's TDM Ordinance that would include numerous measures designed to inform, coordinate, support, and incentivize project employees to utilize alternative forms of transportation for their commutes. Such measures would include: on-site transportation information; designated Project Transportation Coordinator; new employee orientation; parking cash out; incentives for employees living within one-half mile of the site; bike commute training; provision of shared bicycles (either through the City's program or an on-site program in the event of the removal off the City's program); commuter matching; information regarding trips reduction options, such as, flex schedules and telecommuting; transportation allowance; and free bike valet. In accordance with these measures, as previously detailed, the project would be consistent with the VMT reduction land use strategies identified by CAPCOA, including LUT-1, LUT-2, LUT-4, LUT-5, and LUT-8.

iii) Conclusion

As demonstrated above, the project would not conflict with energy efficiency or conservation plans. The project's design would comply with existing energy standards and incorporate features to reduce energy consumption. Therefore, project impacts related to potential conflict with a state or local plan for renewable energy or energy efficiency would be less than significant and no mitigation measures would be required.

Mitigation Measures:

None required.

4. CUMULATIVE IMPACTS

Cumulative development inclusive of the project would also contribute to impacts on energy resources from the SCE and SoCalGas, as well as regional fuel consumption due to increased vehicle miles traveled. Cumulative development for under construction, approved, and pending cumulative projects within the City is identified in Section III, Environmental Setting, of this Draft EIR.

A. Electricity

The geographic context for the cumulative analysis of electricity is SCE's service area. Growth within this service area is anticipated to increase the demand for electricity and the need for infrastructure, such as new or expanded facilities.

Buildout of the project, cumulative projects, and additional growth forecasted to occur in the City would increase electricity consumption during project construction and operation and may cumulatively increase the need for energy supplies. However, as discussed previously, the project as well as cumulative projects in the City would be required to comply with the City's Green Building Code and Energy Code. As such, cumulative projects would also be required to be more energy efficient than the California Energy Code and would be required to install photovoltaic systems. Additionally, Santa Monica receives electricity from the CPA and therefore, the project and cumulative projects would consume electricity that is generated by 100 percent renewable energy sources. Based on this, the project would not have an impact on nonrenewable energy resources or SCE's electric generation capacity or distribution capabilities. Accordingly, the impacts

[36] *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

related to electricity consumption would not be cumulatively considerable, and thus would be less than significant.

B. Natural Gas

The geographic context for the cumulative analysis of natural gas is the SoCalGas service area. While growth within this geographic region is anticipated to increase the demand for new natural gas hookups and meters, efficiency upgrades and the transition away from natural gas as a source of energy generation is expected to decrease the overall natural gas demand in future years.

Though electricity usage is predicted to rise, natural gas demand is expected to decline overall from 2016-2035 accounting for population and economic growth as well as efficiency improvements and the state's transition away from fossil fuel-generated electricity to increased renewable energy. SoCalGas predicts a decline in every sector (residential, industrial, commercial, electricity generation, and vehicular), with the exception of wholesale and international gas sales to Mexico. The 2018 California Gas Report states, "California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035. The forecast decline is a combination of moderate growth in the Natural Gas Vehicle market and across-the-board declines in most of the other market segments."[37]

Buildout of the project and cumulative projects in the SoCalGas service area is expected to increase short term natural gas consumption and the need for natural gas supplies, but long-term energy efficiency upgrades are expected to reduce the energy impacts of both the project and related projects over the next 20 years. According to SoCalGas data, natural gas sales have been relatively stable over the past three years with a slight increase from 287 billion cubic feet in 2014 and 294 billion cubic feet in 2016. Based on the project's estimated natural gas consumption as shown in Table IV.B-7, the project would conservatively account for approximately 0.0002 percent of the forecasted natural gas consumption and approximately 0.0004 percent of forecasted surplus of natural gas in the SoCalGas planning area in the project's buildout year.

Although future development projects would result in 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. Furthermore, SoCalGas' forecasts account for projected population growth and development based on local and regional plans. Therefore, natural gas usage resulting from future operations at future development sites, including the Related Projects, is accounted for in the SoCalGas projections. In addition, like the project, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards in Title 24, and incorporate mitigation measures, as necessary. While initially the project and 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 due to increases in regional natural gas efficiencies and the transition to renewable energy on a statewide basis displacing fossil fuels including natural gas. Therefore, the project would not have a cumulatively considerable impact related to natural gas consumption, and impacts would be less than significant.

C. Transportation Fuel

Buildout of the project and cumulative projects in the region would be expected to increase overall VMT; however, the effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and state regulations. By 2025, vehicles will be required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012-2016 standards. As discussed previously, the project would support statewide efforts to improve transportation energy efficiency and would locate office and commercial/retail uses near major transit facilities, including the 26th Street/Bergamot Metro Line E Light Rail Station, and a number of BBB lines.

[37] *California Gas and Electric Utilities, 2018 California Gas Report, page 4.*

Siting land use development projects at infill sites is consistent with the state's overall goals to reduce VMT pursuant to SB 375, and as outline in the SCAG 2020-2045 RTP/SCS for the region, which seeks to focus growth near destinations and mobility options through strategies such as "prioritiz[ing] infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods."[38] Related projects that would also be consistent with these goals and would also contribute to transportation energy efficiency. Furthermore, based on current proven reserves, current crude oil production would be sufficient to meet 50 years of worldwide consumption.[39] Therefore, as the project would incorporate land use characteristics consistent with state goals for reducing VMT, the project would not have a cumulatively considerable impact related to transportation energy, and impacts would be less than significant.

Mitigation Measures:

None required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project and cumulative Impacts associated with energy consumption would be less than significant.

[38] *Southern California Association of Governments, Connect SoCal, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, page 49.*

[39] *BP Global, Statistical Review of World Energy 2020, page 14.*

IV. ENVIRONMENTAL IMPACT ANALYSIS
C. GREENHOUSE GAS EMISSIONS

1. INTRODUCTION

This section of the EIR includes a discussion of global climate change, existing greenhouse gas emissions (GHG) emissions and regulatory framework pertaining to global climate change, and potential impacts due to the GHG emissions that would result from construction and operation of the proposed project. The analysis also addresses the consistency of the project with applicable regulations and policies set forth by the State of California, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG) and the City of Santa Monica (City) to reduce GHGs. GHG data and modeling results for the project are included in Appendix C to this EIR.

2. ENVIRONMENTAL SETTING

A. Global Climate Change

Earth's natural warming process is known as the "greenhouse effect." This greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass allows solar radiation (sunlight) into Earth's atmosphere, but prevents radiative heat from escaping, thus warming Earth's atmosphere. GHGs are compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. GHGs keep the average surface temperature of the Earth to approximately 60 degrees Fahrenheit. However, excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste.

Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect. While the increase in temperature is known as "global warming," the resulting change in weather patterns is known as "global climate change." Global climate change is evidenced in changes to wind patterns, storms, precipitation, and air temperature.

B. GHG Components and Health Effects

The California Global Warming Solutions Act of 2006 (discussed in the following pages) defined GHGs to include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride. A general description of each GHG discussed in this report is provided in Table IV.C-1, Description of Identified Greenhouse Gases. CO_2 is the most abundant GHG. Other GHGs are less abundant but have higher global warming potential (GWP) than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

C. Global Warming Potential

Global Warming Potential (GWP) is one type of simplified index based upon radiative properties that is used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO_2. A summary of the atmospheric lifetime

and GWP of selected gases is presented at Table IV.C-2, Global Warming Potentials and Atmospheric Lifetimes.

Table IV.C-1
Description of Identified Greenhouse Gases

GHG	General Description
CO_2	CO_2 is an odorless, colorless GHG, which has both natural and man-made sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing; man made sources of CO_2 are burning coal, oil, natural gas, and wood.
CH_4	CH_4 is a flammable gas and is the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. There are no ill health effects from CH_4. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
N_2O	N_2O is a colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
HFCs	HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987.
PFCs	PFCs have stable molecular structures and do not break down though the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
SF_6	SF_6 is an inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Source: Association of Environment Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.

Table IV.C-2
Global Warming Potentials and Atmospheric Lifetimes

Gas	Atmospheric Lifetime	Global Warming Potential[1] (100 Year Horizon)
Carbon Dioxide (CO_2)	—[2]	1
Methane (CH_4)	12	28-36
Nitrous Oxide (NO)	114	298
Hydrofluorocarbons (HFCs)	1-270	12-14,800
Perfluorocarbons (PFCs)	2,600-50,000	7,390-12,200
Nitrogen trifluoride (NF_3)	740	17,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Notes:
Source: http://www3.epa.gov/climatechange/ghgemissions/gases.html
(1) Compared to the same quantity of CO_2 emissions.
(2) Carbon dioxide's lifetime is poorly defined because the gas is not destroyed over time, but instead moves among different parts of the ocean–atmosphere–land system. Some of the excess carbon dioxide will be absorbed quickly (for example, by the ocean surface), but some will remain in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments.

D. Projected Effects of Global Warming

Temperature rises in California are consistent with the overwhelming evidence that the Earth is warming due to changes in the climate system from rising GHG levels. In California, present day (1967-2016) temperatures throughout the state have warmed above temperatures recorded during the first six decades of the 20th century (1901-1960). Annual temperature increases over most of the state have exceeded 1 degree Fahrenheit, with some areas exceeding 2 degrees Fahrenheit.[1] Adverse impacts from changes in global and California temperatures include:[2]

- Atmospheric rivers, responsible for many of the heaviest extremes, will carry more moisture, and extreme precipitation may increase;
- Warming air temperatures throughout the 21st century will increase moisture loss from soils, which will lead to drier seasonal conditions even if precipitation increases, and seasonal dryness in California may become prolonged;
- Spring snowpack, which provides a natural reservoir and a key source of surface and groundwater, will decline substantially due to warmer temperatures even if the amount of precipitation remains relatively stable;
- Drier conditions, vegetation changes, and changes in prominent wind events (i.e., Santa Ana, Sundowner, or Diablo events) will increase wildfire frequency and intensity; and
- Flooding from sea-level and coastal wave events will lead to bluff, cliff, and beach erosion, which could affect large geographical areas (hundreds of kilometers).

Locally, Santa Monica may experience the following climate change impacts:[3]

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1 *State of California, Governor's Office of Planning and Research, California's Fourth Climate Change Assessment, Statewide Summary Report, August 2018.*

2 *Ibid.*

3 *City of Santa Monica Climate Change Vulnerability Assessment*

- *Sea Level Rise* – Current projections predict a high sea level rise (SLR) scenario of 1.67 meters by 2100. While SLR on its own, would not have a significant impact on Santa Monica, coastal flooding from storms and high tide, may cause damage to coastal infrastructure including the Santa Monica Pier, bike path, and utilities associated with beach facilities. Structures like the Annenberg Beach House, as well as private homes and commercial businesses, may also see flooding during high tides and coastal storm events.
- *Extreme Heat* – Increased average temperatures will give rise to extreme heat events in California and the Los Angeles region. It is predicted that extreme heat events are becoming more frequent, more intensive, and longer lasting. Due to its coastal and temperate climate, extreme heat will not likely post a direct impact to Santa Monica. However, increased energy usage for cooling or increased local tourism by people escaping the heat may affect Santa Monica's energy reliability, local economy and traffic.
- *Drought* – Climate change is likely to increase the duration and severity of droughts in California. The variability in wet and dry years will continue in the future under climate change. Santa Monica has made significant progress in reducing overall water usage and increasing local production. However, Santa Monica will still be vulnerable to prolonged periods of drought, coupled with intermittent precipitation.
- *Air quality* – Climate change will impact air quality through warming temperatures and more frequent episodes of stagnant air. Wildfires also have a negative impact on air quality and are likely to increase in number and severity with climate change.

E. Existing Greenhouse Gas Emissions Inventory

i) Global GHG Emissions

As of 2016, global GHG emissions were estimated at 49.3 gigatons (Gt) CO_2e per year, with 2016 emissions growth the slowest since the early 1990s, except for global recession years. This is mainly the result of lower coal consumption from fuel switches to natural gas and increased renewable power generation. About 72% of the 2016 emissions consisted of CO_2.[4] The 2016 CO_2 emissions estimate is approximately a 24 percent increase from the 28.7 Gt CO_2e 1970 emissions.[5] Annual anthropogenic GHG emissions have increased by 10 Gt CO_2e between 2000 and 2010, with this increase directly correlated with increases in energy supply (47 percent), industry (30 percent), transport (11 percent), and buildings (3 percent) sectors. Approximately half of all cumulative anthropogenic CO_2 emissions between 1750 and 2010 have occurred in the last 40 years. In 1970, cumulative CO_2 emissions from fossil fuel combustion, cement production, and flaring since 1750 were 420 Gt CO_2e, since 1970 to 2010, that cumulative total tripled to 1,300 Gt CO_2e.[6]

ii) U.S. GHG Emissions

In 2016, total gross U.S. greenhouse gas emissions were 5,311 million metric tons (MMT) of CO_2e. Total U.S. emissions have increased by 3.70 percent from 1990 to 2016, and emissions decreased from 2000 to 2016 by 11.49 percent. Of the four major sectors generating emissions through direct fossil fuel combustion in 2016 – energy accounts for approximately 83.78 percent, industrial processes and product use accounts for approximately 5.56 percent, agriculture accounts for approximately 8.64 percent, and waste accounts for approximately 2.02 percent. [7]

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[4] *PBL Netherlands Environmental Assessment Agency, Trends in Global CO_2 and Total Greenhouse Gas Emissions, September 2017. Excluding those GHGs emissions/removals from LULUCF (land-use, land-use change and forestry).*

[5] *IPCC, Summary for Policymakers, 2014, website: http://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc_wg3_ar5_summary-for-policymakers.pdf, accessed: September 2018.*

[6] *Ibid.*

[7] *United Nations, Framework Convention on Climate Change, Summary of GHG Emissions for United States of America, June 2018. Excluding those GHGs emissions/removals from LULUCF (land-use, land-use change and forestry)*

iii) State of California GHG Emissions

Table IV.C-3 shows the California GHG emissions inventory for years 2000 to 2017. Statewide GHG emissions decreased in 2009 due to a noticeable drop in on-road transportation, electricity generation, and industrial emissions. In 2012, total GHG and per capita emissions increased then continue to decrease from 2013 to 2017. This increase was driven primarily by strong economic growth in the state, the unexpected closure of the San Onofre Nuclear Generating Station, and drought conditions that limited in-state hydropower.

iv) City of Santa Monica GHG Emissions

Santa Monica has been tracking local GHG emissions for over 20 years through an annual community, sector-based emissions inventory, which measures the emissions in a given region using data from energy consumption in buildings, vehicles, waste, and industry. The 2018 GHG emissions inventory for the City accounted for electricity, natural gas, gasoline, and diesel consumption, as well as solid waste generation within the City. Total existing emissions in 2018 were estimated at approximately 981,249 MT CO2e, approximately 29 percent below the 1990 emission total of 1,386,642 MT CO2e. The changes are largely driven by increased efficiency in vehicle fuel, reduced waste being sent to the landfill, a decline in natural gas consumption, and reduced aviation activity. The emissions reduction is also owed to increased renewable energy for electricity generation, as the City began to purchase electricity from the Clean Power Alliance (CPA).

In addition to the sector-based inventory, the 2018 GHG emissions inventory also includes a consumption-based inventory, which focuses on the consumption of goods and services (e.g., food, clothing, electronic equipment, etc.) by residents of a city. The consumption-based method results in about 56 percent higher emissions than the traditional sector-based approach for the City, largely due to higher emissions from air travel, food, and household purchases. Vehicle transportation remains the largest source of emissions (24%), followed by food (17%), goods (18%), services (19%), air travel (7%), home construction (3%) and electricity (3%)[8].

v) Existing Project Site GHG Emissions

The project site consists of an approximately 87,651 square foot (2.01-acre) lot that is currently developed with a 3-story, brick, office building totaling approximately 45,429 sf and approximately 40 feet in height that was constructed in 1972. The project site also includes a surface parking lot serving the office building with 161 (157 standard and 4 handicap) ~~152~~ parking spaces. As such, GHG emissions are currently generated by the use of on-road motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater. The GHG emissions generated by the existing uses at the project site have been estimated for year 2022 utilizing CalEEMod 2016.3.2 recommended by the SCAQMD and are shown in Table IV.C-4, Existing Project Site Greenhouse Gas Emissions. As shown, GHG emissions generated by the existing uses are approximately 747.39 CO_2e MTY.

[8] *Source: https://www.smgov.net/uploadedFiles/Departments/OSE/Climate/Community_GHG_InventoryReport2018.pdf*

Table IV.C-3
California Greenhouse Gas Emissions Inventory

Scoping Plan Category	CO_2e Emissions (Million Metric Tons)																	
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Transportation	181	181	188	185	187	189	189	189	178	170	165	162	161	161	162	166	169	170
Electric Power	105	122	109	113	115	108	105	114	120	101	90	88	95	90	88	84	69	62
Commercial and Residential	43	42	44	43	44	42	43	43	44	44	45	46	43	44	37	38	39	41
Industrial	97	95	97	96	98	96	93	90	91	88	92	91	91	94	94	92	90	89
Recycling and Waste	7	8	7	8	8	8	8	8	8	8	8	8	8	9	9	9	9	9
Agriculture	32	32	34	34	34	34	35	36	36	34	34	35	36	35	36	34	34	32
High Global Warming Potential	6	7	7	8	8	9	10	11	12	12	14	15	16	17	18	19	20	20

Source: CARB, California Greenhouse Gas Inventory 2000-2017, August 2019; https://ww2.arb.ca.gov/ghg-inventory-data

Table IV.C-4
Existing Project Site Greenhouse Gas Emissions

Emissions Source	Estimated Project CO_2e Emissions (Metric Tons per Year)
Area	0.0012
Energy (Electricity & Natural Gas)	214.06
Mobile (Motor Vehicles)	449.87
Solid Waste Generation	21.25
Water Demand	62.19
Existing Project Site Total	**747.39**
Calculation data and results provided in Appendix C to this EIR.	

F. Regulatory Setting

i) International Regulations

In 1988, the United Nations established the IPCC to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. The UNFCCC is an international environmental treaty adopted on 9 May 1992 and opened for signature at the Earth Summit in Rio de Janeiro from 3 to 14 June 1992. It then entered into force on 21 March 1994, after a sufficient number of countries had ratified it. The UNFCCC objective is to "stabilize greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system". The framework sets non-binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to specify further action towards the objective of the UNFCCC.

The 2015 United Nations Climate Change Conference (COP 21) was held in Paris, from November 30 to December 11, 2015. The conference agreed to a legally binding deal to limit temperature rise well below 2 °C. The deal also includes a long-term emissions goal, which aims to peak global GHG emissions "as soon as possible" and to achieve "balance" between emissions and sinks in the second half of the century. In 2018, there will be a facilitative dialogue to take stock of the collective efforts of countries, which should inform the efforts of future commitments. Countries which have submitted targets for 2025 are then urged to come back in 2020 with a new target, while those with 2030 targets are invited to "communicate or update" them. This process will essentially be repeated every five years, with the first post-2020 stock-take occurring in 2023. The agreement also places a legal obligation on developed countries to continue to provide climate finance to developing countries. It also encourages other countries to provide support voluntarily – a compromise between the highly polarized positions that have taken center stage at the negotiations. In June 2017, U.S. President Donald Trump announced his intention to withdraw the US from the Paris Agreement. Under the agreement, the effective date of withdrawal for the U.S. was November 4, 2020.

ii) Federal

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system

for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors. The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S. Ct. 1438 (2007), that CO_2 and other GHGs are pollutants under the federal Clean Air Act (CAA), which the United States Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare. On December 7, 2009, USEPA Administrator made two distinct findings: (1) the current and projected concentrations of the six key GHGs in the atmosphere (i.e., CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) threatens the public health and welfare of current and future generations; and (2) the combined emissions of these GHGs from motor vehicle engines contribute to GHG pollution which threatens public health and welfare.

USEPA subsequently published its endangerment finding for GHGs in the Federal Register. The USEPA Administrator determined that six GHGs, taken in combination, endanger both the public health and welfare of current and future generations. Although the endangerment finding discusses the effects of six GHGs, it acknowledges that transportation sources only emit four of the key GHGs: CO_2, CH_4, N_2O, and HFCs. Further, the USEPA Administrator found that the combined emissions of these GHGs from new motor vehicles contribute to air pollution that endangers the public health and welfare under the CAA, Section 202(a).

USEPA requires large emitters of GHG to collect and report data. Fossil fuel and industrial GHG suppliers, motor vehicle and engine manufacturers, and facilities that emit 25,000 metric tons or more of CO_2 equivalent per year to report GHG emissions annually data to USEPA. The Rule is referred to as 40 Code of Federal Regulations (CFR) Part 98-Greenhouse Gas Reporting Program.

1) Energy Independence and Security Act (EISA)

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the Bush Administration issued an executive order on May 14, 2007, directing USEPA, the United States Departments of Transportation, and the United States Departments of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. On December 19, 2007, the EISA was signed into law, which requires an increased corporate average fuel economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020.

EISA requires establishment of interim standards (from 2011 to 2020) that will be the maximum feasible average fuel economy for each fleet. On October 10, 2008, the National Highway Traffic Safety Administration (NHTSA) released a final environmental impact statement analyzing interim standards for model years 2011 to 2015 passenger cars and light trucks. NHTSA issued a final rule for model year 2011 on March 23, 2009. In addition to setting increased CAFE standards for motor vehicles, the EISA included other provisions: (1) renewable fuel standard (RFS) (Section 202); (2) appliance and lighting efficiency standards (Sections 301–325); and (3) building energy efficiency (Sections 411-441). Additional provisions addressed energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

2) GHG and Fuel Efficiency Standards for Passenger Cars and Light-Duty Trucks

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The federal standards apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles built in model years 2012 through 2016.

In April 2010, USEPA and NHTSA finalized GHG standards for new (model year 2012 through 2016) passenger cars, light-duty trucks, and medium-duty passenger vehicles. Under these standards, CO_2 emission limits would decrease from 295 grams per mile (g/mi) in 2012 to 250 g/mi in 2016 for a combined fleet of cars and light trucks. If all of the necessary emission reductions were made from fuel economy improvements, then the standards would correspond to a combined fuel economy of 30.1 miles per gallon (mpg) in 2012 and 35.5 mpg in 2016. The agencies issued a joint Final Rule for a coordinated National Program for model years 2017 to 2025 light-duty vehicles on October 15, 2012, that would correspond to a

combined fuel economy of 36.6 mpg in 2017 and 54.5 mpg in 2025. According to the EPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.

In 2017, the EPA issued its Mid-Term Evaluation of the GHG emissions standards, finding that it would be practical and feasible for automakers to meet the model year 2022-2025 standards through a number of existing technologies. In 2018, the EPA revised its 2017 determination, and issued a proposed rule that maintains the 2020 CAFE and CO2 standards for model years 2021 through 2026. The estimated CAFE and CO2 standards for model year 2020 are 43.7 mpg and 204 grams of CO2 per mile for passenger cars and 31.3 mpg and 284 grams of CO2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. In 2019, the state of California, joined by 16 other states and the District of Columbia, filed a petition challenging the EPA's proposed rule to revise the vehicle emissions standards, arguing that the EPA had reached erroneous conclusions about the feasibility of meeting the existing standards. In September 2019, the USEPA published the final rule in the federal register. The USEPA also published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes critical parts of the SAFE) Vehicles Rule and makes clear that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates.

3) GHG and Fuel Efficiency Standards for Medium-and Heavy-Duty Engines and Vehicles

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks, which apply to vehicles from model years 2014 through 2018.[9] The U.S. EPA and the NHTSA adopted standards for CO_2 emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: (1) combination tractors, (2) heavy-duty pickup trucks and vans, and (3) vocational vehicles. According to the U.S. EPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by 6 percent to 23 percent.

In 2017, the EPA issued its Mid-Term Evaluation of the GHG emissions standards, finding that it would be practical and feasible for automakers to meet the model year 2022-2025 standards through a number of existing technologies. In 2018, the EPA revised its 2017 determination, and issued a proposed rule that maintains the 2020 CAFE and CO2 standards for model years 2021 through 2026.[10] The estimated CAFE and CO2 standards for model year 2020 are 43.7 mpg and 204 grams of CO2 per mile for passenger cars and 31.3 mpg and 284 grams of CO2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. In 2019, the state of California, joined by 16 other states and the District of Columbia, filed a petition challenging the EPA's proposed rule to revise the vehicle emissions standards, arguing that the EPA had reached erroneous conclusions about the feasibility of meeting the existing standards.[11] In September 2019, the USEPA published the final rule in the federal register.[12] The USEPA also published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes critical parts of the SAFE) Vehicles Rule and makes clear that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates.

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[9] *United States Environmental Protection Agency, Office of Transportation and Air Quality, EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-duty Vehicles, August 2011, website: http://www.epa.gov/otaq/climate/documents/420f11031.pdf, accessed: September 2018.*

[10] *Federal Register, 2018. Vol. 83, No. 165. August 24. Proposed Rules.*

[11] *Amicus brief, 2019. USCA Case #18-1114, Doc#1772455_filed February 14, 2019. Available: http://climatecasechart.com/case/california-v-epa-4/. Accessed September, 2020*

[12] *Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363*

iii) State

The State of California has passed a number of legislations to address climate change and reduce the potential risks and effects of climate change, as discussed below.

1) Greenhouse Gas Reduction Targets

a) Executive Order B-55-18

September 10, 2018, Governor Edmund G. Brown Jr. issued Executive Order B-55-18 to establish a new ambitious statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative targets of reducing GHG emissions.

b) Executive Order B-30-15 and Senate Bill 32/Assembly Bill 197

On April 29, 2015, Executive Order B-30-15 was issued to establish a statewide GHG reduction target of 40 percent below 1990 levels by 2030. This new emission reduction target is a step toward the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050.

Consistent with Executive Order B-30-15, Senate Bill 32 (SB 32) and its companion bill Assembly Bill 197 was approved by Governor Brown on September 8, 2016 and requires the CARB to approve GHG emissions limits equivalent to 40 percent below 1990 levels by 2030 (and 80 percent below the 1990 level by 2050. Specifically, this bill:

1) Requires CARB to approve, based on the best available scientific, technological, and economic assessments, the following statewide limits on GHG emissions, including short-lived climate pollutants:
    a) 40% below the 1990 level by 2030.
    b) 80% below the 1990 level by 2050.
2) Authorizes CARB to approve an interim GHG emissions target to be achieved by 2040.
3) States the intent of the Legislature for the Legislature and appropriate agencies to adopt complementary policies that ensure the long-term emissions reductions adopted pursuant to the 2030 and 2050 limits advance all of the following:
    a) Job growth and local economic benefits in California
    b) Public health benefits for California residents, particularly in disadvantaged communities.
    c) Innovation in technology and energy, water, and resource management practices.
    d) Regional and international collaboration to adopt similar GHG emissions reduction policies.
4) Prohibits CARB from taking any action to implement the next update of the AB 32 (Núñez), Chapter 488, Statutes of 2006, Scoping Plan unless CARB has:
    a) Conducted an evaluation, with input from an independent advisory committee, of the current and projected GHG reduction actions other jurisdictions are taking, as well as the cost-effectiveness of the various GHG reduction strategies CARB has undertaken, including considering the marginal costs of the strategies.
    b) Submitted the draft Scoping Plan to the Joint Legislative Budget Committee and appropriate policy committees and submitted the final version at least 60 days before adoption.
5) Requires the Legislature to hold at least one oversight hearing on the draft and final Scoping Plans before adoption by CARB.

6) Authorizes the Legislature to act to modify, reject or delay some or all of the Scoping Plan before its adoption.

7) Requires CARB to submit an annual report including:

   a) A list of regulatory policies that have been adopted and implemented by a state agency in furtherance of achieving the GHG emissions limits adopted by CARB pursuant to AB 32.

   b) The amounts, sources, and locations of GHG emissions reductions achieved toward the statewide emissions limit.

8) Requires CARB, in furtherance of approving statewide GHG emissions limits, to consider historic efforts to reduce GHG emissions and objectively seek, and account for, cost-effective actions to reduce GHG emission across all sectors.

9) Requires the Office of Environmental Health Hazard Assessment (OEHHA) to prepare a report analyzing the impacts of the GHG emissions limits on disadvantaged communities.

10) States that nothing in the section affects the authority of CARB or a local air district under the federal Clean Air Act or state air resources laws, or to implement measures adopted prior to the approval of the next update to the Scoping Plan.

11) States the intent of the Legislature that the chapter be interpreted in a manner that does not violate California Constitution Article IV, Section 8.

12) States that the provisions of the chapter are severable.

13) Requires CARB, in consultation with various specified public entities, to ensure that the 2050 GHG emissions limit is achieved without imposing disproportionate GHG emissions reduction requirements on land use and permitting decisions.

c) Executive Order S-3-05 and Assembly Bill 32

On June 1, 2005, Executive Order S-3-05 was issued, which established GHG emissions targets for the State of California, as well as a process to ensure the targets are met. The order directed the Secretary for California's Environmental Protection Agency ("CalEPA") to report every two years on the state's progress toward meeting the Governor's GHG emission reduction targets. As a result of this executive order, the California Climate Action Team, led by the Secretary of CalEPA, was formed. The California Climate Action Team is made up of representatives from a number of state agencies and was formed to implement global warming emission reduction programs and reporting on the progress made toward meeting statewide targets established under the Executive Order. The California Climate Action Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order. The statewide GHG targets are as follows:

- By 2010, reduce to 2000 emission levels.
- By 2020, reduce to 1990 emission levels; and
- By 2050, reduce to 80 percent below 1990 levels.

However, with the adoption of the California Global Warming Solutions Act of 2006 (also known as AB 32), discussed below, the Legislature did not adopt the 2050 horizon-year goal from Executive Order No. S-3-05.

The California Global Warming Solutions Act of 2006 ("AB 32") was signed into law in September 2006. The law codified the targets in Executive Order S-3-05 and instructs the California Air Resources Board ("CARB") to develop and enforce regulations for the reporting and verifying of statewide GHG emissions.

AB 32 set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.[13]

The heart of AB 32 is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. CARB accomplished the key milestones set forth in AB 32, including the following:

- June 30, 2007. Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures.[14] These were later supplemented by adding six other discrete early action measures.[15]
- January 1, 2008. Identification of the 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.[16]
- January 1, 2009. Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan: A Framework for Change* ("Scoping Plan"), discussed in more detail below.[17]
- January 1, 2010. Adoption and enforcement of regulations to implement the "discrete" actions. Several early action measures have been adopted and became effective on January 1, 2010.[18, 19]
- January 1, 2011. Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California's GHG emissions.[20] CARB's Board ordered its Executive Director to prepare a final regulatory package for cap-and-trade on December 16, 2010.[21]

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[13] *Legislative Counsel of California, California Assembly Bill 32, September 2006, website: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf, accessed: September 2018.*

[14] *California Air Resources Board, Summary of Board Meeting, Consideration of Recommendations for Discrete Early Actions for Climate Change Mitigation in California, June 21-22, 2007, website: http://www.arb.ca.gov/board/ms/2007/ms062107.pdf, accessed: September 2018.*

[15] *California Air Resources Board, Summary of Board Meeting, Public Meeting to Consider Approval of Additions to Reduce Greenhouse Gas Emissions under the California Global Warming Solutions Act of 2006 and to Discuss Concepts for Promoting and Recognizing Voluntary Early Actions, October 25-26, 2007, website: http://www.arb.ca.gov/board/ms/2007/ms102507.pdf, accessed: September 2018.*

[16] *California Air Resources Board, Staff Report, California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, November 16, 2007, website: http://www.arb.ca.gov/cc/inventory/pubs/reports/staff_report_1990_level.pdf, accessed: September 2018.*

[17] *California Air Resources Board, Climate Change Scoping Plan, December 2008, website: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed: September 2018.*

[18] *California Air Resources Board, Summary of Board Meeting, Consideration of Recommendations for Discrete Early Actions for Climate Change Mitigation in California, June 21-22, 2007, website: http://www.arb.ca.gov/board/ms/2007/ms062107.pdf, accessed: September 2018.*

[19] *California Air Resources Board, Summary of Board Meeting, Public Meeting to Consider Approval of Additions to Reduce Greenhouse Gas Emissions under the California Global Warming Solutions Act of 2006 and to Discuss Concepts for Promoting and Recognizing Voluntary Early Actions, October 25-26, 2007, website: http://www.arb.ca.gov/board/ms/2007/ms102507.pdf, accessed: September 2018.*

[20] *California Air Resources Board, Proposed Regulation to Implement the California Cap-and-Trade Program, December 16, 2010, website: http://www.arb.ca.gov/regact/2010/capandtrade10/capandtrade10.htm, accessed: September 2018.*

[21] *California Air Resources Board, California Cap-and-Trade Program, Resolution 10-42, December 16, 2010, website: http://www.arb.ca.gov/regact/2010/capandtrade10/res1042.pdf, accessed: September 2018.*

- January 1, 2012. GHG emissions limits and reduction measures adopted in 2011 became enforceable.

2) Transportation Sector

In addition to signed legislation, the current and past Governors of the state have signed a number of executive orders to achieve reduction of GHGs through the transportation sector. The following are the most relevant to the project:

a) Senate Bill 743

Senate Bill (SB) 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce vehicle miles traveled that contribute to GHG emissions, as required by AB 32. Key provisions of SB 743 include reforming aesthetics and parking CEQA analysis for urban infill projects and eliminating the measurement of auto delay, including level of service (LOS), as a metric that can be used for measuring traffic impacts in transit priority areas. SB 743 requires the State Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. It also allows OPR to develop alternative metrics outside of transit priority areas.

b) Senate Bill 375

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill 375 (SB 375) became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs and prompts the creation of regional plans to reduce emissions from vehicle use throughout the state. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating "Sustainable Community Strategies" (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. For the SCAG region, the targets are set at eight percent below 2005 per capita emissions levels by 2020 and 13 percent below 2005 per capita emissions levels by 2035.

Executive Order #B-48-18: On January 26, 2018, Executive Order B-48-18 was issued, declaring California's goal to be 1.5 million zero-emissions vehicles on the road by 2025 and 5 million by 2030. The order directs all State entities to continue to partner with regional and local governments to streamline zero-emission vehicle infrastructure installation processes wherever possible.

Executive Order #B-16-02: On March 23, 2012**,** Executive Order B-16-12 was issued, ordering State agencies to facilitate the rapid commercialization of zero-emission vehicles (ZEVs). The Executive Order sets a target for the number of 1.5 million ZEVs in California by 2025. Also, the Executive Order sets as a target for 2050 a reduction of GHG emissions from the transportation sector equaling 80 percent less than 1990 levels.

3) Statewide Plans

a) Climate Change Scoping Plan

As noted above, on December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various categories of emissions. CARB determined that achieving the 1990 emission level by 2020 would require an approximately 28.5 percent reduction of GHG emissions in the absence of new laws and regulations (referred to as "business as usual" or "No Action Taken"). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team

early actions and additional GHG reduction measures by both entities, and identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following:[22]

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewable energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions;
- Establishing targets for transportation related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In August 2011, CARB released a supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED) to provide an expanded analysis of Section V of the 2008 Scoping Plan FED. In connection with preparation of the 2011 FED, CARB released revised estimates of the expected 2020 emission reductions in consideration of the economic recession and the availability of updated information from development of measure-specific regulations. Incorporation of revised estimates in consideration of the economic recession reduced the projected 2020 emissions from 596 metric tons of CO_2 equivalent ($MTCO_2e$) to 545 million $MTCO_2e$ ($MMTCO_2e$).[23] Under this scenario, achieving the 1990 emissions level in 2020 would require a reduction of GHG emissions of 118 $MMTCO_2e$, or 21.7 percent. This revised reduction represents a 6.8 percentage point reduction from the 28.5 percent level determined in CARB's 2008 Scoping Plan. The 2020 AB 32 baseline was also updated to account for measures incorporated into the inventory, including Pavley (vehicle model-years 2009 to 2016) and the renewable portfolio standard (12 percent to 20 percent) (see below for more details). Inclusion of these measures further reduced the 2020 baseline to 507 $MMTCO_2e$. As a result, based on both the economic recession and the availability of updated information from development of measure-specific regulations, achieving the 1990 emission level would now require a reduction of GHG emissions of 80 $MMTCO_2e$ or a reduction by approximately 16 percent (down from the 28.5 percent level determined in CARB's 2008 Scoping Plan) by 2020 in the "business as usual" or No Action Taken condition.[24,25]

On May 15, 2014, CARB released the first update to the Scoping Plan. The update recalculates 1990 GHG emissions using *Intergovernmental Panel on Climate Change Fourth Assessment Report* released in 2007. Using the AR4 global warming potentials ("GWPs"), the 427 $MMTCO_2e$ 1990 emissions level and 2020

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[22] *California Air Resources Board, Climate Change Scoping Plan, December 2008, website: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed: September 2018.*

[23] *California Air Resources Board, Status of Scoping Plan Recommended Measures, July 25, 2011, website: http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf, accessed: September 2018.*

[24] *Ibid.*

[25] *California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document, website: http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf, accessed: September 2018.*

GHG emissions limit would be slightly higher, at 431 $MMTCO_2e$.[26] Based on the revised estimates of expected 2020 emissions identified in the 2011 FED and updated 1990 emissions levels identified in the first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ (down from 507 $MMTCO_2e$) or a reduction by approximately 15 percent (down from 28.5 percent) to achieve in 2020 emissions levels in the "business as usual" or No Action Taken condition.[27,28,29]

As California moves closer to reaching the 2020 GHG emission reduction goal, state legislation has focused on furthering GHG emission reduction targets. Executive Order B-30-15 was issued April of 2015 and establishes a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030. In 2016, the Legislature passed SB 32 with the companion bill AB 197 which further mandates the 2030 target and provides additional direction to CARB on strategies to reduce GHG emissions. In response to Executive Order B-30-15 and SB 32, CARB released California's 2017 Climate Change Scoping Plan on December 14, 2017.[30] The plan shows California is on track to exceed its 2020 climate target and establishes a path that will lead California to its 2030 GHG reduction target. The 2017 Climate Change Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target, which build on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Climate Change Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors.

The 2017 Scoping Plan also discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. The 2017 Scoping Plan encourages local governments to adopt Climate Action Plans to address local GHG emission sources. As discussed in the following pages, the City of Santa Monica has adopted a Climate Action and Adaptation Plan to reduce local GHG emissions and achieve carbon neutrality.

4) Energy Sector

a) Senate Bill 100

Senate Bill 100 (SB 100), the 100 Percent Clean Energy Act of 2018, was signed into law by Governor Brown on September 10, 2018, requiring the State to shift its renewable resources portfolio for electricity to 33 percent by 2020, 50 percent by 2025, 60 percent by 2030 and 100 percent by 2045.

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[26] *California Air Resources Board, Climate Change Scoping Plan First Update, Discussion Draft for Public Review and Comment, October 2013, website: http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf, accessed: September 2018.*

[27] *California Air Resources Board, Status of Scoping Plan Recommended Measures, July 25, 2011, website: http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf, accessed: September 2018.*

[28] *California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document, website: http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf, accessed: September 2018.*

[29] *California Air Resources Board, Climate Change Scoping Plan First Update, Discussion Draft for Public Review and Comment, October 2013, website: http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf, accessed: September 2018.*

[30] *California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for achieving California's 2030 greenhouse gas target, November 2017.*

b) California's Energy Efficiency Standards for Residential and Nonresidential Buildings

Located in Title 24, Part 6 of the CCR and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The goal of Title 24 energy standards is the reduction of energy use. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.[31] On January 1, 2020, the 2019 Building and Energy Efficiency Standards became effective. The 2019 Title 24 standards include efficiency improvements to the residential standards including requirements for solar power; encourages demand responsive technologies such as battery storage, improving the buildings thermal envelope through high performance attics, walls, and windows, and use of highly efficient air filters; and efficiency improvements to the non-residential standards include updates to indoor and outdoor lightning, and highly efficient air filters.

c) California Green Building Code

The California Green Building Code, referred to as CALGreen, is the first Statewide green building code. It was developed to provide a consistent, approach for green building within California. CALGreen lays out minimum requirements for newly constructed buildings in California, which will reduce greenhouse gas emissions through improved efficiency and process improvements. Specifically, new development projects constructed within California after January 1, 2020 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the CALGreen Code.

iv) Regional Plans

1) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy)

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect SoCal Program Environmental Impact Report.

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

Connect SoCal outlines more than $638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

The goals of Connect SoCal fall into four core categories: economy, mobility, environment and healthy/complete communities. The plan explicitly lays out goals related to housing, transportation technologies, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The plan's guiding policies take these goals and focus them, creating a specific direction for plan investments.

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[31] *CEC, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations.*

2) Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) (SCAG 2016a). Using growth forecasts and economic trends, the 2016 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2016 RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction by 2020, 18 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis. CARB has accepted the SCAG GHG quantification determination in the 2016 RTP/SCS. Compliance with and implementation of 2016 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions associated with reduced per capita vehicle miles traveled (VMT).

SCAG's 2016 RTP/SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles. In addition, the 2016 RTP/SCS includes new strategies to promote active transportation, supports local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. It also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. The 2016 RTP/SCS proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation

v) Local Plans and Regulations

1) Sustainable City Plan

The Sustainable City Plan was adopted in 1994 and updated in January 2014 by the City of Santa Monica to ensure that the City can meet its present environmental, economic, and social needs without compromising the ability of future generations to do the same. The Sustainable City Plan, which includes numeric targets, is advisory, but lays out a direction for land use in the city through guiding principles that emphasize an integrated and regional approach to city policies. The 2014 plan has been expanded to include nine Goal Areas:

- Resource Conservation
- Environmental and Public Health
- Transportation
- Sustainable Local Economy
- Open Space and Land Use
- Housing
- Community Education and Civic Participation
- Human Dignity
- Arts and Culture

Within each Goal Area are specific goals that comprise the core of the community vision and represent what Santa Monica must achieve in order to become a sustainable city. 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.

2) Santa Monica Municipal Code (SMMC)

The City's Green Building Ordinance (reflected in SMMC Chapters 8.106 and 8.108) and Energy Reach Code (Section 8.36.030) establishes a set of green building and energy efficiency requirements for new buildings. Refer to Section IV.B. Energy for these regulations.

The SMMC also includes requirements for individual development projects to support alternative modes of transportation, thereby reducing VMT and associated GHG emissions. Section 9.53, Transportation Demand Management (TDM), includes provisions for development of TDM Plans for individual projects and payment of TDM fees to support City efforts for TDM outreach and Transportation Management Organizations (TMO) formation activities. Refer to Section IV.G Transportation for these regulations.

3) Land Use and Circulation Element

The City of Santa Monica Land Use and Circulation Element (LUCE) provides the framework to achieve the City's sustainability goals and GHG reduction targets through an integrated land use and transportation approach in the City of Santa Monica within the larger context of the greater Los Angeles metropolitan area. Its goals and policies provide the structure and tools to achieve many of the goals of the Sustainable City Plan by translating them into land use policy and direction. The LUCE includes a variety of strategies to reduce greenhouse gas emissions, energy use, water use, and solid waste generation. The LUCE taken as a whole will enable the City to achieve significant reductions in GHG. Refer to Section IV.E. Land Use and Planning of this EIR for a discussion of the project's consistency with applicable LUCE policies that address land use and GHG reduction and Section IV.B Energy for policies that address sustainability and energy efficiency.

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

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

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

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

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

For all other new non-residential buildings:

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

4) Climate Action Plan

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

- Objective 1: Achieve 100 percent renewable grid electricity.
- Objective 2: Install 100 MW of local solar energy.
- Objective 3: Reduce fossil fuel use 20 percent in existing buildings.
- Objective 4: Discourage fossil fuels in new buildings.
- Objective 6: Convert 50 percent of local trips to foot, bike, scooter & skateboard.
- Objective 7: Convert 25 percent of commuter trips to transit.
- Objective 8: Convert 50 percent of vehicles to electric or zero emission.

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

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

- Policy ZNC1 Implement a Community Choice Energy (CCE) Program. Implement CCE in Santa Monica, offering the highest amount of cost-competitive renewable energy. Develop programs to incentivize new local renewable-energy projects. Adopt rates to achieve 100% renewable energy by 2025.
- Policy ZNC5 Adopt a Carbon Reduction Ordinance for Existing Buildings. Adopt a Carbon Reduction Ordinance to require energy benchmarking and carbon performance of existing buildings over 20,000 square feet (sf), including multifamily buildings. Require a reduction of fossil fuel use of covered buildings by 15% in five years and elimination of fossil fuel use by 2050.
- Policy ZNC8 Adopt Carbon Neutral Construction Codes. Require New Construction for commercial, mixed-use and multi-family properties to achieve zero net carbon onsite or pay in-lieu carbon impact fee to offset fossil fuel use. Require electric-ready construction for future electrification of appliances and buildings systems. Ensure that affordable housing developers have additional financing or compliance alternatives available.
- Policy ZNC11 Create Equitable Access to Clean Energy Programs. Partner with utilities and the Clean Power Alliance to provide free home-energy audits and upgrade incentives for low-income households and affordable housing developers and property owners.
- Policy ZW1 Implement Citywide Organics Recycling. Require waste diversion stations (trash, recycling, composting) in all businesses. Develop outreach and enforcement programs to ensure commercial and residential organics recycling citywide.
- Policy ZW5 Increase Construction and Demolition Debris Diversion Requirements. Explore fees and fines to create more incentives for recycling, composting and salvage, while discouraging landfill waste. Provide educational resources to promote responsible demolition and deconstruction.

- Policy SM6 Complete Streets Network. Increase the extent and quality of the complete street network and greenways to ensure residents and visitors alike have safe, convenient, and affordable transportation options. Create designated bike lanes that are protected to provide greater safety and assurance for all riders. Emphasize the movement of people with greater space dedicated to space efficient and low emission modes of transportation. Lower speed limits to improve safety. Expand publicly owned spaces and work with property owners to facilitate public access.
- Policy SM8 Prioritize Transit-Oriented Affordable Housing. Increase the housing to-jobs ratio by prioritizing the expansion and investment in affordable housing located near dense transit hubs with limited parking, through local zoning and incentives.
- Policy SM12 Increase Charging Infrastructure for Electric Vehicles and Electric Mobility Devices. Expand network of off- and on-street public charging stations to 1,000 ports by 2025. Provide charging stations that will accommodate a wide range of vehicle types including bicycles, scooters and other mobility devices. Provide outreach and additional incentives for renters, lower-income individuals and non-profit property owners. Implement emerging best practices in EV technology, including mobile charging, wireless charging, energy storage, and web/smartphone applications.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

There are several unique challenges to analyzing greenhouse gas emissions and climate change under CEQA, largely because of climate change's "global" nature. Typical CEQA analyses address local actions that have local or, at most, regional impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard to global warming, however, it is generally accepted that while the magnitude of global warming effects is substantial, the contribution of an individual general development project is so small that direct project-specific significant impacts (albeit not cumulative significant impacts) are highly unlikely.

Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region or area. Instead, a global climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly "new" emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions or are merely being moved from one place to another. For example, the approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project's emissions. Rather, due to the "relocation" factor, new land use projects sometimes merely redistribute existing mobile emissions. Accordingly, the use of models that measure overall emissions increases without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air quality impacts, where the "addition" of redistributed emissions to a new locale can make a substantial difference to overall air quality.

A. Thresholds of Significance

Appendix G to the State CEQA Guidelines provides a set of screening questions that address impacts with regard to GHG emissions. Specifically, the Guidelines state that a proposed project may have a potentially significant impact associated with GHG emissions if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

CEQA defines a "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment.[32] With respect to global climate change, no one project can individually create a direct impact on what is a global problem (i.e., no project will, by itself, raise the temperature of the planet).

However, the emissions generated by a project may be "cumulatively considerable," meaning "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[33] The CEQA Guidelines add that a lead agency may determine that 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, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.[34]

Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."[35] Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."[36] For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

The CEQA Guidelines do not establish a threshold of significance for GHG impacts; rather lead agencies have the discretion to establish significance thresholds for their respective jurisdictions. A lead agency may look to thresholds developed by other public agencies or other expert entities, such as California Air Pollution Control Officers Association (CAPCOA), so long as the threshold chosen is supported by substantial evidence. SCAG, the SCAQMD, and the City of Santa Monica have not officially adopted a GHG significance threshold applicable to the development of non-stationary source general development projects.

More recently, the California Supreme Court in its ruling for *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (CBD vs. CDFW) (2015) 62 Cal.4th 204*. provided guidance to evaluating the cumulative significance of a proposed land use project's GHG emissions but noted that none of the approaches could be guaranteed to satisfy CEQA for a particular project. The Court's suggested "pathways to compliance" include:

1. Use a geographically specific GHG emission reduction plan (e.g., climate action plan) that outlines how the jurisdiction will reduce emissions consistent with State reduction targets, to provide the basis for streamlining project-level CEQA analysis, as described in CEQA Section 15183.5.

2. Utilize the Scoping Plan's business-as-usual reduction goal but provide substantial evidence to bridge the gap between the statewide goal and the project's emissions reductions.

3. Assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities; as an example, the Court points out that projects consistent with an SB 375 Sustainable Communities Strategy (SCS) may need to re-evaluate GHG emissions from cars and light trucks.

4. Rely on existing numerical thresholds of significance for GHG emissions, such as those developed by an air district.

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[32] *Public Resources Code Section 21068.*

[33] *CEQA Guidelines Section 15065(a)(3).*

[34] *CEQA Guidelines Section 15064(h)(3).*

[35] *CEQA Guidelines Section 15064.7.*

[36] *CEQA Guidelines Section 15064.7(c).*

Although the project's GHG emissions have been quantified as discussed under the Methodology section below, neither CARB, SCAQMD, nor the City has adopted quantitative project-level significance thresholds for assessing impacts related to GHG emissions applicable to the project. As described earlier, the City adopted an update to its SCP in 2014 and adopted the CAAP to help the City meet its goal of carbon neutrality by 2050 and its interim goal of reducing GHG emissions to 80 percent below 1990 levels by 2030. Along with the LUCE and other City programs and ordinances, the City's CAAP and SCP describe how the City will reduce GHG emissions through an integrated system of land use and sustainable transportation, and programs and ordinances to increase recycling, improve bike and pedestrian infrastructure, increase water conservation and efficiency, improve building energy efficiency, expand EV charging infrastructure, and increase local solar energy generation.

For the purpose of evaluating the GHG impacts associated with the proposed project, this analysis determines if the project would conflict with an applicable plan, policy, or regulation adopted for GHG which include CARB's Climate Change Scoping Plan; SCAG's 2016-2040 RTP/SCS; and the City's SCP, CAAP, Green Building and Energy Code, and the LUCE.

B. Methodology

With respect to GHG emissions, the CEQA Guidelines state in CCR Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that a lead agency shall have the discretion to "quantify the GHG emissions from a project, and/or rely on a qualitative analysis or other performance based standards" (14 CCR 15064.4(a)).

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

GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions. They include:

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

Consistent with SCAQMD's guidance, total GHG emissions from the construction and operation of the project were quantified using the California Emissions Estimator Model (CalEEMod version 2016.3.2), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California and is recommended by the SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. The project's emissions modeling worksheets from CalEEMod are provided in Appendix C of this EIR.

i) Construction-Related GHG Emissions

Consistent with SCAQMD recommendations, construction GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod 2016.3.2). The mobile source emission methodology for on-road construction emissions, associated with worker commute and delivery of materials, uses a vehicle miles traveled rate calculated by CalEEMod in order to generate values for annual emissions. The

construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. Emission factors are derived from the EMFAC model using light duty automobile factors for worker commute and heavy-duty truck factors for deliveries.

The Association of Environmental Professionals (AEP) has recommended that total construction emissions be amortized and added to operational emissions (AEP 2010). This amortization method is also recommended by the SCAQMD *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. Accordingly, the construction-related GHG emissions have been amortized over a 30-year operational period to be consistent with this guidance.

The most common GHGs emitted in association with the construction of land use developments include CO_2, CH_4 and N_2O. CalEEMod provides these GHGs and translates them into a common currency of carbon dioxide equivalent (CO_2e). In order to obtain the CO_2e, an individual GHG is multiplied by its global warming potential. The GWP designates on a pound for pound basis the potency of the GHG compared to CO_2.

ii) Operational GHG Emissions

Consistent with SCAQMD recommendations, operational GHG emissions were calculated using CalEEMod 2016.3.2. Operational GHG sources include motor vehicles, electricity, natural gas, water usage/wastewater generation, landscaping/maintenance equipment, and solid waste generation and disposal.

Motor vehicle emission calculations associated with operation of the project use a projection of annual VMT, which is derived from the trips provided in the project's traffic study (provided in Appendix I of this EIR) and the default trip characteristics in CalEEMod[37]. These values account for the daily and seasonal variations in trip frequency and length associated with travel to and from the project site and other activities that require a commute.

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. Combustion of any type of fuel emits criteria pollutants and GHGs directly into the atmosphere; when this occurs in a building this is a direct emission source associated with that building and CalEEMod calculates all of these pollutants. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used, the electricity generation typically takes place offsite at a power plant; electricity use generally causes emissions in an indirect manner and therefore GHG emissions have been calculated from electricity generation. CalEEMod default settings estimate building energy use based on the application of 2016 Title 24 standards. Given recent legislation to increase renewable energy, such as SB 100, energy related GHG emissions calculated from CalEEMod would be very conservative, as they do not account for the reductions for compliance with 2019 Title 24 standards or reflect the fact that electricity consumers in the City of Santa Monica will receive clean energy from the Clean Power Alliance (CPA), and that new legislation would reduce emissions in future years.

The amount of water used, and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. It will often be the case that the water treatment and wastewater treatment occur outside of the project area. In this case, it is still important to quantify the energy and associated GHG emissions attributable to the water use. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both methane and nitrous oxide. Thus, GHG emissions have been calculated from water used and wastewater generated by the project.

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[37] *As the current version of CalEEMod uses EMFAC 2014 for calculations of vehicle emissions, the analysis would be considered to be conservative, and would not include reductions in emissions from Governor Newsom's pledge to phase out gasoline vehicles by 2035.*

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, recycling, or composting. CalEEMod defaults calculate the indirect GHG emissions associated with Project-generated waste that is disposed of at a landfill. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecyle) data for individual land uses. If waste disposal information was not available, waste generation data was used. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. CalEEMod quantifies the GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon. CalEEMod also quantifies the CO_2 emissions associated with the combustion of methane, if applicable. Default landfill gas concentrations were used as reported in Section 2.4 of AP-42.[38] The IPCC has a similar method to calculate GHG emissions from MSW in its 2006 Guidelines for National Greenhouse Gas Inventories.

Planting trees will sequester CO_2 and is considered to result in a one-time carbon-stock change. Trees sequester CO_2 while they are actively growing. The amount of CO_2 sequestered depends on the type of tree. CalEEMod uses default annual CO_2 accumulation per tree for specific broad species classes. To be conservative, no credit/reduction was taken for tree-related CO_2 sequestration in this analysis even though the Project includes the planting of a large mature specimen tree in the courtyard.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, roto-tillers, shredders/grinders, trimmers, chain saws, and hedge trimmers. The emissions associated from landscape equipment use was processed using OFFROAD 2011 and CARB's Technical Memo: *Change in Population and Activity Factors for Lawn and Garden Equipment* (6/13/2003).

iii) Project Consistency with GHG Reduction Plans

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

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

CARB's Climate Change Scoping Plan (last updated in May 2014) provides strategies and recommendations for achieving the AB 32 target, and the California CAT Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05

[38] *See AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, prepared by the Office of Air Quality Planning and Standards, U.S. EPA, January 1995.*

As previously stated, in May 2019, the City adopted the CAAP. The intent of the CAAP is to provide overarching policy direction with respect to climate change through Citywide objectives and broad strategies to reduce GHG emissions. The CAAP is not a regulatory plan to be applied directly to individual development projects. Rather, the City recognizes that GHG reduction goals cannot be achieved by individual projects alone, but instead requires a comprehensive Citywide approach that would include the enactment of future plans, changes to existing ordinances, and an integrated and sustainable approach to land use/transportation planning. For this EIR, the analysis is focused on whether the proposed Project would support, and not hinder, the Citywide objectives and goals of the CAAP.

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

C. Project Impacts and Mitigation Measures

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

Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis:

Impact C-1: Construction and operation of the project would generate greenhouse gas emissions. However, the project's emissions would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHG. The impact of the proposed project would be less than significant.

i) Construction

The project would consist of the refurbishment of the project site's existing three-story, 45,429 square feet (sf) office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 sf of new floor area. The project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The project's three buildings will total approximately 174,685 ~~174,684~~ sf.

The project's construction-related GHGs were calculated using CalEEMod for each phase and each year of construction. See Section IV.A (Air Quality) of this EIR for a complete discussion of the construction schedule. As shown in Table IV.C-5, Project Construction GHG Emissions, the greatest annual increase in GHG emissions from the project's construction activities would be 629.70 CO_2e MTY in 2022. The total amount of construction-related GHG emissions is estimated to be approximately 1,300.20 CO_2e MTY, or approximately 43.34 CO_2e MTY amortized over a 30-year period. This estimate is conservative as advances in technology and recent legislation would reduce emissions in future years.

Table IV.C-5
Project Construction GHG Emissions

Emissions Source	CO_2e Emissions in Metric Tons per Year
2022	629.70
2023	563.99
2024	106.51
Total Project Construction GHG Emissions	**1,300.20**
Calculation data and results provided in Appendix C to this EIR.	

ii) Operation

The project includes the demolition of the existing surface parking, refurbishment of the project site's existing three-story office building, development of creative and business professional office uses within two new buildings, and subterranean parking.

The project's operational GHG emissions associated with area sources, mobile sources (motor vehicles), energy, water, and solid waste have been calculated with CalEEMod. These results are presented in Table IV.C-6, Project Operational GHG Emissions. As shown, the net increase in GHG emissions generated by the project (after the emissions from the existing use is subtracted) would be approximately 2,772.81 $MTCO_2e$ (metric tons of CO_2e) per year.

Table IV.C-6
Project Operational GHG Emissions

Emissions Source	CO_2e Emissions in Metric Tons per Year
Area Sources	0.01
Energy Demand (Electricity & Natural Gas)	1,239.40
Mobile (Motor Vehicles)	1,884.89
Solid Waste Generation	111.38
Water Demand	241.17
Construction Emissions[1]	43.34
Total Project Emissions	***3,520.20***
Less Existing Uses	*-747.39*
Project Net GHG Emissions Increase	**2,772.81**

[1] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance.
Calculation data and results provided in Appendix C to this EIR.

As shown in Table IV.C-6, the estimated annual Project GHG (net) emissions are 2,772.81 MTCO2e. If the Project opts for 5% increase in efficiency over 2019 Title 24 and all residents and nonresidential uses adopt the 100 percent CPA renewable energy plan, then net Project emissions would be 1,694.62 MTCO2e per year.

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

As discussed in detail in Tables IV.E-2 and IV.E-3 in Section IV.E (Land Use and Planning), the project would be consistent with all applicable and relevant objectives, goals and policies identified in the LUCE and the Bergamot Area Plan.

Sustainability has been an integral part of the project's architectural and landscape design concept to ensure the project implements the City's sustainable goals and objects and to integrate LEED principles into the project's infrastructure, design and operation. Specific focus was given to conserving natural resources in line with the City's conservation priorities in reducing water usage and energy usage as well as incorporating sustainable mass timber construction. The project would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. As required by the Santa Monica Municipal Code (SMMC), all new buildings on the site would

conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the most recent applicable State and City codes, which would improve energy efficiency and decrease water usage as compared to existing conditions. Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

iii) Consistency with Statewide and Regional Mandates, Plans, Policies, and Regulations

Executive Orders S-3-05 and B-30-15 established the goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (HSC Division 25.5). SB 32 codified the 2030 reduction target. Executive Order B-55-18 would further support reduction of GHG emissions with an ambitious statewide goal of reaching carbon neutrality no later than 2045. According to the 2017 Scoping Plan, California is on track to meet its 2050 GHG reduction target as specified in S-3-05. The State's existing and proposed regulatory framework identified in the 2017 Scoping Plan can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 and puts the State on a trajectory to meet the target of reducing GHG emissions 80 percent below 1990 levels by 2050. According to the 2017 Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS.

The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan.[39] This strategy requires the CEC in collaboration with the CPUC, to establish the framework for the energy savings target, outlining the necessary actions that will need to occur in future years, including workforce education and training institutions engaging with the building industry, mapping industry priorities for efficiency to major occupations that will provide services, identifying workforce competency gaps, and quantifying the work needed to build a workforce to implement high-quality efficiency projects at scale.[40]

Even though these studies do not provide an exact regulatory and technological roadmap to achieve 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations

[39] *CEC, 2016. California Energy Commission, 2016 Existing Building Energy Efficiency Plan Update, December 2016.http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801_20161214T155117_Existing_Building_Energy_Efficency_Plan_Update_December_2016_Thi.pdf.*

not analyzed in the study could allow the State to meet the 2050 targets.66[40,41.] For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings; however, this type of policy would be necessary to meet the 2050 target.

With statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. The Project's emissions at buildout (2024) likely represent the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use.

Given that the Project is consistent with the Scoping Plan, the RTP/SCS and the City's relevant plans and policies and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Order goals for 2030, 2045, and 2050. Therefore, the Project would be consistent with California's long-term GHG reduction goals, including Executive Orders B-30-15, B-55-18, and S-3-05. For the reasons described above, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets.

As discussed previously, SB 32 was approved by Governor Brown on September 8, 2016 and requires the ARB to approve GHG emissions limits equivalent to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15) and 80 percent below the 1990 level by 2050. CARB is in the process of developing an updated Scoping Plan to achieve the 2030 reduction target; in the interim, it has outlined a number of potential strategies. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems (California State Agencies, 2015). The strategies from the ARB's Scoping Plan are applicable to state, regional, and local agencies in the development of plans to reduce GHG emissions but are not necessarily applicable to each and every new general development project. However, these strategies would benefit the projects, as statewide and utility providers increase their portfolio of renewable energy resources.

Furthermore, a number of the Scoping Plan's strategies and measures are implemented on the regional level within SCAG's 2016 RTP/SCS and on the local level with the City's LUCE, Climate Action and Adaptation Plan, Sustainable City Plan, and Green Building Ordinance and Energy Reach Code (which are more stringent than the State's Title 24 CALGreen standards). As such, projects that comply with the SCAG's RTP/SCS and the City's LUCE, Climate Action and Adaptation Plan, Green Building Ordinance and Energy Reach Code would be consistent with all state mandates aimed at reducing GHGs through green building design. Compliance with the strategies in the RTP/SCS, City's Climate Action and Adaptation Plan, Sustainable City Plan, the City's Green Building Ordinance and Energy Reach Code, and the project's goal to achieve LEED® certification at the Platinum level or equivalent would ensure that the project reduces GHGs to the maximum extent feasible and conform to all applicable local, state, and federal requirements (please see Tables IV.C-7 through IV.C-9 below).

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[40] *The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.*

[41] *Energy + Environmental Economics, Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios, April 6, 2015. Available: https://www.arb.ca.gov/html/fact_sheets/e3_2030scenarios.pdf.*

Table IV.C-7
Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies

Goals/Policies	Evaluation of Project Consistency
Climate Action and Adaptation Plan	
Objective 1. Achieve 100 percent renewable grid electricity. Objective 2. Install 100 MW of local solar energy. Objective 3. Reduce fossil fuel use 20 percent in existing buildings. Objective 4. Discourage fossil fuels in new buildings.	**Consistent.** The project would include PV panels on the roof decks that would provide a minimum of 105 kilowatts in local solar energy. Additionally, the proposed project would automatically receive its energy from the Clean Power Alliance (which uses 100 percent renewable energy sources) unless commercial tenants choose to opt out. The proposed project would also include energy efficient HVAC systems and lighting systems with occupancy sensors and dimmers to reduce fossil fuel use in the proposed buildings. Further, the proposed project would at minimum comply with existing the City's Energy Code, which requires the construction of all-electric buildings, or alternative if mixed fuel buildings are constructed, the buildings would be required to exceed Title 24 compliance by 5 percent.
Objective 6. Convert 50 percent of local trips to foot, bike, scooter & skateboard. Objective 7. Convert 25 percent of commuter trips to transit.	**Consistent**. The Applicant would be required to implement a TDM plan with measures to reduce vehicle trips/VMT and promote alternative transportation. TDM measures to be provided by the project include the following: • On-site transportation information in an on-site physical location, such as a bulletin board or kiosk, or through other media, such as on a website or other digital means. • A designated Project Transportation Coordinator. • New employee orientation. • Parking cash out. • Incentives for employees that live within one-half mile of workplace. • Information regarding availability of bike commute training offered either on-site or by a third party. • If, in the future, citywide bikeshare is not available within a two-block radius of the project, the project shall then provide on-site shared bicycles intended for employee use during the workday. • Commuter matching services for all employees on an annual basis, and for all new employees upon hiring. • Information regarding the benefits of compressed work schedule, flex-time schedule, telecommuting, and guaranteed ride home.

Table IV.C-7
Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies

Goals/Policies	Evaluation of Project Consistency
	• A transportation allowance equivalent to at least 75% of the cost of a monthly regional transit pass, in accordance with SMMC Section 9.53.130(B)(2)(b)(viii). • Bike valet, free of charge, during all automobile valet operating hours. The project would include approximately 5,376 square feet of restaurant/non-office commercial space. The project would concentrate office uses at a site within 0.15 mile to the 26th/Bergamot Metro E Light Rail Station and less than two blocks from existing bus stops, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site.
Objective 8. Convert 50 percent of vehicles to electric or zero emission.	**Consistent**. The proposed project would include approximately 25 EV charging stations, which is beyond the 9 required for the site by SMMC Section 9.28.160(B)(2).
ZNC1. Implement a Community Choice Energy (CCE) Program. Implement CCE in Santa Monica, offering the highest amount of cost-competitive renewable energy. Develop programs to incentivize new local renewable-energy projects. Adopt rates to achieve 100% renewable energy by 2025.	**Consistent.** While this action is not implemented at the project level, the proposed project would be consistent with this action, as it would receive energy from the Clean Power Alliance (which uses 100 percent renewable energy sources) unless commercial tenants choose to opt for lower renewable percentage or opt out completely.
ZNC5. Adopt a Carbon Reduction Ordinance for Existing Buildings. Adopt a Carbon Reduction Ordinance to require energy benchmarking and carbon performance of existing buildings over 20,000 sf, including multifamily buildings. Require a reduction of fossil fuel use of covered buildings by 15% in five years and elimination of fossil fuel use by 2050. ZNC8. Adopt Carbon Neutral Construction Codes. Require New Construction for commercial, mixed-use and multi-family properties to achieve zero net carbon onsite or pay in-lieu carbon impact fee to offset fossil fuel use. Require electric-ready construction for future electrification of appliances and buildings systems. Ensure that affordable housing developers have additional financing or compliance alternatives available.	**Consistent.** While this action is not implemented at the project level, the proposed project would conform to the City's Zero-Net Energy Code. The Code requires new buildings to be All-Electric Building designed to code established by the 2019 CEC or Mixed-Fuel Building designed to be 5 percent more efficient than the code established by the 2019 CEC. Additionally, the proposed project would install a PV system with a rating of 2 watts per square foot of the building footprint, which contributes to reducing carbon emissions.
ZNC11. Create Equitable Access to Clean Energy Programs. Partner with utilities and the Clean Power Alliance to provide free home-energy audits and upgrade incentives for low-income households and affordable housing developers and property owners.	**Consistent.** Refer to the discussion under ZNC1

Table IV.C-7
Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies

Goals/Policies	Evaluation of Project Consistency
ZW1. Implement Citywide Organics Recycling. Require waste diversion stations (trash, recycling, composting) in all businesses. Develop outreach and enforcement programs to ensure commercial and residential organics recycling citywide.	**Consistent**. The proposed project would be consistent with this action, as the proposed project would include easily accessible recycling areas dedicated to the collection and storage of nonhazardous materials such as paper, corrugated cardboard, glass, plastics, metals, landscaping debris (trimmings), and organic waste, consistent with the City's Zero Waste Strategic Plan.
ZW5. Increase Construction and Demolition Debris Diversion Requirements. Explore fees and fines to create more incentives for recycling, composting and salvage, while discouraging landfill waste. Provide educational resources to promote responsible demolition and deconstruction.	**Consistent.** The proposed project would implement a construction waste management plan to divert a minimum of 70 percent of all mixed C&D debris to City certified C&D waste processors, consistent with the SMMC Section 8.108.010 Subpart C**.**
SM6. Complete Streets Network. Increase the extent and quality of the complete street network and greenways to ensure residents and visitors alike have safe, convenient, and affordable transportation options. Create designated bike lanes that are protected to provide greater safety and assurance for all riders. Emphasize the movement of people with greater space dedicated to space efficient and low emission modes of transportation. Lower speed limits to improve safety. Expand publicly owned spaces and work with property owners to facilitate public access.	**Consistent.** Refer to the discussion under Sustainability City Plan Transportation Goal 1 and 2.
SM8. Prioritize Transit-Oriented Affordable Housing. Increase the housing-to-jobs ratio by prioritizing the expansion and investment in affordable housing located near dense transit hubs with limited parking, through local zoning and incentives.	**Consistent.** Surrounding land uses in the area consist of a mix of commercial (retail, entertainment, restaurant, and office), light industrial, and residential uses. The project is considered infill development within the Bergamot Transit Village (BTV) portion of the Bergamot Area Plan (BAP). The project would refurbish the project site's existing three-story, 45,429 square foot office building (Building C), and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings (Building A and B) comprising a total of 129,265 square feet of new floor area. The project would also include a three-level subterranean garage with 399 parking spaces, all within close proximity to public transit. In addition, the proposed project would implement a TDM plan. The project would supply 399 parking spaces ~~(349 new plus 50 replacement)~~, that would include 16 carpool/vanpool spaces, and 9 EV parking spaces. Additionally, the project would supply 35 short term bicycle spaces and 194 long-term spaces. The project

Table IV.C-7
Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies

Goals/Policies	Evaluation of Project Consistency
	would include eight unisex showers and 146 personal lockers. These features would reduce work trips and encourage employees and visitors to use alternative modes of transportation including public transportation, walking, and bicycling.
SM12. Increase Charging Infrastructure for Electric Vehicles and Electric Mobility Devices. Expand network of off- and on-street public charging stations to 1,000 ports by 2025. Provide charging stations that will accommodate a wide range of vehicle types including bicycles, scooters and other mobility devices. Provide outreach and additional incentives for renters, lower-income individuals and non-profit property owners. Implement emerging best practices in EV technology, including mobile charging, wireless charging, energy storage, and web/smartphone applications.	**Consistent.** The proposed project would provide EV charging stations in the subterranean garages in accordance with City requirements. The proposed project would also provide designated parking for carpools and vanpools; long-term bicycle parking; employee shower and locker facilities; and ride share amenities to provide options to reduce internal-combustion vehicle usage for employees and visitors.
Sustainable City Plan	
Resource Conservation Goal 1. Significantly decrease overall community consumption, specifically the consumption of nonlocal, nonrenewable, non-recyclable, and non-recycled materials, water, and energy and fuels. The City should take a leadership role in encouraging sustainable procurement, extended producer responsibility and should explore innovative strategies to become a zero waste city.	**Consistent**. The energy needs for operation of the project would be reduced as the proposed project would be designed to achieve LEED® certification at the Platinum level or equivalent and would comply with the City's Green Building Ordinance. As part of the LEED certification, the proposed project would be required to implement strategies to reduce waste. The project would include on-site recycling containers to support the city's recycling goal. In addition, the proposed project would comply with Section 8.108.010 Subpart B of the Santa Monica Municipal Code, which requires projects involving construction or demolition permits complete and submit a waste management plan (WMP).
Resource Conservation Goal 3. Within renewable limits, encourage the use of local, nonpolluting, renewable and recycled resources (water, energy – wind, solar and geothermal – and material resources).	**Consistent**. Key sustainability features for the project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.
Transportation Goal 2. Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.	**Consistent.** The project would increase office uses on an underutilized site in the transit-rich urbanized area. The project would concentrate office uses at a site served by several Big Blue

Table IV.C-7
Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies

Goals/Policies	Evaluation of Project Consistency
	bus lines and Metro lines, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site. The project applicant would be required to implement a TDM plan that would facilitate a reduction in single occupancy vehicle trips
Sustainable Local Economy 1. Nurture a diverse, stable, local economy that supports basic needs of all segments of the community.	**Consistent.** The project would contribute to a vibrant activity center in the Bergamot Transit Village area by increasing office uses on an underutilized site in this transit-rich urbanized area. In addition, the project would provide 5,376 square feet of non-office commercial space and approximately 29,000 square feet (or 33 percent) open space further enhancing the pedestrian environment in the vicinity of the project site. The project's proposed restaurant uses would serve the local work area community within a transit-rich environment.
Open Space and Land Use Goal 2: Implement land use and transportation planning and policies to create compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling, and the use of existing and future public transit systems.	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 square feet of new floor area. The project would increase office uses on an underutilized site in the transit-rich urbanized area. The project would concentrate office uses at a site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site.
Arts and Culture 1. Retain and nurture Santa Monica's arts community and resources.	**Consistent.** The project would contribute to a vibrant activity center in the Bergamot Transit Village area by increasing office uses on an underutilized site in this transit-rich urbanized area. Land uses in the Bergamot Transit Village include the 26th/Bergamot Metro Line E Light Rail Station; light industrial uses; art galleries; various commercial, general/professional office and creative office uses; private school and community college uses; and accessory retail, restaurant, childcare, and health club uses. In addition, the project would provide 5,376 square feet of non-office commercial space and approximately 29,000 square feet (or 33 percent) open space further enhancing the pedestrian environment in the vicinity of the project site. The project's proposed restaurant

Table IV.C-7
Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies

Goals/Policies	Evaluation of Project Consistency
	uses would serve the local work area community within a transit-rich environment.
Arts and Culture 2: Increase cultural participation and provide greater access to a diversity of cultural programs for all ages.	**Consistent.** The project site is located in the Bergamot Transit Village, and area characterized by high levels of pedestrian and bicycle activity. The project would include 35 short-term bicycle parking spaces on the exterior areas of the building (in addition to the 194 long-term bicycle spaces on Level A of the parking garage). The project would provide direct access to sidewalks along 26th Street and Pennsylvania Avenue. The project would include also approximately 5,376 square feet of restaurant/non-commercial space that would be an active space serving the project and nearby office uses. The project would include a new pedestrian entry plaza along Pennsylvania Avenue between the existing building and Building B flanked by outdoor seating providing a new opportunity for public gathering spaces. Although neither 26th Street or Pennsylvania Avenue are Class II or III bike facilities, bikes are allowed on both these streets.
** This table lists only those goals and policies that are applicable to the proposed project.*	

Table IV.C-8
Consistency of the Proposed Project with LUCE GHG Policies

Goals	Evaluation of Project Consistency
Section 2.1 Linking Land Use and Transportation Policy to Address Climate Change	
Goal LU2: Integrate Land Use and Transportation for Greenhouse Gas 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 improving quality of life.	**Consistent**. This goal addresses overall land use patterns within the City. It includes a number of policies that direct growth to appropriate transportation centers and corridors. Applicable policies are intended to direct growth away from residential neighborhoods and into areas served by transit. Such development contributes to reductions in vehicle miles traveled and is implemented through Land Use policies and the SMMC. The project is consistent with the Land Use policies and the SMMC as discussed further in Section IV.E, Land Use and Planning. By virtue of its infill location in proximity to transit and destinations, the project thus support reductions of GHGs. The project would increase office uses on an underutilized site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops (see Section IV.B [Air Quality], subheading AQMP Consistency). Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another

Table IV.C-8
Consistency of the Proposed Project with LUCE GHG Policies

Goals	Evaluation of Project Consistency
	hub at the 26th/Olympic Metro Line E Light Rail Station. To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. While the project would not change the sidewalks along the 26th Street frontage, will include the planting of street trees along 26th Street and Pennsylvania Avenue. Along Pennsylvania Avenue, the project will include landscape setback from the street providing seating opportunities for the restaurant/non-commercial space in Building B as well as for pedestrians using the lunch time food trucks. Such space would continue to provide and enhance pedestrians use of food trucks which assists in discouraging use of vehicles to travel for lunch. The project would also be within walking distance of a wide variety of residential, retail, and restaurant use. The project would implement a Transportation Demand Management (TDM) plan in accordance with the City's TDM Ordinance.
Section 3.1 Sustainability and Climate Change	
S1.1 Pro-actively cooperate with the State to implement AB32 which calls for reducing GHG emissions to 1990 levels by 2020 and 80 percent below 1990 levels by 2050.	**Consistent**. The project's mixed use and pedestrian design in the transit-oriented Bergamot area would support greenhouse gas reduction goals of AB 32, as well as the goal of EO#B-55-18 to achieve carbon neutrality by 2045. Additionally, the project's location within the Bergamot area with mostly light industrial, and residential uses further support reduction of GHG generated by unnecessary vehicle trips.
S1.3 Implement the LUCE policies in order to achieve the following GHG reduction targets as reflected in the Sustainable City Plan Goals: - Reduce community-wide GHG emissions to 15 percent below 1990 levels by 2015.	**Consistent**. As described above, the project is consistent with City's 2019 CAP which will help the City meet its goal of carbon neutrality by 2050 and its interim goal of reducing GHG emissions to 80 percent below 1990 levels by 2030. The City exceeded the previous target of reducing GHG emissions 15percent below 1990 levels by the end of 2015.
S2.1 Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan, including, but not limited to: focusing new growth in mixed-use, transit-oriented districts; focusing new growth long existing corridors and nodes; supporting the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City.	**Consistent**. See the analysis of Goal LU-2, above. As discussed therein, the project is consistent with applicable policies of the LUCE. The project is a mixed-use infill development that would be complementary to nearby uses, and would be easily accessible from numerous transit, bicycle and pedestrian facilities. The project's location and design would support a reduction in VMT and encourage residents to utilize alternative modes of transportation including public transportation, walking, and bicycling
S2.3 Advance the No Net New Trips goal in the Land Use and Circulation Element with TDM projects such as expanded rideshare programs,	**Consistent**. The project would support the LUCE's No Net New PM Peak Hour Trips by developing a mix of uses near transit.

Table IV.C-8
Consistency of the Proposed Project with LUCE GHG Policies

Goals	Evaluation of Project Consistency
parking management strategies, as well as development impact fees for public transit infrastructure.	Additionally, the project would be subject to a TDM plan consistent with the provisions of SMMC Section 9.53.
** This table lists only those goals that are applicable to the proposed project.*	

Table IV.C-9
Consistency of the Proposed Project with Applicable GHG Reduction Strategies*

Goals/Policies	Evaluation of Project Consistency
AB 1493 (Pavely Regulations)	
Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model year 2017-2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	**Consistent**. The project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
SB 1368	
Establishes an emissions performance standard for power plants within the State of California.	**Consistent**. The project would be consistent with this regulation and would not conflict with implementation of the emissions standards for power plants.
Low Carbon Fuel Standard	
Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent**. The project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards.
Climate Action Team	
Reduce diesel-fueled commercial motor vehicle idling.	**Consistent**. The project would comply with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time.
Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent**. The project would meet this requirement as part of its compliance with the SMMC and the CALGreen Code.
Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The project would provide appropriate landscaping on the project site including vegetation and trees.
Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent**. The project would meet this requirement as part of its compliance with the SMMC and the CALGreen Code. The project would also obtain at minimum LEED® certification at the Gold level or equivalent.
Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent**. The project would be designed at a minimum as a LEED certified v4 for BD+C: New Construction and Major Renovation designation for all building. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and

Table IV.C-9
Consistency of the Proposed Project with Applicable GHG Reduction Strategies*

Goals/Policies	Evaluation of Project Consistency
	Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~all three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.
Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The project would increase office uses on an underutilized site in the transit-rich urbanized area. The project would concentrate office uses at a site served by several Big Blue bus lines and Metro lines, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site.
Reduce energy use in private buildings.	**Consistent**. The project would be designed at a minimum as a LEED certified v4 for BD+C: New Construction and Major Renovation designation for all building. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Other key sustainability features would include photovoltaic panels on the roofs of all three buildings, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus
** This table lists only those goals and policies that are applicable to the proposed project.*	

As stated previously, the project site is designated as Bergamot Transit Village (BTV) ~~BVT~~ in the Bergamot Area Plan (BAP). The BTV ~~BVT~~ designation allows for the creation of a vibrant concentration of retail and services, multi-family housing and creative employment and community gathering spaces, especially in proximity to transit. The permitted densities for the BTV ~~BVT~~ were determined so as to achieve a scale that is consistent with the community vision for a pedestrian-oriented district that provides high quality open

spaces, and that is oriented to and accessible by transit.

The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 square feet of new floor area. The project would increase office uses on an underutilized site in the transit-rich urbanized area that is also near existing housing. The project would include approximately 5,376 square feet of restaurant/non-office commercial space. The project would concentrate office uses at a site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site. Additionally, on-site bicycle parking would be provided. The energy needs for operation of the project would be reduced as the proposed project would be consistent with the SMMC and CalGreen Code and would be designed to achieve at minimum LEED® certification at the Platinum level or equivalent. These project features would reduce operational GHG emissions by reducing VMTs and implementing more sustainable building standards. As such, the project would be consistent with the goals of the LUCE and BAP.

Based on the above, the proposed project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. The impact of the proposed project would be less than significant.

Mitigation Measures:

None required.

4. CUMULATIVE IMPACTS

Although the project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not in itself necessarily an adverse environmental effect. As discussed in recent CEQA case law,[42] the global scope of climate change and the fact that carbon dioxide and other greenhouse gases, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for greenhouse gases, it does not. For individual projects, like the proposed mixed-use development, which is designed to accommodate long-term growth in California's population and economic activity, this fact gives rise to an argument that a certain amount of greenhouse gas emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure. Meeting our statewide reduction goals does not preclude all new development. Rather, the Scoping Plan - the state's roadmap for meeting AB 32's target assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall greenhouse gas reductions necessary, one can reasonably argue that the project's impact is not cumulatively considerable, because it is helping to solve the cumulative problem of greenhouse gas emissions as envisioned by California law.[43]

As discussed above, the net increase in GHG emissions generated by the project (after the emissions from the existing use is subtracted) would be approximately 2,772.81 MTCO2e (metric tons of CO2e) per year, which is below the draft SCAQMD screening threshold of 3,000 MTCO2e/year for all land uses. In addition, and also detailed previously, the project would be consistent with the RTP/SCS, LUCE, City's Climate Action and Adaptation Plan, Sustainable City Plan, BAP, ARB's Scoping Plan, the State Attorney General, Office of Planning and Research, and Climate Action Team.

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[42] *Supreme Court of California, Center for Biological Diversity et al. v. California Department of Fish and Wildlife (2015), S217763, 11-13.*

[43] *Addressing the Significance of Greenhouse Gas Emissions, supra, 4 Golden Gate U. Envtl. L.J. at p. 210.*

Similar to the project, the cumulative projects identified in this EIR and all future projects in the State would be reviewed for consistency with applicable State, regional and local plans, policies, or regulations for the reduction of greenhouse gases. Therefore, based on the discussion above, the project's generation of GHG emissions would not be considered cumulatively considerable and would not conflict with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gasses. Therefore, the project's cumulative impact would be less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project and cumulative Impacts associated with GHG emissions would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
D. HAZARDS & HAZARDOUS MATERIALS

1. INTRODUCTION

This section of the EIR describes the existing conditions related to hazards and hazardous materials in the vicinity of the project site and analyzes the potential for hazards and hazardous materials impacts to occur as a result of project implementation. The analysis is based on the findings of *Phase I Environmental Site Assessment for 1633 26th, Santa Monica, CA*, *Contract No. KIL-MSA-002, Task Order No. 427* (Phase I ESA) prepared by Ardent Environmental Group, Inc., November 2017 and *Supplemental Subsurface Investigation Report, 1633 26th, Santa Monica, CA*, *Contract No. MSA-KIL-002, Task Order No. 046* (SSI Report), prepared by Ardent Environmental Group, Inc., May 2020. Copies of these reports are provided in Appendix G of this EIR.

Hazardous materials are defined as substances with physical and chemical properties of flammability, corrosivity, reactivity, or toxicity, which may pose a threat to human health or the environment. The term "hazardous materials" is used in this section to describe chemicals such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated materials. Additionally, the term "release" as used in this section includes known historical spills, leaks, illegal dumping, or other discharges of hazardous materials to soil, sediment, groundwater, or surface water. Areas where historical releases of hazardous materials have occurred could pose a risk to public health and the environment. Potential future releases of hazardous materials that could occur during construction or operation of the proposed project also are included in the analysis.

Hazards may include exposure to both natural and man-made hazards. These could include hazards associated with aircraft operations at nearby airports or natural hazards such as wildfires. A range of other types of hazards are addressed in other sections of this EIR as follows: geologic hazards, such as earthquakes, landslides and bluff stability are addressed in the Initial Study (Appendix A); air pollution hazards, such as toxic air contaminants (TACs) and particulate matter (PM), are addressed in Section IV.A, Air Quality; urban fire hazards and response/suppression systems are discussed in the Initial Study (Appendix A).

2. ENVIRONMENTAL SETTING

As discussed, Property Solutions prepared a Phase I ESA for the project site. The purpose of Ardent Environmental Group's Phase I ESA was to review the current and past land uses at or within the vicinity of the project site to assess their potential to present environmental concerns relative to the presence of and/or the handling of hazardous materials. These environmental concerns are classified as Recognized Environmental Conditions (RECs). RECs are defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. This qualitative assessment was accomplished by review of current and readily available information regarding past and current land use for indications of the manufacture, generation, use, storage and/or disposal of hazardous substances at the project site. A site visit was also conducted on November 7, 2017 to observe existing site conditions. The existence of RECs at the project site due to the prior and current onsite and offsite activities is addressed further below.

In addition to the Phase I ESA, Ardent also prepared an SSI Report for the project site. The purpose off the SSI was to delineate the extent of fill material in the northeastern portion of the project site beneath the existing parking areas and to assess the presence and extent of potential contaminants within the fill material. The SSI Report detailed the results of 142 soil samples collected from 27 borings advanced in the subsurface of the project site.

A. Project Site

The project site is situated in the mid-City area, approximately 1.4 miles northeast of downtown Santa Monica. The site is bordered by a recently constructed 4 story office building on the north, Pennsylvania Avenue on the south, surface parking serving a 4-story office building on the east and 26th Street on the west. The Water Garden office complex is located south of 26th Street and spans the entire block bounded by Colorado Avenue, Cloverfield Boulevard, Olympic Boulevard and 26th Street. Commercial/retail buildings are located along Colorado Avenue south of 2nd Street and south between Pennsylvania Avenue and Olympic Boulevard. Residential uses are located north of the project site along Colorado Avenue north of 26th Street. The project site is within walking distance of the 26th Street/Bergamot Metro Line E Light Rail Station that provides access to downtown Santa Monica, the Santa Monica Pier, the Santa Monica Place shopping center, and Palisades Park with direct service to Culver City and downtown Los Angeles.

i) Historic Uses

Historical aerial photographs for selected years between 1928 and 2012 were reviewed for information regarding the historic land uses on the project site. In addition, Sanborn Fire Insurance maps for the project site area for years 1965 and 1986 were reviewed for information regarding historic land uses on the project site. City directories, topographic maps, and building department records were also reviewed for similar information. The research findings for these sources are detailed in the Phase I ESA in Appendix G to this Draft EIR.

A review of historical sources showed that the was used for agricultural purposes from at least 1938 to the 1950s. Much of the adjacent land in 1928 was undeveloped or used for agricultural purposes. Several small structures appear on the adjacent property to the north/northwest. In 1938, adjacent structures are found to the south/southwest, as well as a trailer park to the north/northeast. Pennsylvania Avenue and 26th Street are not present. From 1952 to 1967, the project site appeared to be part of a clay borrow pit used for clay brick manufacturing. The northeast part of the site was occupied by the pit. Small buildings or storage areas were present on the west part of the site. A brick manufacturing plans was present to the east and southeast of the site. Several large buildings and associated parking lots appear to the south and southwest in 1964. At that time, commercial buildings were developed to the east, south and west and residential properties were found to the north. In 1965, the site was designated as part of a building materials yard. A small retail building was present in the southwest portion of the site. 26th Street runs along the southern boundary of the site. Colorado Avenue now runs to the north and northwest of the site with single family residential structures and commercial buildings.

Based on review of the historical maps, a truck repair facility was found adjacent to the site in 1962 with small oil storage area building on the boundary of the site. By 1977, the facility was no longer present. Based on the short-term presence of the truck repair facility, the small nature of the oil storage facility, the lack of underground storage of petroleum products, and grading and redevelopment of the site in 1972 the former oil storage is not considered an environmental concern. In 1977, the current onsite office building and associated surface parking lot appear. Development of the surrounding area continued. In 1994, the adjacent multi-tenant office building to the south/southwest was redeveloped into its modern-day iteration.

ii) Current Uses

The project site consists of an approximately 87,651 square foot (2.01-acre) lot that is currently developed with a 3-story, brick, office building totaling approximately 45,429 sf and approximately 40 feet in height that was constructed in 1972. The project site also includes a surface parking lot serving the office building with 161~~152~~ parking spaces (157~~148~~ standard and 4 handicap).

No bodies of water are located on the project site or adjacent on adjoining properties. The buildings are heated and cooled by electricity.

iii) Regulatory Records Review

The Phase I ESA include a review of regulatory databases and files from federal, state, and local environmental regulatory agencies to identify use, generation, storage, treatment or disposal of hazardous materials or release incidents of such materials that may impact the site. The records reviewed included, but were not limited to, the following: National Priorities List (NPL); Federal Delisted NPL; Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List; Resource Conservation and Recovery Act (RCRA) Generators List, Treatment, Storage, and Disposal (TSD) Facilities List, and Corrective Action (COR) Facilities List; Federal Brownfields and Institutional Controls (IC)/Engineering Controls (EC); State (EnviroStor)/Tribal Sites; State Spills 90; State/Tribal Underground Storage Tank (LUST) List; Solid Waste Landfill Sites (SWLF); Emergency Response Notification System (ERNS); State/Tribal Underground Storage Tank (UST) and Aboveground Storage Tank (AST) Registration List; State Voluntary Cleanup Program (VCP); and the Tribal Lands database.

The project site was listed on the following databases:

- EDR Historical Auto Station: the project site was listed as USA Petroleum Corporation between 1976 and 2008. As the three-story building was constructed in 1972, this listing is likely for the corporate offices of USA Petroleum and is not related to an onsite auto station. Therefore, this listing is not considered an environmental concern to the project site.[1]
- CA HAZNET: the project site was listed in the CA HAZNET database as Alesis Corporation and Kilroy Reality LP. Alesis Corporation disposed of laboratory waste chemicals via a transfer station. Other inorganic solid waste and liquids with pH less than or equal to 2 were disposed on site. Kilroy Realty disposed waste oil. Based on the office nature of the existing building and the types of wastes, these listings are not considered an environmental concern to the project site.[2]

iv) Hazardous Conditions

1) Asbestos-Containing Materials

Asbestos is a naturally occurring mineral made of microscopic fibers. Asbestos has unique qualities which include its strength, fire resistance, resistance to chemical corrosion, poor condition of heat, noise and electricity, and low cost. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing. It is often found in ceiling and floor tiles, linoleum, and pipes, as well as on structural beams and asphalt. However, asbestos can become a hazard when the fibers separate and become airborne. Asbestos has been linked with lung diseases caused by inhalation of airborne asbestos fibers, and its use in buildings was banned by 1979.

Testing for asbestos was not conducted as part of the Phase I ESA for the project site,[3] and due to recent (within the past five years) remodeling, there is a low likelihood that ACMs are present within the tenant areas of the second and third floors. However, based on the age of the onsite building (constructed between 1972 and 1977), there is a potential for asbestos-containing materials (ACMs) to exist onsite, primarily on the first floor, core areas, and roof.[4]

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[1] *Ardent Environmental Group, Inc., Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, November 27, 2017, page 19.*

[2] *Ibid.*

[3] *As described further in Appendix G of this Draft EIR, the Phase I ESA was conducted in accordance with ASTM E 1527-13. In accordance with the standards set forth therein, physical testing of buildings is not typically performed during this stage.*

[4] *Ardent Environmental Group, Inc., Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, November 27, 2017, page 23.*

2) Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Although lead-based paint (LBP) has been taken off the market, it is estimated that 80 percent of buildings built prior to 1978 contain some lead paint. California law requires that all residential buildings constructed on or before January 1, 1979 or schools constructed on or before January 1993 to be presumed to contain lead-based paint. Structures (residential, commercial, or industrial) are affected by LBP regulations if remodeling, renovations, or demolition activities would disturb lead-based paint surfaces. While adults can be affected by excessive exposure to lead, the primary concern is the adverse health effects on children. The most common paths of lead exposure in humans are through ingestion and inhalation. LBP is a concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil. Even at low levels, lead poisoning can cause IQ deficiencies, reading and learning disabilities, impaired hearing, reduced attention spans, hyperactivity, and other behavior problems with children under 6 years old being most at risk.

Testing for LBP was not conducted as part of the Phase I ESA for the project site,[5] however, based on the dates of construction of the onsite building (1959 to 1961), there is a potential that LBP may be present on portions of the building.[6]

3) Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the United States Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil.

A visual review was conducted for the presence of electrical equipment that could contain PCBs. One electrical transformer was identified on the project site; however, it is of newer construction and unlikely to have PCB-containing components.[7]

4) Underground and Aboveground Storage Tanks

Underground and aboveground storage tanks are frequently used to store hazardous and potentially hazardous liquids or gases, such as heating oil and motor fuel.

No aboveground or underground storage tanks were observed on the project site.[8]

5) Radon

Radon gas is naturally occurring, colorless, odorless gas that is the by-product of the decay of radioactive materials found within bedrock and soil. The gas enters buildings through cracks, structural joints, and plumbing openings in floor levels that are in direct contact with the soil. When inhaled, it has been found to be carcinogenic in some humans. The United States Environmental Protection Agency (USEPA) recommended action level for radon gas is 4.0 picoCuries per liter (pCi/L). According to the Radon

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[5] *As described further in Appendix G of this Draft EIR, the Phase I ESA was conducted in accordance with ASTM E 1527-13. In accordance with the standards set forth therein, physical testing of buildings is not typically performed during this stage.*

[6] *Ardent Environmental Group, Inc., Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, November 27, 2017, page 24.*

[7] *Ibid, page 23.*

[8] *Ibid, page 24.*

Database for California, 16 individual indoor radon measurements have been taken within the project site zip code, none of which exceeded 4.0 pCi/L.[9]

Radon sampling was beyond the scope of work for the Phase I ESA, however, based on the measurements reported in the Radon Database for California, there is a low potential for significant concentrations off radon gas in the existing project site building.[10]

6) Other Environmental Conditions

No labeled or unlabeled containers or drums of possibly hazardous materials or hazardous wastes were observed at the project site during reconnaissance.[11] No wells, cisterns, or wastewater treatment systems were observed on the project site.[12] Additionally, there were no pits, ponds, lagoons, sumps, or drywells observed.[13] There was no visual evidence of radiological hazards (i.e. radiation storage or warning signs), mold, or additional hazards.[14] Furthermore, no evidence of dumping hazardous materials or petroleum products in trash bins or of onsite sewage discharge in the form of septic tanks, leach fields, or cesspools was observed.[15] Additionally, no evidence of releases, such as stained soil, pools of liquid, or distressed vegetation was observed.[16]

v) Onsite Environmental Concerns

Based on the results of the Phase I ESA, onsite RECs have not been identified. Although not considered to be RECs, as discussed above, ACMs and LBP may be present in portions of the existing building on the project site.[17]

vi) Subsurface Soil Conditions

Due to the existence of the clay borrow pit in the northeastern portion of the project site, subsurface investigations were conducted in order to assess the presence and extent of potential contaminants within fill material used to cover the pit in the 1960s. The subsurface investigations included the advancement of 27 borings to depths between 20 and 60 feet below the ground surface of the parking areas (see Figure IV. D-1, Boring Location Map). A total of 142 soil samples collected from the borings were analyzed for total petroleum hydrocarbons (TPH), PCBs, volatile organic compounds (VOCs), and metals.

TPH of primarily oil range hydrocarbons was detected randomly throughout the fill material generally below applicable regulatory screening levels for protection of human health and the environment. One sample contained diesel range hydrocarbons slightly exceeding a very conservative regulatory screening level; however, based on the low concentration and singular location where it was detected, it was determined that the detection would not be likely to pose a health risk at the project site. Based on the low levels of TPH detected and the random distribution of detections, TPH within the fill material is likely due to the

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[9] *California Department of Public Health, Indoor Radon Program, California Indoor Radon Test Results, February 2016.*

[10] *Ardent Environmental Group, Inc., Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, November 27, 2017, page 24.*

[11] *Ibid22.*

[12] *Ibid, page 22.*

[13] *Ibid, page 24.*

[14] *Ibid, page 24.*

[15] *Ibid, page 21.*

[16] *Ibid, page 22.*

[17] *Ibid, page 25.*

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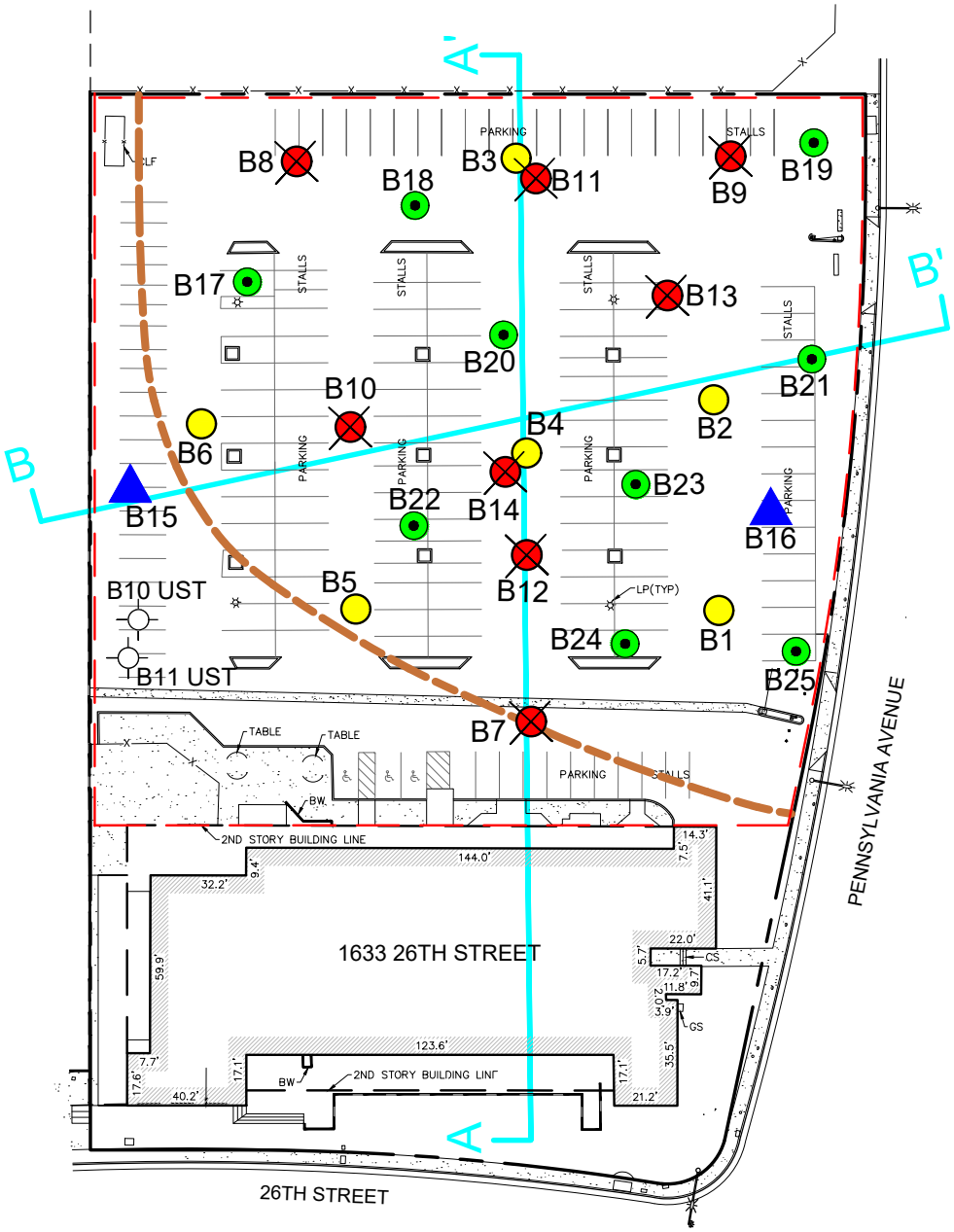

LEGEND

- Previous 30 Foot Deep Boring
- Previous 20 Foot Deep Soil Boring
- Previous 50 to 60 Foot Deep Boring
- Approximate Extent of Proposed Underground Parking Structure
- B17 — 35 Foot Deep Soil Boring
- Approximate Boundary of Former Clay Pit
- A — A' Cross Section Location
- Previous 50 Foot Deep Groundwater Sampling Boring

Source: Ardent Environmental Group, Inc., May 2020.

Figure IV.D-1
Boring Location Map

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weathering of crude oil that was present within the fill prior to being brought to the site and not as a result of onsite activities.[18]

One type of PCBs was detected in one sample at a depth of 20 feet in the center of the project site and was not detected in samples below this depth. Based on these results, PCBs do not appear to be migrating downward at this location and PCBs do not appear to be present or associated with the TPH detected within the remainder of the fill material.

Aromatic VOCs typically associated with crude oil were detected at low levels randomly throughout the fill material. The concentrations of aromatic VOCs are likely derived from the TPH present within the fill material and were below applicable regulatory screening levels. Chlorinated VOCs were also detected randomly throughout the fill material generally below applicable screening levels. Two samples contained a chlorinated VOC (vinyl chloride) slightly exceeding regulatory screening level; however, based on the low concentration, it was determined that the detection would not be likely to pose a health risk at the project site.

Various metals were detected throughout the fill material generally of relatively low concentrations that would likely represent background concentrations or that were below levels of concern. However, select metals, including copper, lead, and zinc were detected at elevated concentrations which exceed California hazardous waste threshold limits or human health screening levels. The majority of these samples contained elevated concentrations of lead, which was detected in 28 samples at depths ranging from 10 to 35 feet below the ground surface. Figure IV. D-2, Distribution of California Hazardous Soil, illustrates the occurrence and extent of fill material that would be classified as a California hazardous waste.

vii) Sensitive Receptors

Land uses that are considered more sensitive to hazardous environmental exposure than others are referred to as sensitive. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to hazardous environmental exposure because the very young, the elderly, and the infirm are more susceptible due to their fragile immune systems and special sensitivity to environmental discharges. Residences are considered to be sensitive because people are often at home for extended periods of time, and could be exposed to pollutants for extended periods.

Surrounding land uses that are considered sensitive receptors to hazardous material exposure include the residences located approximately 240 feet north of the project site along Colorado Avenue in single and two-story residential buildings between 26th Street and Harvard Street. In addition, the following educational facilities/schools nearest to the project site include the following:

- Bright Horizons Children's Center (1620 26th Street #1020 North), a day care, located approximately 220 feet across 26th Street to the southwest of the project site;
- Evergreen Community School (2800 Colorado Avenue),a preschool, located approximately 390 feet to the northeast of the project site; and
- Hill & Dale Family Learning Center (located in Clover Park), an infant and toddler program located approximately 450 feet across 26th Street and Colorado Avenue to the northwest of the project site.

viii) Past Uses of Adjacent and Surrounding Properties

Based on review of historical aerial photographs, previous reports and interviews, the adjoining properties to the northwest, south and west have been developed since at least 1938 for commercial office, and to the north for residential use. Before 1938, the adjacent land was either vacant or used for agricultural purposes. During the 1950s and 1960s, the property to the northeast and east was used as a clay burrow pit and brick manufacturing plant.

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[18] *Ibid, page 15.*

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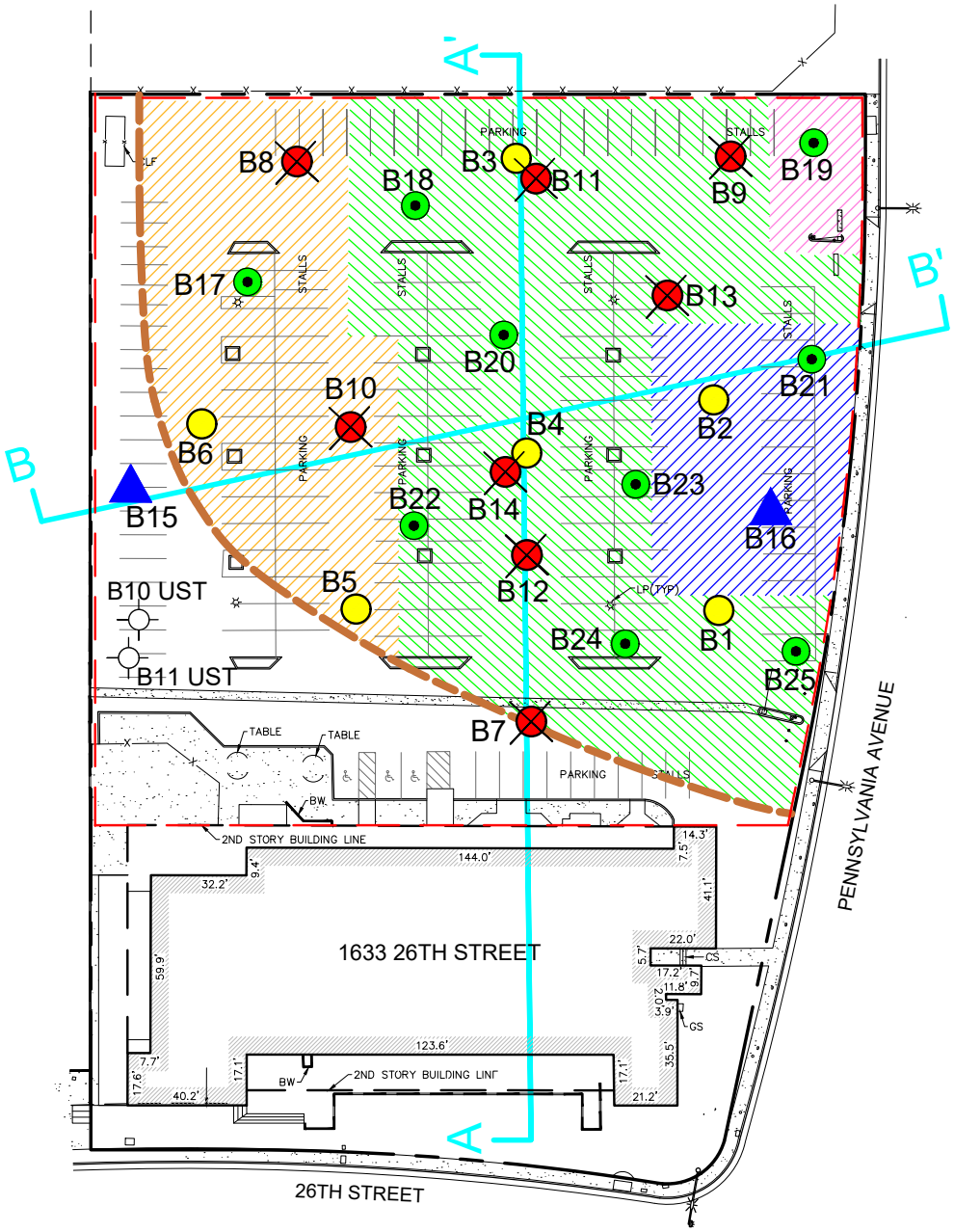

LEGEND

- Previous 30 Foot Deep Boring
- Previous 20 Foot Deep Soil Boring
- Previous 50 to 60 Foot Deep Boring
- 35 Foot Deep Soil Boring (B17)
- Previous 50 Foot Deep Groundwater Sampling Boring
- Approximate Extent of Proposed Underground Parking Structure
- Approximate Boundary of Former Clay Pit
- A — A' Cross Section Location
- California Hazardous Soil From Approximately 7.5 to 12.5 Feet Below the Ground Surface (bgs)
- California Hazardous Soil From Approximately 7.5 to 27.5 Feet (bgs)
- California Hazardous Soil From Approximately 12.5 to 17.5 Feet (bgs)
- California Hazardous Soil From Approximately 12.5 to 35 Feet (bgs)

Source: Ardent Environmental Group, Inc., May 2020.

Figure IV.D-2
Distribution of California Hazardous Soil

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Past uses of surrounding properties consisted of vacant, agricultural, commercial, and residential land. Properties to the north of the site, have historically been used as single-family residences. Properties to the east, south, and west of the site have been used for commercial and light industrial purposes.

ix) Regulatory Records Review

As detailed above for the project site, the Phase I ESA include a review of regulatory databases and files from federal, state, and local environmental regulatory agencies to identify use, generation, storage, treatment or disposal of hazardous materials or release incidents of such materials that may impact the site. Table IV.D-1, Summary of Radius Map Database Search for Offsite Facilities, summarizes the databases identified by EDR that contain a listing for sites located within their respective search radius from the project site. Details regarding listings for sites located adjacent to the project site are included following the table. A complete list and discussion are included in the Phase I ESA (included as Appendix G to this Draft EIR).

Table D-1
Summary of Radius Map Database Search for Offsite Facilities

Federal or State Government Database	Search Radius (miles)	Number of Listings	Adjacent Sites Listed
Federal Comprehensive Environmental Response, Compensation and Liability Information (CERCLIS) List	0.5	32	No
Resource Conservation and Recovery Act (RCRA) Generators List	0.25	4	Yes[1]
State (EnviroStor)/Tribal Sites	1	19	Yes[1]
State/Tribal Leaking Underground Storage Tank (LUST) List	0.5	29	No
Solid Waste Landfill Sites (SWFL)	0.5	8	No
State/Tribal Underground Storage Tank (UST) and Aboveground Storage Tank (AST) Registration List	PS/AP	2	Yes[1]
State Voluntary Cleanup Program (VCP)	0.5	1	No

NOTES: PS = project site only; AP = adjoining properties
1 See discussion below.
2 Other databases are available but not required by the regulations and rules that govern the process of environmental evaluation and inquiry of a property.
Source: Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, Ardent Environmental Group, Inc. November 27, 2017.

1) Resource Conservation and Recovery Act (RCRA) Generators List

"Component Research C" located south of the project site (0.12-mile) was a former Paper Mate Facility and is located downgradient of the project site and not considered environmental concern to the site. The other listing, "Water Garden" is located on adjacent property, south of 26th Street. There are no reported hazardous material incidents and this listing is not considered an environmental concern to the project site.[19]

[19] *Ardent Environmental Group, Inc., Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, November 27, 2017, page 14.*

2) State (EnviroStor)/Tribal Sites

"Water Garden, Phase 1" is located on adjacent property, south of 26th Street. The developer of the property self-directed a cleanup of 85,000 cubic yards of lead contaminated soil in 1994. The Regional Water Quality Control Board closed the case in 2002. Based on the regulatory status, the nature of the contamination, and the property is downgradient from the project site relative to groundwater flow, the listing is not considered an environmental concern to the project site. The other listings are not adjacent. Also, they're considered cross- or downgradient from the project site. Based on their regulatory status, type of listing, and/or distance and direction from the project site, these facilities are not considered an environmental concern to the project site.[20]

3) State/Tribal Underground Storage Tank (UST) and Aboveground Storage Tank (AST) Registration List

One property adjoining the site at 2700 Colorado, to the north, was listed on the UST list. One property, "Water Garden" located to the south was listed on AST list. There are no known reported releases from these tanks and due to distance and this information, these tanks are not considered environmental concern to the project site.[21]

x) Potential Migration of Contaminants from Offsite Sources

As part of the Phase I ESA Report, a VEC study was completed for the project site using Tier 1 criteria as recommended by ASTM E 2600-15. The Tier 1 screening identifies surrounding facilities that pose a possible vapor intrusion source to the project site based on the results of the Phase I ESA investigations, distance of the identified facilities from the project site, the types of chemicals used, and a plume test to determine if the plume associated with a source of contamination is close enough to the project site to impact indoor air quality. Based on a review of previous reports, regulatory records, files, databases, client furnished data, and project site reconnaissance activities, the Phase I ESA Report concluded that the project site would be considered a low risk for vapor intrusion.[22]

xi) Offsite Environmental Concerns

Based on the findings of the Phase I ESA, no actual, potential, or suspected offsite environmental concerns have been identified that would represent a REC at the project site.[23]

B. Regulatory Framework

A number of federal, state, and local laws and regulations have been enacted to ensure the safe handling and use of hazardous materials and hazardous wastes, as well as to manage and remediate sites contaminated by hazardous substances.

The Certified Unified Program Agency (CUPA) is the agency responsible for enforcing applicable laws and regulations for the handling and cleanup of specific materials determined to pose a risk to human health or the environment. The Santa Monica Fire Department (SMFD) is the CUPA at the local level for the City. Enforcement agencies at the state level include two branches of the California Environmental Protection Agency (CalEPA): the DTSC and the Regional Water Quality Control Board (RWQCB). The federal enforcement agency is the U.S. EPA.

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[20] *Ibid, page 16.*

[21] *Ibid, page 18.*

[22] *Ibid, page 25.*

[23] *Ardent Environmental Group, Inc., Phase 1 Environmental Site Assessment, 1633 26th Street, Santa Monica, California, Contract No. KIL-MA-002, Task Order No. 427, November 27, 2017, page 25.*

i) Federal Regulations

Several federal agencies regulate hazardous materials. These include the U.S. EPA, Department of Labor (Federal OSHA), and the Department of Transportation (DOT). Applicable federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the Code of Federal Regulations (CFR). In particular, Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport. Some of the major federal laws include the following statutes (and regulations promulgated there under):

- The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or "Superfund," was enacted in 1980 and created national policy and procedures to identify and cleanup sites where hazardous substances have been released into the environment and provides the mechanisms by which these remedial actions are financed. Additionally, the Superfund Amendment and Reauthorization Act (SARA), which extended and amended CERCLA, required that due diligence be exercised in the investigation of past and current handling of hazardous substances prior to property sale.
- The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 as the first step in regulating the potential health and environmental problems associated with solid hazardous and non-hazardous waste disposal.
- The Toxic Substances Control Act (TSCA), enacted in 1976, regulates and controls harmful chemicals and toxic substances in commercial use, in particular PCBs.
- The Federal Insecticide, Fungicide, and Rodenticide Act (as amended) controls the manufacture, use, and disposal of pesticides and herbicides.
- The Hazardous and Solid Waste Act (HSWA) includes the 1984 amendments to RCRA to address gaps in the area of highly toxic wastes.
- Title 29 Code of Federal Regulations (CFR), Part 1910 contains the Occupational Safety and Health Administration (OSHA) requirements for workers at hazardous waste sites including emergency response, hazard communication, and personal protective equipment.
- CFR Title 14, Part 77.9, requires that any person/organization who intends to sponsor any construction or alteration exceeding 200 feet above ground level must notify the Administrator of the Federal Aviation Administration ("FAA").

ii) State and Regional Regulations

Primary state agencies with jurisdiction over hazardous chemical materials management include the Department of Toxic Substance Control (DTSC) and the RWQCB. Other state agencies involved in hazardous materials management are the Department of Industrial Relations (state OSHA implementation), state Office of Emergency Services (OES—California Accidental Release Prevention implementation), Department of Fish and Game (DFG), Air Resources Board (ARB), Department of Transportation (Caltrans), State Office of Environmental Health Hazard Assessment (OEHHA—Proposition 65 implementation), and the California Integrated Waste Management Board (CIWMB). The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol (CHP) and Caltrans. Hazardous materials waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.

Hazardous chemical and biohazardous materials management laws in California include the following statutes (and regulations promulgated thereunder):

- The Hazardous Materials Management Act (HMMA) requires any business that handles more than a specified amount of hazardous or extremely hazardous materials, termed a "reportable quantity," to submit a Hazardous Materials Business Plan (HMBP) to its CUPA.

- The Hazardous Waste Control Act (HWCL) empowers the Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency (CAL EPA) (formerly part of the Department of Health Services), to administer the State's hazardous waste program and implement the federal program in California. This law includes underground storage tank (UST) regulation.
- The Safe Drinking Water and Toxic Enforcement Act of 1986 (proposition 65) focuses on carcinogenic or teratogenic (causing developmental malformations) contaminants and implements the State's community-right-to-know program.
- The Hazardous Waste Management Planning and Facility Siting (Tanner Act) requires the preparation of hazardous waste management plans and regulates the siting of hazardous waste facilities
- Hazardous Materials Storage and Emergency Response (AB 2185) requires local agencies to regulate the storage and handling of hazardous materials and requires development of a plan to mitigate the release of hazardous materials.
- Porter-Cologne Water Quality Control Act, adopted in 1969, requires the maintenance of the highest reasonable quality of the State's waters. It authorizes the Regional Water Quality Control Board (RWQCB) to supervise cleanup efforts at spill sites that have affected groundwater.

1) Certified Unified Program Agency

Senate Bill 1082, passed in 1993, created the Certified Unified Program Agency (CUPA). The Unified Program consolidates six state environmental programs into one program at the local level, under the authority of a Certified Unified Program Agency. The SMFD was certified by the CalEPA as the CUPA for the City in 1997. The SMFD is responsible for protecting the public and environment by being the first responders to emergencies and overseeing hazardous waste, underground storage tanks, above-ground tanks, hazardous materials, community right-to-know, and accidental release prevention programs. The Division conducts both CUPA regulatory inspections and Fire Code inspections for all program elements, with the exception of the hazardous waste program. The Division contracts with the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials for hazardous waste inspection and enforcement of the hazardous waste program.

2) 2010 State of California Multi-Hazard Mitigation Plan

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

3) South Coast Air Quality Management District

The SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 defines asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling/cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites.

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

iii) Local Regulations

The primary local agency, known as the CUPA, with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management is the SMFD. The CUPA is certified by Cal-EPA to implement the 6 state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The 6 consolidated programs are as follows:

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

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

1) City of Santa Monica General Plan Safety Element

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

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

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

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

2) City of Santa Monica Municipal Code (SMMC)

Chapter 5.24 of the Santa Monica Municipal establishes Hazardous Materials Reporting and Response Planning (HMRRP) and Hazardous Materials Management Plans (HMMP) requirements. Section 5.24.010 requires all businesses to declare to the City if they use, store, or manufacture any quantity of a hazardous or extremely hazardous material. An annual business plan must be submitted if the business uses, stores, or manufactures hazardous materials exceeding 55-gallons or more of liquid, 500-pounds or more of a

solid, and/or 200-cubic feet or more of a gas, at stand temperature and pressure. In addition to inventorying the materials in question, the business plan must describe emergency response plans and procedures to be used in the event of an accident. The requirements are established to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment. Section 8.104 requires that the installation, operation, and removal of USTs be conducted under the authority of City issued permits. Additionally, the investigation, assessment, and cleanup of a release from a UST are overseen by the SMFD, pursuant to Section 8.104.

3) City of Santa Monica Office of Emergency Management

The City of Santa Monica Office of Emergency Management (OEM) has the responsibility of organizing and directing the preparedness efforts during large scale events, emergencies, or disasters in Santa Monica. The mission of the OEM is to protect the City from the loss of life and property in the event of a natural or manmade disaster. The OEM also has primary responsibility for preparing and updating the City's Multi Hazard Functional Emergency Plan. The plan includes resources and information to assist City residents, public and private sector organizations, and others interested in participating in planning for natural hazards. The mitigation plan provides a list of activities that may assist the City in reducing risk and preventing loss from future natural hazard events. The action items address multi-hazard issues, as well as activities for earthquakes, landslides, flooding, tsunamis, wildfires, and severe windstorms/thunderstorms.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

A. Thresholds of Significance

Appendix G to the CEQA Guidelines provides screening questions addressing impacts on hazards and hazardous materials. Specifically, the Guidelines state that a project may have a potentially significant hazard and hazardous materials impact if it would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

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.

Non-Applicable Issues: The Initial Study (included in Appendix A) determined that the project would result in no impact, or less than significant impact with respect to Thresholds a), e), f), and g), listed above. As such, no further analyses of these topics are required.

Question (a): The project would refurbish an existing office building and replace the existing surface parking lot with two new four-story, creative, and business professional office buildings. The project would also include a three-level subterranean garage with 399 ~~401~~ parking spaces. None of these uses would involve the routine transport, use or disposal of hazardous substances, other than minor amounts of hazardous materials typically used for maintenance (e.g., cleaning solvents, paints). Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

Question (e): The closest airport is the Santa Monica Municipal Airport, located approximately 1.4 miles southeast of the project site. The project site is not within the aircraft takeoff and landing flight paths (City of Santa Monica, Airport Influence Area Map, 2003). In addition, minimum altitude over any congested area of a city, town, or settlement, or over any open-air assembly of persons, is an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the aircraft. Because the project site is not within the normal takeoff and landing paths and because the minimum altitude is 1,000 feet above the highest obstacle in the vicinity of the project site, air traffic associated with the Santa Monica Municipal Airport would not expose people in the area either during project construction or operation to a safety hazard or excessive noise from air traffic. In addition, the project is outside of the 65 CNEL Airport Land Use Plan Noise Contour.[24] Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

Question (f): Vehicle and emergency access to the project site is available from 26th Street and Pennsylvania Avenue. These public streets would not be blocked or substantially altered. Additionally, the Santa Monica Fire Department (SMFD) reviews plans for adequate emergency access. Implementation of the project is not anticipated to conflict with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

Question (g): The project site is located in an urbanized area of Santa Monica surrounded by commercial, light industrial, and residential uses. The project site is not located adjacent to or intermixed with wildlands. As such, the proposed project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impact would occur and further analysis of this issue in the EIR is not required.

The following impact analysis addresses questions b), c), and d) listed above, which the Initial Study determined to be potentially significant.

B. Methodology

To evaluate potential impacts related to hazards and hazardous materials, a Phase I ESA in accordance with ASTM Standard E 1527-13 and an SSI Report were prepared for the project site. These reports are provided in Appendix G of this Draft EIR. The analysis of the potential impacts regarding hazards and hazardous material was based on a property and adjacent site reconnaissance, interviews with key personnel, a review of historical use information about the project site, review of regulatory agency records, and laboratory analysis of 142 soil samples collected from 27 soil borings advanced beneath the project site.

[24] *City of Santa Monica, Airport Influence Map, 2003.*

C. Project Impacts and Mitigation Measures

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

Impact Analysis:

Impact D-1 The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction. With mitigation measure MM D-1, impacts would be reduced to less than significant. The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during project operation and impacts would be less than significant.

i) Construction

Construction activities associated with the project would involve the refurbishment of the existing site building, earthmoving activities associated with excavation and grading for the subsurface parking levels, and the transport and disposal of demolished building materials resulting from refurbishment, as well as excavated soil. Such activities have the potential to result in the release of hazardous materials into the environment should these demolished site improvements and soil contain hazardous materials. Construction activities also involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids required for operation and maintenance of equipment.

1) Hazardous Materials Release Related to Refurbishment

As previously discussed, based on the age of the onsite office building, ACMs and LBP may be present, primarily on the first floor, core areas, and roof. Thus, in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1402, the project Applicant would be required to conduct a comprehensive asbestos survey prior to refurbishment of the existing building, subject to approval by the Santa Monica Community Development Department. In the event that ACMs are found within areas proposed for refurbishment, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. Mandatory compliance with applicable federal and state standards and procedures would reduce risks associated ACMs to acceptable levels. With respect to LBP, the contractor would be required to comply with the OSHA Lead In Construction Standard and Cal/OSHA Construction Safety Orders, Lead Section 1532.1, Title 8, California Code of Regulations, including the pre-construction inspection of any previously-identified LBP-containing materials and proper abatement or disposal of any deteriorated LBP-containing materials. In the event that LBP is found within areas proposed for refurbishment, suspect materials would be removed in accordance with procedural requirements and regulations, including those established by TSCA 29 CFR Sections 19010 and 1926 et seq., for the proper removal and disposal of LBP prior to demolition activities. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the site or location at which construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. As with ACMs, mandatory compliance with applicable federal and state standards and procedures would reduce risks associated with LBP to acceptable levels.

With compliance with relevant regulations and requirements, project construction activities would not expose people to a substantial risk resulting from the release of ACMs or LBP into the environment. Therefore, impacts related to the release of hazardous materials into the environment as a result of construction refurbishment activities would be less than significant.

2) Hazardous Materials Release Related to Excavation

As previously discussed, based on the results of the Phase I ESE, no RECs have been identified for the project site, including onsite and offsite sources. However, subsurface investigation at the project site detected elevated concentrations of metals, including copper, lead, and zinc, that exceeds California hazardous waste threshold limits at depths ranging from 10 to 35 feet below the ground surface throughout the fill material beneath the northeastern portion of the project site. Such soil would require special handling and disposal at a licensed landfill classified to accept such waste. Based on delineation of the fill material beneath the project site that contains elevated levels of metals (shown in Figure IV. D-2), the Phase I ESA Report estimated that approximately 27,671 cubic yards of soil would require special handling and disposal as California hazardous waste. PCBs were also detected at a depth of 20 feet in one discreet location in the center of the project site. The location of the PCBs is within a portion of soil that also contains elevated levels of metals and would, accordingly, be subject to the special handling and disposal requirements as a California hazardous waste. No additional requirements for soil containing PCBs beyond the requirements that would be implemented due to the presence of metals were identified by the Phase I ESA Report. Furthermore, although the Phase I ESA Report determined that detections of TPH and VOC were not likely to pose a health risk at the project site, one detection of TPH and two detections of VOC slightly exceeded applicable regulatory screening levels. Furthermore, disposal restrictions for soils containing low levels of TPH and VOC vary from landfill to landfill. Because it is not currently known what landfill the construction contractor would dispose of excavated soil, it is not possible to identify specific disposal restrictions would apply for soils containing TPH and VOCs above detection limits.

The project site would be excavated to a depth of approximately 37 feet below the ground surface (with approximately 55,000 cubic yards of soil removed). A potentially significant impact could occur with project implementation due to the possible presence of isolated areas of impacted soil at the project site. As such, mitigation measure MM D-1 (Soil Management Plan), would be required. Implementation of mitigation measure MM D-1 would reduce the potentially significant impact to less than significant. Therefore, impacts related to the release of hazardous materials into the environment as a result of construction excavation activities would be less than significant with mitigation.

3) Hazardous Materials Release Related to Equipment Use

As mentioned above, construction equipment requires the use of potentially hazardous materials for their operation. However, applications of such materials would likely be in limited (i.e., not commercially reportable) quantities and would be handled in compliance with federal, state, and local regulations pertaining to their transport, use, or disposal. If necessary, appropriate permits, worker training, and agency inspections would be obtained and provided. The construction contractor would be required to implement standard good housekeeping measures, best management practices (BMPs), site maintenance and security precautions, as well as comply with standards and regulations related to the transport, use, or disposal of hazardous materials. Therefore, impacts related to the release of hazardous materials into the environment as a result of construction equipment would be less than significant.

ii) Operation

The project consists of the refurbishment of an existing office building and development of new office and creative space. No uses are proposed that would generate hazardous materials or wastes.

Routine cleaning supplies used on the project site during operations could contain hazardous materials. However, usage of these supplies is subject to county, state, and federal requirements to minimize exposure to people and to ensure safe use, storage, and disposal of any chemicals, including common cleaning and maintenance materials. Compliance with existing regulations would ensure that routine cleaning solvents would not pose a risk from hazardous materials. Therefore, impacts related to the release of hazardous materials into the environment as a result of operation would be less than significant.

Mitigation Measures:

MM D-1 **Soil Management Plan.** 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 Regional Water Quality Control Board (RWQCB), DTSC, SMFD, Santa Monica Public Works Water Resources Division) for review and approval. The soils management plan and transportation plan shall include the following tasks:

Soils Management Plan

Procedures shall be established for recognizing hazardous materials [e.g., training of construction workers regarding tell-tale signs of contaminated soils (e.g., staining, leakage or odors) in soils during constructed. Soils shall be tested to determine level of contamination. Affected soils shall be either directly loaded into awaiting trucks for immediate offsite disposal or temporarily stockpiled on plastic sheeting prior to load-out and offsite disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came.

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

Soil and Material Segregation

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

Stockpile Management

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

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

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

- The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust.
- The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.
- Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected

immediately. Daily records shall be kept of stockpile inspections and any repairs made.
- If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations.
- During stockpile generation and removal, only the working face of the stockpile shall be uncovered.

Decontamination Methods and Procedures

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

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

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

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

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

Truck Loading

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

- Materials shall be transported to an approved treatment/disposal facility.
- No excavated material shall extend above the sides or rear of the truck/trailer.
- Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.
- The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material offsite.

Storm Water Management

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

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

Transportation Plan

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

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis:

Impact D-2 The project would not emit hazardous emissions and would handle hazardous materials in accordance with regulations and manufacturer's specifications. As a result, the project would not create a significant hazard to schools within 0.25-mile of the project site. Impacts would be less than significant.

As detailed in the existing setting discussion above, there are three schools located within 0.25-mile of the project site: Bright Horizons Children's Center, Evergreen Community School, and Hill & Dale Discover Center Preschool. Construction of the project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, operation of the project would involve the limited use of hazardous materials typically used in the maintenance of office land uses (e.g., cleaning solutions, solvents, painting supplies, batteries, etc.). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. As such, the use of such materials would not create a significant hazard to any nearby schools. Additionally, as discussed under Impact D-1, the project would not result in hazardous emissions. Therefore, impacts related to the emission or handling of hazardous materials within 0.25-mile of a school would be less than significant.

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Impact Analysis:

Impact D-3 The project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, because the listings do not identify

any violations or releases have occurred at the project site, the project would not create a significant hazard to the public or the environment during construction or operation. Impacts would be less than significant.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. As part of the Phase I ESA, an environmental information database search was performed for the project site. As detailed in the existing setting discussion above, the project site was listed on the EDR Historical Auto Station and the CA HAZNET lists. Based on the historical uses identified for the project site, the Phase I ESA Report concluded that the listing on the EDR Historical Auto Station list was likely due to a USA Petroleum corporate office and not as a result of an onsite auto station. In addition, the listing on the CA HAZNET database details disposal of waste, including laboratory chemicals and oil. No violations/releases were identified and the databases on which the project site appears are for permitting/documentation purposes rather than for a noted hazardous release. The identification of the project site in connection with its previous uses and activities on these lists is not indicative of a hazardous release and the listings were not identified as RECs. Furthermore, the SSI Report concluded that the presence of detectable amounts of TPH and VOCs in the subsurface materials was likely due to the weathering of crude oil that was present within fill material prior to its introduction to the site, and not as a result of onsite activities or any release of hazardous materials on the project site. Therefore, the project would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. As such, impacts related to the project site's inclusion on lists of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 would be less than significant.

4. CUMULATIVE IMPACTS

The geographical context for the cumulative scope of hazards and hazardous materials analysis is the project site and immediate vicinity. Development of the project in combination with cumulative projects has the potential to increase, to some degree, the risks associated with the potential accidental release of hazardous materials in the project area. In particular, cumulative development could occur on properties listed on hazardous materials sites or the demolition of existing structures, which may contain hazardous materials. However, the individual workers potentially affected and nearby uses would vary from project to project depending upon the location, type, and size of development and the specific hazards associated with individual sites. As with the project, if future projects occur on contaminated sites or have the potential to release hazardous materials (e.g., ACMs, LBPs, PCBs etc.), the applicants of those projects would be required to implement mitigation measures and regulatory requirements appropriate for the type and extent of contamination present and the land use proposed. Compliance with mitigation measures and regulatory requirements would reduce the risk associated with potential contamination.

As discussed above, the project would implement mitigation measures MM D-1, a Soils Management Plan. This measure would provide direction for management of excavated soils that may be discovered to contain contaminants at levels subject to regulatory requirements for handling, transport, and disposal. Because the project would also be required to comply with applicable regulations to ensure that the project would not result in significant public hazards as a result of accidental release of hazardous materials, the project would not result in a cumulatively considerable contribution to hazardous impacts. Therefore, the cumulative impact would be less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of mitigation measure MM D-1, listed above, would reduce project-level and cumulative hazard and hazardous materials impacts to a less-than-significant level.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
E. LAND USE/PLANNING

1. INTRODUCTION

This section of the EIR describes the existing land uses in the project area; describes relevant land use plans, policies and regulations; and analyzes the potential land use effects that could result from the proposed project. This section specifically evaluates the consistency of the project with the Southern California Association of Governments (SCAG)'s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including the recent update as the Connect SoCal 2020–2045 RTP/SCS; and the City of Santa Monica's Land Use and Circulation Element (LUCE), the City's Bergamot Area Plan (BAP), and City's Zoning Ordinance.

2. ENVIRONMENTAL SETTING

A. City of Santa Monica

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

The City occupies approximately 8.25 square miles, almost all of which is urbanized with various mix of residential, commercial, industrial, and institutional uses. The City is organized around a grid system of streets providing a high level of connectivity within the City and to adjacent communities. This grid roadway system is interrupted by I-10, which bisects the City from east to west, dividing neighborhoods and districts north and south of the freeway.

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

B. Bergamot Area Plan

The project site is located within the Bergamot Area Plan (BAP). The BAP area is located in the eastern portion of the City, focused around the 26th Street/Bergamot Station for the Metro Line E (formerly Expo). The BAP area generally encompasses the properties bounded by Centinela Avenue, Franklin Street, and Stanford Street to the east; Colorado Avenue to the north; 26th Street and Cloverfield Boulevard to the west; and Michigan Avenue/Exposition Boulevard to the south. The BAP is divided into two distinct areas: the Bergamot Transit Village in the western portion and the Mixed-Use Creative District in the eastern portion, with Steward Street dividing the two areas.

The project site is situated along the northern border of the Bergamot Transit Village portion of the BAP. The project site is surrounded by commercial, general/professional office and creative office uses on all sides in relatively large floorplate office buildings, with accessory retail, restaurant, childcare, and health club uses. An existing five-story office building is located directly to the north, which separates the project site from existing multi-family residential uses. Large office developments are located directly across 26th Street to the west including the Water Garden, which house corporate, entertainment, and financial offices,

showrooms, and landscaped outdoor areas. Colorado Center is located northwest of the site, at the corner of Colorado Avenue and 26th Street. One- and two-story office buildings, and Santa Monica College (SMC) (Center for Media & Design) buildings and parking structure are located southeast of the site across Pennsylvania Avenue at Stewart Street. This SMC campus location is also home to KCRW radio station. A two-story office building is located to the east along Pennsylvania Avenue.

Photographs depicting land uses surrounding the project site are provided in Section III (Environmental Setting).

C. Project Site

The approximately 87,651 square foot (2.01-acre) project site is comprised of two parcels, Assessor Parcel Numbers (APN) 4268-001-025 and 4268-001-026. The project site is currently developed with a 3-story, brick-faced office building totaling approximately 45,529 square feet, constructed in 1972. The building houses a variety of creative office and office tenants. The project site also includes a surface parking lot serving the office building with 161 (157 standard and 4 handicap) ~~152~~ parking spaces.

The site is landscaped with grass and planters in front of the building along 26th Street and Pennsylvania Avenue, a landscaped private walkway between a narrow driveway to the north, and landscaping in the surface parking lot. One street tree is planted on 26th Street, near Pennsylvania Avenue. Project site landscaping includes approximately eleven trees adjacent to the building in landscaped areas along Pennsylvania Avenue, approximately thirteen trees in tree wells in the surface parking lot, and approximately six trees along the southern border of the project site (parking lot).

During the weekdays, food trucks line Pennsylvania Avenue to serve employees in the surrounding area.

D. Circulation/Transportation System

Vehicle access to and from the existing surface parking lot is provided by two driveways on Pennsylvania Avenue with a gate access ingress at the westerly driveway closest to the building and egress at the easterly driveway. Pedestrian access is provided by sidewalks on 26th Street and a limited portion of Pennsylvania Avenue immediately east of 26th Street, with building entrances on 26th Street, Pennsylvania Avenue and from the surface parking lot.

The project site is regionally accessible from Interstate-10 (I-10, or Santa Monica Freeway) via Cloverfield Boulevard and 20th Street. The Santa Monica Freeway is located approximately 0.37 miles south of the project site. The project site is situated between two major boulevards as defined by the Land Use and Circulation Element (LUCE): Colorado Avenue and Olympic Boulevard.

The project site is within walking distance (0.15 mile south) of the Metropolitan Transportation Authority (Metro) Line E Light Rail 26th/Bergamot Station. The Metro Line E Light Rail provides passenger service between downtown Los Angeles and Santa Monica with headways of approximately 12 minutes in the peak hours.

Additionally, the project site is served by a number of Big Blue Bus (BBB) lines including, route 5 (Olympic Blvd – Century City), 16 (Marina del Rey–Wilshire Blvd/Bundy Dr.) and 43 (San Vicente Blvd 0 26th St–SMC). The closest bus stop is approximately 2 blocks (0.15 mile) south at 26th Street/Olympic Boulevard. This bus stop serves BBB routes 5 and 16.

With the high number of bus routes as well as the Light Rail, the project site is considered a Transit Priority Area pursuant to CEQA.[1]

E. Regulatory Framework

i) State

1) Senate Bill 375 (SB 375)

In 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32) into law, which requires that California greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020. Subsequently, the Legislature adopted Senate Bill 375 (SB 375) as one means of meeting the mandate of AB 32. SB 375 directs local governments to modify their approach to regional planning and calls for the integration of transportation, land use, and housing in regional plans.

SB 375 requires the California Air Resources Board (CARB) to develop regional reduction targets for GHG emissions and calls for the creation of regional plans to reduce those emissions from vehicle use (passenger vehicles and small trucks) throughout the State. With those targets in mind, California's 18 Metropolitan Planning Organizations, including the Southern California Association of Governments (SCAG), were required to develop a "Sustainable Community Strategies" (SCS). The Metropolitan Planning Organizations are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed GHG reduction targets by 2020 and 2035. The Metropolitan Planning Organizations must develop an Alternative Planning Strategy if the Sustainable Community Strategies cannot reach the regional target.

SB 375 has special provisions that apply to Metropolitan Planning Organization, such as SCAG. It states that "a subregional council of governments and the county transportation commission may work together to propose the sustainable communities' strategy and an alternative planning strategy…for that subregional area." In addition, SB 375 authorizes SCAG to "adopt a framework for a subregional SCS or a subregional Alternative Planning Strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships." Finally, SB 375 requires SCAG to "develop overall guidelines, create public participation plans, ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region."

The project's consistency with the RTP/SCS and smart growth principles that are embodied in SB 375 are analyzed in Section IV.A (Air Quality). Among other design concepts, these principles call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors. Sponsors of SB 375 have stated that because most people commute to work, and cars and light trucks generate approximately 30 percent of the GHG emissions in California, reducing the amount of GHGs emitted into the environment is partially dependent on increasing the number of jobs near residential development to shorten commute times. According to the principles of "smart growth," solutions to ever-increasing commute times and distances include enabling more Californians to live near where they work and/or to increase public transportation ridership. The theory behind SB 375 is that if Californians spend less time and travel fewer miles in their vehicles, those vehicles will emit fewer GHGs. This can be done, in part, by locating growth in areas already devoted to urban uses that are readily accessible to transit.

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[1] *As defined in CEQA Section 21099, transit priority area means an area within one-half 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 Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.*

ii) Regional

The Southern California Association of Governments (SCAG) is the designated MPO for 6 Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for regional transportation, land use and growth management, hazardous waste management, and air quality. The City is one of many jurisdictions comprising the SCAG.

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

1) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016-2040 RTP/SCS (adopted on April 7, 2016) presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians."[2] The 2016-2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. As part of this new approach, the 2016-2040 RTP/SCS establishes commitments to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning in order to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS). The 2016-2040 RTP/SCS also establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[3] Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. The project site is located within a High-Quality Transit Area as designated by the 2016-2040 RTP/SCS.[4,5]

On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. However, the RTP/SCS is currently pending certification by the California Air Resources Board (CARB). The circulation of the Notice of Preparation (NOP) for the project began on May 6, 2020, which was prior to the adoption of the 2020-2045 RTP/SCS. Therefore, the analysis in this DEIR focuses on the project's consistency with the 2016-2040 RTP/SCS.

As the 2020-2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the same goals and strategies are similar between the two plans. Like the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses and builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Plan lays out a strategy for the region to meet CARB greenhouse gas reduction targets

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[2] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. iii.*

[3] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.*

[4] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 5.1: High Quality Transit Areas In The SCAG Region For 2040 Plan, p. 77.*

[5] *Los Angeles County Metropolitan Transportation Authority (Metro). "High Quality Transit Areas–Southwest Quadrant."*

at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. Additionally, the Plan anticipates a 25.7 percent decrease in time spent in traffic delay per capita and a five percent decrease in daily miles driven per capita from 2016 to 2045. The project's consistency with the applicable goals of the 2016-2040 RTP/SCS is analyzed in Table IV.E-1, Project Consistency with the Applicable Goals of the 2016-2040 RTP/SCS, in the impact analysis below. The regional transportation impacts of the project are analyzed in greater detail in Section IV.G (Transportation/Traffic) of this Draft EIR.

iii) Local

1) City of Santa Monica General Plan

California state law requires that every city or county prepare and adopt a General Plan. The General Plan is a comprehensive document that provides the long-term goals, policies and objectives to guide future development. The City of Santa Monica General Plan is the fundamental planning policy document of the City, providing a "blueprint" for the design of the City. The General Plan is a comprehensive document that provides the long-term goals, policies and objectives to guide future development. The City of Santa Monica General Plan consists of a series of documents or elements that include seven state mandated elements: Land Use and Circulation Element (2010); Housing Element (2013); Open Space Element (2001); Scenic Corridors Element (1975); Noise Element (1992); Conservation Element (1975); and, Safety Element (1995). In addition, to these state-mandated elements, the Santa Monica General Plan also contains a Historic Preservation Element (2002).

a) Land Use and Circulation Element (LUCE)

The LUCE, adopted July 6, 2010 and amended on March 10, 2020, is the land use and transportation planning document governing existing and future land uses in the City. The LUCE sets forth goals, policies, and standards that are intended to guide the future growth and development in the City. The LUCE is the fundamental planning policy document of the City, identifying the appropriate location of land uses, as well as the basic design and function of circulation, open space and infrastructure policies, and public service needs.

The LUCE establishes a tiered approach for determining allowable height and FAR for new development in the City. Each land use designation includes a base by-right tier (Tier 1) and up to two discretionary tiers (Tiers 2 and 3). Projects requesting a height above the base height (Tiers 2 and 3 projects) are subject to discretionary review and must provide community benefits. The LUCE identifies five priority categories of community benefits: Trip Reduction and Traffic Management; Affordable and Workforce Housing; Community Physical Improvements; Social and Cultural Facilities; and Historic Preservation. The goal of the LUCE tier approach is to create a vibrant and diverse land use pattern that enriches the City's neighborhoods and districts, and which is supported by robust transportation alternatives that help reduce greenhouse gas emissions and vehicle miles traveled.

The LUCE identifies the project site, as well as the properties immediately to the east and south, as Bergamot Transit Village (BTV). Properties to the north and west are designated as Office Campus (see Figure IV.E-1, Land Use Diagram).

The BTV district is envisioned as a mixed-use creative arts/entertainment center focusing on the Expo's 26th/Olympic station. The LUCE identified the need for an Area Plan to refine the vision of this area as well as to establish development standards, design guidelines and implementation measures that guide the location of new automobile, pedestrian and bicycle streets into an interconnected grid to facilitate circulation and support the development of mixed-use, neighborhood-friendly buildings. The LUCE states that the Bergamot Transit Village is one of the areas of the City where creative office uses should be concentrated

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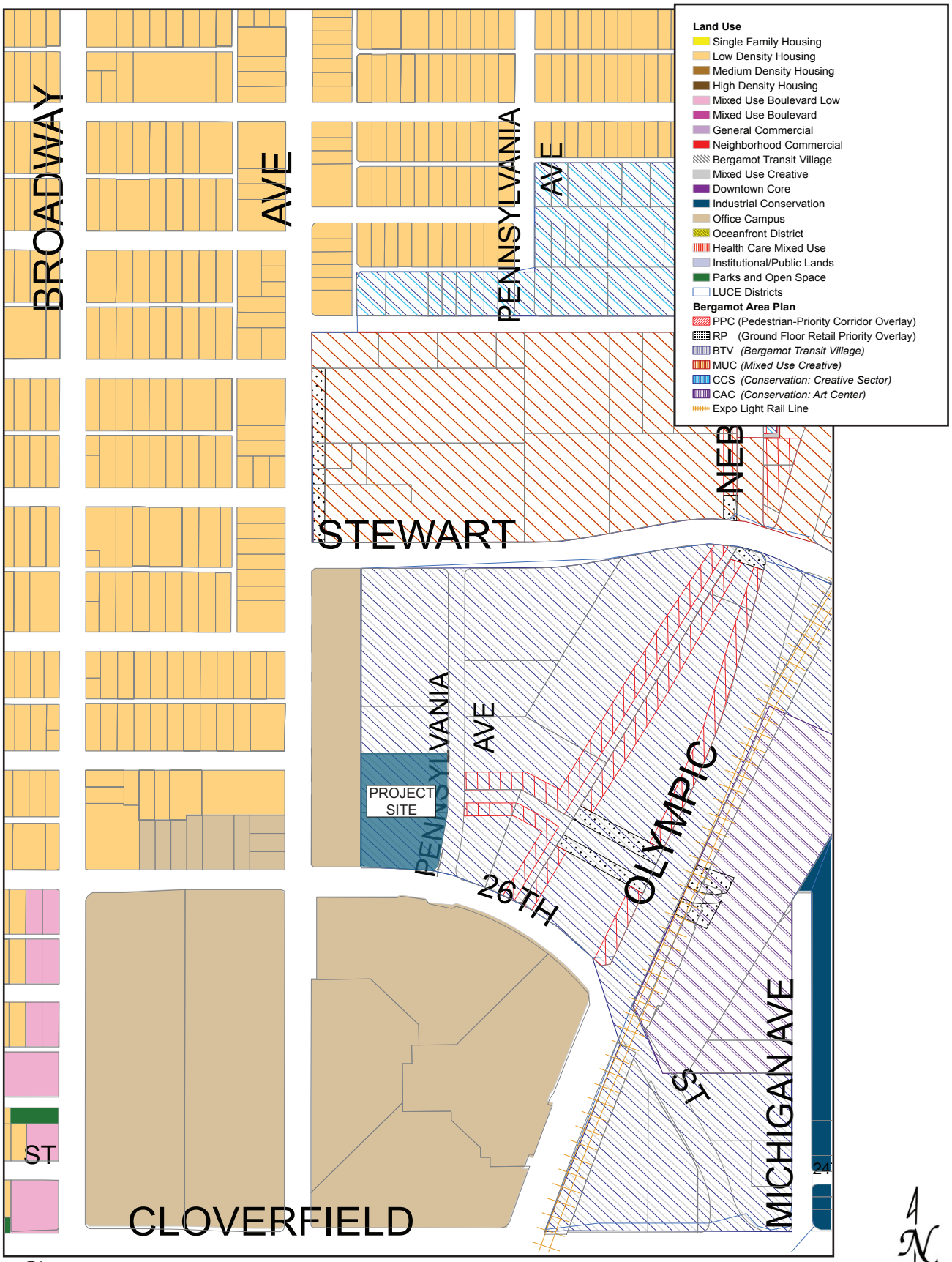

Project Site

Source: City of Santa Monica LUCE, July 24 2015.

Figure IV.E-1
Land Use Diagram

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and acknowledges that "given the large number of residents currently employed in [creative industries], this type of employment can be viewed as local-serving in character."[6]

The BTV designation is defined in the adopted LUCE as follows:

> *The Bergamot Transit Village designation allows for transit-oriented development and the presence of a world-class creative arts center designed to foster Santa Monica's important creative arts industry, including production and post-production uses around the proposed Bergamot Light Rail Station.*
>
> *New development incorporates human scale elements, enhances the pedestrian environment, and is built to the sidewalk with minimal or zero setback. New development provides convenient pedestrian and bicycle access to the future Expo Light Rail station. Incentives are provided to create a significant number of affordable, workforce and market rate housing units, and public infrastructure in this area. The Transit Village designation is intended to capitalize on the potential created by the large public investment in the regional transit system—a system designed to take cars off regional roadways and local streets, helping the City to meet its GHG emission goals.*
>
> *At the ground floor, uses that can maximize transit ridership such as creative office, retail, cultural, entertainment, and public-serving are allowed. Above the ground floor, residential and creative office uses are allowed. However, the ratio of residential to nonresidential uses should be 40/60. This designation also allows businesses that develop or provide sustainable services and products that are appropriate for the City as well as businesses engaged in advanced research and development.*

The LUCE contains goals and policies related to the BTV; however, development standards and use regulations from the BAP act as the primary regulatory tool for properties in this area, and effectively replace those described in the LUCE. Those standards are described below.

1) Santa Monica Zoning Ordinance

The City of Santa Monica Zoning Ordinance and Land Use and Zoning Related Provisions (Chapter 9.01 through Chapter 9.68) of the Santa Monica Municipal Code (SMMC) establishes regulations for permitted uses, height limits, building density, project design and landscaping, sign regulations, open space standards, parking requirements, loading and transportation demand management (TDM) requirements, affordable housing, application requirements, hearing procedures, and other requirements regarding land use and development in the City. The SMMC generally provides most of the development standards based on a site's zoning district. For the project site, the development standards and land use designations, including permissible and prohibited uses for the Bergamot Area Plan Districts, are as prescribed in the BAP.

2) Bergamot Area Plan

The Bergamot Area Plan (BAP) is a community-based planning document that provides guidance on transitioning former industrial lands into an arts-focused, mixed use, pedestrian-oriented neighborhood. As stated in BAP Goal LU1,

> *"[t]he Bergamot Plan area is a high quality, mixed-use, creative-sector district offering opportunities for jobs, housing, arts and culture and community-serving retail, and which benefits from access to the Exposition Light Rail Station and the area's creativity and innovation."*

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[6] *City of Santa Monica. Land Use and Circulation Element (LUCE), pp. 3.4-13 to 14.*

Moreover, the Plan Area "is a strong office location and is particularly known for its entertainment, design and technology industries. The creative office space and employment in the area is an important economic generator for the City of Santa Monica and the jobs base is consistent with priorities identified in the City's strategy for a Sustainable Local Economy."[7] The Bergamot Transit Village is identified in the LUCE as one of the focus areas for new creative office employment.[8]

The LUCE established the outer parameters of new development in the BAP; however, the adopted BAP modified the Tier 2 FAR parameters for the Bergamot Transit Village and Mixed-Use Creative Districts to lower numbers. Therefore, the BAP's development standards act as the primary regulatory tool for properties in this area. The BAP includes two distinct areas: The Bergamot Transit Village (BTV) in the western portion and the Mixed-Use Creative (MUC) District in the eastern portion, with Stewart Street dividing the two areas. Two additional districts within these areas include the Conservation: Art Center (CAC) District (in the southwestern Bergamot Transit Village) and the Conservation: Creative Sector (CCS) District (in the northeastern Mixed-Use Creative District). BAP districts are shown on Figure IV.E-2, Bergamot Area Plan Districts. The project site is located within the BTV District.

The BAP includes development standards regulating FAR, building height, transitional zones, mix of uses, building modulation and floor plates, parcel aggregation, open space, minimum and maximum depth of retail space, and street-based frontage standards. The BAP also defines mandatory and flexible development standards, and standards related to special signage, solar energy requirements, parking and loading, and transportation demand management (TDM).

Projects in the Plan Area are reviewed for compliance with all development standards during the Planning approval process. The BAP includes two overlays: Pedestrian Priority Corridor and Retail Priority on Ground Floor. The project site has no overlays.

The BTV District allows for the creation of a vibrant concentration of retail and services, multi-family housing and creative employment and community gathering spaces, especially in proximity to transit. A mix of 60 percent commercial and 40 percent residential use is established as the target for new development. The permitted densities for the BTV ~~BVT~~ were determined so as to achieve a scale that is consistent with the community vision for a pedestrian-oriented district that provides high quality open spaces, and that is oriented to and accessible by transit. Consequently, densities have been reduced from those described in the LUCE. Permitted development densities and height limits for the BTV are:

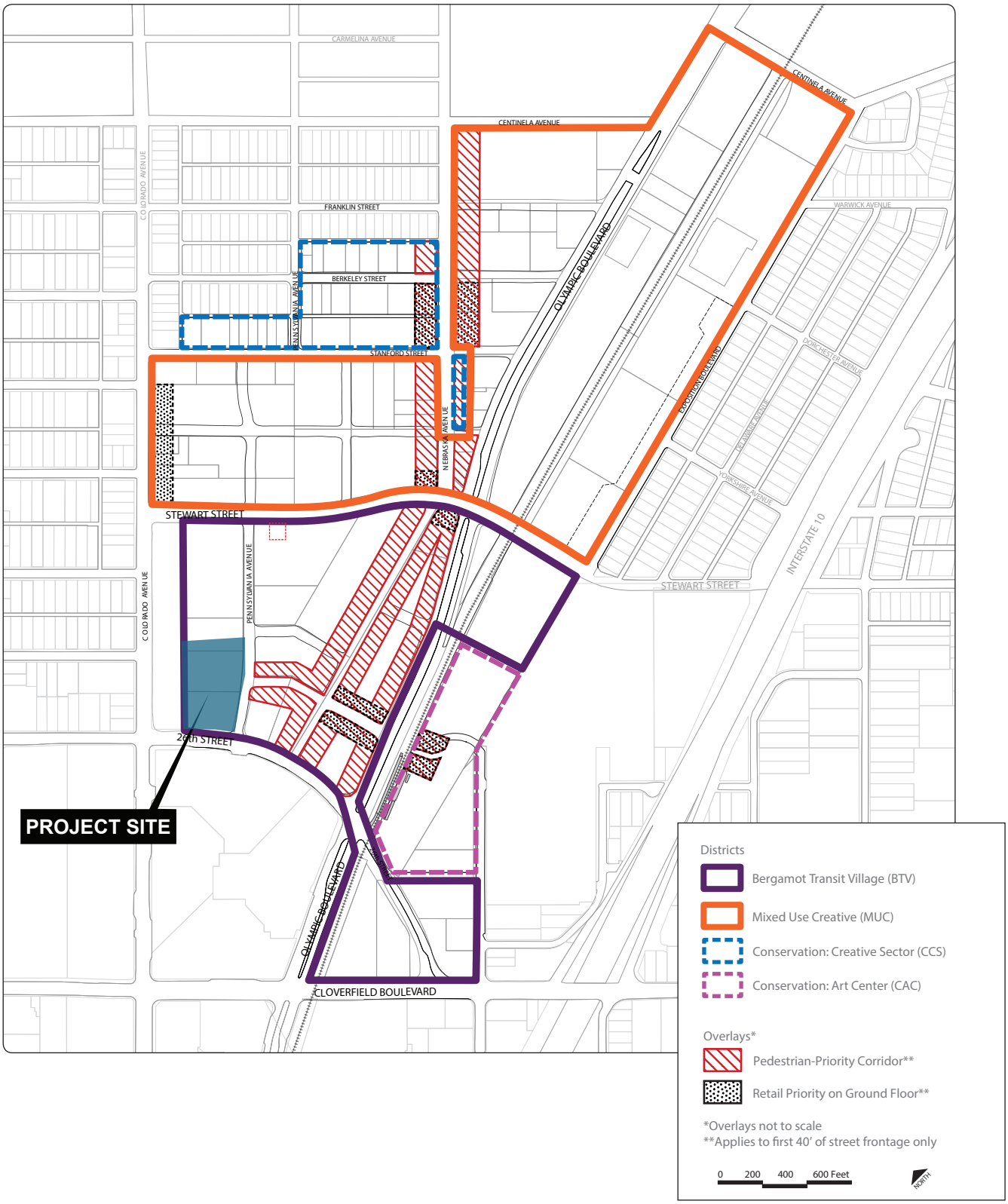
- Tier I: 1.75 Floor Area Ratio (FAR), with 32-foot height limit (39 feet allowed for projects with housing components)
- Tier II: 2.0 FAR, with a 60-foot height limit
- Tier III: 2.5 FAR, with a 75-foot height limit (86 feet allowed with increased floor-to-floor heights and reduced FAR for areas above 75 feet)

A blend of uses is allowed in the BTV ~~BVT~~ including:

- Creative offices and media production facilities
- Housing units with an emphasis on opportunities for employees of local businesses, including live/work units that combine a workspace with incidental residential occupancy
- Employee- and resident-supporting retail uses and services, including restaurants and cafés, entertainment, day-care, personal services, and comparable uses
- Artist studios, exhibition spaces, commercial galleries, and performance venues
- Parks, open spaces, public facilities and educational uses
- Transportation-related uses, such as shared parking structures, bicycle support facilities, designated vehicle sharing spaces and similar facilities

[7] *City of Santa Monica, Bergamot Area Plan, p. 32.*

[8] *Ibid, p. 32.*



Source: City of Santa Monica, Bergamot Area Plan, June 2013.

Figure IV.E-2
Bergamot Area Plan Districts

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The BAP includes land use goals and policies designed to implement the core values of the community related to the types, mix, and character of land uses in the area. The goals and polices complement and are correlated with the goals and policies presented in other sections of the BAP, including urban form, economic development, arts and culture and circulation. Land use regulations and development standards for the BTV in the BAP are presented in Tables 5.02 and 5.03 (of the BAP). Those tables provide allowed uses and standards for development. Vehicle and bicycle parking are presented in BAP Tables 5.06, 5.10, and 5.11. A discussion of project consistency with the standards, goals and policies of the BAP are listed in Table IV.E-4, which discusses whether the project would result in a conflict with these policies.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

A. Thresholds of Significance

Appendix G to the State CEQA Guidelines provides screening questions addressing impacts on land use. Specifically, the Guidelines state that a project may have a potentially significant land use impact if it would:

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

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.

Non-Applicable Issues: The Initial Study (included in Appendix A) determined that the project would result in no impact, or less than significant impact with respect to question a) listed above. As such, no further analysis of this topic is required.

Question a): Surrounding land uses in the area consist of a mix of office, light industrial, and residential uses. The project is considered infill development. No new roads or design features would separate or otherwise divide existing land uses, and no roads or other access routes would be blocked or realigned. The project's offices uses would be consistent with the types of land uses that already exist in the project area and would not result in the division of an established community. The project development would not divide an established community. No impact would occur and further analysis of this issue in an EIR is not warranted.

B. Methodology

The analysis of land use impacts considers both consistency of the project with adopted plans and policies that govern land use on the project site. In particular, SCAG's RTP/SCS, the City's LUCE, BAP, and the City's Zoning Ordinance were reviewed to determine applicable policies and provisions that pertain to the proposed project. CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. A project need not be consistent with each and every policy and objective in a planning document. Rather, a project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary goals of the land use plan or policy. Analysis of the project's consistency with other elements of the General Plan is provided in the applicable resource sections of this EIR.

The criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment. Therefore, the analysis of potential land use impacts of the proposed project compares their development characteristics to the provisions of the adopted plans, regulations, and development

guidelines that regulate land use on the project site to assess consistency, and if there are inconsistencies, to determine whether they translate to significant impacts on the environment.

i) Project Characteristics

The project would refurbish the project site's existing three-story, 45,429 square foot office building (Building C), and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings (Building A and B) comprising a total of 129,265 square feet of new floor area. Up to 5,376 sf of this new floor area could be utilized for ground floor retail/restaurant space. The project's three buildings would total approximately 174,685 square feet. Based on the existing site size of 87,651 square feet, the proposed FAR would be 1.99.

Existing Building C would remain at its current height, 40 feet tall. Proposed Buildings A and B would be 54 feet tall. The existing setback on 26th Street would remain at 13 feet, 8 inches. Proposed setbacks would be 5 feet from Pennsylvania Street, 10 feet from the alley, and 12 feet from the abutting neighboring lot to the east.

The project would include a ground level courtyard surrounded by the three project buildings, with a large mature tree that would serve as the focal point of the courtyard. The proposed courtyard would total 10,436 square feet. Additional open space for project tenants would be provided on two terraces, one in Building A and one in Building B, each on the fourth level. The Building B terrace would provide views of both the courtyard and Pennsylvania Avenue. The Building A terrace would provide views of the courtyard. The terraces would be bordered by walls of glass providing transparency into the buildings.

The project would include landscape buffers between Buildings C and B to 26th Street and Pennsylvania Avenue. New and additional site landscaping consisting of grass, planters with shrubs and trees would be installed, including planting of street trees along 26th Street and Pennsylvania Avenue. Open space would be approximately 29,000 square feet or 33 percent of the lot. Active ground floor use would be 60 percent, as included in Building B.

The project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The project would supply 399 parking spaces ~~(349 new plus 50 replacement),~~ that would include 16 carpool/vanpool spaces, and 9 EV parking spaces. Additionally, the project would supply 35 short term bicycle spaces and 194 long-term spaces. The project would include eight unisex showers and 146 personal lockers. The Project would be required to implement a Transportation Demand Management (TDM) plan in accordance with the City's TDM Ordinance (SMMC Section 9.53.130).

The project would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the Project Site. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the most recent applicable State and City codes, which would improve energy efficiency and decrease water usage as compared to existing conditions. Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

C. Project Impacts and Mitigation Measures

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

Impact Analysis:

Impact E-1: Implementation of the project would not conflict with applicable land use plans, policy and regulations for the project site, including SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, the LUCE, and the BAP. Impacts would be less than significant.

As previously discussed, the development of the project would be subject to the SCAG's RTP/SCS, and the City's LUCE, and BAP. For the project site, the development standards and land use designations, including permissible and prohibited uses for the Bergamot Area Plan Districts, are as prescribed in the BAP. Therefore, a discussion of the Zoning Ordinance is not included. The project's consistency with the policies and goals of applicable land use plans and policy documents are discussed below. As required by CEQA, the project's consistency with air quality plans such as the AQMP is addressed in Section IV.A (Air Quality), and the project's consistency with the Congestion Management Program is addressed in Section IV.G (Transportation) of this EIR.

i) SCAG's Regional Transportation Plan/Sustainable Communities Strategy

As noted above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. However, the RTP/SCS is currently pending certification by the California Air Resources Board (CARB). The circulation of the Notice of Preparation (NOP) for the project began on May 6, 2020, which was prior to the adoption of the 2020-2045 RTP/SCS. Therefore, the analysis in this DEIR focuses on the project's consistency with the 2016-2040 RTP/SCS.

The project's consistency with the applicable goals set forth in the 2016-2040 RTP/SCS is analyzed in Table IV.E-1, Project Consistency with the Applicable Goals of 2016-2040 RTP/SCS. As described therein, the project would be consistent with the applicable goals of the 2016-2040 RTP/SCS. As the 2020-2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the same goals and strategies are similar between the two plans. As demonstrated below, the project would be located in an area well-served by public transit provided by Metro, as well as is within walking distance to a wide variety of additional residential, office, retail, and restaurant uses. Furthermore, the project would increase office uses on an underutilized site in a transit-rich urbanized area, helping produce substantial reductions in auto mode share to and from the project site, aiding the region to accommodate growth, and promoting public transit ridership to minimize GHG emission increases and reducing per capita emissions. Therefore, impacts related to the 2016-2040 RTP/SCS would be less than significant.

Table IV.E-1
Project Consistency with
Applicable Goals of the 2016-2040 RTP/SCS

Goal	Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The project supports the RTP goal of maximizing mobility and accessibility by locating a professional office building within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops (see Section IV.B [Air Quality], subheading AQMP Consistency). Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at the 26th/Olympic E Line station. To encourage bicycle transit, the project would include

Table IV.E-1
Project Consistency with
Applicable Goals of the 2016-2040 RTP/SCS

Goal	Project Consistency
	ample bicycle parking, shower, and locker facilities. The project would also be within walking distance to a wide variety of additional residential, office, retail, and restaurant uses.
Ensure Travel Safety and Reliability for all people and goods in the region.	**Consistent.** The project site is located near existing public transit opportunities provided by the Big Blue bus and Metro, which provides safe and reliable travel options for people and goods within the project area. Also, see discussion above (RTP/SCS Goal - Maximize mobility and accessibility or all people and goods in the region). .
Preserve and ensure a sustainable regional transportation system.	**Consistent.** The project supports the RTP/SCS goal by being located proximate to existing public transit opportunities provided by the Big Blue bus and Metro. Also, the project would include ample bicycle parking, shower, and locker facilities to encourage bicycling for transit.
Maximize the productivity of our transportation system.	**Consistent.** The project would increase office uses on an underutilized site in the transit-rich urbanized area. The project would concentrate office uses at a site served by several Big Blue bus lines and the Metro E Line, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site. Also, see discussion above (RTP/SCS Goal - Maximize mobility and accessibility or all people and goods in the region).
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent.** Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at the 26th/Olympic Metro Line E Light Rail Station. To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. The site is surrounded by existing sidewalks and within walking distance of residential areas, and nearby office use.
Actively encourage and create incentives for energy efficiency, where possible.	**Consistent**. The project would be designed at a minimum as a LEED certified v4 for BD+C: New Construction and Major Renovation designation for all building. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~all three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel

Table IV.E-1
Project Consistency with
Applicable Goals of the 2016-2040 RTP/SCS

Goal	Project Consistency
	certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus. Additionally, the project would be required to implement a Transportation Demand Management (TDM) plan in accordance with the City's TDM Ordinance.
Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** The project would increase office uses on an underutilized site in the transit-rich urbanized area. The project would concentrate office uses at a site served by several Big Blue bus lines and the Metro E Line, thus providing opportunities for employees to use public transit for work trips and walk to restaurants and shops within the project site. Also, see discussion above (RTP/SCS Goal - Maximize mobility and accessibility or all people and goods in the region).
Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016; EcoTierra Consulting, 2020	

ii) City of Santa Monica LUCE

The project site is located within the BTV land use designation of the LUCE. As stated in the LUCE, the BTV designation allows for transit-oriented development to foster Santa Monica's important creative arts industry, including production and post-production uses around the 26th Street/Bergamot Metro Line E Light Rail Station. The BTV is intended to encourage human scale elements and enhance the pedestrian environment. The BTV designation is intended to capitalize on the potential created by the large public investment in the 26th/Bergamot Metro Line E Light Rail Station. The designation also allows businesses that develop or provide sustainable services and products that are appropriate for the City as well as businesses engaged in advanced research and development.

The project would be substantially consistent with the goals and policies of the LUCE. The project would implement goals and policies related to encouraging development in transit rich areas, creating active and content sensitive spaces, and reducing vehicle trips. In addition, the project would serve to reinforce many of the goals and objectives of the LUCE, which include encouraging a lively, active Bergamot Transit Village district with well-designed development, pedestrian-oriented designed ground floors, and appropriately scaled buildings.

Table IV.E-2, Consistency With the Applicable Goals and Policies of the LUCE, contains a discussion of the project's consistency with the goals and policies of the General Plan that are most applicable to the project, including the LUCE goals and policies that are specific to the BTV ~~BVT~~ designation.

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
Land Use and Circulation Element (2017)	
Policy LU2.1 Redirect Growth. *Redirect growth away from residential neighborhoods onto transit corridors, where new uses are served by convenient transportation networks.*	**Consistent**. The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings comprising a total of

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
	129,265 square feet of new floor area. The project would increase office uses on an underutilized site in the Bergamot area and would be within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops, thus providing opportunities for employees to use public transit for commute trips.
Policy LU2.2 Transit Villages. *Capitalize on the Expo Light Rail stations to create vital new complete sustainable neighborhoods with transit as a focal element, green connections and pathways, a variety of housing types and jobs, enhanced creative arts and institutions, and local-serving retail and services.*	**Consistent.** The project would concentrate office uses at a site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station. The project would also potentially include approximately 5,376 square feet of ground floor restaurant/retail commercial space and approximately 29,000 square feet (or 33 percent) open space.
Policy LU2.5 Vehicle Trip Reduction. *Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.*	**Consistent.** The project would increase office uses on an underutilized site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops (see Section IV.B [Air Quality], subheading AQMP Consistency). Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at the 26th/Olympic Metro Line E Light Rail Station. To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. While the project would not change the sidewalks the 26th Street frontage, it would include the planting of new landscaping to improve the pedestrian environment. Along Pennsylvania Avenue, the project would include a landscaped setback thereby creating new sidewalks on the street. The new sidewalk space would enhance pedestrians use of the food trucks which assists in discouraging use of vehicles to travel for lunch. The project would also be within walking distance to a wide variety of residential uses. The project would implement a Transportation Demand Management (TDM) plan in accordance with the City's TDM Ordinance to reduce vehicle trips.
Policy LU2.6 Active Spaces. *Focus new development in defined districts to create active spaces that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections.*	**Consistent**. The project would create new active spaces in the Bergamot Transit Village. The project would provide an interior courtyard with direct access to sidewalks along 26th Street and Pennsylvania Avenue. The project would include also approximately 5,376square feet of ground floor restaurant/retail commercial space fronting Pennsylvania Avenue that would serve as an active space. The project would include a new pedestrian entry plaza along Pennsylvania Avenue between the existing building and Building B, which would be flanked by outdoor seating to activate the street. Also, see discussion above (LUCE Policy LU2.5 Vehicle Trip Reduction).
Policy LU4.4 Pedestrian-Oriented Design. *Engage pedestrians with ground floor uses,*	**Consistent.** The project would be designed to be pedestrian-oriented. The project would include a

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
building design, site planning, massing and signage that promote vibrant street life and emphasize transit and bicycle access.	ground level interior courtyard framed by the three project buildings. Pedestrian access would be available to all three buildings from the courtyard. Access to the courtyard would be provided from the public sidewalk on Pennsylvania Avenue. Pedestrian access to Building C would be available from the public sidewalk on 26th Street. Active ground floor use would be 60 percent, as included in Building B. Also, see discussion above (LUCE Policy LU2.6 Active Spaces). Along Pennsylvania Avenue, the project would include a landscaped setback thereby creating new sidewalks on from the street The new sidewalk space would enhance pedestrian environment, particularly for the food truck activity that occurs along this street. Groundfloor restaurant/retail fronting Pennsylvania Avenue would also create pedestrian activity.
Policy LU8.1 Transportation Demand Management*. Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.*	**Consistent**. The project would include a TDM plan to encourage the use of carpooling, bike commuting, and use of public transportation, including the Expo LRT. The TDM plan would include a parking cash out, commuter matching services, transportation allowance, secure bicycling parking and valet service, and other incentives to increase multi-modal transportation and reduce trips to the site.
Policy LU15.3 Context-Sensitive Design. *Require site and building design that is context sensitive and contributes to the City's rich urban character.*	**Consistent.** The project would include a ground level interior courtyard framed by the three project buildings. Additional open space for project tenants would be provided on two terraces, one in Building A and one in Building B, each on the fourth level. The terraces would be bordered by walls of glass providing transparency into the buildings. These spaces also would be available for tenant gathering. The development of the Project buildings would be similar in context and scale to other nearby office buildings. Also, see discussion above (LUCE Policy LU2.6 Active Spaces.).
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.*	**Consistent**. The project would create a more open and pedestrian-oriented environment by removing the existing surface parking areas and replacing them with a new office development with open space and pedestrian pathways. The project would provide 5,376 square feet of restaurant/retail commercial space and approximately 29,000 square feet (or 33 percent) open space further enhancing the pedestrian environment in the vicinity of the project site. The project would include a ground level interior courtyard framed by the three project buildings, with a large mature tree that would serve as the focal point of the courtyard. Pedestrian access would be available to all three buildings from the courtyard. Access to the courtyard would be provided from the public sidewalk on Pennsylvania Avenue. Pedestrian access to Building C would be available from the public sidewalk on 26th Street.

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
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.*	**Consistent**. The project would include 35 short-term bicycle parking spaces on the exterior areas of the building (in addition to the 194 long-term bicycle spaces on Level A of the parking garage). The project would provide direct access to sidewalks along 26th Street and Pennsylvania Avenue. Also, see discussion above (LUCE Policy LU2.5 Vehicle Trip Reduction and Policy LU15.4 Open and Inviting Development).
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.*	**Consistent**. The project would provide direct access to sidewalks along 26th Street and Pennsylvania Avenue. The project would incorporate a pedestrian scale design, including new sidewalks on Pennsylvania Avenue, building entrances at grade, and ground level open spaces and human-scaled building frontages with transparent facades. The new buildings would include walls of glass providing transparency into the buildings including the proposed approximately 5,376 square foot restaurant/retail space on the ground floor of Building B fronting Pennsylvania Avenue. The restaurant/ retail commercial space would be an active space serving the project and nearby office uses. The project would include a new pedestrian entry plaza along Pennsylvania Avenue between the existing building and Building B flanked by outdoor seating providing new opportunities for public gathering spaces. Building B would include a landscaped set back providing new sidewalks that would be designed to serve the existing pedestrian activity on Pennsylvania Avenue associated specifically with the lunch time food trucks. This space would be intended for pedestrian gathering. Also, see discussion above (LUCE Policy LU2.5 Vehicle Trip Reduction and Policy LU15.4 Open and Inviting Development).
Policy LU15.8 Building Articulation. *Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.*	**Consistent.** The new buildings would be designed with similar materials including windows that would provide for transparency. . The new buildings would contain walls of glass windows with dark grey metal sidings on all four levels facing the interior courtyard, providing transparency into the interior spaces of the buildings and views of the courtyard from within the buildings. Building C would be refurbished with new glass windows within the existing locations and create three large panels framed by blackened metal on the west and east elevations and new glass windows within the existing frame on the north elevation. Glass materials to be used would not be highly reflective and would be subject to design review by the City to ensure adverse effects on views would not occur.
Policy LU15.9 Pedestrian-Oriented Design. *Buildings should incorporate pedestrian-scaled elements with durable, quality materials and*	**Consistent.** The project would incorporate a pedestrian scale design, including widened sidewalks, building entrances at grade, and ground level open spaces and human-scaled building frontages with transparent

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
detailing located on the lower stories adjacent to the pedestrian.	facades. Under the project, the existing building would be renovated with new windows and landscaping along the 26th street façade to be removed and replaced. The intent is to provide more openings to a patio and compatible landscaping to create a more connected presence along 26th Street.
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.** Building B would step up from the interior courtyard entry from Pennsylvania Avenue and would include a covered, set back, fourth floor rooftop terrace. Building A would be visible from Pennsylvania Avenue behind Building B, which would add to views of rooflines that vary from the Building C and B.
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 street wall shall be established in the zoning ordinance.*	**Consistent.** The new project buildings would be 54 feet tall, and four stories in height at the Pennsylvania Avenue frontage, which is less than the maximum allowed height of 60 feet and five stories. The project's buildings would be framed around an interior courtyard in the middle providing a campus-like atmosphere. Proposed Buildings A and B would incorporate a contemporary design, integrating mass timber, metal panels, and red brick with large windows on the north, west and south elevations. To further reduce massing, Buildings A and B, would contain outdoor terraces/decks on the third and fourth levels that also provide additional common open space areas for gathering.
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.*	**Consistent.** The project would include a ground level interior courtyard surrounded by the three project buildings, with a large mature tree that would establish a focal point of the courtyard. The proposed courtyard would total 10,436 square feet. Additional open space for project tenants would be provided on two terraces, one in Building A and one in Building B, each on the fourth level. The Building B terrace would provide views of both the courtyard and Pennsylvania Avenue. The Building A terrace would provide views of the courtyard. The terraces would be bordered by walls of glass providing transparency into the buildings. Additionally, the project would include approximately 5,376,square feet of restaurant/retail commercial space and approximately 29,000 square feet (or 33 percent) open space. The restaurant/retail space would be located on the ground floor of Building B near the new pedestrian access from Pennsylvania Avenue. This new pedestrian access/plaza would be flanked by outdoor seating. In addition, Building B would include a landscaped set back that would provide new sidewalk space to enhance the existing pedestrian environment on Pennsylvania Avenue, especially during the lunch

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
	time when food trucks congregate. The sidewalk space would allow for pedestrian gathering and seating.
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.*	**Consistent.** The project would include pedestrian-scale way-finding signage and pedestrian-scale lighting to facilitate access to the buildings, public outdoor areas, parking area, and for safety and security purposes. The project signage would be durable and comply with the approval processes for signage. The signage would be compatible with the overall project design.
Policy LU16.1 Design Buildings with Consideration of Solar Patterns. *The designs of new buildings need to consider solar patterns 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 project would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. The project would include a ground level courtyard surrounded by the three project buildings, with a large mature tree that would establish a focal point of the courtyard. Open space would be approximately 29,000 square feet or 33 percent of the lot. The project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~.
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**. The project would include a ground level courtyard surrounded by the three project buildings, with a large mature tree that would establish a focal point of the courtyard. Additional open space for project tenants would be provided on two terraces, one in Building A and one in Building B, each on the fourth level.
Policy LU17.2 Active Streets for Living*. Utilize streets as the largest and most universally accessible public spaces in the community by improving them with landscaping (particularly shade trees) pedestrian facilities and other enhancements that promote active recreation and creates a system of green connections throughout the City.*	**Consistent**. There are currently no sidewalks along Pennsylvania Avenue, although the block has become a popular location for food trucks that serve local employees. Building setbacks along with new and additional site landscaping consisting of grass, planters with shrubs and trees would be installed, thereby activating 26th Street and Pennsylvania Avenue.
Policy LU 20.3: *Maintaining the Urban Forest. Encourage properties adjacent to the public right-of-way to contribute to the urban forest environment through on-site plantings and street tree care and maintenance.*	**Consistent**. The project would install new and additional site landscaping consisting of grass, planters with shrubs and trees which would contribute to the urban forest environment.
Bergamot Transit Village Policies	
D20.1 *Encourage a diverse mix of creative arts/entertainment uses and employment opportunities balanced with a variety of residential types and local-serving uses to establish a 17 hours per day/7 days per week active neighborhood.*	**Consistent.** The project would refurbish an existing office building in the Bergamot area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 square feet of new floor area. The project would include up to approximately 5,376square feet of ground-floor restaurant/retail commercial space and approximately 29,000 square feet (or 33 percent) open space. The

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
	project would concentrate office uses at a site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops, thus providing opportunities for employees to use public transit for commute trips.
D20.4 *Uses include creative arts-related industries, local-serving retail uses, affordable, workforce and market-rate housing, mid-price range business hotels, and businesses engaged in advanced research and development.*	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings. Also, see discussion above (Policy D20.1).
D20.8 *Design buildings to be compatible with the existing industrial and creative arts character of the District with a variety of heights, and architectural building elements and shapes to create visual interest. Create meaningful combinations of materials and incorporate three-dimensional articulation to create shadow patterns.*	**Consistent.** Buildings A and B would incorporate a contemporary design, similar to Building C. The materials would integrate mass timber, metal panels, and red brick with large windows on the north, west and south elevations. Also, see discussions above (LUCE Policies LU15.3 through LU15.14).
D20.9 *Scale buildings to the pedestrian to create an enhanced sidewalk shopping or walking environment. Include enhanced materials and detailing on ground floor façades along pedestrian denotes sustainable policy ways.*	**Consistent.** Pedestrian access would be from public sidewalks on 26th Street (to Building C) and Pennsylvania Avenue to the courtyard. From the courtyard, pedestrian access would be provided to all three buildings. The three buildings would form a courtyard in the middle providing a campus-like atmosphere with a mature tree as a focal point and areas for gathering. To further reduce massing, Buildings A and B, would contain outdoor terraces/decks on the third and fourth levels to provide additional common open space areas for gathering. See discussions above (LUCE Policies LU15.4 through LU15.9).
D20.10 *Encourage a well-landscaped streetscape that facilitates pedestrian movement and creates places for people to gather.*	**Consistent**. New and additional site landscaping consisting of grass, planters with shrubs and trees would be installed, including planting of street trees along 26th Street and Pennsylvania Avenue. There are currently no sidewalks along Pennsylvania Avenue, although the block has become a popular location for food trucks that serve local employees. Building B would include a landscaped set back, providing new sidewalks that would be designed to serve the existing pedestrian activity on Pennsylvania Avenue associated specifically with the lunch time food trucks. This space would be intended for pedestrian gathering and seating and would overall enhance pedestrian movement and place for gathering. Also, the project would include a new pedestrian access/plaza on Pennsylvania Avenue between the existing building and Building B which would be flanked by outdoor seating providing new opportunities for public gathering spaces.
D20.11 *Locate building entrances and primary façades facing and adjacent to perimeter streets*	**Consistent.** Pedestrian access would be from public sidewalks on 26th Street (to Building C) and

Table IV.E-2
Consistency with Applicable Goals and Policies of the LUCE

Objective/Policy	Project Consistency
or new vehicle/pedestrian streets to encourage an interesting and varied streetscape with places for people to gather.	Pennsylvania Avenue to the courtyard. See discussions above (LUCE Policies LU15.4 through LU15.9).
D20.12 *Encourage well-designed small- and medium-sized outdoor spaces.*	**Consistent.** The three buildings would form a courtyard in the middle providing a campus-like atmosphere with a mature tree as a focal point and areas for gathering. See discussions above (LUCE Policies LU15.4 through LU15.9).
Circulation Policies	
Policy T7.2 *Continue to enhance street lighting for pedestrians.*	**Consistent**. Project lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. The project would include pedestrian-scale way-finding signs and pedestrian-scale lighting to facilitate access to the building, public outdoor areas, parking area, and for safety and security purposes. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties. .
Policy T8.3 *Facilitate Crime Prevention through Environmental Design (CPTED) principles in the maintenance of landscaping and building design standards.*	**Consistent.** The project would incorporate crime prevention measures into the project's design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the project would also include crime prevention features, such as nighttime security lighting and secure subterranean parking.
Policy T8.4 *Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.*	**Consistent.** Existing pedestrian access to Building C would remain on 26th Street. Additional access would be provided from the new courtyard. Access to Buildings A and B would be from to the courtyard, which is accessed from Pennsylvania Avenue.
Policy T10.2 *Encourage major employers to provide covered and secure bicycle parking and shower and locker facilities for their bicycle commuters, or to assist in funding bicycle-transit centers in nearby locations.*	**Consistent.** To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. The project would include 35 short-term bicycle parking spaces on the exterior areas of the building (in addition to the 194 long-term bicycle spaces on Level A of the parking garage).
Source: City of Santa Monica General Plan, Land Use and Circulation Element, EcoTierra Consulting, 2020.	

As shown in the table, the project would not conflict with the intent and goals of City's LUCE.

iii) Bergamot Area Plan

The BAP was approved on September 11, 2013 and sets forth comprehensive standards, policies, and tools to guide future development. The BAP development standards and land use designations, including permissible and prohibited uses for the Bergamot Area Plan Districts, and effectively replace those described in the LUCE and the SMMC. Pursuant to SMMC Section 9.40.020(3), all new construction of

more than 15,000 sf of floor area located in Nonresidential Districts, requires Planning Commission review and approval of a Development Review Permit (DRP). The proposed 174,685 ~~174,684~~ sf project exceeds the 15,000 sf threshold, and therefore a DRP is required for the project.

The project site is designated as BTV ~~BVT~~ in the BAP. The BTV ~~BVT~~ designation allows for the creation of a vibrant concentration of retail and services, multi-family housing and creative employment and community gathering spaces, especially in proximity to transit. The permitted densities for the BTV ~~BVT~~ were determined so as to achieve a scale that is consistent with the community vision for a pedestrian-oriented district that provides high quality open spaces, and that is oriented to and accessible by transit. Land use regulations and development standards for the BTV ~~BVT~~ in the BAP are presented in Table IV.E-3, Bergamot Area Plan Standards below. The project does not include any deviations from the BAP land use regulations but does include a Conditional Use Permit to expand the flexibility of leasing for general/professional office uses (creative office allowed by-right under the BTV zone).

Table VI.E-3
Bergamot Area Plan Standards

Category	BAP Requirement/Standard	Project
Permitted Use	Office Creative Office Commercial/Retail	174,685 ~~174,684~~ sf of Office/Creative Office (Up to 5,376 sf could be potentially used as Ground floor Retail/Restaurant)
Max Height, Tier II	5 Story, 60 feet	4 story, 54 feet
Max FAR, Tier II	2.0 FAR (175,392 sf)	1.99 FAR (174,685 ~~174,684~~ sf, of which 45,529 sf is existing)
Required Mix of Uses	Not applicable for parcels under 120,000 sf	Not applicable since project site is less than 120,000 sf
Building Modulation of top floors	90% top floor; 100% top Floor minus 1 floor	BUILDING A (Along fire lane): 4th Floor: 16280 SF (3rd floor minus roof deck) 3rd Floor: 17996 SF 90.5% BUILDING B (along Pennsylvania) 4th Floor: 13915 SF (3rd floor minus roof deck) 3rd Floor: 17091 SF 81.4%
Maximum floor Plate	35,000 SF	The project is comprised of three buildings, one of which is existing. The two new buildings would have floor plate sizes ranging from 6,183 sf to 17,423 sf
Open Space	The minimum amount of open space for a site greater than 80,000 square feet in size is 20% of the parcel area. For the project site size of 87,651 sf, 20% open space requirement is 17,530 sf.	The project proposes a total of 28,976 sf, exceeding the requirement.
Primary Open Space	Minimum Size of 4,000 sf	Interior courtyard is 10,436 sf

Table VI.E-3 Bergamot Area Plan Standards		
Category	**BAP Requirement/Standard**	**Project**
Minimum Depth and Maximum Width of Non-Office Commercial	40' min depth 15' – 60' min/max frontage	Depth: 57' 3.5" Frontage: 116'.5" (subdivided into up to two tenant spaces)
Maximum Non-Office Commercial Space	15,000 sf	5,376 sf
Setback (Front Yard)	5'	~13.8' (26th Street - existing)
Setback (Side Yards)	5'	5'/10' (Pennsylvania/Alley)
Setback (Rear Yard)	12'	12' (Abutting neighboring lot)
Vehicle Parking	349 spaces	399 spaces
Bicycle Parking	1:5000 SF short term = 35 short 1:900 SF long term = 194 long term	35 short term; 194 long term
Source: City of Santa Monica Bergamot Area Plan, September 11, 2013, EcoTierra Consulting 2020.		

As shown above in Table IV.E-3 outlining the applicable development standards, the project FAR of 1.99 would be within the 2.0 FAR for BAP Tier II development. The project height of four-stories and 54 feet would be less than the 5-story, 60-foot height limit. The existing Building C setback would not change, but setbacks for Buildings A and B would follow prescribed setbacks. Open space, at 33 percent, would exceed the required 20 percent. The project would provide active ground floor use at street level of 60 percent (in Building B), which would exceed the required 50 percent. Vehicle and bicycle parking (BAP Tables 5.06, 5.10, and 5.11) would be as required, as would bike showers. The project would also comply with building modulation, maximum floor plate, and other development standards of the BAP.

The project would be consistent with the applicable objectives and goals of the BAP, which provides guidance on transitioning former industrial lands into an arts-focused, mixed use, pedestrian-oriented neighborhood. The project would refurbish an existing office building and redevelop the existing surface parking lot with additional creative and business office uses. The project would benefit from access to the Exposition Light Rail Station, which would help to reduce vehicle trips and attract quality commercial tenants and employees.

The project would create a more open and pedestrian-oriented environment by removing the existing surface parking areas and replacing them with a new office development that incorporates open space and a new pedestrian sidewalk on Pennsylvania Avenue. The project would provide 5,376square feet of restaurant/retail commercial space available to the general public. The project would include a ground level interior courtyard framed by the three project buildings, with a large mature tree that would establish a focal point of the courtyard. Open space provided on the site would further enhance the pedestrian environment in the vicinity of the project site. Pedestrian access would be available to all three buildings from the courtyard. Access to the courtyard would be provided from the public sidewalk on Pennsylvania Avenue. Pedestrian access to Building C would be available from the public sidewalk on 26th Street. The project would include a new pedestrian entry plaza along Pennsylvania Avenue between the existing building and Building B flanked by outdoor seating providing new opportunities for public gathering spaces. In addition, Building B would include a landscaped set back creating a new sidewalk designed to serve the existing pedestrian activity on Pennsylvania Avenue associated specifically with the lunch time food trucks.

As stated in the BAP, creative office space and employment in the area is an important economic generator for the City of Santa Monica and the jobs base is consistent with priorities identified in the City's strategy for a Sustainable Local Economy. The Bergamot Transit Village is identified in the LUCE as one of the focus areas for new creative office employment. The project would expand office space, and thereby employment in the BTV ~~BVT~~ area, which would be consistent with the intent and vision of the BAP.

The project's consistency with the applicable goals and polices set forth in the BAP is analyzed in *Table IV.E-4, Project Consistency with the Applicable Goals and Policies of the BAP*.

Table IV.E-4
Project Consistency with Applicable Goals and Policies of the BAP

Bergamot Area Plan Goals and Policies	Project Consistency
Goal LU1: The Bergamot Plan area is a high quality, mixed-use, creative-sector district offering opportunities for jobs, housing, arts and culture and community-serving retail, and which benefits from access to the Exposition Light Rail Station and the area's creativity and innovation.	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 square feet of new floor area. The project would increase office uses on an underutilized site in the Bergamot Plan area that is served by the Metro E Line light rail and also near existing housing. The project would include approximately 5,376 square feet of restaurant/retail commercial space. The project would concentrate office uses at a site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops, thus providing opportunities for employees to use public transit for commute trips.
Policy LU1.1: Prioritize the development, growth and expansion of creative arts, entertainment and related uses that build upon and enhance the critical mass and economic vitality of the Bergamot Plan area's existing uses, while adhering to the desired scale and character of development.	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings. See discussion above (Goal LU1).
Policy LU1.2: Promote the retention of existing, small, incubator and start-up creative arts/entertainment uses, and provide opportunities for the founding, nurture and growth of these enterprises.	**Consistent.** The project would refurbish an existing office building therefore, retaining that office space and provide for growth of creative/entertainment uses in the area.
Policy LU1.3: Strive to achieve land use targets established by the LUCE for the Bergamot Transit Village (60% commercial, 40% residential) and the Mixed-Use Creative District (50% commercial, 50% residential). The calculation shall be based on total floor area, which shall not subtract existing/ demolished floor area on an area-wide basis.	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings. The project would contribute to the development of commercial uses in the Bergamot Transit Village.
Policy LU1.11: Allow the flexible, adaptive re-use of buildings as economic conditions and market demands evolve over the life of the Plan.	**Consistent.** The project would refurbish an existing office building in an existing commercial area as part of a complex of creative and business professional office buildings.
Policy LU1.12: Ensure compliance with CEQA in reviewing development in the BTV and MUC district; in particular, analyze potentially significant off-site and cumulative project impacts not addressed in the Bergamot Area Plan environmental review.	**Consistent.** This EIR has been prepared to address the project's potential environmental impacts in compliance with CEQA.
Goal LU3: Vibrant, small-scale creative arts, entertainment, media and supporting uses are conserved and have increased opportunities for expansion within the area.	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and

Table IV.E-4
Project Consistency with Applicable Goals and Policies of the BAP

Bergamot Area Plan Goals and Policies	Project Consistency
	business professional office buildings. See discussion above (Goal LU1).
Goal LU4: New development and land use changes contribute to the enhancement of the social, cultural, physical and environmental quality of the Bergamot Plan area.	**Consistent.** The project would contribute to a vibrant activity center in the Bergamot Transit Village area by increasing office uses on an underutilized site in this transit-rich urbanized area. In addition, the project would provide 5,376 square feet of restaurant/non-office commercial space and approximately 29,000 square feet (or 33 percent) open space further enhancing the pedestrian environment in the vicinity of the project site. The project's proposed restaurant uses would serve the local work area community within a transit-rich environment.
Policy LU4.1: Encourage developers to provide uses and facilities that benefit the business employees, residents, vitality and quality of the Bergamot Plan area community by considering additional building height and density (floor area ratio) consistent with the development tiers specified in Table 5.02.	**Consistent.** The project FAR of 1.99 would be within the 2.0 FAR for BAP Tier II development.
Policy LU4.2: Require that community benefit uses for which additional building height and density are awarded exceed those that are normally required through the base standards of the Bergamot Area Plan.	**Consistent.** The project is a Tier II project, and thus must provide the established community benefits including payment of Transportation Impact Fees, Cultural Arts Fees, etc.
Goal LU5: An active, pedestrian-oriented, mixed-use district concentrates activity, connects with all uses, and provides convenient pedestrian access to the Expo Light Rail Station.	**Consistent.** The project would contribute to a vibrant activity center in the Bergamot Transit Village area by increasing office uses on an underutilized site in this transit-rich urbanized area. See discussion above (Goal LU1 and LU4).
Goal LU6: The Bergamot Plan area demonstrates the highest levels of environmental, economic, and social sustainability.	**Consistent.** The project would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. The project would contribute to a vibrant activity center in the Bergamot Transit Village area by increasing office uses on an underutilized site in this transit-rich urbanized area.
Policy LU6.1: Encourage developers to exceed Santa Monica's environmental sustainability standards for buildings, sites and infrastructure.	**Consistent**. The project would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. The project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~.
Policy LU6.3: Accommodate a diversity of creative arts and supporting uses that sustain and enhance the economic activity of the Bergamot Plan area and provide quality jobs for local residents.	**Consistent.** The project would refurbish an existing office building in an existing commercial area and replace the existing 58,940 square foot surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 square feet of new floor area. The

Table IV.E-4
Project Consistency with Applicable Goals and Policies of the BAP

Bergamot Area Plan Goals and Policies	Project Consistency
	project would increase office uses on an underutilized site in the transit-rich urbanized area that is also near existing housing. The project would include approximately 5,376 square feet of restaurant/non-office commercial space.
Source: City of Santa Monica Bergamot Area Plan, September 11, 2013, EcoTierra Consulting 2020.	

iv) City of Santa Monica Zoning Ordinance

The project site is located within the Bergamot Area Plan. For the Bergamot Area, the Zoning Ordinance incorporates by reference the BAP's development standards, which are prescribed in Chapter 5 of the BAP. As indicated in the analysis previously presented, the project is consistent with the BAP. Where Zoning Ordinance provisions are not specifically addressed by Chapter 5 of the BAP, the Zoning Ordinance shall apply.

Mitigation Measures:

None required.

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative land use analysis is the area within the City of Santa Monica limits. Land use decisions are made at the City level; therefore, the City of Santa Monica is an appropriate geographic scope. Cumulative land use impacts could occur if other future development projects in the vicinity of the project site would result in land use impacts in conjunction with the project. The project, combined with other planned and pending projects in and near the project vicinity, would cumulatively result in an overall change in land uses in the BAP, and more specifically the BTV ~~BVT~~ area, of the City.

However, these land use changes in the BAP are consistent with the BAP, LUCE, and SCAG goals of focusing new development in limited areas of the City near transit to preserve the City's existing residential neighborhoods and to achieve sustainability goals. The project, in combination with other pending/future projects in the BAP, supports the BAP, LUCE and SCAG goals by locating a mix of new open space, creative office, and retail/restaurant uses in the BAP area, improving the pedestrian environment, and providing uses near the Expo LRT that would connect the City of Santa Monica with the greater Los Angeles region. This integrated land use-transportation approach is expected to increase the use of public transit and decrease the distance between new housing, jobs, and transportation services, thus reducing net increases in City traffic, overall vehicle miles traveled, peak-hour congestion, and greenhouse gas emissions.

In addition, all cumulative projects considered in the cumulative impact scenario are required to be consistent with the LUCE and may be required to undergo Development Agreement and/or Development Review Processing and other discretionary land use actions. The General Plan consistency of each project would be considered on a case-by-case basis. Therefore, the project would not result or contribute considerably to significant cumulative land use impacts. For cumulative impacts that result primarily from development outside of the City's jurisdiction (i.e., in the cities of Los Angeles, Beverly Hills, Culver City, or Marina Del Rey), it should be noted that the City of Santa Monica cannot control land use policies or decisions outside of its boundaries. Increased development densities from cumulative projects would generate secondary cumulative impacts with respect to traffic, air quality, and noise. These impacts are discussed in their respective sections of this EIR.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project-level and cumulative impacts related to land use would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
F. NOISE

1. INTRODUCTION

The purpose of this section is to evaluate the construction-related and operational noise and ground-borne vibration impacts of the proposed project. The section describes the existing noise environment in the project area, estimates noise and vibration levels from construction and operation of the project, and analyzes the project's potential to generate significant noise impacts. Noise monitoring and modeling data are included in Appendix H to this Draft EIR.

2. BACKGROUND INFORMATION

A. Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources, such as an occasional aircraft or train passing by to virtually continuous noise sources like traffic on a major highway. Table IV.F-1, Representative Environmental Noise Levels, illustrates representative noise levels in the environment.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- **L_{eq}** – The equivalent energy noise level is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **L_{min}** – The minimum instantaneous noise level experienced during a given period of time.
- **L_{max}** – The maximum instantaneous noise level experienced during a given period of time.
- **CNEL** – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 10 dBA "penalty" added to noise during the hours of 10:00 PM. to 7:00 AM., and an additional 5 dBA penalty during the hours of 7:00 PM. to 10:00 PM. to account for noise sensitivity in the evening and nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Table IV.F-1 Representative Environmental Noise Levels		
Common Outdoor Activities	**Noise Level (dBA)**	**Common Indoor Activities**
	110	Rock Band
Jet Fly-Over at 100 Feet	105	
	100	
Gas Lawnmower at 3 Feet	95	
	90	
	85	Food Blender at 3 Feet
Diesel Truck Traveling at 50 MPH at 50 Feet	80	Garbage Disposal at 3 Feet
Noisy Urban Area during Daytime	75	
Gas Lawnmower at 100 Feet	70	Vacuum Cleaner at 10 Feet
Commercial Area	65	Normal Speech at 3 Feet
Heavy Traffic at 300 Feet	60	
	55	Large Business Office
Quiet Urban Area during Daytime	50	Dishwasher in Next Room
	45	
Quiet Urban Area during Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime	35	
	30	Library
Quiet Rural Area during Nighttime	25	Bedroom at Night, Concert Hall (background)
	20	
	15	Broadcast/Recording Studio
	10	
	5	
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing
Source: California Department of Transportation, October 1998.		

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the L_{dn} is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

When evaluating changes in 24-hour community noise levels, a difference of 3 dBA is a barely perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be

reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[1] Furthermore, the exterior-to-interior noise reduction of newer homes and office buildings can be more than 30 dBA, depending on construction materials and methods used.

B. Fundamentals of Ground-Borne Vibration

Vibration is sound radiated through the ground or structures. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby, creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as ground-borne vibration. Ground-borne vibration is measured as particle velocity in inches per second and in the U.S. is referenced as vibration decibels (VdB).

The background vibration velocity level in residential is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and heavy traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Ground- borne vibration is almost never annoying to people who are outdoors. Although the motion of the ground may be perceived, without the effects associated with the shaking of a building, the motion does not provoke the same adverse human reaction. In addition, the rumble noise that usually accompanies building vibration is perceptible only inside buildings. The general human response to different levels of ground-borne vibration velocity levels is described below in Table IV.F-2, Human Response to Different Levels of Groundborne Vibration. The structural effects related to different levels of ground-borne vibration velocity levels are shown below in Table IV.F-3, Vibration Thresholds for Potential Structural Damage.

Table IV.F-2
Human Response to Different Levels of Groundborne Vibration

Human Response	Transient (in/sec)	Continuous (in/sec)
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.9	0.1
Severe/Disturbing	2	0.4

Source: Caltrans 2013.
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

[1] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

Table IV.F-3
Vibration Thresholds for Potential Structural Damage

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12
Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.	

3. ENVIRONMENTAL SETTING

A. Existing Noise Levels

The project site is situated in the Bergamot Plan area, which lies in the eastern portion of the City. Land uses in the area include the 26th Street/Bergamot Metro E Station; light industrial uses; art galleries; various commercial, general/professional office and creative office uses; private school and community college uses; and accessory retail, restaurant, childcare, and health club uses. These land uses are housed in a variety of buildings, from large, campus-style business park developments to reused warehouse buildings.

The Santa Monica Airport is located more than approximately 1.4 miles southeast of the project area and has minimal effects on noise levels in the project area. The most common and primary sources of noise in the project vicinity are motor vehicles (e.g., automobiles, buses, trucks, and motorcycles) along Colorado Avenue, 26th Street, and Stewart Street. Motor vehicle noise often creates a sustained noise level.

The project site is surrounded by commercial, general/professional office and creative office uses on all sides in relatively large floorplate office buildings, with accessory retail, restaurant, childcare, and health club uses. An existing five-story office building is located directly to the north, which separates the project site from existing multi-family residential uses. The Water Garden office complex is located directly across 26th Street to the west, which house corporate, entertainment, and financial offices, showrooms, and landscaped outdoor areas. Colorado Center is located northwest of the site, at the corner of Colorado Avenue and 26th Street. One- and two-story office buildings, and Santa Monica College (SMC) (Center for Media & Design) buildings and parking structure are located northeast of the site across Pennsylvania Avenue at Stewart Street. This SMC campus location is also home to KCRW radio station. A two-story office building is located to the east along Pennsylvania Avenue at Stewart Street.

i) Measured Noise Levels

To identify existing noise conditions, existing noise levels were measured in the vicinity of the project site. The locations of where the noise measurements were taken are depicted in Figure IV.F-1, Noise Monitoring Location Map. The noise survey was conducted on Monday, June 29, 2020 between 12:26 PM and 6:18 PM using the Larson Davis Sound Track LxT1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1 and is consistent with the sound level meter definition established in Section 4.12.020 of the Santa Monica Municipal Code. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The results of the measurements are summarized in Table IV.F-4, Existing Noise Levels in the vicinity of the project site. As shown in Table IV.F-4, the measured ambient noise levels ranged from 54.5 dBA Leq to 69.3 dBA Leq in the vicinity of the project site.

Table IV.F-4
Existing Noise Levels[a] in the Vicinity of the Project Site

No.	Noise Measurement Location[b]	Primary Noise Sources	Noise Levels		
			L_{eq}	L_{max}	L_{min}
NM1	West-northwest of the project site, south of 26th Street and west of Colorado Avenue, adjacent to the Hill & Dale Discovery Center Preschool at 1540 26th St	Traffic and light pedestrian activity along 26th Street and Colorado Avenue	69.3	86.8	53.2
NM2	North of the project site, adjacent to residential uses west of Colorado Avenue and south of Princeton Street.	Traffic along Colorado Avenue and residential ambiance.	67.1	83.9	50.7
NM3	Northeast of the project site adjacent to the Evergreen Community School.	Traffic and light pedestrian activity along Colorado Avenue and Stewart Street.	64.0	74.4	52.5
NM4	East-northeast of the project site, adjacent to the Center for Media and Design, south of Stewart Street and east of Pennsylvania Avenue.	Light traffic along Pennsylvania Avenue and Stewart Street.	54.5	67.1	47.1
NM5	Southwest of the project site, adjacent to the commercial uses south of 26th Street and west of Pennsylvania Avenue.	Traffic and light pedestrian activity along 26th Street and Pennsylvania Avenue.	65.0	78.2	48.8

NOTES:
a The noise measurements were obtained while many schools and businesses were closed, or restricted to essential personnel only, due to the Covid-19 pandemic; therefore, the ambient noise levels detailed in this table reflect low activity in the area and are likely lower than ambient noise levels would be during times of normal activity.
b Noise measurements were taken on June 29, 2020 at each location for a duration of 10 minutes. Noise monitoring data provided in Appendix H to this EIR.
Source: EcoTierra Consulting, Inc., September 2020

ii) Roadway Noise Levels

Existing vehicular traffic is the main source of noise levels in the project area. In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. Roadway noise levels were calculated for primary street segments located in proximity to the project site. The roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by project-related traffic, which, for the purpose of this analysis, include the roadways that are nearest to the project site and would carry the most project-generated trips. These roadways, when compared to roadways located farther away from the project site, would experience the greatest percentage increase in traffic generated by the project.

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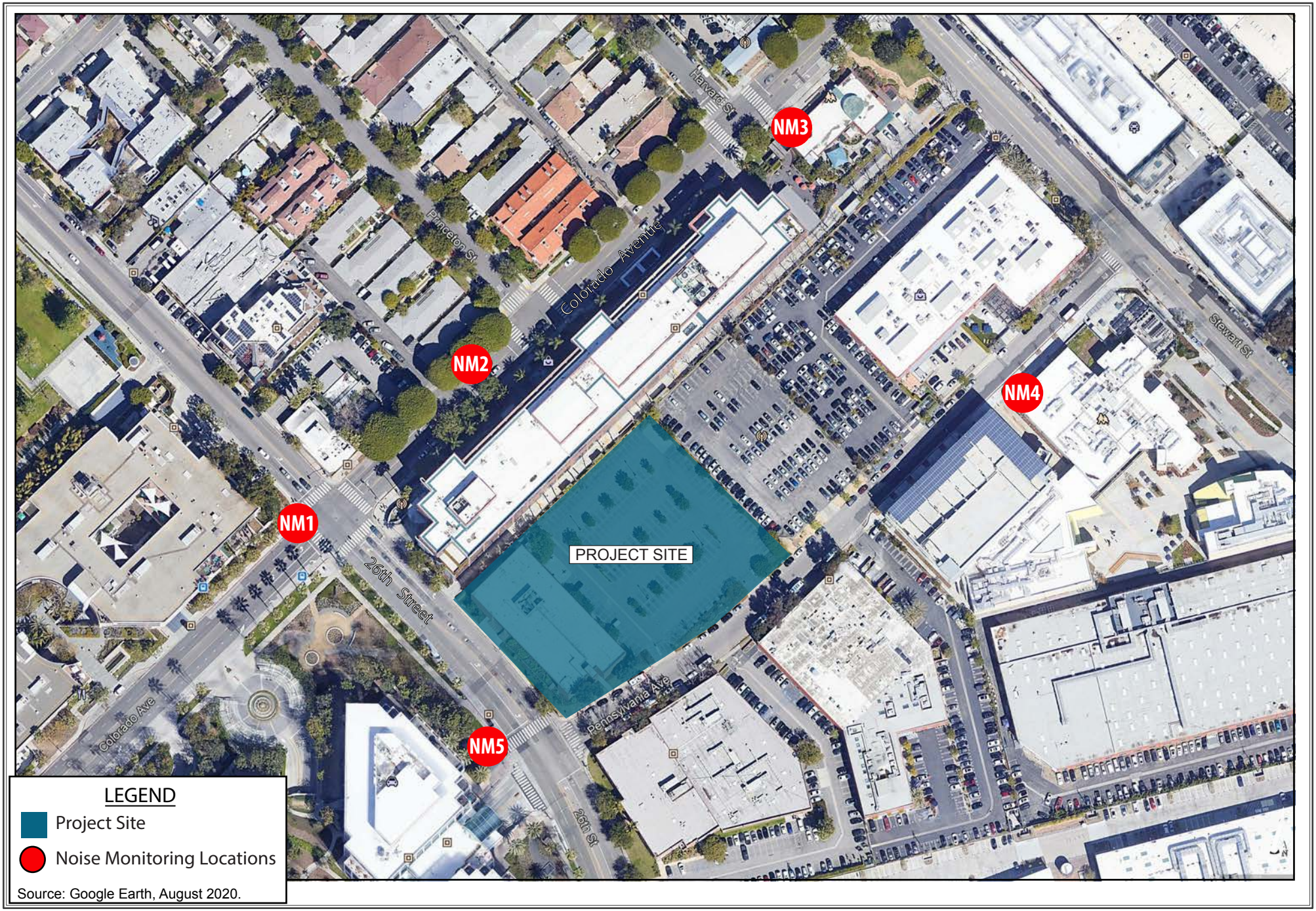

Figure IV.F-1
Noise Monitoring Location Map

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Existing roadway noise levels were modeled utilizing the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108 at an arbitrary distance of 50 feet from roadway centerline and ADTS generated from the PM peak hours given in the Project-specific traffic study (Fehr and Peers, August 2020). The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The uniform distance allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies. Therefore, the change in a noise level between scenarios is the focus of this portion of the analysis, rather than the resulting independent noise level for any one segment. These worksheets are included as Appendix H of this Draft EIR. The modeling is theoretical and does not take into account any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference in with and without project conditions. Roadway input parameters are based on average daily traffic volumes (ADTs), speeds, and vehicle distribution data. The average daily noise levels along study area roadway segments are presented in Table IV.F-5, Estimated Existing Roadway Noise Levels.

Table IV.F-5
Estimated Existing Roadway Noise Levels

Roadway Segment	Existing	
	ADT	dB CNEL
26th Street		
s/e of Wilshire Ave	3,750	63.4
n/w of Wilshire Ave	5,000	64.7
s/e of Santa Monica Blvd	5,780	65.3
n/w of Santa Monica Blvd	5,250	64.9
s/e of Broadway	1,580	59.7
n/w of Broadway	6,170	65.6
s/e of Colorado Ave	4,920	64.6
n/w of Colorado Ave	5,230	64.9
s/e of Pennsylvania Ave	7,620	66.5
n/w of Pennsylvania Ave	4,260	64.0
n/w of Olympic Blvd	3,060	62.6
Stewart Street		
n/w of Pico Blvd	2,780	62.1
s/e of Pico Blvd	8,060	66.8
n/w of National Blvd	3,820	63.5
Colorado Avenue		
n/e of 26th St	8,190	66.8
s/w of 26th St	5,440	65.1
n/e of Stewart St	7,730	66.6
s/w of Stewart St	4,710	64.4
Pennsylvania Avenue		
n/e of 26th St	1,070	58.0
s/w of 26th St	520	54.9

Note:
(1) The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.
Source: EcoTierra Consulting, Inc., September 2020

iii) Existing Groundborne Vibration Levels

Aside from periodic construction work occurring throughout the City, other sources of groundborne vibration in the vicinity of the project site is limited to occasional heavy-duty vehicular travel (refuse trucks, delivery trucks, etc.) on nearby roadways.

B. Noise and Vibration Sensitive Receptors

Noise sensitive land uses are those uses that have associated human activities that may be subject to stress or significant interference from noise. As defined by the Santa Monica Municipal Code (Chapter 4.12), noise-sensitive land uses include public or private schools, places of worship, cemeteries, libraries, hospitals and similar health care institutions. The City of Santa Monica also considers residential uses to be noise-sensitive receptors. The nearest noise-sensitive receptors in the vicinity of the project site include the following:

- Multi-family residential uses located approximately 240 feet from the project site boundary, northwest of Colorado Avenue between 26th Street and Harvard Street;
- Bright Horizons Children's Center (1620 26th Street), a day care, located approximately 220 feet across 26th Street to the southwest (in the Water Garden Business complex) of the project site;
- Evergreen Community School (2800 Colorado Avenue), a pre-school, located approximately 390 feet to the north of the project site;
- Hill & Dale Family Learning Center (Clover Park), an infant and toddler program in Clover Park, located approximately 530 feet to the northwest of the project site; and
- Santa Monica College Center for Media and Design (1660 Stewart Street), home of KCRW recording studios, is located approximately 360 feet northeast-east of the project site.

These receptors are located adjacent to the noise monitoring locations labeled as NM 1 through NM 5, accordingly, on Figure IV.F-1, Noise Monitoring Location Map. All other noise-sensitive uses are located at greater distances from the project site and would therefore experience lower noise levels from potential sources of noise located on the project site. Therefore, noise levels at additional sensitive receptors located beyond those identified above were not evaluated. Uses sensitive to vibration include the aforementioned receptors 1 through 5. Vibration sensitive receptors that are typically more sensitive to vibration effects with regard to structural damage include old or historic buildings which are generally more structurally fragile, due to the building material used. Humans occupying structures near the operation of heavy construction equipment may also perceive the vibration generated, as an annoyance. As such, vibration impacts were analyzed at the closest building, the commercial/film studio uses located directly adjacent to the northwestern portion of the site, at 2700 Colorado Avenue.

C. Regulatory Framework

i) State

The California Department of Health Services has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown in Table IV.F-6, Community Noise Exposure. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

The state has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise. These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of

Regulations). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. Where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL, the standards require an acoustical analysis demonstrating how dwelling units have been designed to meet the interior standard. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

Table IV.F-6
Noise Standards by Land Use

Proposed Land Use Categories		**Compatible Land Use Zones (in CNEL)**					
Categories	**Uses**	**<60**	**60-65**	**65-70**	**70-75**	**75-80**	**>80**
RESIDENTIAL	Single Family, Duplex, Multiple Family	A	B	B	C	D	D
COMMERCIAL Regional, District	Hotel, Motel, Transient Lodging	A	B	B	C	C	D
COMMERCIAL Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	B	B	C

ZONE A – Clearly Compatible: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
ZONE B – Compatible with Mitigation: New construction or development (i.e., substantial remodels and additions representing 50% or more of existing square footage, including garage square footage), should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems on air conditioning, will normally suffice.
ZONE C – Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.
ZONE D – Clearly Incompatible: New construction or development should generally not be undertaken.

Source: City of Santa Monica General Plan Noise Element.

ii) Local

1) City of Santa Monica Noise Element

The Noise Element of the City of Santa Monica General Plan addresses the issue of noise by identifying sources of noise in the City and providing objectives and policies that ensure that noise from various sources would not create an unacceptable noise environment. The City's guidance is based on the State guidelines for assessing the compatibility of various land use types with a range of noise levels for residential and commercial uses. The Noise Element provides generally acceptable noise level in CNEL for specific land uses classified into four categories: (1) "clearly compatible," (2) "compatible with mitigation," (3) "normally incompatible," and (4) "clearly incompatible." Table IV.F-6 presents the land use/compatibility matrix and interior and exterior noise standards from Table 1 and Table 2 of the Noise Element. With respect to the project's proposed commercial uses, Table 1 in the Noise Element identifies a noise level of up to 70 dBA CNEL as clearly compatible. With respect to the project's proposed residential and hotel uses, Table 1 identifies a noise level of up to 60 dBA CNEL as clearly compatible. Table 2 in the Noise Element identifies exterior design standards for commercial and residential uses as 65 dBA CNEL.

The Noise Element policies and actions that are relevant to the proposed project are as follows.

Policy 1: Provide for measures to reduce noise impacts from transportation noise sources.

Action 1.2 Provide for continued evaluation of truck movements and routes in the City to provide effective separation from residential or other noise sensitive land uses.

Policy 2: Incorporate noise considerations into land use planning decisions (as they apply to finished projects, not construction actions).

Action 2.2 Through the Noise Ordinance, incorporate noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses. The noise referral zones identified in Exhibits 6 and 7 (areas exposed to noise levels greater than 60 dB CNEL) can be used to identify locations of potential conflict. New developments would be permitted only if appropriate mitigation measures are included such that the standards contained in this Element are met.

Action 2.3 Continue to enforce the State of California Uniform Building Code that specifies that the indoor noise levels for residential living spaces not exceed 45 dB CNEL due to the combined effects of all noise sources. The state requires implementation of this standard when the outdoor noise levels exceed 60 dB CNEL. The Noise Referral Zones (60 dB CNEL) can be used to determine when this standard needs to be addressed. The Uniform Building Code (specifically, the California Administrative Code, Title 24, Part 6, Division T25, Chapter 1, Subchapter 1, Article 4, Sections T25-28) requires that "Interior community noise levels (CNEL/Ldn) with windows closed, attributable to exterior sources shall not exceed an annual CNEL or Ldn of 45 dB in any habitable room." The code requires that this standard be applied to all new hotels, motels, apartment houses and dwellings other than detached single-family dwellings. The City should also, as a matter of policy, apply this standard to single-family dwellings.

Policy 3 Develop measures to control non-transportation noise impacts.

Action 3.3 Require that new commercial and residential projects to be built near existing residential land use demonstrate compliance with the City Noise Ordinance prior to approval of the project. This shall include a requirement that all project plans show the location of mechanical equipment in relation to adjacent noise-sensitive (i.e., residential) uses. Require that all Building Permit applicants, including contractors, sign a form acknowledging requirements of the noise ordinance, and assuming responsibility for compliance with the noise ordinance. This is particularly important for the non-resident contractor installing mechanical equipment.

Policy 4: The City shall develop measures to control noise impacts.

Action 4.1 Consider incorporating provisions into the Noise Ordinance to address the problems of construction noise:

- Clearly state the permitted hours of construction and expressly prohibit construction on Sunday.
- During the environmental review of all projects requiring extensive construction, determine the proximity of the site to the established residential areas. If the project will involve pile-driving, nighttime truck hauling, blasting, 24-hour pumping (important in coastal excavations), or any other very high noise equipment, the environmental review shall include a construction noise alternative analysis. From this analysis, specific mitigation measures shall be developed to mitigate potential noise impacts. This may include but not be limited to:
  - Requirements to use quieter albeit costlier construction techniques.
  - Notification of residents (homeowners and renters) of time, duration, and location of construction.
  - Relocation of residents to hotels during noise construction periods.
  - Developer reimbursement to City for 24-hour on-site inspection to verify compliance with required mitigation.
  - Limit hours of operation of equipment 15 dB above noise ordinance limits to the hours of 10:00 to 4:00 P.M

2) City of Santa Monica Land use and Circulation Element (LUCE)

The project site is located within the Bergamot Area Plan (BAP). The BAP is a community-based planning document that provides guidance on transitioning former industrial lands into an arts-focused, mixed use, pedestrian-oriented neighborhood. As stated in BAP Goal LU1,

> *"[t]he Bergamot Plan area is a high quality, mixed-use, creative-sector district offering opportunities for jobs, housing, arts and culture and community-serving retail, and which benefits from access to the Exposition Light Rail Station and the area's creativity and innovation."*

The LUCE identifies the project site, as well as the properties immediately to the east and south, as Bergamot Transit Village (BTV). The BTV district is envisioned as a mixed-use creative arts/entertainment center focusing on the Expo's 26th/Olympic station. The LUCE identified the need for an area plan to refine the vision of this area as well as to establish development standards, design guidelines and implementation measures that guide the location of new automobile, pedestrian and bicycle streets into an interconnected grid to facilitate circulation and support the development of mixed-use, neighborhood-friendly buildings. The LUCE states that the Bergamot Transit Village is one of the areas of the City where creative office uses should be concentrated and acknowledges that "given the large number of residents currently employed in [creative industries], this type of employment can be viewed as local-serving in character."[2]

Several policies within the LUCE relate to noise. The two most pertinent polices include the following:

Citywide Land Use Policies:

Policy LU1.3 **Quality of Life**. Preserve neighborhood quality of life and protect neighborhoods against potential impacts related to development, traffic, noise, air quality and encroachment of commercial activities and establish standards that transition down the building envelope of commercial buildings adjacent to residential properties.

Policy N1.4 Preserve and protect existing neighborhoods against potential impacts related to development: traffic, noise, air quality and encroachment of commercial activities.

3) Santa Monica Municipal Code (SMMC)

The City of Santa Monica has also adopted a Noise Ordinance (Chapter 4.12 of the Santa Monica Municipal Code), which identifies noise standards intended to provide limitations on unnecessary, excessive, and annoying noises within the City. Section 4.12.010 of the SMMC establishes the general standards relative to disturbance of peace as follows:

> *It is determined that certain noise levels and vibration are detrimental to the public health, welfare, and safety, and contrary to public interest and, therefore, the City Council of the City of Santa Monica does ordain and declare that creating, maintaining, causing or allowing to be created, caused, or maintained, any noise or vibration in a manner prohibited by, or not in conformity with, the provisions of this Chapter, is a public offense and shall be punishable as such.*

Section 4.12.050 defines designated noise zones in the City, which include a variety of land use types, depending on their nature. These zones are defined as follows:

- **Noise Zone I**. All property in any residential district established by Municipal Code Subchapter 9.04.04 or any revisions thereto. In addition, property zoned Low Density Multiple Residential Beach District (R2B), Medium Density Multiple Family Coastal Residential District (R3R), Ocean Park Single Family Residential District (OP1), OP Duplex Ocean Park Duplex Residential District (OP-Duplex) OPD, Ocean Park Low Multiple Residential District (OP2), Ocean Park Medium

[2] *City of Santa Monica. Land Use and Circulation Element (LUCE), pp. 3.4-13 to 14.*

Multiple Residential District (OP3), and Ocean Park High Multiple Residential District (OP4) shall be included in this noise zone. The Santa Monica Pier shall be excluded from this noise zone.

- **Noise Zone II**. All property in any commercial district established by Municipal Code Subchapter 9.04.04 or any revisions thereto. In addition, property zoned Beach Parking District (BPD), Civic Center (CC), Bayside Commercial District (BSCD) and the Santa Monica Pier shall be included in this noise zone.
- **Noise Zone III**. All property in any manufacturing or industrial district as established by Municipal Code Subchapter 9.04.04 or any revisions thereto. In addition, property zoned Light Manufacturing and Studio District (LMSD) shall be included in this noise zone.

Section 4.12.060 outlines the noise standards for the different noise zones in the city, as shown in Table IV.F-7, Noise Standards in the City of Santa Monica. The project site lies within Noise Zone II.

The following standards from Section 4.12.060 outline the enforcement of the noise zones in the City:

a) For each Noise Zone, the allowable exterior equivalent noise level shall be reduced by five dBA for impulsive or simple tone noise, or for noises consisting of speech or music. If the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard.
b) Except as provided for in this Chapter, no person shall at any location within the City create any noise or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes:
    1) The equivalent noise level to exceed the noise standards established in subsection (a) of this Section for the noise zone where the measurement is taken; or
    2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits established in subsection (a) of this Section for the noise zone where the measurement is taken plus twenty dBA for any period of time.
c) If any portion of a parcel is located within one hundred feet of a noise zone with higher noise standards as compared to the noise standards for the noise zone in which the parcel is located, then the maximum allowable exterior equivalent noise level for the entire parcel shall be the average of the noise standards of the two noise zones. However, any noise level measurement must be taken at least twenty-five feet from the parcel line of the source of the noise.
d) Construction activity shall be subject to the noise standards set forth in Section 4.12.110.
e) The noise standards established in Section 6.116.030 shall apply on the Third Street Promenade and the Transit Mall.

Table IV.F-7
Noise Standards in the City of Santa Monica

Noise Zone	Time Interval	Allowable L_{eq}	
		15-minute Continuous Measurement Period	5-minute Continuous Measurement Period
I	Monday-Friday 10:00 PM to 7:00 AM 7:00 AM to 10:00 PM	 50 dBA 60 dBA	 55 dBA 65 dBA
	Saturday and Sunday 10:00 PM to 7:00 AM 7:00 AM to 10:00 PM	 50 dBA 60 dBA	 55 dBA 65 dBA
II	All Days of the Week 10:00 PM to 7:00 AM 7:00 AM to 10:00 PM	 60 dBA 65 dBA	 65 dBA 70 dBA
III	Anytime	70 dBA	75 dBA

Source: City of Santa Monica Municipal Code, Section 4.12.060.

With regard to restrictions on construction activity, Section 4.12.110 of the City Municipal Code states the following:

a) No person shall engage in any construction activity during the following times anywhere in the City:
   1) Before 8:00 a.m. or after 6:00 p,m.on Monday through Friday, except that construction activities conducted by employees of the City of Santa Monica or public utilities while conducting duties associated with their employment shall not occur before seven or after six on Monday through Friday;
   2) Before 9:00 a.m. or after 5:00 p.m. on Saturday;
   3) All day on Sunday;
   4) All day on New Year's Day, Martin Luther King's Birthday, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, as those days have been established by the United States of America.
b) Except as set forth in subsection (d) of this Section, the noise created by construction activity shall not cause:
   1) The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of this Chapter, for the noise zone where the measurement is taken, plus twenty dBA, or
   2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of this Chapter for the noise zone where the measurement is taken plus forty dBA, for any period of time.
c) Prior to the issuance of a building permit, all development projects located within five hundred feet of any residential development or other noise sensitive land uses must submit a list of equipment and activities required during construction. In particular, this list shall include the following:
   1) Construction equipment to be used, such as pile drivers, jackhammers, pavement breakers or similar equipment;
   2) Construction activities such as twenty-four hour pumping, excavation or demolition;
   3) A list of measures that will be implemented to minimize noise impacts on nearby residential uses;
d) Any construction that exceeds the noise levels established in subsection (b) of this Section shall occur between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday.
e) A permit may be issued authorizing construction activity during the times prohibited by this Section whenever it is found to be in the public interest. The person obtaining the permit shall provide notification to persons occupying property within a perimeter of five hundred feet of the site of the proposed construction activity prior to commencing work pursuant to the permit. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit. Applications for such permit shall be in writing, shall be accompanied by an application fee and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the Building Officer. No permit shall be issued unless the application is first approved by the Director of Environmental and Public Works Management, the Building Officer, the Chief of Police and the Director of Planning and Community Development. The City Council shall establish by resolution fees for the filing and processing of the application required by this subsection (e) and any required compliance monitoring. This fee may be revised from time to time by resolution of the City Council.

With regard to vibration, Section 4.12.070 of the SMMC prohibits any person to create, maintain or cause any ground vibration that is perceptible without instruments at any point on any property. The perception threshold shall be presumed to be more than 0.05 inches per second root-mean-square velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft is exempt from this section.

Section 4.12.130 defines location, screening and noise measurements of mechanical equipment, as follows:

"All development project applications must demonstrate compliance with or contain the following information:

(a) A list of all permanent mechanical equipment to be placed outdoors and all permanent mechanical equipment to be placed indoors which may be heard outdoors. All such equipment shall require a noise analysis to demonstrate compliance with Section 4.12.060 of SMMC prior to the issuance of a building permit for the development project.

(b) Mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot unless it can be shown that the noise will comply with the requirements of Section 4.12.060 of SMMC. Roof locations may be used when the mechanical equipment is installed within a noise attenuating structure.

(c) Final approval of the location of any mechanical equipment will require a noise test to demonstrate compliance with Section 4.12.060 of SMMC. Equipment for the test shall be provided by the owner or contractor and the test shall be conducted by the owner or contractor. A copy of noise test results on mechanical equipment shall be submitted to the Community Noise Officer for review to ensure that noise levels do not exceed maximum allowable levels for the applicable noise zone".

Section 4.12.170 states that "new development may only be permitted if noise mitigation measures are taken in project siting and design such that exterior noise levels meet equivalent noise level requirements of Section 4.12.060 of SMMC, and the standards contained in the Interior and Exterior Noise Standards Matrix as contained in the Noise Element of the General Plan for any existing noise sources near the project or contained within the project."

Section 9.21.140 provides requirements for screening of mechanical and electrical equipment and of non-residential uses, as follows:

A. Screening of Mechanical and Electrical Equipment. All exterior mechanical and electrical equipment shall be screened on all vertical sides at least to the height of the equipment it is screening and incorporated into the design of buildings to the maximum extent feasible. Equipment to be screened includes, but is not limited to, all roof-mounted equipment, air conditioners, heaters, utility meters, cable equipment, telephone entry boxes, backflow preventions, irrigation control valves, electrical transformers, pull boxes, and all ducting for air conditioning, heating, and blower systems. Screening materials may include landscaping or other materials that shall be consistent with the exterior colors and materials of the building. Solar energy systems are exempt from this screening requirement. The Architectural Review Board or Landmarks Commission may reduce the height of the required screening based on the placement of the equipment on the roof, the existing height of the subject building and surrounding buildings, and the overall visibility of the equipment.

B. Screening of Nonresidential Uses. Wherever any building or structure is erected or enlarged on any parcel that contains any Commercial, Industrial, Public or Semi-Public use (except Cemetery, Community Garden, Day Care Center, or Public Park), or a Transportation, Communication and Utilities use, and abuts a Residential District, a solid decorative wall shall be erected and maintained along the parcel line abutting the Residential District. Such screening wall shall be at least 6 feet in height. Such screening wall shall be provided at the time of new construction or expansion of buildings by more than 10 percent of floor area, or changes from one use classification to another non-residential use classification.

1. Location. Screening walls shall follow the parcel line of the parcel to be screened or shall be so arranged within the boundaries of the parcel so as to substantially hide from adjoining properties the building, facility, or activity required to be screened.

2. Materials. Industrial uses must provide a solid screening wall of stucco, decorative block, or concrete panel. Screening walls for other uses may be constructed of stucco, decorative block, concrete panel, wood or other substantially equivalent material. Chain-link fencing does not fulfill the screening wall requirement.

3. Maintenance. Screening walls shall be maintained in good repair, including painting, if required, and shall be kept free of litter or advertising. Where hedges are used as screening, trimming or pruning shall be employed as necessary to maintain the maximum allowed height.

4. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts related to noise. Specifically, the Guidelines state that a proposed project may have a significant adverse noise or vibration impact if the project would result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
b) Generation of excessive ground-borne vibration or ground-borne noise levels;
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

The following impact analysis addresses questions (a) through (c) listed above.

Based on the above, the following significance thresholds are utilized by the City:

i) Applicable Noise Standards

The City utilizes the noise standards of the Noise Ordinance discussed previously in this section.

Temporary or Periodic Increase in Ambient Noise Levels

The timing of construction noise impacts is an important factor in determining significance. In any urban area, residents expect to periodically be exposed to construction noise during normal working hours on weekdays and for more abbreviate periods on Saturdays (and sometimes Sundays). As set forth in the previous discussion of the City's Noise Ordinance, construction activities are generally permissible only between 8:00 AM and 6:00 PM on weekdays, and between 9:00 AM and 5:00 PM on Saturdays. During these hours, the City permits construction noise up to 20 dBA in excess of normally acceptable levels, or up to 40 dBA above normally acceptable levels for any "maximum instantaneous" noise event.

Construction noise beyond these levels is only permitted between 10:00 AM and 3:00 PM on weekdays. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does not consider construction activities consistent with these timing limits to constitute significant environmental effects.

Permanent Increase in Ambient Noise Levels

The CEQA Guidelines do not define the levels at which temporary and permanent increases in ambient noise are considered substantial. As discussed previously, a noise level increase of 3 dBA is barely perceptible to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. However, as the existing level of ambient noise increases, the allowable level of project generated noise increases, but the total amount that community noise exposure is allowed to increase is reduced. This accounts for the unexpected result that a project noise exposure, which is less than the existing noise exposure, can still cause impact. As a result, and consistent with the thresholds used for the City of Santa Monica's *Land Use and Circulation Element Final Environmental Impact Report*, the thresholds shown in Table IV.F-8, Significance thresholds for Operational Ambient Noise Impacts, are used herein for assessing a project's impacts relative to operational roadway noise.

ii) Ground-borne Vibration

The State CEQA Guidelines do not define the levels at which ground-borne vibration or ground-borne noise are considered "excessive." However, Section 4.12.070 of the SMMC states that the perception threshold

for vibration shall be presumed to be more than 0.05 inches per second root-mean-square velocity at any point on any property. For the purpose of this analysis, groundborne vibration impacts associated with human annoyance would be significant if the proposed project exceeds the threshold of 0.05 in/sec at any point on any property. With regard to structural damage, this analysis assumes a threshold of 0.1 in/sec within 25 feet of any building. Per Caltrans/FTA, this threshold corresponds to the level which has the potential to cause structural damage in fragile buildings.

Table IV.F-8
Significance Thresholds for Operational Ambient Noise Impacts

Ambient Noise Levels Without Project (CNEL)	Threshold (CNEL)
‘<60 dBA	+5.0 dBA or more
60-65 dBA	+3.0 dBA or more
>65 dBA	+1.5 dBA or more
Source: LUCE EIR, 2010.	

B. Methodology

This analysis of the future noise environments and the impact of the proposed project is based on noise level measurements and noise prediction modeling. Noise monitoring and modeling data are included in Appendix H to this Draft EIR.

i) Construction Noise Levels

Noise levels associated with each phase of construction were modeled utilizing worksheets based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RNCM), together with several key construction parameters. Key model inputs include; the distance to the sensitive receiver, equipment usage, percentage usage factor, and baseline parameters for the Project Site. Construction and demolition noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work.

ii) Operational Noise Levels

Noise impacts related to vehicular traffic were modeled using a version of the Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA-RD-77-108), as modified for CNEL and the “Calveno” energy curves. Site-specific information is entered, such as roadway traffic volumes, roadway active width, source-to-receiver distances, travel speed, noise source and receiver heights, and the percentages of automobiles, medium trucks, and heavy trucks that the traffic is made up of throughout the day, amongst other variables.

The FHWA Traffic Noise Prediction Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). Adjustments are then made to the REMEL to account for: total average daily traffic volumes, roadway classification, width, speed and truck mix, roadway grade and site conditions (hard or soft ground surface). All modeled roadways were assumed to have a “hard site” to predict worst-case, conservative noise levels. A hard site, such as pavement, is highly reflective and does not attenuate noise as quickly as grass or other soft sites. Any reductions in noise levels due to intervening topography and buildings were not accounted for in this analysis.

Existing, Future Without Project and Future With Project ADTs were calculated from the peak hour traffic volumes and Project trip distribution given in the Project-specific Traffic Impact Analysis (Fehr and Peers, Inc., 2020). The ADTs for the scenarios described above were calculated by multiplying the peak hour traffic volumes by 10. Roadway parameters utilized to model future traffic noise levels to the Project include location, traffic volume, speed and vehicle mix (autos, medium trucks, and heavy trucks) . The various scenarios that are described above were modeled to determine project-specific increases in noise levels at an arbitrary distance of 50 feet from roadway centerline. The uniform distance allows for direct comparisons

of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies. Therefore, the change in a noise level between scenarios is the focus of this portion of the analysis, rather than the resulting independent noise level for any one segment. FHWA calculation spreadsheets are included in Appendix H of this Draft EIR.

Noise impacts related operational stationary noise (mechanical equipment, parking lot activities etc.) were analyzed by identifying the noise levels generated by identifying outdoor stationary noise sources, such as building rooftop mechanical equipment (e.g., heating, air conditioning, and ventilation (HVAC)), building loading area activity, and on-site activity by calculating the Leq noise level from each noise source (using reference noise levels) at sensitive receptor property lines, and comparing such noise levels to existing noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point source noise impacts:

1. Existing noise levels were measured (see Table IV.F-4 above);
2. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;
3. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
4. Noise level increase were compared to the stationary source noise significance thresholds; and for outdoor mechanical equipment, the maximum allowable noise emissions from any and all outdoor mechanical equipment were specified such that noise levels would not exceed the significance threshold

iii) Ground-borne Vibration

Groundborne vibration levels resulting from construction activities were estimated using the published data in the 2013 Caltrans Transportation and Construction Vibration Guidance Manual. Per page 37 therein, vibration from construction equipment has been estimated with the following formula:

$$PPVEquipment = PPVRef\ (25/D)^n\ (in/sec)$$

Where: PPVRef = reference PPV at 25 ft.

D = distance from equipment to the receiver in ft.

n = 1.5 (the value related to the attenuation rate through ground)

Operational groundborne vibration was assessed based on the proposed land uses at the project site and the expected activities that would produce groundborne vibration at the project site, such as truck deliveries and trash collecting.

C. Project Impacts and Mitigation

Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis:

Impact F-1: Based on compliance with Section 4.12.110 the SMMC, impacts with respect to construction noise would not exceed standards established in the City's Noise Ordinance.

The project would consist of the refurbishment of the project site's existing three-story, 45,429 square feet (sf) office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 sf of new floor area. The

project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The project's three buildings will total approximately 174,685 ~~174,684~~ sf.

Construction of the proposed project is anticipated to be conducted in one phase. The estimated duration for construction is approximately 24 months beginning 2022 and ending in the 2nd quarter of 2024. It is estimated that construction would begin 2022 and the Project would be operational by the 2nd/3rd quarter of 2024. Construction activities associated with the proposed project would be undertaken in three main steps: (1) demolition of existing uses, 2) grading/site preparation/excavation, and (3) building construction.

Demolition would occur for approximately 3 months (and would require the demolition and removal of the existing 161-space surface parking lot. The demolition will generate approximately 2,500 cubic yards (cy) of material, primarily concrete. Depending on the type of haul truck used, demolition could require up to approximately 275 truck trips to haul debris off-site. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one ram-hoe/hydraulic, three rubber tired or track dozer, one dumper/tender, one air compressor, one generator, and four tractors/loaders/backhoes.

Grading, site preparation and excavation would occur for approximately 2 months and would require the export of approximately 55,000 cy of soil export for excavation for the subterranean project components. Soil export activities could require up to 3,200 truck trips to haul soil off-site. The depth of excavation would be approximately 37 feet below surface grade. This analysis assumes daily grading, site preparation, and excavation activities would require the following equipment: one air compressor, two compactors, two drilling rigs, one generator, one grader, two-three excavators, one dumpers/tender, one street sweeper, and -three-four tractors/loaders/backhoes.

Building construction would occur for approximately 19 months and would include the construction of the proposed structures (Buildings A and B), refurbishment of the existing building (Building C), connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the project site. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two-four forklifts, two dumpers/tenders, multiple hydraulic/electric man lifts, two generator sets, one-two tractors/loaders/backhoes, two welders, and two-three air compressor.

Construction worker parking will be provided via the use of City parking structures and agreements with neighboring lots and, if required, a shuttle service will be employed to deliver construction workers from parking areas to the site. All required equipment and material staging would be provided on site and all work shall be subject to a Construction Mitigation Plan to be approved by the City. The Construction Mitigation Plan will address street and sidewalk closures, truck hauling routes, construction hours, etc.

Pursuant to Section 4.12.110 of the City's Noise Ordinance, construction activities would be restricted to the hours of 8:00 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays, exclusive of designated public holidays.

Construction activities associated with the proposed project would require the use of heavy equipment for demolition, excavation, grading, and building construction that would generate noise. Noise would also be generated from haul trucks, the operation of smaller power tools, generators, and other equipment. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. No pile driving would be necessary.

The U.S. EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment. The data for the types of construction equipment that are expected to be used at the project site are presented in Table IV.F-9, Noise Range of Typical Construction Equipment. As shown, construction equipment used for the proposed project could produce maximum noise levels of 73 to 90 dBA L_{max} at a distance of 50 feet from the source.

Table IV.F-9
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	76-84
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.
Source: U.S. EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

The U.S. EPA has also compiled data regarding the noise generating characteristics of typical construction activities. These data, which represent composite construction noise, are presented in Table IV.F-10, Typical Outdoor Construction Noise Levels. As with noise generated by individual construction equipment, these noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance.

As stated previously, Section 4.12.060 of the City's Noise Ordinance allows for construction equivalent noise levels of up to 20 dBA above the noise standards specified for the noise zone. The exterior noise standard for Noise Zone II (within which the project site is located) is set at 65 dBA from 7:00 AM to 10:00 PM, thereby allowing a maximum noise level of 85 dBA during these hours.

Table IV.F-10
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	76	70
Excavation, Grading	86	80	74
Foundations	77	71	65
Structural	83	77	71
Finishing	86	80	74

Source: U.S. EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Construction noise associated with the project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the project site. Distances to receptors were based on the acoustical center of the

proposed construction activity. Construction noise levels were calculated for each phase. To be conservative, the noise generated by each piece of equipment was added together for each phase of construction; however, it is unlikely (and unrealistic) that every piece of equipment will be used at the same time, at the same distance from the receptor, for each phase of construction. As shown in Table IV.F-11, Estimated Exterior Construction Noise at Closest Receptors, construction activities are not expected to exceed the exterior noise standard (65 dBA) at the closest sensitive receptors by more than 20 dBA. Although not expected, if certain project construction activities have the potential to exceed the 85 dBA exterior standard at sensitive receptors (i.e., 65 dBA ambient standard plus the allowed 20 dBA increase), those construction activities would be required to occur between 10:00 AM and 3:00 PM Monday through Friday, consistent with Section 4.12.110(d) the SMMC. Therefore, based on estimates in Table IV.F-11 and compliance with Section 4.12.110 the SMMC, impacts with respect to construction noise would be less than significant.

Table IV.F-11
Estimated Exterior Construction Noise Levels at Closest Receptors

Construction Phase	Receptor Locations Relative to the Project Site	Existing Ambient Noise Levels (dBA Leq)[1]	Unmitigated Construction Noise Levels (dBA Leq)[2 3]	Increase Over Ambient (dBA)	Increase Over 65 dBA?	Is the Increase Significant?
Demolition	West (NM1)	69.3	67.5	-1.8	2.5	No
	Northwest (NM2)	67.1	69.6	2.5	4.6	No
	North-northeast (NM3)	64.0	65.5	1.5	0.5	No
	Northeast (NM4)	54.5	66.0	11.5	1.0	No
	Southwest (NM5)	65.0	70.6	5.6	5.6	No
Site Preparation	West (NM1)	69.3	64.4	-4.9	-0.6	No
	Northwest (NM2)	67.1	66.6	-0.5	1.6	No
	North-northeast (NM3)	64.0	62.5	-1.5	-2.5	No
	Northeast (NM4)	54.5	62.9	8.4	-2.1	No
	Southwest (NM5)	65.0	67.5	2.5	2.5	No
Grading	West (NM1)	69.3	64.9	-4.4	-0.1	No
	Northwest (NM2)	67.1	67.0	-0.1	2.0	No
	North-northeast (NM3)	64.0	51.7	-12.3	-13.3	No
	Northeast (NM4)	54.5	52.1	-2.4	-12.9	No
	Southwest (NM5)	65.0	56.7	-8.3	-8.3	No
Building Construction	West (NM1)	69.3	64.8	-4.5	-0.2	No
	Northwest (NM2)	67.1	67.0	-0.1	2.0	No
	North-northeast (NM3)	64.0	62.9	-1.1	-2.1	No
	Northeast (NM4)	54.5	63.3	8.8	-1.7	No
	Southwest (NM5)	65.0	67.9	2.9	2.9	No
Architectural Coating	West (NM1)	69.3	59.4	-9.9	-5.6	No
	Northwest (NM2)	67.1	61.5	-5.6	-3.5	No
	North-northeast (NM3)	64.0	57.4	-6.6	-7.6	No

Table IV.F-11
Estimated Exterior Construction Noise Levels at Closest Receptors

Construction Phase	Receptor Locations Relative to the Project Site	Existing Ambient Noise Levels (dBA Leq)[1]	Unmitigated Construction Noise Levels (dBA Leq)[2] [3]	Increase Over Ambient (dBA)	Increase Over 65 dBA?	Is the Increase Significant?
	Northeast (NM4)	54.5	57.9	3.4	-7.1	No
	Southwest (NM5)	65.0	62.5	-2.5	-2.5	No

Notes:
(1) Noise measurement locations are shown on Figure IV.F-1.
(2) Construction noise calculations available in Appendix H of this DEIR.
(3) Thresholds for Unmitigated Construction Noise Levels (dBA Leq) would be 65 dBA plus the allowable 20 dBA increase for a total of 85 dBA.

Source: EcoTierra Consulting, Inc., September 2020

In addition to these on-site construction activities, the project would also generate truck traffic on roadways. The highest activity of heavy-truck traffic would occur during the excavation phase. During this phase the project would generate up to 313 haul truck trips per day travelling to and from the project site. It is anticipated that construction delivery/haul trucks would travel via 26th Street, Olympic Boulevard, and Centinela Avenue to the I-10 freeway. As such, sensitive receptors along the haul route may be impacted by noise from haul trucks. Building frontages along Centinela Avenue are located approximately 40 feet from the roadway center line and include residential sensitive receptors along the frontages of the haul route. As shown in Table IV.F-9, noise from haul trucks could reach between 76-84 dBA L_{eq} at a distance of 50 feet. As such, haul truck noise activities are not expected to exceed the exterior noise standard by more than 20 dBA (i.e., 65 dBA ambient standard plus the allowed 20 dBA increase). Therefore, impacts with respect to off-site construction truck traffic would be less than significant.

The City of Santa Monica Municipal Code Section 4.12.110 allows for noise resulting from construction activities to be exempt from noise limits established in the Code if they are conducted at certain times during the day and on certain days. In accordance with the Noise Ordinance, Section 4.12.110(d), if a construction activity were to exceed the 20 dBA construction noise limit above allowable noise zone levels, the activity would have to occur between the hours of 10:00 and 3:00 Monday through Friday to be exempt from the regulations of the Noise Ordinance. Construction activities not exceeding the 20 dBA construction noise limit above allowable noise zone levels would otherwise be limited to the hours of 8:00 and 6:00 on Monday through Friday, between 9:00 and 5:00 on Saturdays, and prohibited on Sundays and federal holidays. In the event that construction would occur during times other than those stipulated in the Noise Ordinance, project applicant(s) would be required to obtain a permit from the City building official in accordance with Section 4.12.110(e) of the Municipal Code.

Based on compliance with Section 4.12.110 of the SMMC, impacts with respect to construction noise would be less than significant. No mitigation measures are required.

Mitigation Measures:

None required.

Impact Analysis:

Impact F-2: With regard to noise impacts, operation of the proposed project would not generate a substantial temporary or permanent increase in ambient noise levels due to vehicles on roadways in the project vicinity or stationary noise sources.

i) Vehicular Noise

Off-site locations in the project vicinity would experience an increase in noise resulting from the additional traffic generated by the project. The project-related increases in noise levels at the primary roadway segments located in proximity to the project site are identified in Table IV.F-12, Project Traffic Noise Contributions. Table IV.F-12 identifies the change in noise levels along the study-area roadway segments between the future without project scenario and the future with project scenario. As shown, the project would increase local noise levels by a maximum of 1.5 dBA CNEL along the roadway segment of Colorado Avenue n/e of 26th Street. This increase, along with all other roadway noise increases, would be below the applicable significance thresholds identified. Therefore, operation of the proposed project would not generate a substantial permanent increase in ambient noise levels on nearby roadways. Vehicular related operational noise impact of the proposed project would be less than significant.

Table IV.F-12
Project Traffic Noise Contributions

Noise Levels 50 feet from Roadway Centerline*[1 2]						
	Future Without Project		Future With Project			
	ADT	dB CNEL	ADT	Total	Project Specific increase	Is the increase Significant ?
26th Street						
s/e of Wilshire Ave	4,900	64.6	4,970	64.7	0.1	**No**
n/w of Wilshire Ave	6,300	65.7	6,370	65.7	0.0	**No**
s/e of Santa Monica Blvd	5,750	65.3	5,830	65.4	0.1	**No**
n/w of Santa Monica Blvd	6,700	66.0	6,790	66.0	0.0	**No**
s/e of Broadway	6,300	65.7	6,400	65.8	0.1	**No**
n/w of Broadway	5,800	65.3	6,720	66.0	0.7	**No**
s/e of Colorado Ave	6,520	65.8	6,620	65.9	0.1	**No**
n/w of Colorado Ave	6,330	65.7	6,590	65.9	0.2	**No**
s/e of Pennsylvania Ave	7,600	66.5	7,800	66.6	0.1	**No**
n/w of Pennsylvania Ave	3,400	63.0	3,680	63.4	0.4	**No**
n/w of Olympic Blvd	5,880	65.4	5,990	65.5	0.1	**No**
Stewart Street						
s/e of Colorado Ave	2,800	62.2	2,860	62.3	0.1	**No**
s/e of Olympic Blvd	7,250	66.3	7,350	66.4	0.1	**No**
n/w of Olympic Blvd	4,180	63.9	4,250	64.0	0.1	**No**
Colorado Avenue						
n/e of 26th St	7,600	66.5	10,690	68.0	1.5	**No**
s/w of 26th St	6,220	65.6	6,240	65.7	0.1	**No**
n/e of Stewart St	7,500	66.5	7,690	66.6	0.1	**No**
s/w of Stewart St	4,800	64.5	4,800	64.5	0.0	**No**
Pennsylvania Avenue						
n/e of 26th St	700	56.2	900	57.2	1.0	**No**
s/w of 26th St	600	55.5	600	55.5	0.0	**No**

Table IV.F-12
Project Traffic Noise Contributions

Noise Levels 50 feet from Roadway Centerline*1 2						
	Future Without Project		Future With Project			
	ADT	dB CNEL	ADT	Total	Project Specific increase	Is the increase Significant ?

** (1) The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.*
(2) Significance threshold is 3 dBA.

Source: EcoTierra Consulting, Inc. September 2020

ii) Stationary Noise Sources

The project includes the refurbishment of the project site's existing three-story, 45,429 square feet (sf) office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and business professional office buildings comprising a total of 129,265 sf of new floor area. The project would also include a three-level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. The BAP "is a strong office location and is particularly known for its entertainment, design and technology industries. The creative office space and employment in the area is an important economic generator for the City of Santa Monica and the jobs base is consistent with priorities identified in the City's strategy for a Sustainable Local Economy."[3] The Bergamot Transit Village is identified in the LUCE as one of the focus areas for new creative office employment.[4]

On-site noise sources associated with the operations of the project would consist primarily of HVAC/mechanical systems and parking structure-related noise.

1) Mechanical Equipment

The HVAC/mechanical system that would be installed on the rooftop of the proposed building would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. CNELs for constant noise sources are about 6 dBA greater than 24-hour L_{eq} measurements. As such, the HVAC equipment associated with the proposed project could generate noise levels that average from 46 to 56 dBA CNEL at 50 feet from the source when the equipment is operating continuously over a 24-hour period. However, Section 4.12.130 of the City's Municipal Code requires exterior mechanical equipment to not exceed the exterior noise standards and requires all new rooftop HVAC to be enclosed or incorporate other elements to prevent adverse noise that might be heard by persons on adjacent properties. Noise testing would be required for HVAC units to ensure compliance with the City of Santa Monica exterior noise standards. Therefore, noise from the HVAC/mechanical system would be less than significant.

2) Parking Noise

Operation of the proposed project would have the potential to generate noise due to truck loading/unloading, cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human

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[3] *City of Santa Monica, Bergamot Area Plan, p. 32.*
[4] *Ibid, p. 32.*

activity. Activity levels would be highest in the early morning and evening when the largest number of people would enter and exit. However, these events would occur at low exiting and entering speeds, which would not generate high noise levels. During these times, the noise levels can range from 44 to 63 dBA Leq[5]. As the parking area would be fully enclosed on all sides except the driveway areas and located in the subterranean levels of the project site, noise generated from within the parking garage would not adversely affect off-site sensitive receptors. Therefore, these impacts would be less than significant.

Mitigation Measures:

None required.

Would the project result generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis:

Impact F-3: Neither construction nor operation of the proposed project would generate groundborne vibration levels that would exceed the FTA human annoyance or structural damage thresholds. Impacts associated with ground-borne vibration would be less than significant.

Mitigation Measures:

None required.

i) Construction-Related Vibration

As discussed previously, construction activities associated with the proposed project would require the use of heavy equipment for demolition, excavation, and building construction. These activities would generate temporary increases of ground-borne vibration. Table IV.F-13, Construction Equipment Vibration Source Levels, identifies various vibration velocity levels (in/sec) for the types of construction equipment that would operate at the project site during construction. The closest sensitive receptor is located approximately 85 feet north of the site (along Colorado Avenue).[6] Based on the data provided in Table IV.F-13 and the formula provided previously in the methodology section, construction vibration levels at receptors located more than 75 feet from the project site would experience vibration levels of less than 0.011 in/sec. As stated previously, ground-borne vibration impacts associated with human annoyance would be significant if the proposed project exceeds the threshold of 0.05 in/sec at any point on any property.

Table IV.F-13
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches per second)		
	At 25 feet	At 50 feet	At 100 feet
Clam Shovel Drop (slurry wall)	0.202	0.071	0.025
Vibratory Roller	0.210	0.074	0.026
Hoe Ram	0.089	0.031	0.011
Large Bulldozer	0.089	0.031	0.011
Caisson Drilling	0.089	0.031	0.011
Loaded Trucks	0.076	0.027	0.010

[5] *Gordon Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.*

[6] *The residential uses on Colorado Avenue north of the project site are separated by Colorado Avenue and an existing 5-story office building (2700 Colorado Avenue).*

Table IV.F-13
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches per second)		
	At 25 feet	At 50 feet	At 100 feet
Jackhammer	0.035	0.012	0.004
Small Bulldozer	0.003	0.001	0.0004
Source: Federal Transit Administration: Transit Noise and Vibration Impact Assessment, 2018.			

These vibration levels would not have the potential to exceed the 0.05 in/sec threshold at any of the sensitive uses. Additionally, with respect to human annoyance, similar to construction noise level increases and consistent with Section 4.12.110 of the City's Noise Ordinance, construction activities would be restricted to the hours of 8:00 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays, exclusive of designated public holidays. Further, heavier noise and vibration generating activities (i.e., project construction activities have the potential to exceed the 85 dBA exterior noise standard at sensitive receptors) would be required to occur between 10:00 AM and 3:00 PM Monday through Friday, consistent with Section 4.12.110(d) the SMMC. As such, vibration impacts associated with human annoyance would be less than significant.

Table IV.F-14
Typical Human Reaction and Effects on Buildings Due to Groundborne Vibration

Vibration Level Peak Particle Velocity (PPV)	Human Reaction	Effect on Buildings
0.006–0.019 in/sec	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any
0.08 in/sec	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10 in/sec	Level at which continuous vibration begins to annoy people	Virtually no risk of "architectural" (i.e., not structural) damage to normal buildings
0.20 in/sec	Vibrations annoying to people in buildings	Threshold at which there is a risk to "architectural" damage to normal dwelling – houses with plastered walls and ceilings
0.4–0.6 in/sec	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause "architectural" damage and possibly minor structural damage
Source: California Department of Transportation. Transportation and Construction Vibration Guidance Manual, Chapter 6 Tables 5 and 12, September 2013.		

Vibration generated by construction activity generally has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile. The closest buildings are the commercial/film studio uses located directly adjacent to the northwestern portion of the site. At a distance of 25 feet, use of a large bulldozer would be expected to generate a PPV of 0.089 in/sec, which is less than the 0.10 in/sec vibration level shown in Table IV.F-14 above that states there is virtually no risk of architectural damage to normal buildings.

As these vibration levels would not have the potential to exceed the 0.1 in/sec threshold at the closest building, the project would also not have the potential to exceed the threshold at uses located farther away from the project site. As such, vibration impacts associated with structural damage to off-site uses would be less than significant.

Mitigation Measures:

None required.

ii) Operational Vibration

The proposed project does not include uses that are expected to generate measurable levels of ground-borne vibration during operation of the proposed project. Therefore, the greatest regular source of project-related ground-borne vibration would be from local trucks making deliveries to the project site and trash trucks collecting refuse material. The vibration levels associated with these trucks would be less than the levels associated with large construction equipment and would be generally consistent with existing trucks (i.e., refuse trucks) operating in the project area and serving the existing uses on the project site. Therefore, the operational ground-borne vibration impact would be less than significant.

Mitigation Measures:

None required.

For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis:

Impact F-4: The project would not expose people residing or working in the project area to excessive airport-related noise levels.

The project site is located within the BAP. As stated previously, the Santa Monica Airport, located in the southeast corner of the City, is approximately 1.4 miles southeast of the project area and has minimal effects on noise levels in the project area. In addition, the project would not result in an expansion or planned expansion of airport operations. As such, the project would not expose people residing or working the in the area to excessive noise levels and impacts would be less than significant.

Mitigation Measures:

None required.

5. CUMULATIVE IMPACTS

The geographic context for the analysis of cumulative noise impacts is the immediate area surrounding the project site (i.e., within one block of the project site). Development of the proposed project in conjunction with future cumulative projects would potentially result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized City of Santa Monica.

A. Construction-Related Cumulative Impacts

Construction of the proposed project would potentially overlap with other future projects in the project area. It should be noted that the project applicant has no control over the timing or sequencing of future development projects that may occur. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction of the project in combination with construction of development projects in the immediate area could result in an increase in construction-related noise and vibration levels in this urbanized area of the City. However, like the project, construction projects would be subject to the SMMC, which limits construction noise levels and the hours of allowable construction activities. In addition, each construction project could be subject to additional project-specific mitigation measures aimed at the reduction of construction noise and vibration levels as needed.

Furthermore, as noise is a localized phenomenon and decreases in magnitude as distance from the source increases, it is unlikely that project-related construction activities would combine with construction activities associated with the related projects to generate a cumulatively considerable noise and vibration impact during construction. As such, cumulative impacts with respect to construction noise and vibration would be less than significant.

B. Operational Cumulative Impacts

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed project and cumulative projects within the study area. As shown previously, in Table IV.F-12, for the analysis of the future without project scenario and the future with project scenario; the project would increase local noise levels by a maximum of 1.5 dBA CNEL along the roadway segment of Colorado Avenue northeast of 26th Street. In addition, it should be noted that these increases are conservative as they do not fully reflect future availability and use of electric vehicles, which would generate lower noise levels compared to traditional motor vehicle fleet mixes. As discussed previously, and consistent with the City's LUCE and BAP, a noise level increase of 3 dBA is barely perceptible to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. As cumulative roadway noise levels would not increase by 3 dBA compared to conditions without the project, cumulative impacts with respect to operational traffic noise would be less than significant.

With respect to stationary operational noise sources, operation of the project in combination with cumulative projects could result in an increase in stationary noise sources in this urbanized area of the City. However, like the project, all of the cumulative projects would be subject to Section 4.12.130 of the City's Municipal Code, which requires mechanical equipment to not exceed the exterior noise standards and requires all new rooftop HVAC to be enclosed or incorporate other elements to prevent adverse noise that might be heard by persons on adjacent properties. Noise testing would be required for HVAC units to ensure compliance with the City of Santa Monica exterior noise standards. As such, cumulative impacts with respect to stationary operational noise would be less than significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project-level and cumulative construction and operational noise and vibration impacts would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
G. TRANSPORTATION

1. INTRODUCTION

This section of the EIR analyzes the project's effects related to transportation and circulation. The analysis is based on the 1*633 26th Street Project Transportation Impact Analysis* (Transportation Study) prepared by Fehr & Peers Inc., November 2020. A copy of this report is provided in Appendix I of this Draft EIR.

2. ENVIRONMENTAL SETTING

A. Project Site

The project site is located at 1633 26th Street in the urbanized City of Santa Monica within the Bergamot Plan area in the eastern area of the City. The project site is on the northeast corner of 26th Street and Pennsylvania Avenue and is surrounded by office buildings and a satellite campus of Santa Monica College. It occupies two parcels and is immediately bounded by a four-story office building on the north, Pennsylvania Avenue on the south, surface parking serving a four-story office building on the east, and 26th Street on the west.

The project site is currently developed with a 3-story, brick-faced office building totaling approximately 45,529 square feet, constructed in 1972. The building houses a variety of creative office and office tenants. The project site also includes a surface parking lot serving the office building with 161 (157 standard and 4 handicap) ~~152~~ parking spaces. Vehicle access to and from the existing surface parking lot is provided by two driveways on Pennsylvania Avenue with a gate access ingress at the westerly driveway closest to the building and egress at the easterly driveway. Pedestrian access is provided by sidewalks on 26th Street and a limited portion of Pennsylvania Avenue immediately east of 26th Street, with building entrances on 26th Street, Pennsylvania Avenue and from the surface parking lot.

B. Bergamot Area Plan

The project site is located within the Bergamot Area Plan (BAP). The BAP area is located in the eastern portion of the City, focused around the 26th Street/Bergamot Station for the Metro E (formerly Expo) Line. The BAP area generally encompasses the properties bounded by Centinela Avenue, Franklin Street, and Stanford Street to the east; Colorado Avenue to the north; 26th Street and Cloverfield Boulevard to the west; and Michigan Avenue/Exposition Boulevard to the south. The BAP is divided into two distinct areas: The Bergamot Transit Village in the western portion and the Mixed-Use Creative District in the eastern portion, with Stewart Street dividing the two areas.

The project site is situated along the northern border of the Bergamot Transit Village portion of the BAP. The project site is surrounded by commercial, general/professional office and creative office uses on all sides in relatively large floorplate office buildings, with accessory retail, restaurant, childcare, and health club uses. An existing five-story office building is located directly to the north, which separates the project site from existing multi-family residential uses. Large office developments are located directly across 26th Street to the west including the Water Garden, which house corporate, entertainment, and financial offices, showrooms, and landscaped outdoor areas. Colorado Center is located northwest of the site, at the corner of Colorado Avenue and 26th Street. One- and two-story office buildings, and Santa Monica College (SMC) (Center for Media & Design) buildings and parking structure are located southeast of the site across Pennsylvania Avenue at Stewart Street. This SMC campus location is also home to KCRW radio station. A two-story office building is located to the east along Pennsylvania Avenue at Stewart Street.

C. Existing Transportation System

i) Existing Street System

Regional access is provided by the Santa Monica Freeway (I-10), with access ramps approximately one-half mile to the south at Centinela Avenue, Cloverfield Boulevard, and 20th Street. Other regional highways in the area include the San Diego Freeway (I-405) and Palisades Beach Road/Pacific Coast Highway (SR-1), both of which connect to I-10 and are located more than two miles from the project site.

The streets nearest to the project site are described below.

- Pennsylvania Avenue is a short two-lane (one vehicle lane in each direction) east-west roadway that runs between 26th Street and Stewart Street. It is classified as an Avenue: Industrial. Pennsylvania Avenue has limited sidewalks which include a 6-foot wide sidewalk on the north side of the street adjacent to a portion of the project site. There is also an 18-foot wide sidewalk on the south side of the street fronting Santa Monica College. Neither side of Pennsylvania Avenue has a continuous sidewalk that extends over the entire block.

- 26th Street is a north-south roadway that runs between the project area and the Brentwood neighborhood in Los Angeles. South of Colorado Avenue, one to two vehicle lanes are provided in each direction and parking is not permitted. North of Colorado Avenue 26th Street provides one lane in each direction and, north of Broadway, parking is allowed. Near the project site, 26th Street is developed with a mostly office, with medium density residences on north of the area of the site. To the south, 26th Street at Olympic Boulevard provides access to the E 26th Street/Bergamot Metro Line E Station. It is classified as an Avenue: Major south of Broadway and as an Avenue: Secondary north of Broadway and is signed as a bicycle route. Sidewalks are generally present along both sides of the street and are approximately 8' wide.

- Colorado Avenue is an east-west roadway that provides surface street access to Downtown Santa Monica and connects with nearby Los Angeles neighborhoods such as West LA and Sawtelle. In Los Angeles, Colorado Avenue continues as Idaho Avenue. West of 26th Street, Colorado Avenue provides two vehicle lanes in each direction with left-turn lanes at intersections and parking generally allowed. East of 26th Street the roadway narrows to one lane in each direction with raised planted medians and the character of the adjacent land uses is mostly residential on the north side and office uses on the south side. Sidewalks are present along both sides of the street and are approximately 6 feet wide.

- Stewart Street is a four-lane north-south roadway located east of the site between Colorado Avenue and Pico Boulevard. Near the project site, Stewart Street is developed with large plate office buildings. Stewart Street also provides access to Santa Monica College and crosses Metro's E Line at Olympic Boulevard. Sidewalks are present on both sides of the street and are approximately 6-8 feet wide.

The Land Use and Circulation Element (LUCE) defines the street system according to its use by various modes including walking, biking, transit, and automobile. These street types include Boulevard, Special Streets, Downtown Commercial, Neighborhood Commercial, Major Avenue, Secondary Avenue, Minor Avenue, Industrial Avenue, Neighborhood Street, Shared Street, Parkway, Pathway, Bikeway, Highway, and Alley. The city streets surrounding the project are described below based on their designations in the LUCE:

- Boulevard – Boulevards are regional transportation corridors with continuous mixed-use and commercial land uses. Boulevards provide access for all forms of transportation but emphasize transit and walking. Regional automobile traffic is also accommodated along Boulevards in order to minimize regional traffic on parallel local streets. Wilshire Boulevard, Santa Monica Boulevard, and Pico Boulevard are classified as boulevards near the study site. Boulevards typically provide two vehicle lanes in each direction, often have metered on-street parking, and typically do not have bicycle lanes although bicycle routes or "sharrows" may be posted.

- Avenue: Major – These streets serve regional automobile trips and provide access for all modes of transportation. They are designed to discourage regional auto traffic from using Secondary or Minor Avenues. The Major Avenues in the study area include Cloverfield Boulevard south of Santa Monica Boulevard, 26th Street south of Broadway, and Centinela Avenue south of Olympic Boulevard. These streets typically do not allow on-street parking or stopped vehicles.

- Avenue: Secondary – These streets distribute automobile trips onto Minor Avenues and Neighborhood Streets and often serve regional bicycle trips. Secondary Avenues in the study area include Broadway west of 26th Street, Colorado Avenue, 20th Street, 26th Street north of Broadway, and Centinela Avenue north of Olympic Boulevard. These streets are generally a single vehicle lane in each direction. These streets may include on-street parking, such as along Broadway.

- Avenue: Minor – These streets serve local automobile and bicycle trips. Minor Avenues in the study area include Stewart Street, Nebraska Avenue, and Broadway east of 26th Street. These streets typically provide a single vehicle lane in each direction and typically provide on-street parking for residents, visitors and loading zones. All three of these streets provide bicycle lanes.

- Avenue: Industrial – These streets are minor streets that provide access to individual industrial parcels. Pennsylvania Avenue is classified as an Industrial Avenues in the study area. These streets typically provide a single vehicle lane in each direction and typically provide on-street parking for visitors and loading zones.

- Neighborhood Street – These streets primarily serve adjacent buildings. 17th Street is a Neighborhood Street in the study area. These streets provide a single vehicle lane in each direction and typically have on-street parking for residents, visitors, and loading zones.

ii) Existing Transit System

The City's Big Blue Bus and the Los Angeles County Metropolitan Transportation Authority (Metro) provide a dense network of public transit service throughout the study area. The project site is directly accessible via transit links between most areas of the City and much of the metropolitan area including Downtown Los Angeles, University of California, Los Angeles (UCLA)/West Los Angeles, Century City, Los Angeles International Airport (LAX), Venice, and Culver City. Weekday peak hour transit ridership varies by bus line, as described below, but generally the peak hour falls between 6:00 AM to 9:00 AM and 4:00 PM to 7:00 PM. Transit operators adjust bus schedules and headways typically two or three times a year, particularly in the case of Big Blue Bus as service changes coincide with the schedules of Santa Monica College and UCLA. During these schedule updates, service is sometimes reallocated between routes to match demand and changing travel patterns; the route descriptions below are from late 2019 and can be considered representative of the existing schedules and headways.

1) Metro E Line (Expo) Light Rail and 26th Street/Bergamot Station

The project site is located less than a ¼ mile from the 26th Street/Bergamot Station, two stops away from the western terminus of the Metro E Line (Expo) Light Rail. The 26th Street/Bergamot Station is located at 26th Street/Olympic Boulevard. Formerly known as the Expo Line or Expo LRT, the E Line provides a high-frequency rail connection between downtown Santa Monica to Downtown Los Angeles and connects with other Metro rail service in Downtown Los Angeles. Service operates daily from approximately 4:00 AM through 2:00 AM, with peak headways of 6 minutes in both directions and off-peak headways between 12 and 20 minutes. A new connecting line along Crenshaw Boulevard is under construction and is planned to open in 2021, providing service south towards LAX and connecting with the Metro C Line (Green). In the future, Metro's "Regional Connector" subway project in Downtown Los Angeles will extend the E Line through downtown and connect with the existing L Line (Gold) towards East Los Angeles, creating a single-seat transit trip that currently requires multiple connections. That project is planned to open sometime after 2023.

2) Public Buses

There are five Big Blue Bus lines that serve the project site. Big Blue Bus Lines 5, 16, and 43 stop across the street from the Bergamot station provide further means of access to Downtown Santa Monica, Venice, Mar Vista, Marina Del Rey, Brentwood, Century City, West LA, and Palms. Lines 16 and 43 also stop at Stewart Street and Pennsylvania Avenue. Big Blue Bus lines 1 and 10 Rapid have stops at Santa Monica Boulevard and 26th Street provide access to Venice, Downtown Santa Monica, Westwood, West Los Angeles, and Downtown Los Angeles. One Metro line serves the project site. Metro Bus Rapid Line 704 and Metro Early AM, Evening/Owl Line 4 stop on Santa Monica Boulevard and 26th Street providing access to Downtown Santa Monica, West Los Angeles, West Hollywood, Echo Park, and Downtown Los Angeles.

More details about the bus lines within 0.25 miles of the project site are outlined below:

- Big Blue Bus Line 1 (Santa Monica Boulevard) – Line 1 runs between Venice and UCLA in Westwood. Headways are approximately every 10 minutes during the weekdays and every 10 to 20 minutes during weekends. The stop closest to the project site is located at Santa Monica Boulevard and 26th Street.
- Big Blue Bus Line 5 (Colorado Avenue & Olympic Boulevard) – Line 5 runs between Downtown Santa Monica and Century City via Colorado Avenue and Olympic Boulevard and continues from Century City to the Metro E Line Palms Station. Headways are every 20 to 30 minutes during the weekdays. The stop closest to the project site is located at Olympic Boulevard and 26th Street.
- Big Blue Bus Line 10 Rapid (Santa Monica Boulevard) – Line 10 runs between Downtown Santa Monica and Downtown Los Angeles via Santa Monica Boulevard and the I-10. Line 10 connects to three Metro Stations including the Bundy Station and others in downtown LA. Headways to Downtown Los Angeles from Downtown Santa Monica are every 30 minutes in the morning during the weekdays. Headways to Downtown Santa Monica from Downtown Los Angeles are every 30 minutes in the late afternoon during the weekdays. The stop closest to the project site is located at Santa Monica Boulevard and 26th Street.
- Big Blue Bus Line 16 (Stewart Street) – Line 16 runs between Marina del Rey to West Los Angeles. Headways are every 25 to 35 minutes during the weekdays. The stop closest to the project site is located at Olympic Boulevard and 26th Street.
- Big Blue Bus Line 43 (26th Street) – Line 43 runs from the Downtown Santa Monica to Brentwood via 26th Street. Headways are every 20 to 30 minutes during the weekday in the mornings and every hour in the afternoons. The stop closest to the project site is located at Olympic Boulevard and 26th Street.
- Metro Line 4 / Rapid 704 (Santa Monica Boulevard) – Line 4/704 runs from Downtown Santa Monica to Downtown Los Angeles via Santa Monica and Sunset Boulevards. Daytime service on Line 704 is Rapid (limited stop) service with 15-minute headways throughout the day. Off-peak local service on Santa Monica Boulevard in the study area with headways of 15 to 30 minutes and is provided overnight when Big Blue Bus Line 1 is not operating. The stop closest to the project site is located at Santa Monica Boulevard and 26th Street.

iii) Existing Bicycle and Pedestrian Facilities

1) Bicycle Facilities

The City of Santa Monica is one of the most bikeable community in the Southern California region. The City has a dense and growing network of bicycle facilities including some immediately adjacent to the Project site. The following streets near the project site have marked bicycle lanes separating bicyclists from vehicles:

- 26th Street between Olympic Boulevard and Broadway
- Stewart Street (northbound only) between Pico Boulevard and Colorado Avenue
- Yale Street between Colorado Avenue and Montana Avenue

- Broadway from Ocean Avenue to past Centinela Avenue
- Nebraska Avenue from Stewart Street to past Centinela Avenue

Following the alignment of the E Line, the Expo Line Bike Path is located near the project site and is a dedicated bike path, entirely separating bicyclists and other non-motorized users from vehicles on the street.

In addition to these facilities, the City designated some streets as Bicycle Routes or Slow Streets allowing for bicyclists to share the same space. Bicycle Routes are marked with “sharrow” markings, and Slow Streets are designed for slow travel and shared, safe usage for all users. Around the project site, Chelsea Avenue between Broadway and Washington Avenue has a Bicycle Route. Slow Streets around the project site include Princeton Street, Harvard Street, and Pennsylvania Avenue. Figure IV.G-1 shows existing transit and bicycle facilities near the project site.

2) Bicycle Parking

Bicycle parking is available throughout the study area, including in many parking structures, on-street racks, and at public and private facilities. For example, bicycle parking locker are provided at the 26th/Bergamot Metro Line E Light Rail Station. The City also continues to install racks throughout the area. In addition, there is a bicycle retail and repair shop near 26th Street and Broadway, which also provides bicycle parking.

3) Bike Share

The City also has a citywide Bike Share service (which will be privately operated beginning October 2020), which allows residents, visitors, and employees to ride a public bicycle for their travel needs within the City. There are three bike hubs adjacent to the site at Pennsylvania Avenue and 26th Street, Pennsylvania Avenue and Stewart Street, and on Colorado Avenue west of Stewart Street. There is also a hub at 26th/Bergamot Metro Line E Light Rail Station. The bikeshare program makes several hundred "smart" bicycles available at more than 80 stations Citywide including Downtown, and in Venice in the City of Los Angeles.

4) Pedestrian Facilities

Sidewalks are generally present on all streets throughout Santa Monica. Generally, sidewalks throughout Santa Monica between 5 and 15 feet wide depending on the street and block. Olympic Boulevard east of 26th Street lacks sidewalks on the north side of the street.

Santa Monica also recently updated man traffic signals in the study area to include a “leading pedestrian interval” (LPI), which holds all vehicle movements (red signal) for several seconds at the start of a pedestrian phase to improve safety by giving pedestrians a head start and improve their visibility to motorists.

Signalized intersections throughout the study area have marked or textured crosswalks and pedestrian countdown signals. Signalized pedestrian walk signals are either automatic at the intersection or actuated by pedestrians by push-button. Recently, as a result of the COVID19 pandemic, the City has temporarily placed all pedestrian walk signals in the City as automatic pedestrian recall mode. All intersections have accessible curb ramps.

5) Other Transportation Choices

a) Shared Mobility Technologies

The growth of privately-operated Transportation Network Companies (TNCs) like Lyft and Uber has also changed the way people move in and around the City. TNC’s provide app-based platforms to connect passengers with drivers who use personal, non-commercial vehicles. Lyft and Uber have become the most

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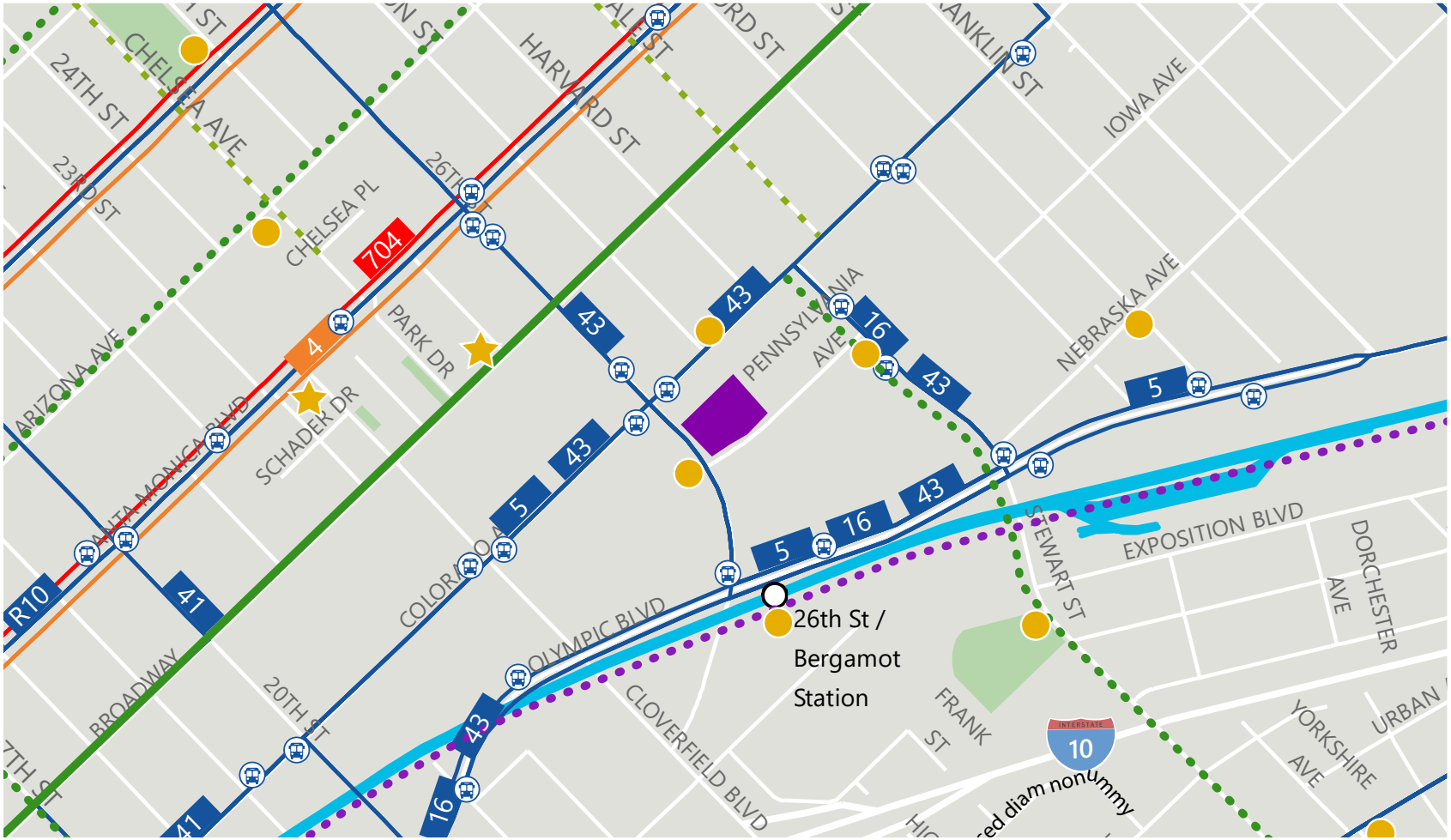

Transit Lines

- Big Blue Bus Routes
- Metro E Line (Expo)
- Metro E Line Stations
- Metro Rapid
- Metro Local
- Bus Stop

Existing Bicycle Facilities

- Expo Line Bike Path
- Class 2 Bike Lane
- Class 2b Bike Lane
- Class 3 Bike Lane
- Bike Share Hub
- Bike Shop

- Project Site

Source: Fehr & Peers, August 2020.

Figure IV.G-1
Project Area Existing Transit and Bicycle Facilities

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recognized and ubiquitous forms of shared mobility. Research around the nation in recent years suggests that usage of Lyft and Uber is generating an increase in vehicle traffic.[1] Other research has suggested this result is in part because many users are making trips they would not have made previously, and in some cases replacing transit trips.

In late 2017, the City saw the burgeoning of dockless mobility devices, including electric scooters (e-scooters), on City streets. These dockless mobility devices became increasingly popular in the City, allowing scooters and bicycles to be left in any location. In response to these dockless mobility devices, the City provided "drop zones" on wide sidewalks, where users are encouraged to park when they finish a trip, to reduce sidewalk clutter and prevent obstructions to the sidewalk, which can significantly impact the Americans with Disabilities Act (ADA) provisions for providing clear path of travel. The City also worked with permitted operators to designate sensitive high-pedestrian areas as "no-ride" zones, including the Third Street Promenade and Palisades Park.

Based on the City's November 19 council staff addressing these mobility devices, four companies (Bird, Lime, Lyft, and Jump) provided riders with a total of 2,673,819 trips from October 2018 to October 2019. The average trip duration was 14 minutes and length was 1.3 miles, and ridership peaked during the spring and summer months but was strong throughout the year. Today, Bird and Lyft are the remaining two companies providing e-scooters in the City The e-scooters are included in existing count data as bicycles, but no assumption of changes to mobility behavior are included in the analysis given the new and rapidly changing circumstances as well as lack of available data.

D. Regulatory Framework

i) State

1) AB 32 and SB 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32. The proposed LUCE pro-actively incorporates strategies for integrated land use and transportation planning that achieve per capital GHG reduction, per capita VMT reduction, and trip reduction that would further the City's efforts to meet the state-wide policy intent of this legislation.

In 2007, CARB adopted a list of early action programs that could be put in place by January 1, 2010. In 2008, VRB defined its 1990 baseline level of emissions, and by 2011 it completed its major rule making for reducing GHG emissions. Rules on emissions, as well as market-based mechanisms like the proposed cap and trade program, took effect January 1, 2012.

On December 11, 2008, California ARB adopted its Proposed Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, SB 375 addresses regional GHG emissions targets. California ARB's Regional Targets Advisory Committee will guide the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, will be updated every 8 years in conjunction with the revision schedule of housing and transportation elements.

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[1] *Pangilinan, Chris. "Learning more about how our roads are used today". Medium.com August 5, 2019 https://medium.com/uber-under-the-hood/learning-more-about-how-our-roads-are-used-today-bde9e352e92c https://drive.google.com/file/d/1FIUskVkj9lsAnWJQ6kLhAhNoVLjfFdx3/view*

Second, MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within 3 years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the CTC. Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

2) Senate Bill (SB) 743

To further the state's commitment to the goals of SB 375, AB 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code. The project site qualifies as a Transit Priority Area (TPA), and therefore key provisions of SB 743, including reforming aesthetics and parking CEQA analyses for urban infill projects would apply to the project site. Under SB 743, the focus of transportation analysis shifted from driver delay to reduction of GHG emissions, creation of multimodal networks, and promotion of a mix of land uses.

Specifically, SB 743 required the OPR to amend the CEQA Guidelines (Title 14 of the California Code of Regulations sections and following) to provide an alternative metric to LOS for evaluating transportation impacts. The CEQA Guidelines were amended to include alternative criteria; therefore, auto delay (as measured by LOS) is no longer considered a significant impact under CEQA. Particularly for areas served by transit (TPAs) such as the City of Santa Monica, those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." (New Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." (Ibid.) OPR also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate. (Id. at subd. (c).)

Pursuant to SB743, Section 15064.3 of the CEQA Guidelines was added by the Office of Planning and Research on December 28, 2018, and states that vehicles miles traveled (VMT) is the appropriate measure of transportation impacts. Section 15064.3(c) also states that the provisions of this section shall apply prospectively (i.e., only applicable to new projects after date of adoption) and were implemented statewide by July 1, 2020.

ii) Regional

1) Southern California Associations of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) (adopted April 7, 2016) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) presents a long-term vision for the region's transportation system through the year 2040 and identifies mobility, accessibility, sustainability, and high quality of life as the principals most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated

in the 2016-2040 RTP/SCS, SB 375 requires SCAG and other Metropolitan Planning Organizations (MPO) throughout the State to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing, and environmental planning.[2] Within the 2016-2040 RTP/SCS, the overarching strategy includes plans or High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[3] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[4] The project site is located within an HQTA as designated by the 2016–2040 RTP/SCS.[5,6]

On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. However, the RTP/SCS is currently pending certification by the California Air Resources Board (CARB). The circulation of the Notice of Preparation (NOP) for the project began on May 6, 2020, which was prior to the adoption of the 2020-2045 RTP/SCS. Therefore, the analysis in this DEIR focuses on the project's consistency with the 2016-2040 RTP/SCS. Please refer to Section IV.E, Land Use/Planning, for a detailed discussion of the applicable provisions of the 2016–2040 RTP/SCS that apply to the project. As demonstrated therein, the project would be consistent with applicable goals and principles set forth in the 2016–2040 RTP/SCS.

iii) Local

1) Santa Monica Municipal Code (SMMC) Article 9, Chapter 9.28, Section 140, Bicycle Parking

The SMMC requires all new development to provide a minimum number of bicycle parking spaces based on the primary uses of the site. Bicycle spaces must be provided for both short-term and long-term parking needs. This section of the SMMC also requires bicycle parking to be provided in a safe, secured, well-lit, and accessible location on the project site with adequate signage.

2) SMMC Article 9, Chapter 9.53, Transportation Demand Management (TDM)

The purpose of the City's TDM Ordinance is to proactively manage traffic congestion, reduce automobile dependence, and enhance transportation choices by requiring trip reduction plans. The ordinance applies to employers with 10 employees or more and developers of projects with 7,500 sf of floor area 16 units, or mixed-use project with 16 units or more. Under the City's TDM Ordinance, employers and developers shall strive to achieve an Average Vehicle Ridership (AVR) of 1.5 prior to January 1, 2016. After January 1, 2016, employers and developers shall strive to achieve the AVR for their respective land use designation. Within the Bergamot Transit Village, the target AVR is 2.0 after January 1, 2016.

Under the City's TDM Ordinance, employers with 10 to 49 employees are required to provide each of their employees with information about carpooling/vanpooling, transit, air pollution, bicycle routes and facility, walking and pedestrian safety, and alternatives to driving alone to work every day. Employers of 50 or more employees are required to prepare and submit an Emission Reduction Plan, which shall include the option of 1) purchase of mobile source emission reduction credits or 2) preparation and implementation of Employee Trip Reduction Plan to achieve the applicable AVR target. Additionally, developers of projects

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[2] *SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 166.*

[3] *Ibid, p. 189.*

[4] *Ibid, p. 76.*

[5] *SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

[6] *Metro, High Quality Transit Areas – Southeast Quadrant, Map.*

are required to prepare and implement a TDM plan that would include physical and programmatic elements to reduce single occupancy vehicle trips and achieve the targeted AVR. Annual monitoring is a requirement of the developer TDM Plan. The project's TDM Plan is described in II. Project Description.

3) SMMC Article 9, Chapter 9.73, Transportation Impact Fee

Article 9, Chapter 9.73 of the City's Municipal Code is intended to ensure that new development projected through the year 2030 to pay its fair share of the costs of providing transportation infrastructure necessary to implement the policies and achieve the No Net New PM Peak Hour trips goals of the LUCE. The new development is required to fund transportation improvements such as new sidewalks, crosswalks, traffic signal upgrades, transit, and bicycle facilities that are necessitated by the new trips associated with land use change. The transportation impact fees are based on residential units or commercial square footage. The fee is charged prior to issuance of building permits, unless state law requires the City to accept later fee payments.

4) City of Santa Monica General Plan Land Use and Circulation Element

The LUCE, adopted in July 2010, provides a framework to integrate land use and transportation to reduce vehicle trips; encourage walking, bicycling, and transit use; and create active pedestrian-oriented neighborhoods. The LUCE establishes the goal of achieving No Net New PM Peak Hour vehicle trips generated within Santa Monica. To achieve this goal, a primary strategy in the LUCE is vehicle trip reduction. The LUCE proposes the creation of a comprehensive multi-modal transportation system that builds on the City's investment in transit and the opportunity offered by the coming of the Expo LRT line. The LUCE identifies local strategies that manage trips, with aggressive requirements for trip reduction, transit enhancements, pedestrian and bike improvements, and shared parking. Further, the LUCE requires projects above the established base height to provide Transportation Demand Management (TDM) trip reduction measures that reduce automobile travel demand and incentivize alternative modes such as carpool, vanpools, and shuttles, walking, bicycling, and shared parking are all encouraged.

Many policies within the LUCE relate to transportation/circulation. The most pertinent polices are listed and analyzed for project consistency in ~~the~~ Section IV.G.3. Environmental Impacts and Mitigations, Table IV.G-1, Project Consistency with Transportation Policies of the LUCE, below.

5) Santa Monica Bike Action Plan

The City of Santa Monica adopted a Bike Action Plan in October 2011. The Bike Action Plan outlines community priorities that will guide and coordinate implementation of bicycle programs and the LUCE bicycle network, and encourage residents, employees, and visitors to make bicycling their transportation of choice. It provides both a 20-year vision and a 5-year implementation strategy for further integrating bicycles into the City of Santa Monica.

6) Santa Monica Pedestrian Action Plan

The City of Santa Monica also adopted a Pedestrian Action Plan in 2016. The plan provides a comprehensive approach to pedestrian policy in Santa Monica using a multi-disciplined approach to making physical, operational and educational improvements that prioritize pedestrians. The goals, policies and actions in the Pedestrian Action Plan address the input gathered from the community, stake holders and key professionals such as public safety personnel, transportation planners and engineers, while aligning a vision with data analysis to develop strategies that prioritize actions for the short- and long-terms. The Plan introduces a Vision Zero program which envisions zero fatalities from pedestrian crashes. Components of the program include prioritizing and organizing community safety goals and facilitating the systematic implementation of current and future actions that support safer walkability for people of all ages and abilities.

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

A. Thresholds of Significance

Appendix G of CEQA Guidelines provides a set of screening questions that address impacts with regard to transportation. Specifically, the Guidelines state that a project may have a significant impact on transportation if it would:

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

CEQA requires a lead agency to determine the significance of all environmental impacts (Public Resources Code Section 21082.2; CEQA Guidelines Section 15064). For the analysis of consistency with circulation plans, programs, ordinances, and policies; hazardous design features, and emergency access, this EIR utilizes Appendix G of the CEQA Guidelines as the thresholds. The CEQA Guidelines provide that lead agencies may use the questions set forth in the Appendix G of the CEQA Guidelines to assess the significance of the environmental effects associated with a project. For the analysis of vehicles miles traveled, the analysis uses the City's VMT thresholds which were adopted in June 2020 as provided below:

Conflict with CEQA Guidelines Section 15064.3 (vehicle miles traveled)

For projects that are subject to a VMT analysis (not screened out per the City's VMT guidance), the City has adopted two sets of VMT significance thresholds, both of which are applied to land use projects:

- Threshold 1: VMT per capita: A project's VMT per capita must not exceed the existing Citywide average VMT per capita for that particular land use.

City of Santa Monica VMT Threshold: Significance Criteria 1 (VMT per Capita)

Land Use	Proposed Threshold
Residential	No greater than existing Citywide average VMT/capita
Commercial Employee	No greater than existing Citywide average VMT/employee
Retail	Any net increase in total City VMT

- Threshold 2: Total VMT: The project's combined total VMT for residents and commercial employees must be at least 16.8% below existing Citywide "business as usual" VMT per capita. Business as Usual VMT is defined as what the calculated VMT for the project would be if the project were generating VMT per capita at the existing citywide average.

City of Santa Monica VMT: Significance Criteria 2 (Total VMT)

	Project VMT	Existing City Average VMT/capita	Project Population	Business as Usual (BAU) VMT	Threshold
Residential	A	9.0	D	= (9.0 x D)	
Commercial Employee	B	19.2	E	= (19.2 x E)	

City of Santa Monica VMT: Significance Criteria 2 (Total VMT)

	Project VMT	Existing City Average VMT/capita	Project Population	Business as Usual (BAU) VMT	Threshold
	Total Residential + Employee (VMT (A +B)			**Total BAU VMT**	**Is Total Residential + Employee VMT at least 15.8% lower than Total BAU VMT?**

Projects exceeding either or both of these thresholds are considered to have a significant transportation impact on the environment. These City-specific thresholds reflect a local consideration to the City's existing transportation conditions as well as State and local land use and sustainability goals. This strategic approach would also ensure that new development will not hinder the City's progress towards reducing GHG emissions, improving mobility options, and implementation of the LUCE.

B. Methodology

1) Conflict with a program plan, ordinance or policy addressing the circulation system

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

2) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – Vehicle Miles Traveled

VMT Screening

As a first step in the transportation review of projects, the City has adopted screening criteria that can be used to "screen" out projects from VMT analysis. Projects meeting the VMT screening criteria are deemed to have a less than significant impact and no further VMT analysis is necessary. The Project is reviewed against the tiered screening criteria described below.

Tier 1: Does the project include the development of the following land uses, which are screened out from further analysis?

Table 1: Land uses Screened from VMT Analysis

- 200 residential dwelling units or less
- 100% affordable housing
- 50,000 sf or less of commercial floor area by land use type[1]
- New construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increase, 75% of the student body comes from within 2.0 miles of the school

Table 1: Land uses Screened from VMT Analysis

- Expansions of civic/government use (such as fire and police stations and utility facilities less than 50,000 sf or replacement of such/uses/facilities (in same or another location) to serve the community
- Local serving Parks and Recreation facilities as determined by City Staff

[1] Commercial uses covered under this screening criteria include retail, restaurant, movie theater, gym/fitness, grocery store/market. Hotel, medical office, office, and hospital uses less than 50,000 sf. Excludes museums, amusement parks, and other large regional trip attractors as may be determined by City Staff.

If yes, no further analysis is required. If no, move to Tier 2.

For a mixed-use project, the individual components of the project should be evaluated to determine if each can be screened out. For example, a mixed-use project with 150 units and 75,000 square feet of office area cannot be screened out at the Tier 1 level and would be required to move to Tier 2.

Tier 2: Is the project located within 0.5-mile walking distance of an Expo LRT station or 0.25 walking distance of Rapid BRT stop?[7]

If no, conduct VMT analysis. If yes, move to Tier 3.

Tier 3: Would the project provide more parking than required by Code (or if located in the Downtown, exceed parking maximums)?

If no, no further analysis is required. If yes, conduct VMT analysis.

Additionally, for a land use project, a less than significant impact would also result if:

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

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

Methodology for VMT Calculation

The City of Santa Monica developed a VMT Calculator tool to assess the VMT impacts of proposed development projects within the City. The VMT Calculator also assesses the effectiveness of selected TDM measures proposed for a project based on available research.

The VMT Calculator is specific to the City and utilizes land use and transportation data from the Santa Monica Travel Demand Forecast Model (TDFM), which is calibrated to local vehicle count collected in and around the City. The Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA states that travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT). The guidance states:

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[7] *Walking distance is defined as the actual physical distance that a person would need to walk based on the street network. BRT (bus rapid transit) stops includes stops for Big Blue Bus Rapid routes and Metro Rapid Bus routes.*

> *"To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an "apples-to-apples" comparison between thresholds, VMT estimates, and VMT mitigation estimate." (Appendix 1 – page 30).*

The VMT Calculator utilizes trip generation rates derived from the TDFM, which vary depending upon area of the City and proximity to transit. The trip length distribution is calibrated based on the cell phone probe data and Household Travel Survey. Detailed Census employment and demographic data is used to estimate the existing VMT rates per capita or per employee.

The VMT Calculator estimates VMT for a wide variety of potential land uses, including the office and restaurant uses proposed as part of the project. Analysis was conducted for the project using the City's VMT analysis procedures and VMT Calculator.

As noted in Section 2.0, Project Description, the Project would include the refurbishment of an existing three-story, 45,429 sf office building and the adjacent development of two new four-story, creative and business professional office buildings comprising a total of 129,256 sf of new floor area. If not developed for office space, up to 5,376 sf of ground floor space could alternatively be utilized for active retail/restaurant use. These Project land use characteristics are inputted in the VMT Calculator. Further, the Project's TDM measures as required by the City's current Transportation Demand Management (TDM) Ordinance (Santa Monica Municipal Code Section 9.53). These required TDM measures are inputted into the VMT Calculator to take into account VMT reductions that would occur and would be made conditions of approval for the Project:

- On-site transportation information in an on-site physical location, such as a bulletin board or kiosk, or through other media, such as on a website or other digital means
- A designated Project Transportation Coordinator
- New employee orientation
- Parking cash out (for leased spaces)
- Incentives for employees that live within one-half mile of workplace
- Information regarding availability of bike commute training offered either on-site or by a third party
- On-site shared bicycles intended for employee use during the workday, if citywide bikeshare is unavailable within two-block radius of Project site in the future
- Commuter matching services for all employees on an annual basis, and for all new employees upon hiring
- Information regarding the benefits of compressed work schedule, flex-time schedule, telecommuting, and guaranteed ride home
- Transit pass subsidy
- Bike valet, free of charge, during all automobile valet operating hours

3) Hazards Due to Design Features Analysis

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

4) Emergency Access

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

C. Project Impacts and Mitigation Measures

Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact Analysis:

Impact G-1 The project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The project would be consistent with the City's LUCE, TDM Ordinance, Bike Action Plan, Pedestrian Action Plan, and SCAG's SCS/RTP. Therefore, impacts would be less than significant.

Planning documents in the City that address transportation include the LUCE, TDM Ordinance, Bike Action Plan, and Pedestrian Action Plan. The project's potential to conflict with these policies in analyzed below.

i) City LUCE

The project's consistency and potential to conflict with transportation policies in the LUCE are discussed in Table IV.G-1.

Table IV.G-1
Project Consistency with Transportation Policies of the LUCE

Goal	Project Consistency
Policy LU2.5 Vehicle Trip Reduction. *Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle, and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle, and foot, and discourage vehicle trips at a district-wide level. Monitor progress-using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.*	**Consistent.** The project would increase office uses on an underutilized site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops (see Section IV.B [Air Quality], subheading AQMP Consistency). Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at 26th/Olympic Metro Line E Light. Rail Station. To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. While the project would not change the sidewalks along the 26th Street frontage, it would include the planting of street trees along 26th Street and Pennsylvania Avenue. Along Pennsylvania Avenue, the project would include landscape setback from the street providing seating opportunities for the restaurant/non-commercial space in Building B as well as for pedestrians using the lunch time food trucks. Such space would continue to provide and enhance pedestrians use of food trucks which assists in discouraging use of vehicles to travel for lunch. The project would also be within walking distance of a wide variety of residential, retail, and restaurant use. The project would implement a Transportation Demand Management (TDM) plan in accordance with the City's

Table IV.G-1
Project Consistency with Transportation Policies of the LUCE

Goal	Project Consistency
	TDM Ordinance.
Policy LU4.4 Pedestrian-Oriented Design. *Engage pedestrians with ground floor uses, building design, site planning, massing and signage that promote vibrant street life and emphasize transit and bicycle access.*	**Consistent.** The project would include a continuous sidewalk along Pennsylvania Avenue in an area that currently does not include a continuous sidewalk. The project would also include a ground level courtyard surrounded by the three project buildings. Pedestrian access would be available to all three buildings from the courtyard. Access to the courtyard would be provided from the public sidewalk on Pennsylvania Avenue. Pedestrian access to Building C would be available from the public sidewalk on 26th Street. Active ground floor use would be 60 percent, as included in Building B. Also, see discussion above (LUCE Policy LU2.6 Active Spaces).
Policy LU4.7 Pedestrian, Bicycle, and Transit Access. *Emphasize pedestrian and bicycle access throughout the City, with a special focus on neighborhood gathering areas. Provide direct and convenient bicycle and pedestrian connections between destinations. Prioritize land use patterns that generate high transit ridership at major transit stops.*	**Consistent.** See the discussion for Policy LU2.5.
Policy LU8.1 Transportation Demand Management. *Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.*	**Consistent.** The project would include a TDM plan to encourage the use of carpooling, bike commuting, and use of public transportation, including Metro's E Line light rail transit. The TDM plan would include a parking cash out for leased spaces, commuter matching services, transportation allowance, secure bicycling parking and valet service, and other incentives to increase multi-modal transportation and reduce trips to the site.
Policy LU8.2 Comprehensive Parking Management*. Comprehensively manage parking and parking policies to address housing affordability, congestion management, and air quality goals. Facilitate the creation of shared parking, particularly within activity centers, transit districts, and near Expo light-rail stations. Use pricing and other innovative strategies to manage parking availability.*	**Consistent.** See the discussion for Policy LU8.1.
Policy LU8.3 Pedestrian, Bicycle, and Transit Connections. *Ensure pedestrian, bicycle and transit mobility by creating facilities for comfortable walking throughout the City, a complete and safe bicycle network, and convenient and frequent transit service that will make transit an attractive option for all types of*	**Consistent.** The project would include a continuous sidewalk along Pennsylvania Avenue in an area that currently does not include a continuous sidewalk. To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. The project's location within 0.15 mile to the 26th/Bergamot Metro Line E Light. Rail Station and less than two blocks

Table IV.G-1
Project Consistency with Transportation Policies of the LUCE

Goal	Project Consistency
trips.	from existing bus stops would support transit use in the City.
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.*	**Consistent.** The project would include 35 short-term bicycle parking spaces on the exterior areas of the building (in addition to the 194 long-term bicycle spaces on Level A of the parking garage). The project would provide a continuous sidewalk along Pennsylvania Avenue (fronting the project site). This sidewalk would have direct access to sidewalks along 26th Street. Also, see discussion above (LUCE Policy LU2.5 Vehicle Trip Reduction and Policy LU15.4 Open and Inviting Development).
Policy S2.1 *Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan including, but not limited to: focusing new growth in mixed use, transit-oriented districts; focusing new growth along existing corridors and nodes; supporting the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and, promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City.*	**Consistent.** The project would expand an existing commercial office development in the BVT. The project's proximity to existing residential uses and transit would support VMT reduction in the City. The project would provide a landscaped sidewalk on its southern boundary along Pennsylvania Avenue, which is currently lacking a continuous sidewalk.
Policy S2.3 *Advance the No Net New Trips goal in the Land Use and Circulation Element with TDM projects such as expanded rideshare programs, parking management strategies, as well as development impact fees for public transit infrastructure.*	**Consistent.** See the discussion for Policy LU8.1.
LUCE Section 4.0 Circulation	
Policy T5.5 *Prioritize property access from transit, walking and bicycling over auto access.*	**Consistent.** The project would provide direct access to the buildings from sidewalks along 26th Street and Pennsylvania Avenue. The project would provide a landscaped sidewalk on its southern boundary along Pennsylvania Avenue, which is currently lacking a continuous sidewalk. 26th Street provides direct access to Metro's E Line light rail transit station 0.15 miles at 26th Street/Olympic and to Metro buses on Colorado Street, Broadway and Olympic Boulevard, in addition to the Expo Line Bike Path (0.15 miles) at 26th Street and Olympic Boulevard and other nearby bike lanes (e.g., Broadway, Stewart Street).
Policy T10.2 *Encourage major employers to provide covered and secure bicycle parking and shower and locker facilities for their bicycle commuters, or to assist in funding bicycle transit*	**Consistent.** The project would include a minimum of 229 bicycle spaces for employees and visitors. Of these, 194 would be long-term bicycle parking that would be located within enclosed/secure facilities on Level A of

Table IV.G-1
Project Consistency with Transportation Policies of the LUCE

Goal	Project Consistency
centers in nearby locations.	the parking garage. Access to these spaces would be provided with a shared driveway and ramp with vehicles on Pennsylvania Avenue. Bicycle facilities would also include showers accommodating up to eight individuals and locker facilities with up to 146 personal lockers all located in the parking garage on Level A.
Policy T15.1 *Reduce automobile trips starting or ending in Santa Monica, especially during congested periods, with the goal of keeping peak period trips at or below 2009 levels.*	**Consistent.** The project would implement TDM measures in accordance with the City's TDM ordinance to reduce its peak hour trips to the maximum extent feasible. In addition, the project site is located within 0.15 mile of the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops which would decrease peak hour vehicle trips. Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at 26th/Olympic Metro Line E Light. Rail Station. Additionally, see the discussion for Policy LU8.1.
Policy T21.3 *TDM program requirements shall be triggered for new development consistent with the LUCE performance standards.*	**Consistent.** See the discussion for Policy LU8.1.
Policy T25.3 *Minimize the width and number of driveways at individual development projects.*	**Consistent.** The project site currently has two driveways. The project would reduce the number of driveways as vehicle access for the project would be provided via one approximately 24-foot driveway on Pennsylvania Avenue that leads directly into the subterranean parking garage.
Source: City of Santa Monica General Plan, Land Use and Circulation Element, EcoTierra Consulting, 2020	

The project would be substantially consistent with the LUCE goals and policies addressing transportation. The project would be located within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station. In addition, the project would serve to reinforce many of the goals and objectives of the LUCE, which include encouraging expanded office and commercial employment uses in the City to maximize walking and active transportation modes to get to work in the City. The project would implement goals and policies related to street-level improvements that facilitate pedestrian access and create an active streetscape.

ii) Santa Monica Municipal Code: Bike Parking, TDM Ordinance and Transportation Impact Fee Ordinance

Consistent with SMMC Chapter 9.28, Section 140, Bicycle Parking, the project would include 35 short-term bicycle parking spaces on the exterior areas of the building (in addition to the 194 long-term bicycle spaces on Level A of the parking garage). Additionally, as required by the City's current Transportation Demand Management (TDM) Ordinance (SMMC Chapter 9.53), the project would be required to implement TDM measures to reduce net new vehicle trips. In addition, the project applicant would pay the TIF (SMMC Chapter 9.73) to fund for mobility improvements that reduce trips in the City.

iii) Santa Monica Bike Action Plan

The Bike Action Plan outlines community priorities that encourage residents, employees, and visitors to make bicycling their transportation of choice. Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at the 26th/Olympic Metro Line E Light Rail Station. The project would include a minimum of 229 bicycle spaces for employees and visitors. Of these, 194 would be long-term bicycle parking that would be located within enclosed/secure facilities on Level A of the parking garage. Access to these spaces would be provided with a shared driveway and ramp with vehicles on Pennsylvania Avenue. Bicycle facilities would also include showers accommodating up to eight individuals and locker facilities with up to 146 personal lockers all located in the parking garage on Level A. These project features would be consistent with and would support the goals of the Bike Action Plan.

iv) Santa Monica Pedestrian Action Plan

The Pedestrian Action Plan includes prioritizing and organizing community safety goals and facilitating the systematic implementation of current and future actions that support safer walkability for people of all ages and abilities. The project would not conflict with the Pedestrian Action Plan and would support the goals and policies in the Plan by providing a continuous sidewalk along Pennsylvania Avenue in an area that currently does not include a continuous sidewalk.

v) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

As stated previously, the circulation of the Notice of Preparation (NOP) for the project began on May 6, 2020, which was prior to the adoption of the 2020-2045 RTP/SCS. As the 2020-2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the same goals and strategies are similar between the two plans. Like the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses and builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Please refer to Section IV.E, Land Use/Planning, for a detailed discussion of the applicable provisions of the 2016–2040 RTP/SCS that apply to the project. As demonstrated therein, the project would be consistent with applicable goals and principles set forth in the 2016–2040 RTP/SCS.

Mitigation Measures:

None required.

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact G-2 The project would not conflict with CEQA Guidelines section 15064.3, subdivision (b) which addresses vehicles miles traveled. The project's VMT per employee would be less than existing Citywide average, and its total VMT would be more than 16% below business as usual. Therefore, impacts would be less than significant.

<u>VMT Screening</u>

The proposed project was reviewed against the City's VMT screening criteria system to determine if a VMT analysis would be required.

<u>Tier 1: Does the project include the development of the land uses in Table 1, which are screened out from further analysis?</u> *(If yes, no further analysis is required. If no, move to Tier 2)*

The proposed project consists of approximately 169,309 sf of office/creative office and 5,376 sf of restaurant space. There proposed retail space is less than 50,000 sf and is therefore screened out.

The commercial office floor area exceeds the City's Tier 1 screening criteria of 50,000 sf. Further analysis is required; therefore, the Project was reviewed against the City's Tier 2 screening criteria (proximity to transit).

Tier 2: Is the project located within 0.5-mile walking distance of an Expo LRT station or 0.25 walking distance of Rapid BRT stop? *(If no, conduct VMT analysis. If yes, move to Tier 3)*

The proposed project is located 0.2 miles from the 26th Street/Bergamot Station on the E LRT Line. This is less than the threshold of being within a 0.5-mile walking distance to an E Line station. The Tier 2 screening criteria is met and so the project should be reviewed against the City's Tier 3 screening criteria (related to parking).

Tier 3: Would the project provide more parking than required by Code (or if located in the Downtown, exceed parking maximums)? *(If no, no further analysis is required. If yes, conduct VMT analysis.)*

The proposed project consists of the refurbishment of one existing office building as well as the development of two new office buildings. A total of 399 parking spaces serving all three office buildings would be located in a three-level subterranean garage. The Bergamot Area Plan requires 2.0 parking spaces per 1,000 sf of commercial space. When this standard is applied to the entire project (including existing Building C, for which parking is currently provided in the existing surface parking lot), the project would be required to provide 349 parking spaces. The project's 399 parking spaces would exceed the total Code-required parking. Because the total parking supply will exceed the current Code-required parking for the three buildings, the project would provide more parking than required by Code and a VMT analysis is required. [8]

VMT Analysis

Project Comparison to Significance Threshold 1

Based on the most recent data available from the City's TDFM, the existing citywide work VMT per employee is 19.2. Therefore, this is the current threshold applied to the project. The total project (including the existing office to remain) is estimated by the VMT Calculator to produce a total of 2,096 daily vehicle trips[9] and a total daily VMT of 17,780, including office employees, restaurant employees, and restaurant patrons. The daily work VMT per employee is estimated at 13.6, less than the threshold of 19.2 for existing citywide work VMT per employee. Thus, the project is projected to have a less-than-significant impact on work VMT per employee as estimated by the VMT Calculator under the City's Significance Threshold 1.

Project Comparison to Significance Threshold 2

The proposed project would have an estimated 713 employees, including 678 office employees (4 employees per thousand square feet) and 36 restaurant employees (10 employees per 1,500 square feet). In terms of the City's VMT Significance Threshold 2, the total employee VMT calculated for the project (not including restaurant patrons) would be 9,697 miles, which is 29.2% lower than the "business as usual" employee VMT. Therefore, when reviewed against the City's Significance Threshold 2, the proposed project would have a less than significant VMT impact. Table IV.G-2 shows this analysis.

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[8] *For the project's floor area in new Buildings A and B, the project is providing parking at the 2.0 space per 1,000 square foot standard required under the Bergamot Area Plan, and the project's overall parking in excess of this standard is the result of the project's right to relocate existing surface parking spaces that preceded the adoption of the Bergamot Area Plan. However, in performing a VMT analysis for the project, this transportation study for the EIR is taking a conservative approach by applying the 2.0 space per 1,000 square foot parking standard to the entire project instead of only to the new floor area in Buildings A and B.*

[9] *See Figure 3 of the Transportation Study for details of the City's VMT Calculator.*

Table IV.G-2
Significance Threshold 2 VMT Analysis

Land Use	Existing City Average VMT/capita	Project Population	Business as Usual (BAU) VMT	Threshold (16.8% below BAU VMT)	Project VMT
Commercial Employee	19.2	713	13,690	11,390	9,697
Residential	9.0	0	0	0	0
		Total	**13,690**	**11,390**	**9,697 - 29.2%**

Since the project's VMT calculations would not exceed VMT Significance Threshold 1 and Significance Threshold 2, the proposed project would have a less-than-significant impact on CEQA Guidelines section 15064.3, subdivision (b).

Mitigation Measures:

None required.

Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact G-3 The project would not substantially increase hazards due to a design feature. Impacts would be less than significant.

Development would be internal to the site and access to the site would remain relatively consistent with the existing access points. The proposed project does not include any hazardous design feature such as sharp curves or dangerous intersections on- or off-site, nor does the proposed project propose any hazardous or incompatible uses. Furthermore, there are no existing hazardous design features such as sharp curves or dangerous intersections on-site or in the surrounding project area. The proposed project would provide a driveway off of Pennsylvania Avenue, similar to existing conditions. Therefore, impacts would be less than significant.

Mitigation Measures:

None required.

Would the project result in inadequate emergency access?

Impact G-4 The project would not result in inadequate emergency access ~~substantially increase hazards due to a design feature~~. Impacts would be less than significant.

Emergency access to the project site is currently provided to emergency vehicles on Pennsylvania Avenue and 26th Street. The site plan for the proposed project would be reviewed prior to issuance of a building permit to ensure that all SMFD fire safety requirements (including those related to emergency access) are met. The proposed project would not result in inadequate emergency access. Therefore, impacts would be less than significant.

Mitigation Measures:

None required.

4. CUMULATIVE IMPACTS

Conflict with a program plan, ordinance or policy addressing the circulation system

For the analysis of consistency with plans, ordinance, and policies addressing the circulation system, the geographic scope of the cumulative transportation analysis is the City of Santa Monica limits. Transportation policies are made at the City level; therefore, the City of Santa Monica is an appropriate geographic scope. Cumulative transportation impacts could occur if other future development projects in conjunction with the project would conflict with plans, ordinance policies addressing the circulation system. However, as previously analyzed, the project would be consistent with the City's LUCE, TDM Ordinance, Bike Action Plan, and Pedestrian Action Plan and would not conflict with any policies, plans, or programs addressing circulation. Other pending/future employment projects in the City would similarly be reviewed by the City to ensure consistency with the LUCE, TDM Ordinance, Bike Action Plan, and Pedestrian Action Plan. Therefore, cumulative impacts related to consistency with transportation plans and policies would be less than significant.

Conflict with CEQA Guidelines Section 15064.3 Subdivision (b)

With regard to VMT, VMT measures the full length of the trip including origin and destination. As discussed under OPR's Technical Advisory, "metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa." (OPR Technical Advisory p. 6.) Consequently, please see the analysis above for discussion of combined project specific and cumulative analysis.

Hazards due to Design Features

With regard to operation, hazards due to design features and emergency access are generally project and project site specific, and associated impacts are generally not additive between projects. Furthermore, like the Project, each of the cumulative projects would be subject to site plan review and would meet City street design and access requirements. Therefore, during operation of the Project in combination with the cumulative project, hazards due to design features and inadequate emergency access would be less than significant.

Emergency Access

During construction, emergency access could be impeded as a result of the construction traffic particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes), that may disrupt traffic flows, limit turn lane capacities, and generally slow traffic movement. However, as required by the City's Construction Management Ordinance, the Project and other future construction projects would be required to implement a Construction Impact Management Plan. These plans, which would address construction traffic routing and control, vehicular and pedestrian safety, pedestrian/bicycle access and parking, street closures, and construction parking in the area, would be reviewed by the City with an understanding of the other projects undergoing construction in the vicinity simultaneously. Thus, implementation of the City-approved CIMP for cumulative projects would ensure the continued provision of emergency access. Therefore, the project would not contribute to a cumulatively significant impact on emergency access during construction.

Upon project buildout, the project would not alter or block existing emergency access routes. Therefore, the project would not contribute to a cumulatively significant impact on emergency access during operation.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project-level and cumulative impacts related to transportation would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
H. TRIBAL CULTURAL RESOURCES

1. INTRODUCTION

This section discusses the project's potential impacts on tribal cultural resources. Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

2. ENVIRONMENTAL SETTING

A. Ethnographic Setting

The project site is located in the City of Santa Monica, a fully urbanized community in southern California. There is evidence for human occupation of mainland southern California for as long as 13,000 years or possibly more.[1] Although past development and sediment deposition may have obscured prehistoric sites, no prehistoric sites are known within the immediate 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 vicinity of the project site could be from any of the various past cultural epochs, they would most likely represent past occupation by the Gabrielino/Tongva.

The project site is located within the traditional ethnographic territory of the Gabrielino/Tongva peoples, a Takic-speaking group. The total Gabrielino/Tongva territory covered more than 1,500 square miles and included the watersheds of the Los Angeles River, San Gabriel River, Santa Ana River, and Rio Hondo. The Gabrielino/Tongva also occupied the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities 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, as well as ritual sites.

The Gabrielino/Tongva arrived around 500 B.C. and exhibited a complex culture, social organization, religious beliefs, and art and material production. The Gabrielino/Tongva were known for excellent artisanship in the form of pipes, ornaments, cooking implements, inlay work, and basketry. Although few specifics are known of Gabrielino/Tongva life, their economic system severed to manage food reserves (i.e., storage and processing), provide a market to exchange goods, and distribute resources. The development of the large coastal and littoral territorial villages of the Gabrielino/Tongva recorded in ethnohistoric accounts has fueled speculation about the achievement of a completely sedentary type of settlement. Temporary seasonal camps appear to have been utilized even in coastal areas where large village sites were located close to one another. Population estimates gleaned from historic reports indicate there were possibly more than 100 mainland villages; Spanish reports suggest village populations ranged from 50 to 200 people.[2] Prior to Spanish migration, the Gabrielino/Tongva population had been decimated

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[1] *City of Santa Monica, Planning and Community Development Department, Downtown Community Plan Project Final Environmental Impact Report, April 2017, page 3.7-1.*

[2] *Ibid, page 3.7-2.*

by diseases, probably European diseases spread via coastal stopovers by early Spanish maritime explorers.[3]

Due to the relatively long history of urban development, the full extent and density of Gabrielino/Tongva or other prehistoric culture occupation of the project vicinity is difficult to accurately characterize. However, the known presence of the Gabrielino/Tongva village at Kuruvungna Springs located 2 miles northeast of Downtown Santa Monica reveals that areas near the project site did have extended occupation by the Gabrielino/Tongva.

B. Historical Setting

i) Spanish Exploration and Mexican Occupation of the Santa Monica Region

The Portuguese navigator, Juan Rodriguez Cabrillo, sailing under the Spanish flag, commanded the first expedition along the California coast in 1542. As he sailed the Southern California coastline, he gave names to several geographical features, including San Pedro Bay, Santa Catalina Island, and Santa Monica Bay, where he is believed to have dropped anchor on October 9, 1542. Although the territory was placed under Spanish rule at that time, the territorial lands were not explored until 1769 when the King of Spain sent a party of missionaries to colonize California, creating missions up and down the coast, located approximately one day's journey apart.

The first direct contact between the Europeans and the Gabrielino is thought to have occurred in 1542 with the arrival of Cabrillo's small fleet at Santa Catalina Island, and later in 1602 when the Sebastian Vizcaino expedition visited San Clemente and Santa Catalina islands and the mainland near present-day San Pedro.[4] Later in 1769, the Gaspar de Portolá expedition crossed the Gabrielino homeland twice. Mission San Gabriel was founded on September 8, 1771 at a location near the Whittier Narrows. Sometime around 1774, Mission San Gabriel was moved to its present location to obtain more suitable land for agriculture. A second mission, San Fernando, was established within Gabrielino territory in 1797.

Mission life was highly regimented and contrasted sharply with the traditional Gabrielino lifeway; as a result, colonization had a dramatic and negative effect on Gabrielino society, including fugitivism. The traditional Native American communities were depopulated and epidemics caused by the introduction of European diseases further reduced the Native American population. Between 1832 and 1834, the Mexican government implemented a series of secularization acts that were theoretically designed to turn over the mission lands to the native populations; however, most of this land was taken over by Mexican civilians. Consequently, the primary result of secularization was increased fugitivism among the Gabrielino.[5] The later American takeover of California brought further hardships to the Gabrielino who eventually settled at small Native American and Mexican settlements in the Eagle Rock and Highland Park districts of Los Angeles as well as in Pauma, Pala, Temecula, Pechanga, and San Jacinto.

Many of the soldiers of the Spanish explorers and missionaries were subsequently granted large tracts of land in payment for their services, which began the Rancho system in California. When California became Mexican territory in 1822, the area around Santa Monica was not included in any Spanish land grants. As early as 1828, Don Francisco Sepulveda took possession of an area that would later be granted to him by Mexican Governor Juan Alvarado in 1839.[6] The Rancho San Vicente y Santa Monica, as it came to be known, was a 33,000- acre area bordered by the Pacific Ocean on the west, Santa Monica Canyon on the north, present- day Pico Boulevard on the south, extending east to present-day Westwood, encompassing what eventually became Downtown Santa Monica. With the cession of California to the U.S. following the Mexican-American War, the 1848 Treaty of Guadalupe Hidalgo provided that the previous Mexican land

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[3] *Ibid.*

[4] *Ibid, page 3.7-3.*

[5] *Ibid.*

[6] *City of Santa Monica, Historic Preservation Element, prepared by PCR Services Corporation and Historic Resources Group, September 2002.*

grants would be honored. As required by the Land Act of 1851, a claim for Rancho San Vicente y Santa Monica was filed with the Public Land Commission.

C. Native American Heritage Commission Sacred Lands File

The California Native American Heritage Commission (NAHC) is a Statewide Trustee Agency for the protection and preservation of Native American cultural resources pursuant to PRC Section 21070. The NAHC maintains a confidential Sacred Lands File (SLF) that contains sites of traditional, cultural, or religious value to the Native American community. The SLF search is a search of recorded Native American sacred sites and burial sites as defined by the NAHC and PRC Sections 55097.94(a) and 5097.96.

The NAHC was contacted on April 30, 2020, to request a search of the SLF. The NAHC responded to the request in a letter dated May 8, 2020 and indicated that the SLF was completed with negative results. However, the NAHC noted that the absence of specific site information does not indicate an absence of Native American cultural resources in the area and recommended that Native American individuals and organizations be contacted to elicit information and/or concerns regarding cultural resource issues related to development of the project. The NAHC response included a consultation list of tribes with traditional lands or cultural places located within the boundaries of Los Angeles County. Copies of the NAHC response and the list of contacts provided by NAHC are included in Appendix J of this Draft EIR.

D. Native American Outreach

In accordance with Assembly Bill 52 (AB 52), the City submitted request to consult letters to the identified Native American individuals and organizations on the CEQA Tribal Consultation List on June 10, 2020. Recipients were requested to respond within 30 days of receipt of the letter if they wished to engage in government to- government consultation per AB 52. Of the eight groups and/or individuals contacted, one responded with comments. On June 23, 2020 the City received a letter via email from Mr. Andrew Salas, Chairperson, of the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) as part of the AB 52 consultations.

The Gabrielino Band of Mission Indians – Kizh Nation, represented by Andrew Salas, identified the project site as being within their Ancestral Tribal Territory and requested consultation on the project. The City provided additional information on the site and conducted a consultation via telephone with the Gabrielino Band of Mission Indians – Kizh Nation representatives Andrew Salas and Matt Teutimez, on July 2, 2020. The consultation included geotechnical information that identifies the site is a former clay pit and that, based on the site plan, ground disturbance would only occur within original disturbed soils. Based on information provided by the City and discussion on the call, the Tribe stated they have no concerns related to the project as proposed. The City concluded consultation on July 6, 2020 and the conclusion was accepted by the Tribe on July 17, 2020. Copies of the correspondence related to the consultation are included in Appendix J. To date, no other response letters from the Native American community have been received as part of the AB 52 tribal consultation effort. As a result of the City's consultation efforts, no known tribal cultural resources have been identified within the project site or vicinity.

E. Regulatory Framework

i) Assembly Bill 52

The Native American Historic Resource Protection Act (Assembly Bill ["AB"] 52) took effect July 1, 2015 and incorporates tribal consultation and analysis of impacts to tribal cultural resources into CEQA. It requires tribal cultural resources to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California Native American tribes. Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt a ND or MND are subject to AB 52. A significant impact on a tribal cultural resource is considered a significant environmental impact, requiring feasible mitigation measures.

Tribal cultural resources are defined as either of the following:

1. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources as set forth in PRC Section 21074(a)(1).
2. The lead agency, supported by substantial evidence, chooses to treat the resource as a tribal cultural resource as set forth in PRC Section 21074(a)(2)).

The first category requires that the tribal cultural resources qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource granted that the lead agency supports its determination with substantial evidence and considers the resource's significance to a California Native American tribe. The following is a brief outline of the process:[7]

1. A California Native American tribe must first request in writing to be notified by lead agencies of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe.
2. Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested project notification.
3. A tribe must respond, in writing, within 30 days of receiving the notification if it wishes to request consultation.
4. The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
5. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource; or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
6. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality, does not however apply to data or information that are, or become publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the project applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency (PRC Section 21082.3(c)(2)(B).

3. ENVIRONMENTAL IMPACTS AND MITIGATIONS

A. Thresholds of Significance

Appendix G of the CEQA Guidelines provides screening questions that address tribal cultural resources, which frame the impact assessment methodology used in this analysis. Specifically, Appendix G of the CEQA Guidelines states that a project may have a significant adverse impact on cultural resources if it would do any of the following:

[7] *PRC Sections 21080.3.1 – 21080.3.3.*

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is:

   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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.

B. Methodology

The analysis of tribal cultural resources provided in this section is based on review of the project site's history of development as well as AB52 tribal consultation. Tribal consultation pursuant to AB52 consisted of project notification and request to consult letters that the City submitted to Native American individuals and organizations and follow-up Native American consultations.

C. Project Impacts and Mitigation Measures

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Impact Analysis:

Impact H-1: The project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, since no tribal cultural resources were identified as located within the project site, or its immediate adjacency. No impacts to tribal cultural resources would occur.

Construction activities associated with the project would involve the refurbishment of the existing site building, earthmoving activities associated with excavation and grading for the subsurface parking levels, and the transport and disposal of demolished building materials resulting from refurbishment, as well as excavated soil. Grading, site preparation and excavation would require the export of approximately 55,000 cy of soil export for excavation for the subterranean project components. Soil export activities could require up to 3,200 truck trips to haul soil off-site. The depth of excavation would be approximately 37 feet below surface grade.

As discussed in Section IV.D, Hazards and Hazardous Materials, from 1952 to 1967, the project site appeared to be part of a clay borrow pit used for clay brick manufacturing. The northeast part of the site was occupied by the clay pit. Small buildings or storage areas were present on the west part of the site. A brick manufacturing plans was present to the east and southeast of the site. Therefore, given the extensive on-site grading/excavation associated with the clay pit, it is highly unlikely that uncovered tribal cultural resources would be buried beneath the site. Furthermore, as previously discussed, the NAHC letter dated May 8, 2020 and that the SLF was completed with negative results.

The City commenced tribal notification for this project in accordance with AB 52 on June 10, 2020 via a mailing to tribal representatives of the following tribes that had requested notification of projects within the area including the project site:

- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Soboba Band of Luiseno Indians

The 30-day notification response window closed on July 10, 2020. On June 23, 2020, the City received a letter via email from Mr. Andrew Salas, Chairperson, of the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) as part of the AB 52 consultations.

The Gabrielino Band of Mission Indians – Kizh Nation, represented by Andrew Salas, identified the project site as being within their Ancestral Tribal Territory and requested consultation on the project. The City provided additional information on the site and conducted a consultation via telephone with the Gabrielino Band of Mission Indians – Kizh Nation representatives Andrew Salas and Matt Teutimez, on July 2, 2020. The consultation included geotechnical information that identifies the site is a former clay pit and that, based on the site plan, ground disturbance would only occur within originally disturbed soils. Based on information provided by the City and discussion on the call, the Tribe stated they have no substantial evidence of TCRs on the site and no concerns related to the project as proposed. The City concluded consultation on July 6, 2020 and the conclusion was accepted by the Tribe on July 17, 2020. As a result of the City's consultation efforts, no tribal cultural resources have been identified within the project site or vicinity. Therefore, there would be no impact to tribal cultural resources.

Mitigation Measures:

None required.

4. CUMULATIVE IMPACTS

Based on search results by NAHC and consultation with Native American tribes, the project site does not contain tribal cultural resources on site. Accordingly, the project would not contribute to a significant cumulative impact to tribal cultural resources. Cumulative impacts to tribal cultural resources would be less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074; therefore, impacts related to tribal cultural resources would be less than significant. No mitigation measures are required.

Cumulative impacts would be less than significant.

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V. OTHER CEQA CONSIDERATIONS

1. SIGNIFICANT UNVAVOIDABLE ENVIRONMENTAL EFFECTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

Based on the analysis contained in **Chapter IV, Environmental Impact Analysis**, of this EIR, construction and operation of the project would not result in any significant unavoidable environmental impacts.

2. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines states that the "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." Section 15126.2(c) further states that "irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The types and level of development associated with the project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the project and would continue throughout its operational lifetime. The development of the project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources and (3) the transportation of goods and people to and from the project site.

Construction of the project would require consumption of resources that are not replenishable or that may renew slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The consumption of these resources would be spread out through the construction period. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

Furthermore, Sustainability has been an integral part of the project's architectural and landscape design concept to ensure the project implements the City's sustainable goals and objects and to integrate LEED principles into the project's infrastructure, design, and operation. Specific focus was given to conserving natural resources in line with the City's conservation priorities in reducing water usage and energy usage as well as incorporating sustainable mass timber construction.

The project would, at a minimum, comply with the sustainability requirements included in state and City regulations and codes. All new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements, and the refurbishment of Building C would comply with all applicable state and City codes. Key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the proposed project. However, the project's use of non-renewable resources would be on a relatively small scale and

consistent with regional and local growth forecasts for the area, as well as state and local goals for reductions in the consumption of such resources. In addition, the project site contains no energy resources that would be precluded from future use through Project implementation.

3. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 12126.2(d) of the CEQA Guidelines states:

> *Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

A. Direct Growth (Housing and Economic Growth)

Development of the project would not remove existing housing or construct new housing and would, accordingly, not directly induce housing growth. However, the project would develop 169,285 square-feet of office space and 5,400square-feet of restaurant/retail space at the project site. Table V-1, Project Generation of Employment, presents the project's estimated contributions to employment growth and compares the growth to SCAG projections for the City.

Table V-1
Project Generation of Employment

Employees			
Proposed Uses	**Amount (sf)**	**Employment Generation Factor** [a]	**Number of Employees**
Office	169,285	4 employees/1,000 sf	677
Restaurant/retail	5,400	10 employees/1,500 sf	36
Total	174,685		713
Existing Uses	**Amount (sf)**	**Employment Generation Factor** [a]	**Number of Employees**
Office	45,529	4 employees/1,000 sf	182
Net New Employees Generated by Project			**531**

Time Period	**Project Increase**	**SCAG Projected Citywide Value**	**Project Percentage of Citywide Value**
2020 Baseline [c]	646	105,524	0.6
2024 Buildout [c]	646	105,156	0.6
2040 Growth Projection Horizon [b]	646	103,700	0.6

Notes: sf = square feet

a Employee generation factor source: City of Santa Monia and Project Applicant, Kilroy Realty Corporation, 2020.

b Existing Building not fully occupied as of 2020. The number of employees for existing building represents a scenario with full occupancy.

Table V-1
Project Generation of Employment

c	*Project baseline and buildout year values were interpolated from the difference between values published in SCAG's regional and local projection documents. Based on these published values, employment in Santa Monica is expected to decrease at a rate of 0.09 percent per year from 105,800 jobs in 2017 (source: Southern California Association of Governments, Local Profiles Report 2019, Profile of the City of Santa Monica, May 2019, page 3) to 103,700 jobs in 2040 (source: Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016, Demographics and Growth Forecast Appendix, Table 11: Forecast Jurisdictional 2040, pages 23 to 29).*
Source (table): EcoTierra Consulting, Inc., 2020.	

As shown in Table V-1, the project would be expected to generate approximately 646 net new employees at the project site. This increase in employment would not be significant relative to the City's existing employment or its projected employment for the project buildout year (2024) or the regional planning growth forecast horizon year (2040), representing 0.6 percent of the existing and projected jobs in the City. In addition, it should be noted that the restaurant/retail use would likely draw employees from the existing local workforce as most employees do not typically relocate for jobs in this employment sector. Therefore, the project would not significantly increase the population of the City.

Furthermore, the project would foster economic growth and revitalize an area by adding new office space and restaurant/retail uses to the currently underutilized project site. The project would support the 2016-2040 RTP/SCS regional growth goals of maximizing mobility and accessibility by locating professional office buildings in close proximity to transit and within walking distance of a wide variety of residential, office, retail, and restaurant uses. In addition, the project would be substantially consistent with the goals and policies of the LUCE. The project would implement goals and policies related to encouraging development in transit rich areas, creating active and content sensitive spaces, and reducing vehicle trips. The Bergamot Transit Village is identified in the LUCE as one of the focus areas for new creative office employment. The project would also be consistent with the applicable objectives and goals of the BAP. As stated in the BAP, creative office space and employment in the area is an important economic generator for the City of Santa Monica and the jobs base is consistent with priorities identified in the City's strategy for a Sustainable Local Economy. Accordingly, the direct growth impacts of the project would be less than significant.

Mitigation Measures:

None required.

Level of Significance After Mitigation:

Less than significant.

B. Indirect Growth (Utility and Infrastructure Growth)

Although the project would increase the density at the project site, it would not necessitate the extension of roads or other infrastructure. The project's location near existing transit opportunities would increase those transit option's viability through increased ridership as a result of the introduction of new users, which would potentially reduce, rather than increase, the need for additional infrastructure. Street access and utilities are fully built-out in the area. Roadways and other infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.) associated with the project would not induce growth because the project site is located in a developed area of the City and connections to all local utility infrastructures, including water, wastewater, electricity, and natural gas, are readily available to the project site. Therefore, utility infrastructure would not be expanding into a new area as a result of the project. The project would not cause growth (i.e., new housing or employment generators) that exceeds projected/planned levels or accelerate development in an undeveloped area that would result in an adverse physical change in the environment or introduce unplanned infrastructure. Therefore, the Project would not spur additional growth other than that already anticipated. Accordingly, the indirect growth impacts of the project would be less than significant.

Mitigation Measures:

None required.

Level of Significance After Mitigation:

Less than significant.

4. POTENTIAL SECONDARY EFFECTS OF MITIGATION MEASURES

Section 15126.4(a)(1)(D) of the State CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the project as proposed. The analysis of project impacts in Chapter IV, Environmental Impact Analysis, of this Draft EIR, resulted in recommended mitigation measures for several environmental topics, which are identified below. The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required mitigation measures. For the reasons stated below, it is concluded that the project's mitigation measures would not result in significant secondary impacts.

A. Cultural Resources

Mitigation Measures MM CUL-1 establishes the protocol in the event that archeological resources are discovered during construction, including protection, evaluation, and treatment procedures, and requires the preparation of a final report and appropriate California Department of Parks and Recreation Site Forms for submittal by the Applicant or its Successor to the South Central Coastal Information Center, and representatives of other concerned agencies as appropriate. As such, this measure represents procedural actions, which would not increase or generate additional environmental impacts, and would be beneficial in protecting archeological resources that could potentially be encountered onsite. No construction or operation of additional uses, structures or other improvements, and no additional construction activities, would be required. Accordingly, implementation of MM CUL-1 would not result in adverse secondary impacts.

B. Geology and Soils

Mitigation Measures MM GEO-1 and MM GEO-2 establish protections for paleontological resources through monitoring as well as the treatment, reporting and salvaging of resources should they be encountered. These mitigation measures would ensure that paleontological resources are not damaged or harmed consistent with State CEQA Guidelines and regulations that provide for the protection of such resources. As such, these measures represent procedural actions, which would not increase or generate additional environmental impacts, and would be beneficial in protecting paleontological resources that could potentially be encountered onsite. No construction or operation of additional uses, structures or other improvements, and no additional construction activities, would be required. Therefore, the implementation of these mitigation measures would not result in significant secondary impacts on the environment.

C. Hazards and Hazardous Materials

Mitigation Measure MM G-1 requires the preparation of a Soil Management Plan that requires profiling of the subsurface soil in order to establish the procedures for screening, testing, segregation, and transport of potentially contaminated subsurface soils and the decontamination of methods for equipment that contacts such soils. While no additional physical development would occur as a result of MM G-1, the measure could potentially result in additional onsite earthwork, stockpiling, and sorting of contaminated soils for disposal (and related increases in construction air emissions and noise), as well as additional polluted runoff as a result of required equipment decontamination. However, any additional air emissions and noise would be minimal relative to the total amount of proposed earthwork and would be limited to the construction period. In addition, all construction activities, including decontamination procedures, would be required to adhere to the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08-DWQ) and the City of Santa Monica Urban Runoff Pollution Ordinance (Municipal Code Section 7.10), which provides for the prevention of polluted runoff. Accordingly, implementation of MM G-1 would not result in adverse secondary impacts.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

1. INTRODUCTION

The CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that would avoid or reduce the significant environmental impacts of the proposed project, while still attaining most of the basic project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

A. Alternatives to the Project

Section 15126.6 (a) of the CEQA Guidelines states the following requirement to discuss alternatives to a project:

> *An EIR shall describe a range of reasonable alternatives to the 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 comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

Section 115126.6(f)(1) of the State CEQA Guidelines states that among the factors that may be considered when addressing the feasibility of alternatives are: site suitability; economic viability; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries (projects with a regionally significant impact should consider the regional context); and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site.

B. Purpose

Section 15126.6(b) of the State CEQA Guidelines states the following purpose of the alternatives discussion:

> *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives or would be more costly.*

C. Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the State CEQA Guidelines states the following regarding the selection of alternatives:

> *The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from*

detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

D. Assumptions and Methodology

Whereas mitigation measures are designed to directly address and reduce a project's significant environmental impacts, the alternatives analysis examines the potential reduction in impacts that could result from changes to the project through, for example, modifications in design or modifications in development parameters.

Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project. Following CEQA Guidelines, the alternatives analysis is presented as a comparative analysis to the proposed project and assumes that all applicable mitigation measures identified for the project would apply to each alternative. Each alternative is considered against the project objectives to determine whether the alternative would feasibly attain most of the basic project objectives, and whether it would avoid or substantially lessen any of the significant impacts of the project.

Impacts associated with each alternative are compared to project-related impacts and are classified as greater (or higher), less (or lower), or essentially similar to (or comparable to) the level of impacts associated with the project. Environmental issues that were analyzed in the Initial Study and for which it was determined that there is no substantial evidence that the project could cause significant environmental effects are not included in the analysis of alternatives, because the alternatives were selected based on their potential to reduce the significant impacts of the project.

E. Project Objectives

As discussed in Section II, Project Description of this EIR, the basic and fundamental objectives for the proposed project are:

- Develop an underutilized site with a well-designed and financially feasible commercial project that is consistent with the character and operational characteristics of surrounding commercial uses and promotes the City's economic well-being, increases the local tax base, and fosters the continued evolution of an active, pedestrian-oriented, mixed-use district.
- Strategically concentrate new commercial development and facilitate employment centers at a location that capitalizes on existing and future infrastructure and services, including being in close proximity to the 26th Street/Bergamot Expo Light Rail station.
- Support the growth and expansion of creative arts, entertainment and related uses in the City of Santa Monica that enhance the economic vitality of the Bergamot Plan area, while adhering to a scale and character of development that is complementary to adjacent and nearby properties.
- Activate the 26th Street and Pennsylvania Avenue street frontages through the construction of streetscape improvements and a perimeter and interior landscaping program that enhances the visual appearance and urban character of the Bergamot Plan area.
- Facilitate safe and convenient pedestrian and bike travel and access to and from the 26th Street/Bergamot Expo Light Rail Station.
- Utilize sustainable building and site design features and construction practices, including mass timber construction and all-electric design for building core and shell, to provide a high-performance and environmentally efficient commercial project that will seek a Leadership in Energy and Environmental Design (LEED)® certification of Platinum.

- Support the City's sustainability goals through the refurbishment of an existing office building to reduce consumption of raw materials, material production and the resulting carbon impact.

2. ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(c) also states that an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

The alternatives that were considered but ultimately rejected as infeasible include the following:

A. Alternative Site within the Bergamot Area Plan Area

State CEQA Guidelines Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

The project would refurbish an existing 45,429 sf office building and construct 129,265 sf of new office space for a total of approximately 174,685 ~~174,684~~ sf of creative professional office space. The project would also include up to 5,376 sf of ground floor retail/restaurant space. Alternate sites within the Bergamot Area Plan (BAP) area were considered for development of the proposed project. Such sites would need to be large enough to accommodate up to approximately 174,685 ~~174,684~~ sf of commercial uses and be consistent with the allowed FAR and BAP building heights for the area, be undeveloped or underdeveloped (e.g., one- and two-story structures, surface parking lot), and be within walking distance (i.e., 0.15 mile) of the 26th/ Bergamot Metro Line E Light Rail Station. Very few sites within BAP area are large enough to accommodate the proposed project and be consistent with the allowed FAR and building heights. Even fewer lie within walking distance of the Metro Line E. Additionally, these alternate sites are not under the control or ownership of the City or project applicant and are not currently available for development. Therefore, alternate locations in the BAP area were determined not to be viable and these sites were discarded from further consideration.

B. All Residential Alternative

An All Residential Alternative that would include demolition of the existing office building and redevelopment of the entire site with all residential uses was considered in light of the City's strong goals encouraging housing projects. In this alternative and consistent with the definition of a housing project, several residential buildings would be developed on the project site. Assuming a Tier 2 project, the development on the project site would be similar in size to the proposed project, with a FAR of 2.0. Using the assumptions of an average of 1000 sf per unit, this alternative could result in approximately 1,500 residential units.

While this alternative would increase the housing stock, it would result in the loss of a significant amount of office space in the Bergamot Area Plan which is important to the economic viability of the area. The loss of office would be in conflict with the vision of the area as a center for the creative sector in the City. Furthermore, an all residential alternative would not achieve the main purpose and objectives of the project. Additionally, as analyzed in this Draft EIR, the project would not result in significant environmental impacts. Therefore, development of an all residential alternative (that could potentially reduce or even increase certain environmental impacts) is not necessary under CEQA. For these reasons, this alternative was considered and rejected.

3. SUMMARY OF ALTERNATIVES SELECTED

Based on the CEQA Guidelines, several factors were considered in determining the range of alternatives to be analyzed in this EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the possible potentially significant impacts of the proposed project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the proposed project, (3) the ability of the alternatives to meet the objectives of the proposed project, and (4) the feasibility of the alternatives. The outcome of these discussions identified four alternatives to analyze in the EIR (including the No Project Alternative).

The following alternatives analysis compares the potential environmental impacts of the four feasible alternatives with the proposed project for each of the environmental topics analyzed in detail in Section IV (Environmental Impact Analysis) of this EIR, although in less detail than in Section IV (pursuant to State CEQA Guidelines Section 15126.6(d)).

The four alternatives analyzed include the following:

- Alternative 1: No Project/No Build
- Alternative 2: Tier 1 (Reduced Height/Density) Development
- Alternative 3: Tier 3 (Increased Height/Density) Development
- Alternative 4: Mixed Use Office & Residential

Table VI-1, Alternatives Development Summary, shows a comparison of the alternative development summary including building square footage, proposed FAR, number of stories, and building heights. Detailed alternatives descriptions are included at the beginning of the analysis for each of the alternatives.

Table VI-1
Alternatives Development Summary

Building Square Footage	Proposed Project	Alternative 1 (No Project/ No Build)	Alternative 2 (Tier 1)	Alternative 3 (Tier 3)	Alternative 4 (Mixed Use Office & Residential)
Building A	69,266	—	44,282	87,778	129,256[a]
Building B	59,990	—	44,282[a]	87,778[a]	—
Building C (existing to remain)	45,429	45,429	45,429	45,429	45,429
Total	174,685	45,429	133,393	220,986	174,685
Net New	129,256	0	88,564	175,557	129,256
FAR					
	1.99	0.52	1.52	2.52	2.0
Stories					
Building A	4	—	2	5	4
Building B	4	—	2	5	—
Building C (existing to remain)	3	3	3	3	3
Height					
Building A	54 feet	—	32 feet	75 feet	60 feet
Building B	54 feet	—	32 feet	75 feet	—
Building C (existing to remain)	40 feet	40 feet	40 feet	40 feet	40 feet

NOTES:
BAP = Bergamot Area Plan
a If not developed for office space, up to 5,376 sf of ground floor space could alternatively be utilized for retail/restaurant. For the various issue areas, the EIR will analyze the land use scenario that results in the most conservative (worst case) environmental impacts

4. ALTERNATIVE ANALYSIS

A. Alternative 1: No Project/No Build

i) Description

As previously stated, CEQA Guidelines Section 15126.6(e) requires the analyses of a "no project" alternative. The No Project Alternative assumes the proposed project is not approved, and that the project site would remain in its current condition with the existing office building and a surface parking lot. No adaptive reuse/refurbishment of the existing office building would occur, and no new office buildings would be constructed with subterranean parking. There would be no publicly accessible open space and courtyard within the interior of the project site, and the existing sidewalk on Pennsylvania would not be improved. The analysis of the No Project Alternative assumes the continuation of existing conditions, as well as development of the cumulative projects shown in Table III-1 (Cumulative Projects List). The potential environmental impacts associated with the No Project Alternative are described below and are compared to the environmental impacts associated with the proposed project. Table VI-2, Alternative 1 (No Project/No Build) Components, provides a breakdown of the existing on-site uses under this alternative.

Table VI-2
Alternative 1 (No Project/No Build) Components

Building Components	Building A	Building B	Building C[a]	Total
Creative Office/General Office Floor To Remain	—	—	45,429 sf[b]	45,429 sf
Stories	—	—	3	3
Height	—	—	40 feet	40 feet
Floor Area Ratio (FAR)				
Current FAR				0.52
Current Parking for Commercial				161 ~~152~~

ii) Impact Discussion

No permanent change in environmental conditions would occur under this Alternative because no new development would occur. The proposed project would result less than significant impacts with mitigation on cultural resources (including previously unknown buried archeological deposits), geology/soils (paleontological resources), and hazards and hazardous materials (release of hazardous materials into the environment). Alternative 1 would not result in any impacts, including these less than significant with mitigation impacts.

However, Alternative 1 would not expand office and commercial employment near transit to the extent that the project would; therefore, Alternative 1 would not as strongly meet the LUCE goals and policies related to transit-oriented development in the Bergamot Transit Village (BTV) ~~BVT~~, the RTP/SCS, nor have the potential to reduce Vehicle Miles Traveled (VMT) in the City as the project. Additionally, Alternative 1 would not refurbish the existing office building and, therefore, would not upgrade the building to new energy standards and incorporate features to reduce energy consumption.

iii) Relationship to Project Objectives

The No Project Alternative would have fewer impacts than the proposed project, however, it would not satisfy any of the Project Objectives, as listed in Section II. Project Description of this EIR.

iv) Reduction of Project Impacts

A comparison of the impact of each of the alternatives to the project is summarized in Table VI-6 (Summary of Alternatives' Impacts). As stated above, the project would not create any significant and unavoidable

impacts but would create less than significant impacts with mitigation on cultural resources (including previously unknown buried archeological deposits), geology/soils (paleontological resources), and hazards and hazardous materials (release of hazardous materials into the environment). The No Project Alternative would avoid these project-related impacts because no new development would occur on the project site. However, the No Project Alternative would not implement any of the basic and fundamental Project Objectives.

B. Alternative 2: Tier 1 (Reduced Height/Density) Development

i) Description

Alternative 2, Tier 1 Development, represents a reduced project alternative with a reduction in floor area and height. Similar to the project, Alternative 2 would retain the existing 45,429 sf office building and construct two new buildings for office use with some ground floor active retail/restaurant use.

Under the City's Bergamot Area Plan, the Tier 1 standards allow a maximum building height of 32 feet and 1.75 FAR for a parcel less than 100,000 sf. Based on the total project site size of approximately 87,651 sf, the maximum Tier 1 FAR is approximately 133,393 sf. With consideration to the adaptive reuse of the existing 45,429 office building as well as open space requirements, Alternative 2 would result in two new office buildings providing a net new of 88,564 sf. Up to 5,376 sf of the new ground floor space could alternatively be utilized for active retail/restaurant use. The total floor area when considering the existing office building would be 133,393 sf (1.75 FAR), 23% less than the project.

Under Alternative 2:

- The existing office building would remain with minimized exterior window line modifications.
- Two new 2-story buildings A and B would be constructed with a smaller building footprint and with a maximum height of 32 feet.
- Similar to the project, Building B may include Active Use Areas (retail/restaurant) on the ground floor (up to 5,376 sf).
- Open Space would be reduced to 17,530 sf as compared to the project's 28,976 sf, resulting in a significant reduction in the central courtyard space.
- Employment ratio would be similar to the project at 4 employees/1000 for office with a total of 534 employees.
- Parking would be provided within a two-level subterranean garage as compared to three under the project, reducing the amount of excavation required.
- Access to garage would be same as the project, along Pennsylvania Avenue.

Table VI-3, Alternative 2 (Tier 1 Development) Components, provides a breakdown of the existing and proposed on-site uses under this alternative. Because this alternative is conceptual for the purposes of the EIR, the exact layout and structural configuration of the proposed development is not determined. Figure VI-1, Alternative 2, Tier 1 (Reduced Height/Density) Development, presents the schematic design for this alternative.

Table VI-3
Alternative 2 (Tier 1) Components

Building Components	Building A	Building B	Building C[a]	Total
Creative Office/General Office Floor Area	44,282	44,282[b]	45,429	133,393 sf
Net New Square Footage				88,564 sf
Stories	2	2	3	N/A
Height	32 feet	32 feet	40 feet	N/A
Floor Area Ratio (FAR)				
BTV Tier 1 Allowable FAR				1.75
Max. Allowable FAR (87,651 sf x 1.75)				153,389 sf
Proposed Floor Area				133,393 sf
Proposed FAR				1.52
Open Space				
Min. Required per BAP (% of Site)				20 %
Proposed Open Space				20 % (17,530 sf)
Vehicle Parking				
~~*Existing Parking to be Relocated*~~				~~50 spaces~~
Required Parking for Commercial				216 spaces
Total Parking Provided (2 level subterranean garage)				267 spaces (includes relocated spaces)

NOTES:
BTV = Bergamot Transit Village
BAP = Bergamot Area Plan
a= Existing Building to Remain
b = If not developed for office space, up to 5,376 sf of ground floor space could alternatively be utilized for active retail/restaurant.

ii) Impact Discussion

1) Air Quality

Would the alternative conflict with or obstruct implementation of the applicable air quality plan?

Alternative 2 would construct less new building square footage than the project. Therefore, construction of Alternative 2 would generate fewer air emissions than the project. As with the project, Alternative 2 would not result in construction air quality emissions that exceed the SCAQMD thresholds of significance. Construction of Alternative 2 would be subject to the same regulatory measures (e.g., SCAQMD rules) as those required for the project. Similar to the project, Alternative 2 would be consistent with the BTV land use designation on the site. Alternative 2 would not exceed the assumptions utilized in preparing the AQMP and would not have the potential to impair implementation of the AQMP. As Alternative 2 would generate slightly fewer emissions than the project, impacts with respect to regional plans and AQMP consistency would be incrementally less.

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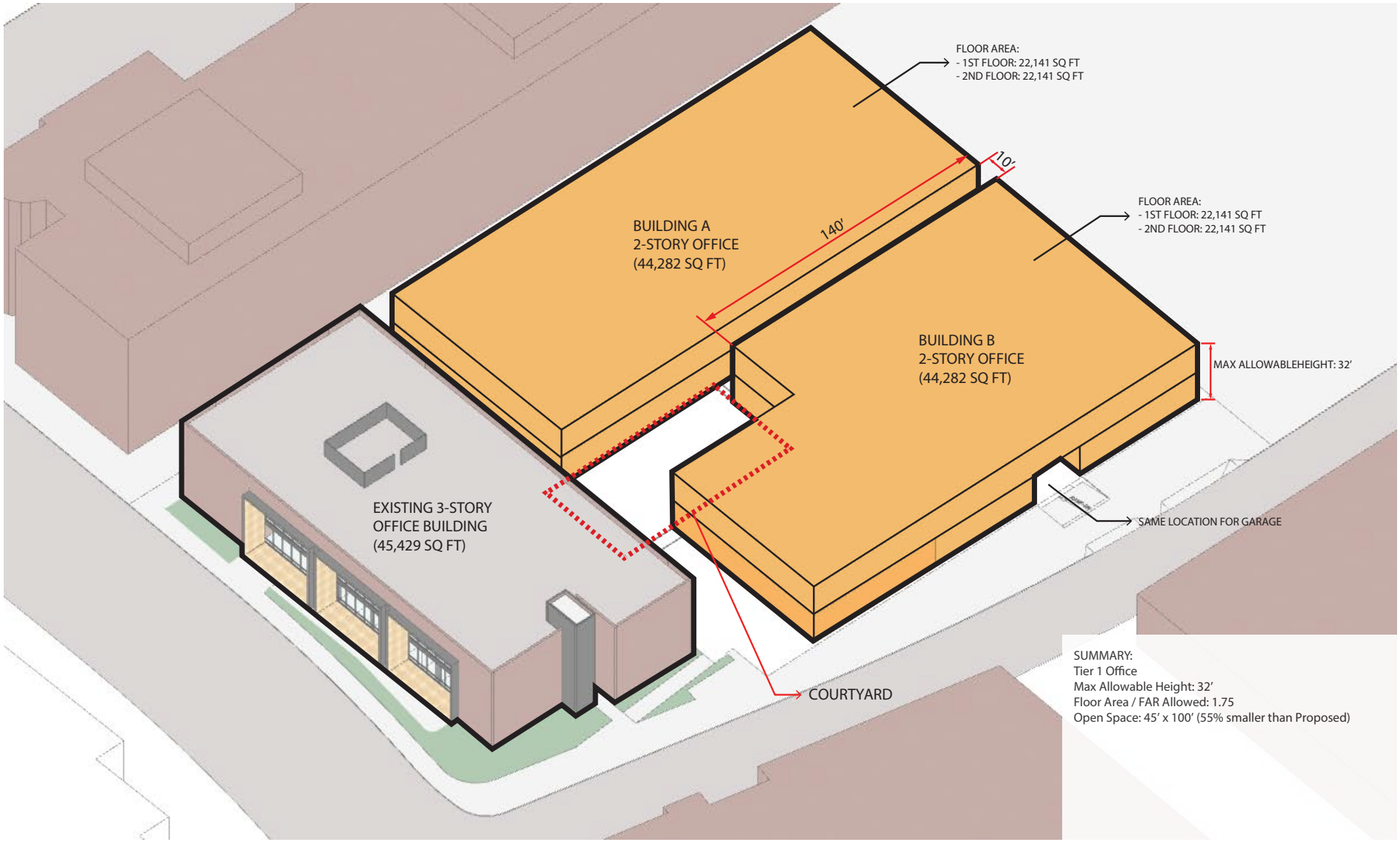

Source: Belzberg Architects, November 2020.

Figure VI-1
Alternative 2: Tier 1 (Reduced Height/Density) Development

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Would the alternative result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Construction Impacts

Construction of Alternative 2 would generate fewer air emissions than the project due to the reduction in new building square footage and excavation. The duration of construction would be shorter due to less construction and excavation for the subterranean parking. Similar to the project, the peak daily emissions

generated during the construction of Alternative 2 would not exceed any of the regional emission thresholds recommended by the SCAQMD. Construction of Alternative 2 would be subject to the same regulatory measures (e.g., SCAQMD rules) as those required for the project. Therefore, construction air pollutant emissions overall would be incrementally less than those that would occur with the project.

Operation Impacts

Alternative 2 would result in an overall decrease in development compared with the Project. This would translate into a reduction in the number of weekday net vehicle trips and a reduction in energy use. Operational regional air quality emissions associated with area sources (e.g., use of consumer products and maintenance equipment), energy demand (use of natural gas), and mobile sources (motor vehicles) under Alternative 2 would be less than the project and would not exceed the regional thresholds of significance set by the SCAQMD.

Like the project, Alternative 2 would not contribute a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Therefore, impacts to regional air quality would be less than the project's less than significant impact.

Would the alternative expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

Alternative 2 would generate fewer emissions than the project during construction due to the smaller amount of construction and less excavation. Therefore, as with the proposed project, Alternative 2 would not exceed any of the identified localized thresholds of significance during construction or operation. Therefore, impacts related to localized emissions that could affect sensitive receptors would be incrementally less than the project's less than significant impact.

Carbon Monoxide (CO) Hotspots

Similar to the project, Alternative 2 would generate operational vehicle trips that would incrementally increase CO levels at intersections and roadways within one-quarter mile of sensitive receptors. However, since Alternative 2 would result in less vehicle trips than the proposed project, Alternative 2 would similarly not exceed the CAAQS standards and would not cause localized CO concentrations.

TACs

Potential TAC generators are associated with specific types of facilities such as dry cleaners, gas stations, warehouses, and chrome plating facilities, and are the focus of local control efforts. SCAQMD recommends that operational health risk assessments 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. Similar to the project, Alternative 2 would not result in the use, storage, or processing of carcinogenic or non-carcinogenic TACs. As such, impacts with respect to TACs would be incrementally less than the proposed project.

Would the alternative result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As with the project, construction for Alternative 2 would include the use of architectural coatings and solvents, which could generate other emissions such as odors. The use of such materials would be compliant with all applicable SCAQMD Rules, including those addressing odors. Therefore, construction activities or materials would not create other emissions such as those leading to odors.

Alternative 2 would construct creative and business professional office uses; therefore, similar to the project, long-term operation of these uses under Alternative 2 would not create other emissions including those leading to odors. As such, impacts with respect to other emissions adversely affecting a substantial number of people would be less than significant, similar to the proposed project.

2) Cultural Resources – Archaeological [1]

Would the alternative cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Construction for Alternative 2 would require grading and excavation for a two-level subterranean garage. Although excavation would be less than what would be required for the project's three-level subterranean garage, there is still a similar potential to uncover archaeological resources from site grading. Alternative 2 would be required to implement the same mitigation measure related to the discovery of unknown archaeological resources as the project. Therefore, impacts would be similar to those of the project and less than significant with mitigation.

3) Energy

Would the alternative result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

During construction of Alternative 2, energy would be consumed in the form of electricity, natural gas, and transportation fuel. Alternative 2 would require incrementally less energy due to the reduction in new building square footage and amount of excavation. Like the project, compliance with anti-idling and emissions regulations 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 Alternative 2 would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure.

During operation, Alternative 2 would consume electricity for multiple purposes, including lighting and the use of electronics, equipment, and appliances. Natural gas would also be consumed for heating and cooking. This consumption would be incrementally less as compared to the project's less than significant demand due to the reduced amount of building square footage. Alternative 2 would generate fewer employees due the smaller amount of building square footage, which would incrementally decrease the use of transportation fuels during operation as compared to the project's less than significant demand.

Similar to the project, Alternative 2 would support sustainable mobility options by locating office and commercial/retail uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to several public transit routes, including Metro's 26th Street/Bergamot station for the E Line light rail and a number of BBB lines. The site's location near transit in an urban area would result in reduced VMT and increased energy efficiency, as compared to a project

[1] *Though not a Draft EIR section, the Initial Study identified mitigation for discovery of unknown archaeological resources. As such, this alternative addresses similar impact and mitigation.*

of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops.

Would the alternative conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Similar to the project, Alternative 2 would not conflict with energy efficiency or conservation plans as the design would comply with existing energy standards and incorporate features to reduce energy consumption. Therefore, Alternative 2 impacts related to potential conflict with a state or local plan for renewable energy or energy efficiency would be similar to the project's less than significant impact.

4) Geology and Soils[2]

Would the alternative directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Construction for Alternative 2 would require grading and excavation for a two-level subterranean garage. Although this excavation would be less than what would be required for the project's three-level subterranean garage, there is still a similar potential to uncover paleontological resources from site grading. Alternative 2 would be required to implement the same mitigation measure as the project related to discovery of paleontological resources. Therefore, impacts would be similar to those under the project and less than significant with mitigation.

5) Greenhouse Gas Emissions

Would the alternative generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Similar to the project, Alternative 2 would require grading, excavation, and construction that would generate GHG emissions. However, these emissions would be incrementally less than the project due to the reduction in excavation (for a two-level as opposed to a three-level subterranean garage) and the reduction in new building square footage. Alternative 2 would create operational GHG emissions associated with area sources, mobile sources (motor vehicles), energy, water, and solid waste. However, these operational emissions would be incrementally less as well. Therefore, impacts from the generation of GHG emissions under Alternative 2 would be less than under the project's less than significant.

Would the alternative conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of greenhouse gases?

As with the project, Alternative 2 would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus. The project site is designated as BTV ~~BVT~~ in the BAP. The BTV ~~BVT~~ designation allows for the creation of a vibrant concentration of retail and services, multi-

[2] *Though not a Draft EIR section, the Initial Study identified mitigation for discovery of unknown paleontological resources. As such, this alternative addresses similar impact and mitigation.*

family housing and creative employment and community gathering spaces, especially in proximity to transit. A mix of 60 percent commercial and 40 percent residential use is established as the target for new development. The permitted densities for the BTV ~~BVT~~ were determined so as to achieve a scale that is consistent with the community vision for a pedestrian-oriented district that provides high quality open spaces, and that is oriented to and accessible by transit. Alternative 2 would be located within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station. In addition, Alternative 2 would expand office and commercial employment uses in the City to maximize walking and active transportation modes to get to work in the City. Similar to the project, Alternative 2 would be consistent with the LUCE and BAP goals and policies addressing sustainability. Although Alternative 2 would result in development on the site with a FAR of 1.52, which is less than the project FAR of 1.99, Alternative 2 would still expand office and commercial employment near transit and would therefore, meet the LUCE goals and policies related to sustainability.

6) Hazards & Hazardous Materials

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

Similar to the project, construction activities associated with Alternative 2 would involve refurbishing the existing site building, earthmoving activities associated with excavation and grading for the subsurface parking levels, and transporting and disposing construction debris/wastes, as well as excavated soil. Such activities have the potential to result in the release of hazardous materials into the environment should these demolished site improvements and soil contain hazardous materials or if excavated soil contain elevated concentrations of metals, including copper, lead, and zinc, that exceeds California hazardous waste threshold limits. Additionally, construction activities also involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids required for operation and maintenance of equipment. Similar to the project, Alternative 2 would be required to implement the same mitigation measure as the project including preparing and complying with a Soil Management Plan. Similar to the project, operation of Alternative 2 would not include any uses that generated hazardous materials or waste. Only routine cleaning supplies used in compliance with existing regulations would be used on site. Therefore, impacts during construction and operation would be similar to those under the project and less than significant with mitigation.

Would the alternative emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Similar to the project, Alternative 2 would be located within 0.25-mile of Bright Horizons Children's Center, Evergreen Community School, and Hill & Dale Discover Center Preschool. However, all potentially hazardous materials for construction and operation would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. Additionally, as discussed above, Alternative 2 would be required to implement the same mitigation measure as the project during construction. Therefore, impacts during construction and operation to nearby schools would be the same as under the project and less than significant with mitigation.

Would the alternative be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Alternative 2 would be located on the same site as the project. Alternative 2 would not exacerbate any current environmental conditions so as to create a significant hazard to the public or the environment. As such, impacts related to the project site's inclusion on lists of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 would be the same as the project and less than significant.

7) Land Use/Planning

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

Like the project, Alternative 2 would be consistent with SCAG's RTP/SCS by implementing goals and policies of SCAG's RTP/SCS related to encouraging development in transit rich areas. Alternative 2 would be consistent with policies in the LUCE related to focusing new commercial development near the Expo LRT, creating active and context sensitive spaces, and reducing Citywide vehicle miles traveled. Alternative 2 would also serve to reinforce many of the goals and objectives of the BAP, which include encouraging a lively, active Bergamot Transit Village district with well-designed development, pedestrian-oriented designed ground floors, and appropriately scaled buildings.

However, Alternative 2 would result in development on the site with a FAR of 1.52, which is less than the project FAR of 1.99. This lower FAR would not expand office and commercial employment near transit to the extent that the project would; therefore, Alternative 2 would not as strongly meet the LUCE goals and policies related to transit-oriented development in the BTV ~~BVT~~ as the project. Nonetheless, impacts would be less than significant.

8) Noise

Would the alternative result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Similar to the project, Alternative 2 would refurbish the existing office building and demolish the surface parking lot for the construction of two new office buildings. Alternative 2 would create construction noise associated with the use of heavy equipment for demolition, excavation, grading, and building construction that would generate noise. Noise would also be generated from haul trucks, the operation of smaller power tools, generators, and other equipment. Construction noise levels for Alternative 2 at all sensitive receptor locations would be similar to those of the project as the type of construction equipment and peak daily activities would be similar. However, the duration of construction for Alternative 2 would be shorter than the project due to less construction and excavation for the subterranean parking; and as such, sensitive receptors would be exposed to temporary construction noise for a shorter duration of time. Therefore, overall construction noise would be incrementally less than under the project's less than significant impact.

Operation

Alternative 2 proposes the same types of office uses as the project. However, Alternative 2 would result in fewer employees on site due to the reduced amount of square footage. Therefore, vehicular related operational noise impact from Alternative 2 would be less than the project's less than significant impact. Similar to the project, on-site noise sources associated with the operations would consist primarily of HVAC/mechanical systems and parking structure-related noise. Like the project, parking would be located in a subterranean garage. Therefore, impacts to ambient noise from operations would be similar to the project and less than significant. Overall, ambient noise from Alternative 2 would be incrementally less than the project.

Would the alternative result in generation of excessive ground-borne vibration or ground-borne noise levels?

Similar to the project, construction of Alternative 2 would require the use of heavy equipment for demolition, excavation, and building construction. These activities would generate temporary increases of ground-borne vibration. Alternative 2 would require less excavation than the project as the garage would be two-

levels as opposed to the project's three-level subterranean garage. Additionally, Alternative 2 would require less construction as the overall new building square footage is less. Therefore, the duration of ground-borne vibration or ground-borne noise levels for Alternative 2 would be incrementally less than for the project. However, daily construction vibration levels for Alternative 2 would be similar to the project since the quantity and type of equipment used on a daily basis would be similar.

9) Transportation

Would the project conflict with adopted policies, plans, or programs addressing the circulation system, including transit, bicycle and pedestrian facilities?

Similar to the project, Alternative 2 would be consistent with the LUCE goals and policies addressing transportation. Alternative 2 would be locate office and commercial uses within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station, enhancing transit use and supporting mobility options in the City. In addition, Alternative 2 would also implement sidewalk improvements connecting to ground-level open space (courtyard), and therefore, would be consistent with LUCE and BAP policies to create a pedestrian friendly environment and new pedestrian/bicycle connections. Similar to the project, Alternative 2 would include bicycle amenities, including the required number of bicycle parking spaces, showers, and lockers, and implement a TDM plan that encourage sustainable mobility options and reduce Citywide VMT per capita. This impact would be the same as under the project.

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Alternative 2 was reviewed against the City's VMT screening criteria system to determine if a VMT analysis would be required. Based on a review of Alternative 2 against the City's VMT screening criteria, Alternative 2 would have a less than significant impact on VMT:

- Alternative 2's proposed retail space is less than 50,000 sf (Tier 1 screening criteria) and therefore would have a less than significant VMT impact and screened out from further VMT analysis.

- Alternative 2's commercial office floor area would be greater than 50,000 sf (Tier 1 screening criteria) but would be located approximately 0.15 miles from the 26th Street/Bergamot Metro Light Rail Station and would not provide more parking than required by Code (Tier 3 screening criteria). Therefore, Alternative 2 would have a less than significant VMT impact and further VMT analysis is not required for this alternative.

This less than significant impact would be greater than those under the project since there is less density; with less density, Citywide VMT per capita would not be reduced to the same extent as the project.

10) Tribal Cultural Resources

Would the alternative cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Alternative 2 would be located on the same site as the project, a former clay pit. There are no known tribal cultural resources on the site. The potential to discover unknown tribal cultural resources is the same as under the project and there would be no impact.

iii) Relationship to Project Objectives

This alternative would meet the underlying purpose of the Project since Alternative 2 would provide new office uses in the Bergamot Plan area. However, with the reduction in development and changes to the site plan that would occur, Alternative 2 would not meet the following project objectives, to the same degree as the project:

- Although Alternative 2 would develop an underutilized site with a well-designed and financially feasible commercial project that is consistent with the character and operational characteristics of surrounding commercial uses, it would not promote the City's economic well-being, increase the local tax base, and foster the continued evolution of an active, pedestrian-oriented, mixed-use district to the same extent as the project due to the reduction in development.

- Similar to the project, Alternative 2 would ensure a financially feasible project that promotes the City's economic well-being, increases the local tax base, and fosters the continued evolution of an active, pedestrian-oriented, mixed-use district.

- Although Alternative 2 would strategically concentrate new commercial development and facilitate employment centers at a location that capitalizes on existing and future infrastructure and services, including being in close proximity to the 26th Street/Bergamot Metro E Light Rail Station, there would be less employment due to the reduction in office development.

- Although Alternative 2 would support the growth and expansion of creative arts, entertainment and related uses in the City of Santa Monica that enhance the economic vitality of the Bergamot Plan area, it would do so to a lesser extent since there would be less office square footage and less employment.

- Similar to the proposed project, Alternative 2 would activate the 26th Street and Pennsylvania Avenue street frontages through the construction of streetscape improvements and a perimeter and interior landscaping program that enhances the visual appearance and urban character of the Bergamot Plan area.

- Similar to the proposed project, Alternative 2 would facilitate safe and convenient pedestrian and bike travel and access to and from the 26th Street/Bergamot Metro E Light Rail Station.

- Similar to the proposed project, Alternative 2 would support the City's sustainability goals through the refurbishment of an existing office building to reduce consumption of raw materials, material production and the resulting carbon impact . Additionally, Alternative 2 would utilize sustainable building and site design features and construction practices, including mass timber construction and all-electric design for building core and shell, to provide a high-performance and environmentally efficient commercial project that would seek a Leadership in Energy and Environmental Design (LEED)® certification of Platinum.

- Similar to the proposed project, Alternative 2 would provide community and project benefits consistent with the City's Land Use and Circulation Element, including open space opportunities for employees and visitors, transportation demand management, high-quality architectural design, sustainability, payment of a transportation infrastructure fee and enhanced pedestrian environment.

iv) Reduction of Project Impacts

A comparison of the impact of each of the alternatives to the project is summarized in Table VI-6 (Summary of Alternatives' Impacts). All project impacts are less than significant with mitigation and the project would

not result in any significant and unavoidable impacts. Alternative 2 would result in similar less than significant impacts with mitigation and would not reduce any impacts.

However, Alternative 2 would result in development on the site with a FAR of 1.52, which is less than the project FAR of 1.99. This lower FAR would not expand office and commercial employment near transit to the extent that the project would; therefore, Alternative 2 would not as strongly meet the LUCE goals and policies related to transit-oriented development in the BTV ~~BVT~~, including expanding employment uses in the City that would help to reduce Citywide VMT to the same extent as the project.

C. Alternative 3: Tier 3 Development (Increased Height/Density)

i) Description

Alternative 3 assumes development of the project at a Tier 3 height and density, which would be greater than the project. As is the case with the project, Alternative 3 would retain the existing 45,429 sf office building and construct two new buildings for office use with some ground floor active retail/restaurant use in a similar layout as the project.

Under the City's Bergamot Area Plan, the Tier 3 standards allow a maximum building height of 80 feet and 2.75 FAR for a parcel less than 100,000 sf. Based on the total project site size of approximately 87,651 sf, the maximum Tier 3 FAR is approximately 241,040 sf. With consideration to the adaptive reuse of the existing 45,429 office building as well as building modulation and open space requirements, Alternative 3 would result in two new office buildings providing a net new of 175,557 sf. The total floor area when considering the existing office building would be 220,986 sf (2.52 FAR), or 27 percent greater than the project.

Under Alternative 3:

- Existing office building would remain with minimized exterior window line modifications.
- Two new 5-story buildings A and B would be constructed with a larger building footprint and increased height of 75 feet.
- Similar to the project, for Building B may include Active Use Areas (retail/restaurant) on the ground floor (up to 5,376 sf) fronting Pennsylvania Avenue.
- Open Space would be reduced to 25 percent (21,913 sf) as compared to the project's 33 percent (28,976 sf), significantly reducing the size of the central courtyard space.
- Employment ratio would be similar to the project at 4 employees/1000 sf for office with a total of 884 employees.
- Parking would be provided within a four-level subterranean garage as compared to three under the project, and therefore, excavation would be greater.
- Access to the garage would be same as the project, provided along Pennsylvania Avenue.

Table VI-4, Alternative 3 (Tier 3 Development) Components, provides a breakdown of the existing and proposed on-site uses under this alternative. Figure VI-2, Alternative 3, Tier 3 (Increased Height/Density) Development, presents the schematic design for this alternative.

Table VI-4
Alternative 3 (Tier 3) Components

Building Components	Building A	Building B	Building C[a]	Total
Creative Office/General Office Floor Area	87,778 sf	87,778[b] sf	45,429 sf	220,986 sf
Net New Square Footage				175,557 sf

Table VI-4
Alternative 3 (Tier 3) Components

Building Components	Building A	Building B	Building C[a]	Total
Stories	5	5	3	N/A
Height	75 feet	75 feet	40 feet	N/A
Floor Area Ratio (FAR)				
BTV Tier 1 Allowable FAR				2.75
Max. Allowable FAR (87,651 sf x 1.75)				241,040 sf
Proposed Floor Area				220,986 sf
Proposed FAR				2.52
Open Space				
Min. Required per BAP (% of Site)				25 %
Proposed Open Space				25 % (21,913 sf)
Vehicle Parking				
~~Existing Parking to be Relocated~~				~~50 spaces~~
Required Parking for Commercial				441 spaces
Total Parking Provided (4 level subterranean garage)				~~401~~ 399 spaces

NOTES:
BTV = Bergamot Transit Village
BAP = Bergamot Area Plan
a = Existing Building to Remain
b = If not developed for office space, up to 5,376 sf of ground floor space could alternatively be utilized for active retail/restaurant.

ii) Impact Discussion

1) Air Quality

Would the alternative conflict with or obstruct implementation of the applicable air quality plan?

Alternative 3 would construct a greater amount of new building square footage than the project. Therefore, construction of Alternative 3 would generate incrementally more air emissions than the project. As with the project, Alternative 3 would not result in construction air quality emissions that exceed the SCAQMD thresholds of significance. Similar to the project, Alternative 3 would be consistent with the Bergamot Transit Village land use designation on the site. Alternative 3 would not exceed the assumptions utilized in preparing the AQMP and would not obstruct implementation of the AQMP. As Alternative 3 would generate slightly greater emissions than the project, impacts with respect to regional plans and AQMP consistency would be incrementally greater.

Would the alternative result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Construction Impacts

As shown in Table VI-1 above, the project proposes 129,256 net SF of new development and Alternative 3 proposes 175,557 net SF of new development. Therefore, Alternative 3 would be approximately 36 percent larger than the proposed project. Construction of Alternative 3 would generate greater air emissions than the project due to the increase in new building square footage and increase in excavation. The duration of construction would be greater due to increased construction and excavation for the subterranean parking. Although the duration of construction/excavation would be greater, the peak daily emissions generated during the construction of Alternative 3 are expected to be similar as the footprint is the same, will use a

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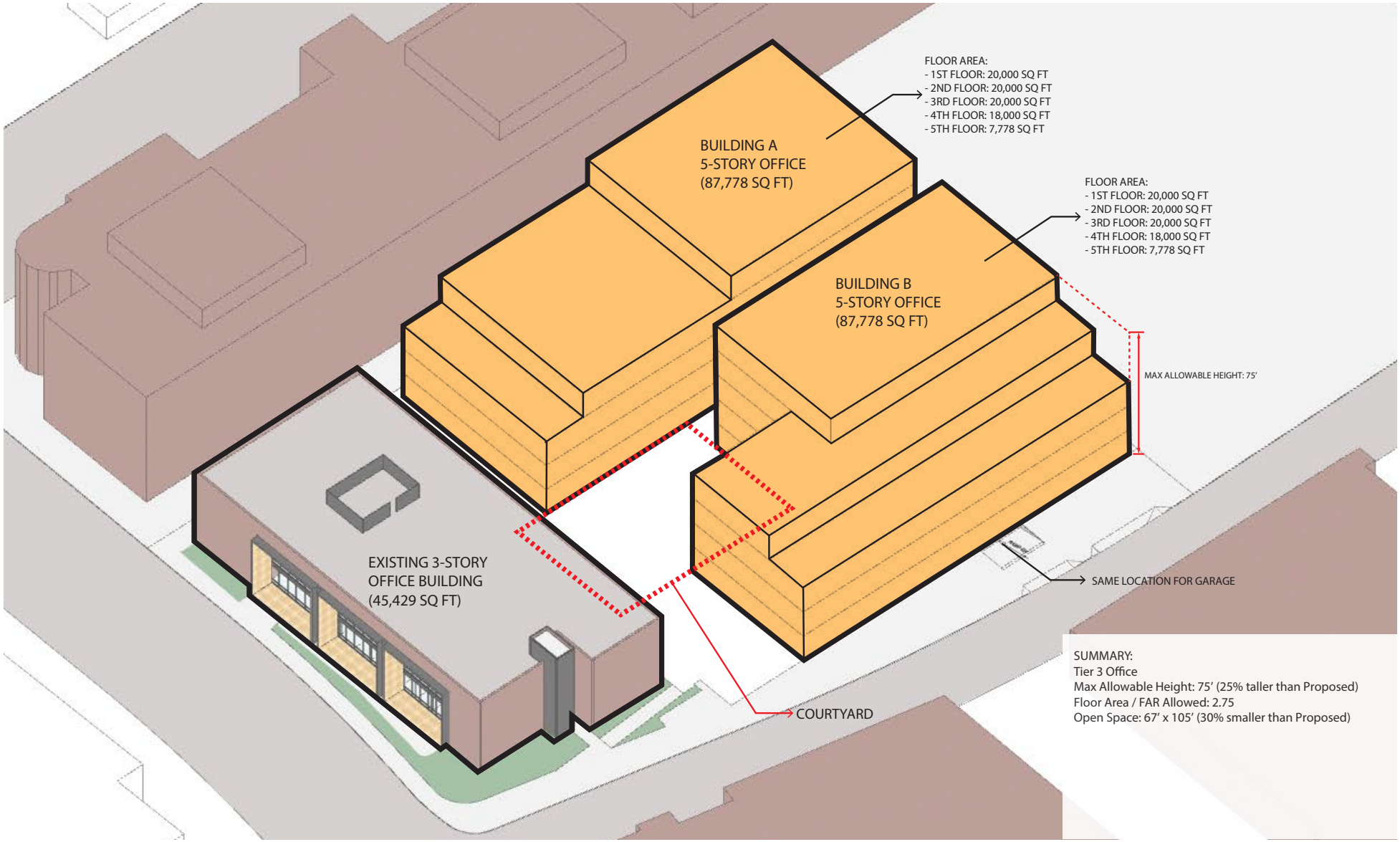

Source: Belzberg Architects, November 2020.

Figure VI-2
Alternative 3: Tier 3 (Increased Height/Density) Development

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similar amount of equipment, and the peak daily construction activities would be similar. Using the emissions generated by the construction of the proposed project as a basis for the emissions calculations for Alternative 3, a 36 percent increase over building construction emissions would produce daily emissions of approximately: 47.46 lbs of ROG (VOC), 29.86 lbs of NOx, 36.4 lbs of CO, 0.08 lbs of SO_2, 3.64 lbs of PM-10 and 1.78 lbs of PM-2.5 (overlapping the emissions of building construction and architectural coating), none of which would exceed SCAQMD mass daily regional construction thresholds. Based on a 36 percent increase, the daily local on-site construction emissions for Alternative 3 are as follows for building construction: 18.27 lbs NOx, 20.72 lbs CO, 0.88 lbs PM-10 and 0.84 lbs PM-2.5. For architectural coating, the daily local emissions for Alternative 3 would be 4.97 lbs NOx, 7.37 lbs CO, 0.24 lbs PM-10 and 0.24 lbs PM-2.5, none of which would exceed LSTs at the closest receptor locations.

Therefore, Alternative 3 would not exceed any of the regional or local emissions thresholds recommended by the SCAQMD. Construction of Alternative 3 would be subject to the same regulatory measures (e.g., SCAQMD rules) as those required for the project. Therefore, construction air pollutant emissions overall would be incrementally greater than those that would occur with the project but still less than significant.

Operation Impacts

As shown above, Alternative 3 would construct a greater amount of development than the project. Therefore, Alternative 3 would be approximately 36 percent larger than the proposed Project and would be anticipated to generate approximately 36 percent more operational emissions.

For the operation of Alternative 3, using a 36 percent increase over the proposed Project's operational emissions, Alternative 3 would generate daily operational emissions of 7.61 lbs ROG (VOC), 15.11 lbs NOx, 42.35 lbs CO, 0.16 lbs SO_2, 14.18 lbs PM-10 and 3.92 lbs PM-2.5. Therefore, although operational regional air quality emissions associated with area sources (e.g., use of consumer products and maintenance equipment), energy demand (use of natural gas), and mobile sources (motor vehicles) under Alternative 3 would be greater than the project, emissions are not anticipated to exceed any SCAQMD thresholds.

Similar to the project, Alternative 3 would not contribute a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Due to the increase in new building square footage and associated vehicular trips, impacts to regional air quality would be incrementally greater than the Project's less than significant impact; however, the impacts are still anticipated to remain less than significant.

Would the alternative expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

Alternative 3 would generate greater emissions than the project during construction due to the increased amount of construction and excavation. However, as detailed above, Alternative 3 would not exceed any of the identified localized thresholds of significance during construction or operation. These impacts would be only incrementally larger than the project's less than significant impact, due to the greater amount of new building square footage and, like the project, will still remain less than significant

Carbon Monoxide (CO) Hotspots

Alternative 3 would result in an overall increase in development compared with the Project. This would translate into an increase in the number of weekday net vehicle trips and incremental increase in CO emissions. However, CO concentrations in SRA 2 are substantially below the state standards for 1-hour (20 ppm) and 8-hour (9 ppm), and CO concentrations in SRA 2 are substantially below the federal standards for 1-hour (35 ppm) and 8-hour (9 ppm). Therefore, even with a 36 percent increase in emissions, similar to the project, Alternative 3 would not cause localized CO concentrations.

TACs

Potential TAC generators are associated with specific types of facilities such as dry cleaners, gas stations, warehouses, and chrome plating facilities, and are the focus of local control efforts. SCAQMD recommends that operational health risk assessments 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. Similar to the project, Alternative 3 would not include the operation of any land uses routinely involving warehouse and transfer facilities. Additionally, Alternative 3 would not result in the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Overall, impacts with respect to TACs would be similar to the proposed project as neither the project nor Alternative 3 propose uses that would generate TACs.

Would the alternative result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Similar to the project, construction for Alternative 3 would include the use of architectural coatings and solvents which could result in other emissions such as odors. The use of such materials would be compliant with all applicable SCAQMD Rules addressing odors. Therefore, construction activities or materials would not result in other emissions such as those leading to odors.

Alternative 3 would construct creative and business professional office uses; therefore, similar to the project, long-term operation of these uses under Alternative 3 would not result in other emissions (such as those leading to odors). As such, impacts with respect to other emissions (such as odors) adversely affecting a substantial number of people would be less than significant, similar to the proposed project.

2) Cultural Resources – Archaeological[3]

Would the alternative cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5??

Construction for Alternative 3 would require grading and excavation for a four-level subterranean garage. Although this excavation would be greater than what would be required for the project's three-level subterranean garage, there is still a similar potential to uncover archaeological resources from site grading. Alternative 3 would be required to implement the same mitigation measure related to the discovery of unknown archaeological resources as the project. Therefore, impacts would be similar to those under the project and less than significant with mitigation.

3) Energy

Would the alternative result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

During construction of Alternative 3, energy would be consumed in the form of electricity, natural gas, and transportation fuel. Alternative 3 would consume incrementally more energy due to the increased construction of new building square footage and greater amount of excavation. Similar to the project, compliance with anti-idling and emissions regulations during 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 Alternative 3 would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure.

[3] *Though not a Draft EIR section, the Initial Study identified mitigation for discovery of unknown archaeological resources. As such, this alternative addresses similar impact and mitigation.*

During operation, Alternative 3 would consume electricity for multiple purposes, including lighting and the use of electronics, equipment, and appliances. Consumption of natural gas would occur for heating and cooking. Energy consumption would be incrementally greater due to the increased amount of building square footage as compared to the project. Alternative 3 would generate more employees due the larger amount of building square footage, which would incrementally increase the use of transportation fuels during operation as compared to the project's less than significant demand.

Similar to the project, Alternative 3 would support sustainable mobility options by locating office and commercial/retail uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to several public transit routes, including the 26th Street/Bergamot Metro Line E Light Rail Station and a number of BBB lines. The site's proximity to transit would result in reduced VMT and increased land use/transportation energy efficiency, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops.

Would the alternative conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Similar to the project, Alternative 3 would not conflict with energy efficiency or renewable energy plans as the design would comply with existing energy standards include the City's Energy Reach Code and Green Building Code. Alternative 3 would also incorporate features to reduce energy consumption. Therefore, Alternative 3 impacts related to potential conflict with a state or local plan for renewable energy or energy efficiency would be similar to the project's less than significant impact.

4) Geology and Soils[4]

Would the alternative directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Construction for Alternative 3 would require grading and excavation for a four-level subterranean garage. Although this excavation would be greater than what would be required for the project's three-level subterranean garage, there is still a similar potential to uncover paleontological resources from site grading. Alternative 3 would be required to implement the same mitigation measure as the project related to discovery of paleontological resources. Therefore, impacts would be similar to the project and less than significant with mitigation.

5) Greenhouse Gas Emissions

Would the alternative generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Similar to the project, Alternative 3 would require grading, excavation, and construction that would generate GHG emissions. However, these emissions would be incrementally greater than the project due to the increase in excavation (for a four-level as opposed to a three-level subterranean garage) and the increase in new building square footage. Alternative 3 would create operational GHG emissions associated with area sources, mobile sources (motor vehicles), energy, water, and solid waste. These operational emissions would be incrementally more as well. Therefore, impacts from the generation of GHG emissions under Alternative 3 would be slightly greater than under the project's less than significant.

[4] *Though not a Draft EIR section, the Initial Study identified mitigation for discovery of unknown paleontological resources. As such, this alternative addresses similar impact and mitigation*

Would the alternative conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHG?

Similar to the project, Alternative 3 would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code, the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15 percent embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus. The project site is designated as BTV ~~BVT~~ in the BAP. The BTV ~~BVT~~ designation allows for the creation of a vibrant concentration of retail and services, multi-family housing and creative employment and community gathering spaces, especially in proximity to transit. A mix of 60 percent commercial and 40 percent residential use is established as the target for new development. The permitted densities for the BTV ~~BVT~~ were determined so as to achieve a scale that is consistent with the community vision for a pedestrian-oriented district that provides high quality open spaces, and that is oriented to and accessible by transit. Alternative 3 would be located within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station. In addition, Alternative 3 would expand office and commercial employment uses in the City to maximize walking and active transportation modes to get to work in the City. Similar to the project, Alternative 3 would be consistent with the LUCE and BAP goals and policies addressing sustainability. Alternative 3 would result in development on the site with a FAR of 2.52, which is more than the project FAR of 1.99. Therefore, Alternative 3 would expand office and commercial employment near transit and would therefore, meet the LUCE goals and policies related to sustainability.

6) Hazards & Hazardous Materials

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

Similar to the project, construction activities associated with Alternative 3 would involve the refurbishing the existing site building, earthmoving activities associated with excavation and grading for the subsurface parking levels, and transporting and disposing construction debris/waste, as well as excavated soil. Such activities have the potential to result in the release of hazardous materials into the environment should these demolished site improvements and soil contain hazardous materials or if excavated soil contain elevated concentrations of metals, including copper, lead, and zinc, that exceeds California hazardous waste threshold limits. Additionally, construction activities also involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids required for operation and maintenance of equipment. Similar to the project, Alternative 3 would be required to implement the same mitigation measure as the project including preparing and complying with a Soil Management Plan. Similar to the project, operation of Alternative 3 would not include any uses that generated hazardous materials or waste. Only routine cleaning supplies used in compliance with existing regulations would be used on site. Therefore, impacts during construction and operation would be similar to those under the project and less than significant with mitigation.

Would the alternative emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Similar to the project, Alternative 3 would be located within 0.25-mile of Bright Horizons Children's Center, Evergreen Community School, and Hill & Dale Discover Center Preschool. However, all potentially

hazardous materials for construction and operation would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. Additionally, as discussed above, Alternative 3 would be required to implement the same mitigation measure as the project during construction. Therefore, impacts during construction and operation to nearby schools would be similar to those under the project and less than significant with mitigation.

Would the alternative be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Alternative 3 would be located on the same site as the project. Alternative 3 would not exacerbate any current environmental conditions so as to create a significant hazard to the public or the environment. As such, impacts related to the project site's inclusion on lists of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 would be the same as the project and less than significant.

7) Land Use/Planning

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

Similar to the project, Alternative 3 would be consistent with SCAG's RTP/SCS by implementing goals and policies of SCAG's RTP/SCS related to developing new uses in transit rich areas. Alternative 3 would be consistent with policies in the LUCE to locate commercial uses in proximity to the Metro E Light Rail, create active and context sensitive development, and reduce City vehicle miles traveled. Alternative 3 would reinforce many of the goals and objectives of the BAP, which include encouraging a lively, active Bergamot Transit Village district with well-designed development, pedestrian-oriented designed ground floors, and appropriately scaled buildings.

Alternative 3 would result in development on the site with a FAR of 2.52, which is greater than the project FAR of 1.99. This increased FAR would be consistent with the BAP's Tier 3 standards, expand office and commercial employment near transit to a greater extent than the project, and would also provide community benefits. In general, land use impact under Alternative 3 would be similar to the proposed project.

8) Noise

Would the alternative result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Similar to the project, Alternative 3 would refurbish the existing office building and demolish the surface parking lot for the construction of new buildings. Alternative 3 would create construction noise associated with the use of heavy equipment for demolition, excavation, grading, and building construction. Noise would also be generated from haul trucks, the operation of smaller power tools, generators, and other equipment. Peak daily construction noise levels for Alternative 3 at all sensitive receptor locations would be similar to those of the project as the type of construction equipment and peak daily construction activities would be similar. However, the duration of construction for Alternative 3 would be greater than the project due to increased square footage and greater excavation for the subterranean parking. As such, sensitive receptors would be exposed to temporary construction noise for a longer duration of time. Therefore, overall construction noise would be incrementally greater than under the project but still less than significant.

Operation

Alternative 3 proposes the same types of office/creative office uses as the project. However, Alternative 3 would result in more employees on-site due to the larger amount of square footage. Therefore, vehicular-related operational noise levels from Alternative 3 would be incrementally greater than the project's less than significant impact due to the increase in site population and activities. Similar to the project, on-site noise sources associated with operation would consist primarily of HVAC/mechanical systems and parking structure-related noise. Like the project, parking would be located in a subterranean garage. Therefore, impacts to ambient noise from operations would be similar to the project and less than significant. Overall, ambient noise from Alternative 3 would be incrementally greater than the project due to the increase in vehicular noise levels.

Would the alternative result in generation of excessive ground-borne vibration or ground-borne noise levels?

Similar to the project, construction of Alternative 3 would require the use of heavy equipment for demolition, excavation, and building construction that would generate temporary increases of ground-borne vibration. Alternative 3 would require more excavation than the project as the garage would be four-levels as opposed to the project's three-level subterranean garage. Additionally, Alternative 3 would require more construction as the overall new building square footage would be greater. However, daily construction vibration levels for Alternative 3 would be similar to the project since the quantity and type of equipment used on a daily basis would be similar. Therefore, ground-borne vibration levels for Alternative 3 would be incrementally greater than for the project, but still less than significant.

9) Transportation

Would the project conflict with adopted policies, plans, or programs addressing the circulation system, including transit, bicycle and pedestrian facilities?

Similar to the project, Alternative 3 would be consistent with the LUCE goals and policies addressing transportation and circulation. Alternative 3 would locate new office and commercial uses within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station, enhancing transit use and supporting mobility options in the City. In addition, Alternative 3 would also implement sidewalk improvements connecting to ground-level open space (courtyard), and therefore, would be consistent with LUCE and BAP policies to create a pedestrian friendly environment and new pedestrian/bicycle connections. Similar to the project, Alternative 3 would provide bicycle amenities, including the required number of bicycle parking spaces, showers, and lockers, and implement a TDM plan that encourage sustainable mobility options and reduce Citywide VMT per capita. As such, impacts related to circulation policies, plans, or programs would be less than significant and similar to the project.

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Alternative 3 would include approximately 175,557 sf of new office/creative office, of which 5,376 sf could be used for retail/restaurant space. Based on a review of Alternative 3 against the City's VMT screening criteria, Alternative 3 would have a less than significant impact on VMT:

- Alternative 3's retail space would be less than 50,000 sf (Tier 1 screening criteria) and therefore would have a less than significant VMT impact and screened out from further VMT analysis.
- Alternative 3's commercial office floor area would be greater than 50,000 sf (Tier 1 screening criteria) but is located 0.15 mile from the 26th Street/Bergamot Station Metro Line E Light Rail Station (Tier 2 screening criteria) and would not provide more parking than required by Code (Tier 3 screening criteria). Therefore, this alternative would be considered to have a less than significant VMT impact and further VMT analysis is not required for this alternative.

10) Tribal Cultural Resources

Would the alternative cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Alternative 3 would be located on the same site as the project, a former clay pit. There are no known tribal cultural resources on the site. The potential to discover unknown tribal cultural resources is the same as under the project and there would be no impact.

iii) Relationship to Project Objectives

This alternative would meet the underlying purpose of the Project since Alternative 3 would provide new office uses in the Bergamot Plan area. With the increase in development and changes to the site plan that would occur, Alternative 3 would meet the following project objectives:

- Although Alternative 3 would develop an underutilized site with a well-designed and financially feasible commercial project that is consistent with the character and operational characteristics of surrounding commercial uses, it would result in greater impacts to air quality and noise due to the increase in development square footage. Additionally, Alternative 3 would require more site dewatering due to the increased excavation required for deeper subterranean parking; therefore, potentially creating greater impacts to area groundwater.

- Due to the depth of groundwater on the site, Alternative 3 would require more dewatering and may not be a financially feasible project.

- Similar to the proposed project, Alternative 3 would strategically concentrate new commercial development and facilitate employment centers at a location that capitalizes on existing and future infrastructure and services, including being in close proximity to the 26th Street/Bergamot Metro E Light Rail Station, there would be less employment due to the reduction in office development.

- Similar to the proposed project, Alternative 3 would support the growth and expansion of creative arts, entertainment and related uses in the City of Santa Monica that enhance the economic vitality of the Bergamot Plan area, it would do so to a lesser extent since there would be less office square footage and less employment.

- Similar to the proposed project, Alternative 3 would activate the 26th Street and Pennsylvania Avenue street frontages through the construction of streetscape improvements and a perimeter and interior landscaping program that enhances the visual appearance and urban character of the Bergamot Plan area.

- Similar to the proposed project, Alternative 3 would facilitate safe and convenient pedestrian and bike travel and access to and from the 26th Street/Bergamot Metro E Light Rail Station.

- Similar to the proposed project, Alternative 3 would support the City's sustainability goals through the refurbishment of an existing office building to reduce consumption of raw materials, material production and the resulting carbon impact . Additionally, Alternative 3would utilize sustainable building and site design features and construction practices, including mass timber construction and all-electric design for building core and shell, to provide a high-performance and environmentally efficient commercial project that would seek a Leadership in Energy and

Environmental Design (LEED)® certification of Platinum. However, construction of Alternative 3 would require more energy and generate more air and GHG emissions.

- Similar to the proposed project, Alternative 3 would provide community and project benefits consistent with the City's Land Use and Circulation Element, including open space opportunities for employees and visitors, transportation demand management, high-quality architectural design, sustainability, payment of a transportation infrastructure fee and enhanced pedestrian environment.

iv) Reduction of Significant Project Impacts

A comparison of the impact of each of the alternatives to the project is summarized in Table VI-6 (Summary of Alternatives' Impacts). As indicated, all project impacts would be less than significant with mitigation and the project would not result in any significant and unavoidable impacts. Although Alternative 3 would increase development on the site, Alternative 3 would also result in less than significant impacts with mitigation.

Alternative 3 would result in increased office uses on the site; therefore, Alternative 3 would meet the LUCE and BAP goals and policies related to transit-oriented development in the BTV to a greater extent than the project, including expanding employment uses in the City that would help to reduce citywide VMT. However, with the increase in development, Alternative 3 would result in incrementally greater air quality and noise impacts. Furthermore, the construction of a four-level subterranean parking garage would encounter the groundwater table, requiring dewatering during construction and potentially during operation. Hydrology/water quality impacts would likely be greater.

D. Alternative 4: Mixed-Use Office & Residential

i) Description

Alternative 4 assumes development of a mixed-use office and residential project at a Tier 2 height and density, equivalent to the project. Alternative 4 would retain the existing 45,429 sf office building and construct a new 4-story residential building with some ground floor active retail/restaurant use to the east of the office building. Because this alternative is conceptual for the purposes of the EIR, the exact layout and structural configuration of the proposed development is not determined. However, it is envisioned that the residential building would be oriented with an active restaurant/retail frontage along Pennsylvania Avenue.

Under the City's Bergamot Area Plan, the Tier 2 standards allow a maximum building height of 60 feet and 2.00 FAR for a parcel less than 100,000 sf. Based on the total project site size of approximately 87,651 sf, the maximum Tier 2 FAR is approximately 175,302 sf. With consideration to the adaptive reuse of the existing 45,429 office building as well as building modulation and open space requirements, Alternative 4 would result in a new residential building providing a net new of 129,256 sf. The total floor area when considering the existing office building would be 174,685 sf (2.0 FAR).

Under Alternative 4:

- The existing office building would remain as office with employment being the same.
- The new 4 story residential building would include 107 new residential units consisting of 96 market-rate (13 studio, 42 one-bedroom, 25 two-bedroom, and 16 three-bedroom units) and 11 affordable units (all two-bedrooms).
- Open Space would be the same as the project at 33 percent (28,976 sf).
- Similar to the project, parking would be provided within a three-level subterranean garage that would be located beneath the new building.
- Access to the garage would be same as the project, provided from Pennsylvania Avenue.

Table VI-5, Alternative 4 (Mixed-Use Office & Residential) Components, provides a breakdown of the existing and proposed on-site uses under this alternative. Figure VI-3, Alternative 4, Mixed Use Office & Residential, presents the schematic design for this alternative.

Table VI-5
Alternative 4 (Mixed Use Office & Residential) Components

Building Components	Building A	Building B	Building C[a]	Total
Creative Office/General Office Floor Area		—	45,429	45,429 sf
Residential/Active Retail Floor Area	129,873			129,256
Net New Square Footage				129,256sf
Stories	4	—	3	N/A
Height	60 feet	—	40 feet	N/A
Floor Area Ratio (FAR)				
BTV Tier 1 Allowable FAR				2.0
Max. Allowable FAR (87,651 sf x 1.75)				175,302 sf
Proposed Floor Area				174,685
Proposed FAR				2.0
Open Space				
Min. Required per BAP (% of Site)				20 %
Proposed Open Space				20% (28,976 sf)
Vehicle Parking				
~~*Existing Parking to be Relocated*~~				~~50 spaces~~
Required Parking for Commercial				349 spaces
Total Parking Provided (3 level subterranean garage)				399 spaces

NOTES:
BTV = Bergamot Transit Village
BAP = Bergamot Area Plan
a = Existing Building to Remain
a = If not developed for office space, up to 5,376 sf of ground floor space could alternatively be utilized for active retail/restaurant.

ii) Impact Discussion

1) Air Quality

Would the alternative conflict with or obstruct implementation of the applicable air quality plan?

Alternative 4 would construct a similar amount of new building square footage as the project. Therefore, construction of Alternative 4 would generate the same amount of air emissions as the project. Construction of Alternative 4 would be subject to the same regulatory measures (e.g., SCAQMD rules) as those required for the project. As with the project, Alternative 4 would not result in construction air quality emissions that exceed the SCAQMD thresholds of significance. Furthermore, land uses proposed under Alternative 4 would be consistent with the BTV land use designation on the site and would not exceed the assumptions utilized in preparing the AQMP. Therefore, Alternative 4 would not conflict with or obstruct implementation of the AQMP. As Alternative 4 would generate the same amount of emissions as the project, impacts with respect to regional plans and AQMP consistency would be the same.

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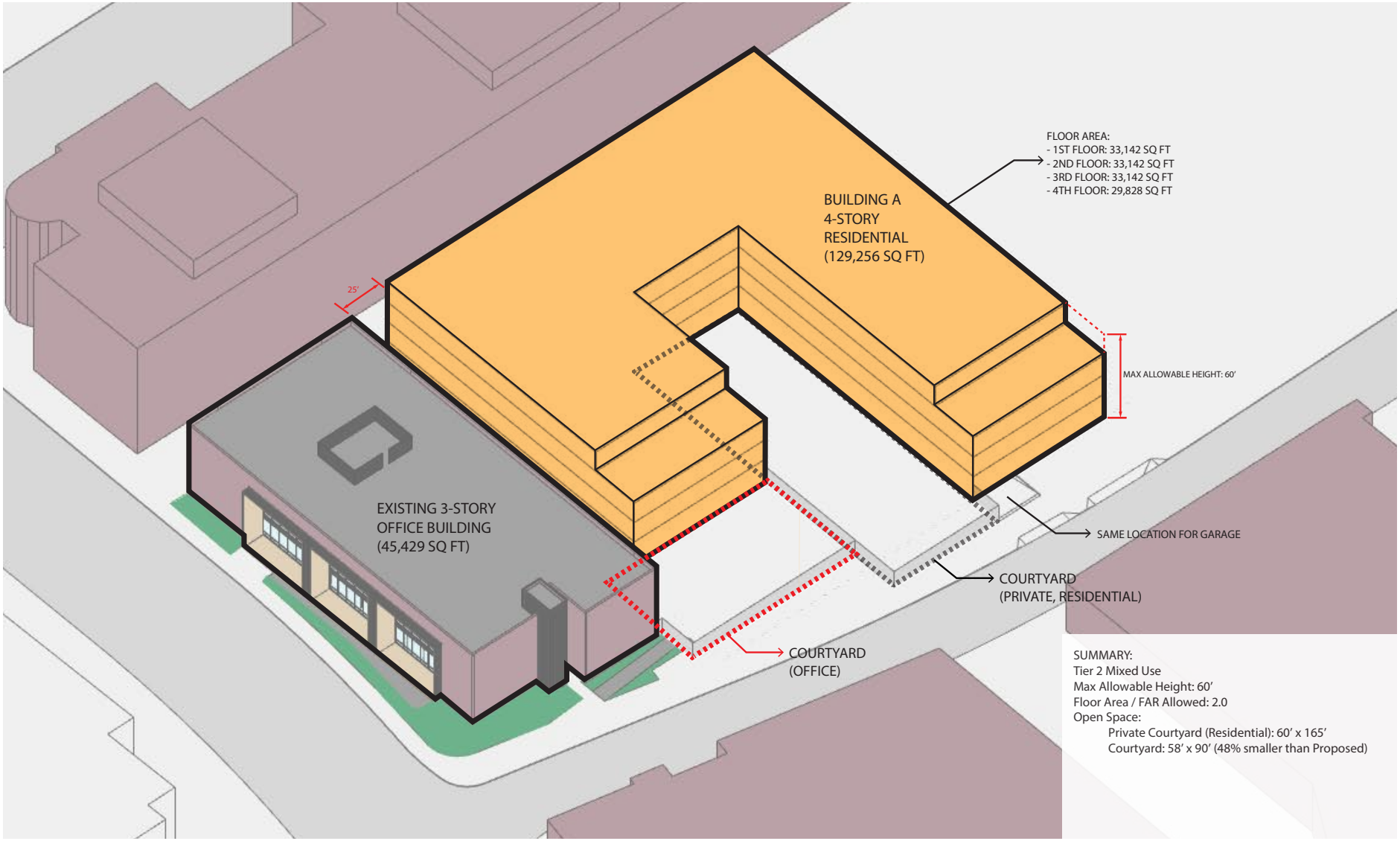

Source: Belzberg Architects, November 2020.

Figure VI-3
Alternative 4: Mixed Use Office & Residential

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Would the alternative result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Construction Impacts

Since new building square footage and amount of excavation is similar, construction of Alternative 4 would generate similar air emissions as the project. Similar to the project, the peak daily emissions generated during the construction of Alternative 4 would not exceed any of the regional emission thresholds recommended by the SCAQMD. Construction of Alternative 4 would be subject to the same regulatory measures (e.g., SCAQMD rules) as those required for the project. Therefore, construction air pollutant emissions overall would be similar to those that would occur with the project and still less than significant.

Operation Impacts

As Alternative 4 proposes net new development of 129,256 sf, which is the same as the net new development square footage of the Project, operational regional air quality emissions associated with area sources (e.g., use of consumer products and maintenance equipment), and energy demand (use of natural gas), under Alternative 4 would be similar to those already analyzed for the project and would not exceed the regional thresholds of significance set by the SCAQMD. As Alternative 4 proposes an increase in commercial uses over that proposed for the project, the mobile source emissions are anticipated to increase slightly, as commercial uses have higher trip generation rates; however, as stated in the Fehr and Peers traffic impact analysis, Alternative 4 does not exceed the City's tier 1 screening criteria of 200 residential dwelling units or less, and a VMT analysis was not required. Therefore, like the project, the mobile source emissions (based on VMT) for Alternative 4 would also be less than significant.

Similar to the project, Alternative 4 would not contribute a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. These impacts would be similar to the project's less than significant impact.

Would the alternative expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

As Alternative 4 proposes the same size building as the project, the on-site construction emissions for Alternative 4 would also be similar to those analyzed for the project, and Alternative 4 would not exceed any of the identified localized thresholds of significance during construction or operation. Alternative 4 would generate the same amount of TACS during construction that would affect residential or school uses due to the greater amount of construction. Therefore, these impacts would be the same as the project's less than significant impact.

Carbon Monoxide Hotspots

Similar to the proposed project, Alternative 4 would generate operational vehicle trips that would incrementally increase CO levels at intersections and roadways within one-quarter mile of sensitive receptors. However, since Alternative 4 would result in a number of vehicle trips similar to that of the proposed project and those vehicle trips are not enough to warrant a VMT analyses per the City's VMT screening protocol, Alternative 4 would similarly not exceed the CAAQS standards and would not cause localized CO concentrations. Impacts will be less than significant.TACs

Potential TAC generators are associated with specific types of facilities such as dry cleaners, gas stations, warehouses, and chrome plating facilities, and are the focus of local control efforts. SCAQMD recommends that operational health risk assessments 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. Similar to the project, Alternative 4 would not result in the use, storage, or

processing of carcinogenic or non-carcinogenic TACs. Overall, impacts with respect to TACs would be similar to those of the proposed project.

Would the alternative result in other emissions (such as those leading to odors) affecting a substantial number of people?

Similar to the project, construction for Alternative 4 include the use of architectural coatings and solvents, which could generate other emissions such as odors. The use of such materials would be compliant with all applicable SCAQMD Rules including those addressing odors. Therefore, construction activities or materials would not result in other emissions (such as those leading to odors) affecting a substantial number of people.

Alternative 4 would construct creative and business professional office and residential uses; therefore, similar to the project, long term operation of these uses under Alternative 4 would not result in other emissions (such as those leading to odors). As such, impacts with respect to the other emissions (such as those leading to odors) would be less than significant, similar to the proposed project.

2) Cultural Resources – Archaeological[5]

Would the alternative cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5??

Construction for Alternative 4 would require grading and excavation for a three-level subterranean garage. This excavation would be similar to that required for the project's three-level subterranean garage and there is still a similar potential to uncover archaeological resources from site grading. Alternative 4 would be required to implement the same mitigation measure related to the discovery of unknown archaeological resources as the project. Therefore, impacts would be the same as under the project and less than significant with mitigation.

3) Energy

Would the alternative result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

During construction of Alternative 4, energy would be consumed in the form of electricity, natural gas, and transportation fuel. Construction activities for Alternative 4 would consume a similar amount of energy due to similar development of new building square footage and excavation. Similar to the project, compliance with anti-idling and emissions regulations would minimize or eliminate the wasteful and unnecessary consumption of energy. Therefore, construction of Alternative 4 would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure.

During operation, Alternative 4 would consume electricity for multiple purposes, including lighting and the powering of electronics, equipment, and appliances. Natural gas would also be consumed for heating and cooking. This consumption would be incrementally more due to the residential uses as compared to the project. Alternative 4 would generate fewer employees due the smaller amount of commercial building square footage. As both Alternative 4 and the project propose a development with a similar net square footage, the increase in residential uses would likely offset this potential to reduce the use of transportation fuels during operation as compared to the project's less than significant demand. Furthermore, as Alternative 4 does not meet the screening threshold for a VMT analysis and has less than significant VMT

[5] *Though not a Draft EIR section, the Initial Study identified mitigation for discovery of unknown archaeological resources. As such, this alternative addresses similar impact and mitigation.*

impacts, transportation fuel use during operation is anticipated to be similar to the overall amount analyzed for the project.

Similar to the project, Alternative 4 would support sustainable mobility options by locating office and commercial/retail and residential uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and nearby several public transit routes, including the 26th Street/Bergamot Station for the Metro Line E Light Rail and a number of BBB lines. The site's location near transit in an urban area would result in reduced VMT and transportation energy efficiency, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops.

Would the alternative conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Similar to the project, Alternative 4 would not conflict with energy efficiency or renewable energy plans as the building would comply with existing energy standards including the City's Energy Reach code and the Green Building Ordinance. As with the project, Alternative 4 would incorporate features to reduce energy consumption. Therefore, Alternative 4 impacts related to potential conflict with a state or local plan for renewable energy or energy efficiency would be similar to the project's less than significant impact.

4) Geology and Soils[6]

Would the alternative directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Construction for Alternative 4 would require grading and excavation for a three-level subterranean garage. This amount of excavation would be similar to that required for the project's three-level subterranean garage; therefore, there is a similar potential to uncover paleontological resources from site grading. Alternative 4 would be required to implement the same mitigation measure as the project related to discovery of paleontological resources. Therefore, impacts would be similar to those under the project and less than significant with mitigation.

5) Greenhouse Gas Emissions

Would the alternative generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Similar to the project, Alternative 4 would require grading, excavation, and construction that would generate GHG emissions. These emissions would be similar to the project as both would require excavation for a three-level subterranean garage and similar new building square footage. Alternative 4 would create operational GHG emissions associated with area sources, mobile sources (motor vehicles), energy, water, and solid waste. These operational emissions would be similar to the project. Therefore, impacts from the generation of GHG emissions under Alternative 4 would be similar to those of the project and less than significant.

Would the alternative conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHG?

Similar to the project, Alternative 4 would strive to attain LEED Platinum certification v4 for BD+C: New Construction and Major Renovation designation for all buildings on the project site. As required by Santa Monica code, all new buildings on the site would conform to the City's Green Building Code, Energy Code,

[6] *Though not a Draft EIR section, the Initial Study identified mitigation for discovery of unknown paleontological resources. As such, this alternative addresses similar impact and mitigation*

the City's Water Neutrality Ordinance and Runoff Conservation and Sustainable Management Ordinance requirements. The refurbishment of Building C would comply with the applicable State and City codes. Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~the three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15 percent embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus. The project site is designated as BTV ~~BVT~~ in the BAP. The BTV ~~BVT~~ designation allows for the creation of a vibrant concentration of retail and services, multi-family housing and creative employment and community gathering spaces, especially in proximity to transit. Land uses proposed under Alternative 4 would be consistent with the BTV land use designation on the site. However, the ratio of residential to commercial uses would not be consistent. Alternative 4 is composed of approximately 74 percent residential uses. The BTV ~~BVT~~ designation states that the ratio of residential to commercial uses shall be 40/60. The permitted densities for the BTV ~~BVT~~ were determined so as to achieve a scale that is consistent with the community vision for a pedestrian-oriented district that provides high quality open spaces, and that is oriented to and accessible by transit. Alternative 4 would be located within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station. In addition, Alternative 3 would expand office and commercial employment uses in the City to maximize walking and active transportation modes to get to work in the City. Similar to the project, Alternative 4 would be consistent with the LUCE and BAP goals and policies addressing sustainability. Alternative 4would result in development on the site with a FAR of 2.00, which is similar to the project FAR of 1.99. Therefore, Alternative 4 would expand office and commercial employment and residential uses near transit and would therefore, meet the LUCE goals and policies related to sustainability.

6) Hazards & Hazardous Materials

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

Similar to the project, construction activities associated with Alternative 4 would involve the refurbishing the existing site building, earthmoving activities associated with excavation and grading for the subsurface parking levels, and transporting and disposing construction debris/waste materials, as well as excavated soil. Such activities have the potential to result in the release of hazardous materials into the environment should these demolished site improvements and soil contain hazardous materials or if excavated soil contain elevated concentrations of metals, including copper, lead, and zinc, that exceeds California hazardous waste threshold limits. Additionally, construction activities also involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids required for operation and maintenance of equipment. Similar to the project, Alternative 4 would be required to implement the same mitigation measure as the project including preparing and complying with a Soil Management Plan. Similar to the project, operation of Alternative 4 would not include any uses that generated hazardous materials or waste. Only routine cleaning supplies used in compliance with existing regulations would be used on site. Therefore, impacts during construction and operation would be similar to those under the project and less than significant with mitigation.

Would the alternative emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Similar to the project, Alternative 4 would be located within 0.25-mile of Bright Horizons Children's Center, Evergreen Community School, and Hill & Dale Discover Center Preschool. However, all potentially hazardous materials for construction and operation would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. Additionally, as discussed above, Alternative 4 would be required to implement the same mitigation

measure as the project during construction. Therefore, impacts during construction and operation to nearby schools would be similar to those under the project and less than significant with mitigation.

Would the alternative be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Alternative 4 would be located on the same site as the project. Alternative 4 would not exacerbate any current environmental conditions so as to create a significant hazard to the public or the environment. As such, impacts related to the project site's inclusion on lists of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 would be similar to those of the project and less than significant.

7) Land Use/Planning

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

Similar to the project, Alternative 4 would be consistent with SCAG's RTP/SCS by implementing goals and policies of SCAG's RTP/SCS related to encouraging development in transit rich areas. Alternative 4 would be consistent with policies in the LUCE and BAP related to encouraging development in transit rich areas, creating active and content sensitive spaces, and reducing vehicle trips. Alternative 4 would also serve to reinforce many of the goals and objectives of the LUCE, which include encouraging a lively, active Bergamot Transit Village district with well-designed development, pedestrian-oriented designed ground floors, and appropriately scaled buildings.

Alternative 4 would result in development on the site with a FAR of 2.00, which is similar to the project FAR of 1.99. This FAR would provide ~~expand~~ office and commercial employment similar to the project and also provide residential uses near transit ~~in a similar manner as than the project~~. Therefore, Alternative 4 would meet the LUCE goals and policies related to transit-oriented development in the BTV ~~BVT~~ to a similar extent as the project. Impacts would similarly be less than significant.

8) Noise

Would the alternative result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Similar to the project, Alternative 4 would refurbish the existing office building and demolish the surface parking lot for the construction of a new approximately 130,000 sf residential building. Alternative 4 would create construction noise associated with the use of heavy equipment for demolition, excavation, grading, and building construction that would generate noise. Noise would also be generated from haul trucks, the operation of smaller power tools, generators, and other equipment. Construction noise for Alternative 4 would be the same loudness at all receptor locations as the project. Alternative 4 proposes a similar amount of building square footage; therefore, the duration of time sensitive receptors would be exposed to temporary construction noise would be the same as under the project. Therefore, overall construction noise would be similar to those under the project but still less than significant.

Operation

Alternative 4 proposes office and residential uses. Alternative 4 would result in fewer employees on the site as compared to the project. However, the inclusion of residential uses would result in more trips traveling to and from the site. Therefore, the residential uses could result in an increase in ambient noise levels from traffic over the project.

Similar to the project, on-site noise sources associated with the operations would consist primarily of HVAC/mechanical systems and parking structure-related noise. However, the inclusion of residential uses would result in people on the site 24-hours/day which would incrementally increase noise levels on the site. Like the project, parking would be located in a subterranean garage. Therefore, impacts to ambient noise from operations would be similar to the project and less than significant. Overall, ambient noise from Alternative 4 would be incrementally greater than the project due to the increase in traffic and the presence of people on the site 24-hours/day.

Would the alternative result in generation of excessive ground-borne vibration or ground-borne noise levels?

Similar to the project, construction of Alternative 4 would require the use of heavy equipment for demolition, excavation, and building construction. These activities would generate temporary increases of ground-borne vibration. Alternative 4 would require the same amount of excavation as the project for the three-level subterranean garage. Alternative 4 would require the same amount of construction as the overall new building square footage is similar. Daily construction vibration levels for Alternative 4 would be similar to the project since the quantity and type of equipment used on a daily basis would be the similar. Therefore, ground-borne vibration levels for Alternative 4 would be less than significant, and similar to the project.

9) Transportation

Would the project conflict with adopted policies, plans, or programs addressing the circulation system, including transit, bicycle and pedestrian facilities?

Similar to the project, Alternative 4 would be consistent with the LUCE goals and policies addressing transportation and circulation. Alternative 4 would locate new office and commercial uses as well as residential uses within walking distance (0.15 mile south) of the 26th/Bergamot Metro Line E Light Rail Station, creating access to various mobility options in the City. Alternative 4 would also implement sidewalk improvements connecting to ground-level open space (courtyard), which would also be consistent with the LUCE and BAP policies to create a pedestrian friendly environment and new pedestrian/bicycle connections. Similar to the project, Alternative 4 would provide bicycle amenities, including the required number of bicycle parking spaces, showers, and lockers, and implement a TDM plan that encourage sustainable mobility options and reduce Citywide VMT per capita. Based on the above, impacts related to circulation policies, plans, and programs would be less than significant and would be similar to the project.

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Alternative 4 would construct a 4-story residential building with 107 new residential units. Based on a review of Alternative 4 against the City's VMT screening criteria, Alternative 4 would have a less than significant impact on VMT:

- Alternative 4's number of residential units does not exceed the City's Tier 1 screening criteria of 200 residential dwelling units or less.

Therefore, Alternative 4 would have a less than significant VMT impact and further VMT analysis is not required.

10) Tribal Cultural Resources

Would the alternative cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Alternative 4 would be located on the same site as the project, a former clay pit. There are no known tribal cultural resources on the site. The potential to discover unknown tribal cultural resources is similar under the project and there would be no impact.

iii) Relationship to Project Objectives

Alternative 4 includes development of residential unit which is not an identified project objective. Therefore, this alternative would not meet the underlying purpose of the project, which is to develop an office/creative project in the heart of the Bergamot Area Plan. However, Alternative 4 would meet the following project objectives:

- Alternative 4 would develop a portion of an underutilized site with a well-designed and financially feasible commercial project. Similar to the project, Alternative 4 would promote the City's economic well-being, increase the local tax base, and foster the continued evolution of an active, pedestrian-oriented, mixed-use district. However, the residential uses on the site would not be consistent with the character and operational characteristics of surrounding commercial uses to the same extent as the project.

- Similar to the project, Alternative 4 would ensure a financially feasible project that promotes the City's economic well-being, increases the local tax base, and fosters the continued evolution of an active, pedestrian-oriented, mixed-use district.

- Although Alternative 4 would strategically concentrate new commercial development and facilitate employment centers at a location that capitalizes on existing and future infrastructure and services, including being close to the 26th Street/Bergamot Metro E Light Rail Station, it would do so to a lesser extent due to the reduction in office development.

- Although Alternative 4 would support the growth and expansion of creative arts, entertainment and related uses in the City of Santa Monica that enhance the economic vitality of the Bergamot Plan area, it would do so to a lesser extent since there Alternative 4 would development residential uses with less office square footage and less employment.

- Similar to the proposed project, Alternative 4 would activate the 26th Street and Pennsylvania Avenue street frontages through the construction of streetscape improvements and a perimeter and interior landscaping program that enhances the visual appearance and urban character of the Bergamot Plan area.

- Similar to the proposed project, Alternative 4would facilitate safe and convenient pedestrian and bike travel and access to and from the 26th Street/Bergamot Metro E Light Rail Station.

- Similar to the proposed project, Alternative 4 would support the City's sustainability goals through the refurbishment of an existing office building to reduce consumption of raw materials, material production and the resulting carbon impact . Additionally, Alternative 4 would utilize sustainable building and site design features and construction practices, including mass timber construction and all-electric design for building core and shell, to provide a high-performance and environmentally efficient commercial project that would seek a Leadership in Energy and Environmental Design (LEED)® certification of Platinum.

- Similar to the proposed project, Alternative 4 would provide community and project benefits consistent with the City's Land Use and Circulation Element, including open space opportunities for employees and visitors, transportation demand management, high-quality architectural design, sustainability, payment of a transportation infrastructure fee and enhanced pedestrian environment.

iv) Reduction of Significant Project Impacts

A comparison of the impact of each of the alternatives to the project is summarized in Table VI-6 (Summary of Alternatives' Impacts). All project impacts are less than significant with mitigation and the project would not result in any significant and unavoidable impacts. Alternative 4 would result in similar less than significant impacts with mitigation and would not reduce any impacts.

However, Alternative 4 would result in development on the site with a FAR of 2.00, which is similar to the project FAR of 1.99. This FAR would expand office and commercial employment and residential uses near transit similar to the project. Therefore, Alternative 4 would meet the LUCE goals and policies related to transit-oriented development in the BTV ~~BVT~~, including expanding employment and residential uses in the City that would help to reduce VMT.

5. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment. Of the alternatives considered, the "No Project/No Project Alternative" does not create any new impacts; therefore, it is environmentally superior to the project, which proposes to change existing conditions. However, the No Project Alternative would not achieve any of the project objectives and would not provide any of the community benefits that would be offered by the proposed project.

As previously stated, CEQA requires the identification of another environmentally superior alternative when the No Project Alternative is identified to be environmentally superior to the proposed project. Alternative 2, Tier 1 Development would be environmentally superior to the proposed project. As shown in Table VI-6, this alternative would reduce impacts as compared to the proposed project with respect to overall air quality and greenhouse gas emissions. This alternative, however, would not be as consistent with sustainability, land use, and transportation plans as the project as it would not create as much employment opportunities in a transit-rich area. Therefore, Alternative 2 would not meet the project objectives to the same extent as the project ,nor would it support the City's sustainability goals to the extent that would occur under the proposed project.

Table VI-6
Summary of Alternative Impacts

Impact Area	Proposed Project Impact	Alternative 1: No Project/No Build	Alternative 2: Tier 1 Development	Alternative 3: Tier 3 Development	Alternative 4: Mixed-Use Office & Residential
Air Quality					
Air Quality Plan Conflict	LTS	Less	Less	Greater	Similar
Criteria Pollutants	LTS	Less	Less	Greater	Similar
Sensitive Receptors	LTS	Less	Less	Greater/Similar	Similar
Odors	LTS	Similar	Similar	Similar	Similar
Cultural Resources					
Archaeological Resources	LTS W/ M	Less	Similar	Similar	Similar
Energy					
Wasteful Consumption	LTS	Similar	Less	Similar	Similar
Sustainability Plan Conflict	LTS	Greater	Similar	Similar	Similar
Geology and Soils					
Paleontology	LTS W/ M	Less	Similar	Similar	Similar
Greenhouse Gas Emissions					
Emissions	LTS	Less	Less	Greater	Similar
Plans and Policies	LTS	Greater	Similar	Similar	Similar
Hazards &Hazardous Materials					
Construction	LTS W/ M	Less	Similar	Similar	Similar
Schools	LTS	Similar	Similar	Similar	Similar
Hazardous Site	LTS	Similar	Similar	Similar	Similar
Land Use/Planning					
Plan Conflict	LTS	Greater	Greater	Similar	Greater
Noise					
Construction/Traffic Noise	LTS	Less	Less	Greater	Similar/Greater
Operation	LTS	Less	Less	Greater	Greater
Construction/Operation Vibration	LTS	Less	Less	Greater	Similar
Transportation					
Plans and Policies	LTS	Greater	Similar	Similar	Similar
VMT	LTS	Similar	Similar	Similar	Similar
Tribal Cultural Resources					
Adverse Change to TCR	LTS	Similar	Similar	Similar	Similar

LTS: Less Than Significant; SU: Significant and Unavoidable: Less: Impacts of the alternative are lower as compared to the proposed project;
Similar: Impacts of the alternative are the same or similar as compared to the proposed project.
Greater: Impacts of the alternative are greater as compared to the proposed project.

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VII. EFFECTS FOUND NOT TO BE SIGNIFICANT

1. INTRODUCTION

This section addresses potential environmental resources for which the project would not result in significant impacts related to the environmental topics listed below. California Public Resources Code Section 21003(f) states:

> *"…it is the policy of the State that…all persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment."*

The lead agency, the City of Santa Monica, has determined that the project would not result in potentially significant impacts related to the environmental topics listed below. Pursuant to Section 15128 of the State CEQA Guidelines:

> *"An EIR shall contain 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."*

CEQA Guidelines, Appendix G, provides thresholds for significance that are used by the City of Santa Monica in the Initial Study prepared for the project. In addition, the City of Santa Monica has provided thresholds of significance for two additional issue areas, Construction Effects and Neighborhood Effects that are addressed in the Initial Study and EIR. The Initial Study prepared by the City of Santa Monica is provided in Appendix A to this EIR.

2. EFFECTS FOUND NOT TO BE SIGNIFICANT

It has been determined that there is no substantial evidence that the project could cause significant environmental effects in the following areas:

- **Aesthetics/Shadows –** *All subtopics*
- **Agricultural and Forestry Resources –** *All subtopics*
- **Biological Resources** – *All subtopics*
- **Cultural Resources** – *All subtopics*
- **Geology and Soils** – *All subtopics*
- **Hazards and Hazardous Materials** – *Transport/Use of Hazardous Materials, Airport Land Use Plan Area, Private Airstrip, Emergency Response Plan, Wildland Fires*
- **Hydrology and Water Quality** – *All subtopics*
- **Land Use and Planning** – *Physically Divide an Established Community*
- **Mineral Resources** – *All subtopics*
- **Noise** – *Airport Land Use Plan Area / Vicinity of Private Airstrip*
- **Population and Housing** – *All subtopics*
- **Public Services** – *All subtopics*
- **Recreation** – *All subtopics*
- ~~**Transportation/Traffic** – *Increase Hazards due to Design Features, Inadequate Emergency Access*~~
- **Utilities and Service Systems** – *All subtopics*
- **Wildfire** – *All subtopics*

Refer to the Initial Study found in Appendix A to the EIR for the detailed analysis of these issue areas.

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IX. ACRONYMS AND ABBREVIATIONS

AAM	annual arithmetic mean
AB	Assembly Bill
ACMs	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	average daily traffic
AEP	Association of Environmental Professionals
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASF	Age Sensitivity Factors
ASHRAE	American Society of Heating and Air-Conditioning Engineers
ASTs	above-ground storage tanks
AVR	Average Vehicle Ridership
BAP	Bergamot Area Plan
Basin	South Coast Air Basin
BAU	Business as Usual
BBB	Big Blue Bus
BMPs	best management practices
BPD	Beach Parking District
BRT	bus rapid transit
BSCD	Bayside Commercial District
BTV	Bergamot Transit Village
CAA	Federal Clean Air Act
CAAP	Climate Action & Adaptation Plan
CAC	Conservation: Art Center District
CAFÉ	corporate average fuel economy
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEMA	California Emergency Management Agency
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CalOSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CalRecycle	California Department of Resources Recycling and Recovery
CAPCOA	California Air Pollution Control Officers Association
CC	Civic Center
CCAA	California Clean Air Act
CCE	Community Choice Energy
CCR	California Code of Regulations
CCS	Conservation: Creative Sector District
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act

cf	cubic feet
CFCs	chloroflourocarbons
CFR	Code of Federal Regulations
CH_4	methane
CHP	California Highway Patrol
CIWMB	California Integrated Waste Management Board
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CO	carbon monoxide
CO_2	carbon dioxide
COR	Corrective Action Facilities List
COVID-19	Coronavirus
CPA	Clean Power Alliance
CUPA	Certified Unified Program Agency
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
DFG	Department of Fish and Game
DOT	Department of Transportation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EC	Engineering Controls
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
ERNS	Emergency Response Notification System
EV	electrical vehicle
EVAP	Electrical Vehicle Action Plan
FAA	Federal Aviation Administration
FAR	floor area ratio
FED	Functional Equivalent Document
FHWA	Federal highway Administration
GHG	greenhouse gas
g/mi	grams per mile
Gt	gigatons
GWh	gigawatt-hours
GWP	global warming potential
HFCs	hydrofluorocarbons
HI	hazard index
HMBP	Hazardous Materials Business Plan
HMMA	Hazardous Materials Management Act
HMMP	Hazardous Materials Management Plans
HMMRP	Hazardous Materials Reporting and Response Planning
HQTA	High Quality Transit Areas
HSWA	Hazardous and Solid Waste Act
HVAC	heating, ventilation, and air conditioning

HWCL	Hazardous Waste Control Law
IC	Federal Brownfields and Institutional Controls
in/sec	inches per second
kWh	kilowatt-hours
LACFD	Los Angeles County Fire Department
LAX	Los Angeles International Airport
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
L_{eq}	equivalent energy noise level
L_{max}	maximum instantaneous noise level
L_{min}	minimum instantaneous noise level
LEED	Leadership in Energy and Environmental Design
LHMP	Local Hazard Mitigation Plan
LMSD	Light Manufacturing and Studio District
LNG	liquid natural gas
LOS	Level of Service
LPI	leading pedestrian interval
LSTs	localized significance thresholds
LUCE	Land Use and Circulation Element
LUST	State/Tribal Underground Storage Tank List
MATES IV	Multiple Air Toxics Exposure Study IV
Metro	Los Angeles County Metropolitan Transportation Authority
MICR	maximum individual cancer risk
MMcf	million cubic feet
MMT	million metric tons
$MMTCO_2E$	million metric tons of carbon dioxide equivalents
mpg	miles per gallon
MPO	Metropolitan Planning Organizations
MSW	Municipal solid waste
$MTCO_2e$	metric tons of CO_2 equivalent
MUC	Mixed-Use Creative
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NF_3	nitrogen triflouride
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
N_2O	nitrous oxide
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOD	Notice of Determination
NOP	Notice of Preparation
NOx	nitrogen oxides
NPL	National Priorities List
O_3	ozone

OEHHA	Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OES	Office of Emergency Services
OP-Duplex	OP Duplex Ocean Park Duplex Residential District
OP2	Ocean Park Low Multiple Residential District
OP3	Ocean Park Medium Multiple Residential District
OP4	Ocean Park High Multiple Residential District
OSHA	Occupational Safety and Health Administration
OVA	organic vapor analyzer
Pb	lead
PCBs	polychlorinated biphenyls
pCi/L	picoCuries per liter
PCH	Pacific Coast Highway
PFCs	perfluorocarbons
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppm	parts per million
ppv	peak particle velocity
PV	photovoltaic
R2B	Low Density Multiple Residential Beach District
R3R	Medium Density Multiple Family Coastal Residential District
RCP	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation and Recovery Act
REMEL	Reference Energy Mean Emission Level
RHNA	Regional Housing Needs Assessment
RNCM	Roadway Construction Noise Model
RNG	renewable natural gas
ROGs	reactive organic gases
RPS	Renewables Portfolio Standard
RTP	Regional Transportation plan
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendment and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCP	Santa Monica Sustainable City Plan
SCS	Sustainable Community Strategies
sf	square feet
SF_6	sulfur hexafluoride
SHMP	State of California Multi-Hazard Mitigation Plan
SIP	State Implementation Plan
SLF	Sacred Lands File
SLR	sea level rise

SMC	Santa Monica College
SMFD	Santa Monica Fire Department
SMMC	Santa Monica Municipal Code
SoCalGas	Southern California Gas Company
SO_2	sulfur dioxide
SOx	sulfur oxides
SRA	source receptor areas
SSI	Supplemental Subsurface Investigation Report
SWLF	Solid Waste Landfill Sites
TACs	toxic air contaminants
TDM	Transportation Demand Management
TIA	Transportation Impact Assessment
TMO	Transportation Management Organizations
TNC	Transportation Network Companies
TOD	Transit-oriented development
TPA	Transit Priority Area
TPH	petroleum hydrocarbons
TSCA	Toxic Substances Control Act
TSD	Generators List, Treatment, Storage, and Disposal Facilities List
UCLA	University of California, Los Angeles
UFMP	Urban Forest Master Plan
µg/m3	micrograms per cubic meter
UNFCCC	United Nations Framework Convention on Climate Change
U.S. EPA	United States Environmental Protection Agency
USTs	underground storage tanks
VCP	State Voluntary Cleanup Program
VcB	vibration decibels
VMT	vehicle miles traveled
VOC	volatile organic compound
WMP	waste management plan
ZEVs	zero-emission vehicles

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XI. RESPONSES TO COMMENTS ON THE DRAFT EIR

This section of the EIR provides written comments received on the Draft EIR. Section 15088(a) of the State CEQA Guidelines states that "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." Comments on the Draft EIR include issues raised by the public that warrant clarification or correction of certain statements and content in the Draft EIR. The changes described in this Section and in Section XII, Corrections and Additions, do not add "significant new information" to the Draft EIR that would require recirculation of the Draft EIR. CEQA requires recirculation of a Draft EIR only when significant new information is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

1. LIST OF THOSE WHO COMMENTED ON THE DRAFT EIR

The City received a total of 2 comment letters on the Draft EIR. Each comment letter has been assigned a corresponding number, and comments within each comment letter are also numbered. For example, comment letter "1" is from the Caltrans. The comments in this letter are numbered "1," "2", etc.

The responses acknowledge comments addressing points and opinions relevant to consideration for project approval, and discuss as necessary the points relevant to the environmental review. The response "comment noted" is often used in cases where the comment does not raise a substantive issue relevant to the review of the environmental analysis. Such points are usually statements of opinion or preference regarding a project's design or its presence as opposed to points within the purview of an EIR: environmental impact and mitigation. These points are relevant for consideration in the subsequent project approval process. In addition, the response "comment acknowledged" is generally used in cases where the commenter is correct.

During the public review period, the following organizations/persons provided written comments on the Draft EIR to the City:

Comment Letter No.	Summary of Commenters 1633 26th Street	Date
1	Department of Transportation	January 14, 2021
2	Lozeau Drury, LLP	January 15, 2021

2. COMMENTS AND RESPONSES

This section contains the original comment letters, which have been bracketed to isolate the individual comments, each followed by responses to the individual, bracketed comments within that letter. As noted above, and stated in CEQA Guidelines Sections 15088(a) and 15088(b), comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA

review do not merit a response, but are included within this Final EIR and may be considered by the City of Santa Monica Planning Commission prior to taking action on this Final EIR and the proposed project. In some cases, a response may refer the reader to a previous response, if that previous response substantively addressed the same issues.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-8391
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TTY 711
www.dot.ca.gov

Serious Drought.
Making Conservation
a California Way of Life.

January 14, 2021

Ms. Rachel Kwok, Environmental Planner
City Planning Division
City of Santa Monica
1685 Main Street, Main Stop 28
Santa Monica, CA 90401

RE: 1633 26th Street Office Project
Vic. LA-10 PM R3.34
SCH # 2020050142
Ref. GTS # LA-2020-03287AL-NOP
GTS # LA-2020-03433AL-DEIR

Dear Ms. Kwok:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project would consist of the refurbishment of the project site's existing three story, 45,529 square feet (sf) office building, and replacement of the existing 58,940 sf surface parking lot with two new four-story, creative and/or business professional office buildings. The proposed new buildings (Buildings A and B) would comprise a total of 129,265 sf of new floor area building (Building C) rising to a maximum height of 54 feet. Together, the three buildings would total approximately 174,684 sf and would form a campus-like area leaving open space in the middle as a courtyard. The approximately 10,436 sf courtyard would feature a large mature specimen tree that would be a focal point of the open space. The project would also include a three level subterranean garage with 399 parking spaces with access provided from Pennsylvania Avenue. 1

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

http://opr.ca.gov/ceqa/updates/guidelines/

This development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. 2

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in July 2020. 3

https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743

Overall, a future environmental report should include a Transportation Impact Study (TIS) to ensure all modes are well served by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions. 4

The City's Big Blue Bus and the Los Angeles County Metropolitan Transportation Authority (Metro) provide a dense network of public transit service throughout the study area. The project site is directly accessible via transit links between most areas of the City and much of the metropolitan area including Downtown Los Angeles, University of California, Los Angeles (UCLA)/West Los Angeles, Century City, Los Angeles International Airport (LAX), Venice, and Culver City. 5

The City of Santa Monica is one of the most bikeable community in the Southern California region. The City has a dense and growing network of bicycle facilities including some immediately adjacent to the Project site. The following streets near the project site have marked bicycle lanes separating bicyclists from vehicles: 6

- 26th Street between Olympic Boulevard and Broadway
- Stewart Street (northbound only) between Pico Boulevard and Colorado Avenue
- Yale Street between Colorado Avenue and Montana Avenue
- Broadway from Ocean Avenue to past Centinela Avenue
- Nebraska Avenue from Stewart Street to past Centinela Avenue

Following the alignment of the E Line, the Expo Line Bike Path is located near the project site and is a dedicated bike path, entirely separating bicyclists and other non-motorized users from vehicles on the street. In addition to these facilities, the City designated some streets as Bicycle Routes or Slow Streets allowing for bicyclists to share the same space. Bicycle Routes are marked with "sharrow" markings, and Slow Streets are designed for slow travel and shared, safe usage for all users. Around the project site, Chelsea Avenue between Broadway and Washington Avenue has a Bicycle Route. Slow Streets around the project site include Princeton Street, Harvard Street, and Pennsylvania Avenue. **6 cont.**

Sidewalks are generally present on all streets throughout Santa Monica. Generally, sidewalks throughout Santa Monica between 5 and 15 feet wide depending on the street and block. Olympic Boulevard east of 26th Street lacks sidewalks on the north side of the street. Santa Monica also recently updated man traffic signals in the study area to include a "leading pedestrian interval" (LPI), which holds all vehicle movements (red signal) for several seconds at the start of a pedestrian phase to improve safety by giving pedestrians a head start and improve their visibility to motorists.

Signalized intersections throughout the study area have marked or textured crosswalks and pedestrian countdown signals. Signalized pedestrian walk signals are either automatic at the intersection or actuated by pedestrians by push-button. Recently, as a result of the COVID19 pandemic, the City has temporarily placed all pedestrian walk signals in the City as automatic pedestrian recall mode. All intersections have accessible curb ramps. Caltrans recommends City of Santa Monica to consider pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and use striping to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists, etc. **7**

The project would increase office uses on an underutilized site within 0.15 mile to the 26th/Bergamot Metro Line E Light Rail Station and less than two blocks from existing bus stops. Two bike hubs are within two blocks of the project site, including a hub on 26th Street at Pennsylvania Avenue and another hub at 26th/Olympic Metro Line E Light. Rail Station. To encourage bicycle transit, the project would include ample bicycle parking, shower, and locker facilities. While the project would not change the sidewalks along the 26th Street frontage, it would include the planting of street trees along 26th Street and Pennsylvania Avenue. Along Pennsylvania Avenue, the project would include landscape setback from the street providing seating opportunities for the restaurant/noncommercial space in Building B as well as for pedestrians using the lunch time food trucks. Such space would continue to provide and enhance pedestrians use of food trucks which assists in discouraging use of vehicles to travel for lunch. The project would also be within walking distance of a wide variety of residential, retail, and restaurant use. The project would implement a Transportation Demand Management (TDM) plan in accordance with the City's TDM Ordinance. **8**

The project would include a TDM plan to encourage the use of carpooling, bike commuting, and use of public transportation, including Metro's E Line light rail transit. The TDM plan would include a parking cash out for leased spaces, commuter matching services, transportation allowance, secure bicycling parking and valet service, and other incentives to increase multi-modal transportation and reduce trips to the site. **9**

Since the project's VMT calculations would not exceed VMT Significance Threshold 1 and Significance Threshold 2, the proposed project would have a less-than-significant impact on CEQA Guidelines section 15064.3, subdivision (b). **10**

For this project as a reminder, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size construction/operation truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes. **11**

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03433AL-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse

Comment Letter No. 1

Department of Transportation
District 7
Miya Edmonson
IGR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles, CA 90012

Dated: January 14, 2021

Response to Comment 1

This comment provides introductory text in which Caltrans correctly summarizes the proposed I project, iterates the mission of Caltrans and the mandate through Senate Bill 743 to review transportation impacts using Vehicle Miles Traveled as the primary metric in identifying transportation impacts pursuant to CEQA. No further response is required.

Response to Comment 2

This comment states Caltrans support of multi-modal and complete streets transportation elements that promote alternatives to the use of automobiles. The comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR.

Response to Comment 3

This comment states Caltrans has published a VMT-focused Transportation Impact Study Guide and Interim Land Development and Intergovernmental Review Practitioners Guidance. The comment does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR.

Response to Comment 4

This comment states that the future environmental report includes a Transportation Impact Study addressing reduction in single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility and reducing greenhouse gas emissions. The Transportation Impact Report (Appendix I to the Draft EIR), prepared by Fehr & Peers, November 2020, and the Draft EIR, section IV.G, Transportation/Traffic, addresses existing public transit service available to the patrons of the project site, including nearby City's Big Blue Bus and Metro's bus service stops, Metro E Line (Expo) station located ¼ mile from the project site. Also, the report identified shared mobility technologies, such as Lyft and Uber that change the way people move in around the City. In addition, the report identifies the City's bicycle network, bicycle parking available on site and the citywide Bike Share service that is now privately operated. All of these modes serve to reduce single occupancy vehicle trips and reduce vehicle miles traveled; thus, reducing greenhouse gas emissions. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 5

The comment states the availability of the City's Big Blue Bus and Metro bus service available in the City/study area with accessibility to other areas of metropolitan Los Angeles (e.g., Downtown Los Angeles, UCLA/West Los Angeles, Century City, Culver City, LAX, Venice). The Draft EIR, section IV.G, Transportation/Traffic and the Transportation Impact Study (Appendix I of the Draft EIR), identify the City's Big Blue Bus and Metro bus service available in the project vicinity. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 6

The comment states the availability of bicycle facilities in the project vicinity and identifies specific streets in the area, as well as the bike path following the alignment of Metro's E Line, the Expo Line Bike Path,

XII. CORRECTIONS AND ADDITIONS

As required by Section 15088 of the CEQA Guidelines, this section provides a summary of corrections or clarifications to the Draft EIR. None of the corrections and additions constitutes significant new information or substantial project changes as defined by Section 15088.5 of the CEQA Guidelines. Corrections and additions to the Draft EIR are provided below in underline or strikeout text as needed to indicate an addition or deletion, respectively. Minor typographical errors are not listed below in this section; however, all changes are presented throughout the Final EIR document in underline and strikeout format.

GLOBAL EDIT

- Existing parking on the project site totals 161 (157 standard and 4 handicap), and not 152 spaces. Throughout the Draft EIR, all references to the number of existing parking spaces shall be revised to indicate 161 spaces.
- There is an internal discrepancy regarding the total floor area provided. The project floor area incorrectly stated 174,684 square feet and should read as 174,68<u>5.</u> Throughout the Draft EIR, all references to the total floor area shall be revised to indicate 174,685 square feet.
- Throughout the Draft EIR, "BVT" is used instead of "BTV" to indicate the Bergamot Transit Village district. Where erroneous provided, the abbreviation is corrected to read "BTV". Also, "BAP" is defined as Bergamot Area Plan.

TABLE OF CONTENTS

No corrections or additions are provided.

ES. EXECUTIVE SUMMARY

Page ES-1,

Page ES-1, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. The second sentence, in the last paragraph is revised as follows:

> Specific sustainable features will include, photovoltaic panels on the roof~~s~~ of <u>Building A (feeding all three buildings with conduit on the two new buildings for future use)</u>~~the three buildings,~~<u>;</u> LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

I. INTRODUCTION

No corrections or additions are provided.

II. PROJECT DESCRIPTION

Page II-9, existing parking on the project site totals 161 (157 standard and 4 handicap). Table II-1, Proposed Project Components for *Existing Parking to be Relocated* is revised as follows:

Existing Parking to be Relocated	<u>161</u> ~~50~~ spaces

Page II-12, due to the current leasing market, its recommended to provide some additional flexibility to the construction schedule. Under Construction Grading and Schedule, the second sentence, in the first paragraph is revised as follows:

> It is estimated, respectful of market conditions, that construction would begin 2022 and the project would be operational by the 2nd/3rd quarter of 2024.

Page II-13, the Draft EIR did not find any significant and unavoidable impacts. Due to the Draft EIR findings, it is not necessary to prepare a Statement of Overriding Considerations for the project. Under Required Approvals and Permits, the second bullet item is deleted as follows:

> ~~• Approval of a Statement of Overriding Considerations if necessary (Planning Commission)~~

III. ENVIRONMENTAL SETTING

Page III-1, the date of the NOP was erroneously stated as January 16, 2017 and it was published May 6, 2020. Under Baseline Existing Conditions, the third sentence in the first paragraph is revised as follows:

> The NOP for the proposed project was published on May 6, 2020 ~~January 16, 2~~017.

Page III-1, the location of Santa Monica was erroneously stated as 10 miles west of downtown Los Angeles and is 15 miles. Under Regional Setting, the second sentence of the first paragraph is revised as follows:

> Santa Monica is approximately 15 ~~10~~ miles west of downtown Los Angeles.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. AIR QUALITY

Page IV.A-28, there is an internal discrepancy regarding the total floor area provided. The project floor area incorrectly stated 174,684 square feet and should read as 174,685. Under Impact A-3, the third sentence, in the first paragraph is revised as follows:

> The project's three buildings would total approximately 174,685 ~~174,684~~ sf.

B. ENERGY

Page IV.B-12, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. The second full sentence, in the first paragraph is revised as follows:

> The project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~ LED lighting; no use of cooling towers to minimize water usage; harvesting of storm-water; carbon neutral operations; 15% embodied carbon reduction; electrical vehicle (EV) charging stations; all electric core and shell; and low-water drought tolerant landscape plant palette.

Page IV.B-16, the fourth sentence of the last paragraph is revised as follows:

> In addition, as detailed in the methodology above, the demand factors also accounted for the project's LEED® certification of Platinum and photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings~~.

C. GREEN HOUSE GAS EMISSIONS

Page IV.C-29, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. The second full sentence, in the first paragraph is revised as follows:

> Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

Page IV.C-34, Table IV.C-7, Consistency of the Proposed Project with Applicable Climate Action and Adaptation Plan and Sustainable City Plan GHG Policies, Resource Conservation Goal 3 consistency discussion, the first sentence is revised as follows:

> Key sustainability features for the project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus

Page IV.C-38, Table IV.C-9, Consistency of the Proposed Project with Applicable GHG Reduction Strategies, Climate Action Team consistency discussion for the fifth strategy, the fourth sentence is revised as follows:

> Other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~all three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

Page IV.C-39, Table IV.C-9, Consistency of the Proposed Project with Applicable GHG Reduction Strategies, Climate Action Team consistency discussion for the seventh strategy, the fourth sentence is revised as follows:

> Other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~all three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

D. HAZARDS AND HAZARDOUS MATERIALS

Page IV.D-19, the total number of parking spaces for the project is 399, not 401. The second sentence in the second paragraph is revised as follows:

> The project would also include a three-level subterranean garage with 399 ~~401~~ parking spaces.

E. LAND USE AND PLANNING

Pages IV.E-14, existing parking on the project site totals 161 (157 standard and 4 handicap). The second sentence in the fifth paragraph under Project Characteristics is revised as follows:

> The project would supply 399 parking spaces (includes the 161 ~~50~~ replacement), 16 carpool/vanpool spaces, and 9 EV parking spaces.

Page IV.E-14, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. Under Project Characteristics, the fourth sentence, in the last paragraph is revised as follows:

> Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

Page IV.E-16, Table IV.E-1, Project Consistency with Applicable Goals of the 2016-2040 RTP/SCS, under policy "Actively encourage and create incentives for energy efficiency, where possible", the fourth sentence under the consistency paragraph is revised as follows:

> Other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use) ~~all three buildings~~, LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

Page IV.E-22, Table IV.E-2, Consistency with Applicable Goals and Policies of the LUCE, Policy LU16.1, Design Buildings with Consideration of Solar Patterns, the second sentence of the consistency paragraph is revised as follows:

> The project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~;

Page IV.E-25, Table IV.E-3, Bergamot Area Plan Standards, under the Permitted Use, the first sentence of the project paragraph is revised as follows:

> 174,685 ~~174,684~~ sf of Office/Creative Office (Up to 5,376 sf could be potentially used as Ground floor Retail/Restaurant)

Page IV.E-25, Table IV.E-3, Bergamot Area Plan Standards, under the Max FAR, Tier II, the first sentence of the project paragraph is revised as follows:

> 1.99 FAR (174,685 ~~174,684~~ sf, of which 45,529 sf is existing)

Page IV.E-28, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. Table IV.E-4, Project Consistency with Applicable Goals and Policies of the BAP, Policy LU6.1, the second sentence of the consistency paragraph is revised as follows:

> The project would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings~~.

F. NOISE

Page IV.F-10, the distance between the project site and Santa Monica College Center for Media Design is not specified. The distance is approximately 360 feet to the northeast- east of the project site. The last bullet item under Noise and Vibration Sensitive Receptors is revised as follows:

- Santa Monica College Center for Media and Design (1660 Stewart Street), home of KCRW recording studios, is located approximately 360 feet northeast-east of the project site.

Page IV.F-22, in Table IV.F-11, Estimated Exterior Construction Noise Levels at Closest Receptors, the applicable threshold for the Unmitigated Construction Noise Levels (dBA Leq) would be exceedance of the exterior noise standard (65 dBA) at the closest sensitive receptors plus the allowable 20 dBA increase for a total of 85 dBA. The following footnote is added to Table IV.F-11 for the Unmitigated Construction Noise Levels (dBA Leq) column:

> *(3) Thresholds for Unmitigated Construction Noise Levels (dBA Leq) would be 65 dBA plus the allowable 20 dBA increase for a total of 85 dBA.*

Page IV.F-24, in Table IV.F-12, Project Traffic Noise Contributions, the applicable significance threshold is 3 dBA. The following footnote is added to Table IV.F-12 after the current note regarding the uniform distance notation:

> Significance threshold is 3 dBA.

G. TRANSPORTATION

Page IV.G-7, Figure IV.G-1, Project Area Transit Lines and Bicycle Facilities, was inadvertently left out of the Draft EIR. The Figure is inserted into the Final EIR.

Page IV.G-12, reference to the pertinent LUCE Transportation polices that are analyzed needs to be corrected. The only sentence of the second paragraph under City of Santa Monica General Plan Land Use and Circulation Element is revised as follows:

> Many policies within the LUCE relate to transportation/circulation. The most pertinent polices are listed and analyzed for project consistency in ~~the~~ Section IV.G.3. Environmental Impacts and Mitigations, Table IV.G-1, Project Consistency with Transportation Policies of the LUCE, below.

Page IV.G-23, Impact G-4 subheading needs to reference CEQA Guidelines threshold "Result in inadequate emergency access. Impact G-4 subheading is revised as follows:

> **Impact G-4 The project would not result in inadequate emergency access ~~substantially increase hazards due to a design feature~~. Impacts would be less than significant.**

H. TRIBAL CULTURAL RESOURCES

No corrections or additions are provided.

V. OTHER CEQA CONSIDERATIONS

Page V-1, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. Under Significant Irreversible Environmental Changes, the third sentence, in the fifth paragraph is revised as follows:

> Key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15%

embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

VI. ALTERNATIVES

Pages VI-5, existing parking on the project site totals 161 (157 standard and 4 handicap). Table VI-2, Alternative 1 (No Project/No Build), components under *Current Parking for Commercial* is revised as follows:

Current Parking for Commercial	161 ~~152~~

Pages VI-7, existing parking on the project site totals 161 (157 standard and 4 handicap). Table VI-3, Alternative 2 (Tier 1), Components under *Existing Parking to be Relocated* is revised as follows:

Existing Parking to be Relocated	161 ~~50~~ spaces
Required Parking for Commercial	216 spaces
Total Parking Provided (2 level subterranean garage)	267 spaces (includes relocated spaces)

Page VI-13, photovoltaic panels would be located atop Building A only and provide feed to all three buildings. The other two buildings would include solar-ready conduit for future use. Under Greenhouse Gas Emissions, the fourth sentence, in the second paragraph is revised as follows:

> Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15% embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus.

Pages VI-19, existing parking on the project site totals 161 (157 standard and 4 handicap). Table VI-4, Alternative 3 (Tier 3), components under *Existing Parking to be Relocated* is revised as follows:

Existing Parking to be Relocated	161 ~~50~~ spaces
Required Parking for Commercial	441 spaces
Total Parking Provided (4 level subterranean garage)	399 ~~401~~ spaces ~~(Correct?)[RK1]~~[CZ2]

Page VI-26, under Greenhouse Gas Emissions, the fourth sentence of the first paragraph is revised as follows:

> Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15 percent embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus

Pages VI-31, existing parking on the project site totals 161 (157 standard and 4 handicap). Table VI-5, Alternative 4 (Mixed Use Office & Residential), components under *Existing Parking to be Relocated* is revised as follows:

Existing Parking to be Relocated	161 ~~50~~ spaces
Required Parking for Commercial	349 spaces

Total Parking Provided *(3 level subterranean garage)*	399 spaces

Page VI-38, under Greenhouse Gas Emissions, the second full sentence of the top paragraph is revised as follows:

> Some of the other key sustainability features would include photovoltaic panels on the roof~~s~~ of Building A (feeding all three buildings with conduit on the two new buildings for future use)~~the three buildings,~~; LED lighting; no use of cooling towers to minimize water usage; renewable energy health and wellness initiatives (Fitwel certification); harvesting of storm-water, carbon neutral operations; 15 percent embodied carbon reduction, electrical vehicle (EV) charging stations; all electric core and shell; low-water drought tolerant landscape plant palette; and a smoke-free campus

Page VI-39, the FAR provided under Alternative 4 would maintain existing office use and adds new residential above subterranean parking. Alternative 4 does not expand office use. Under Land Use/Planning, the second sentence, in the second paragraph is revised as follows:

> This FAR would provide~~expand~~ office and commercial employment similar to the project and also provide residential uses near transit ~~in a similar manner as than the project~~.

VII. EFFECTS FOUND NOT TO BE SIGNIFICANT

Page VII-1, for Transportation/Traffic, "Increase Hazards due to Design Features" and "Inadequate Emergency Access" were included in Section IV.G, Transportation, for discussion and analysis. The following is deleted from the list of issue areas on Page VII-1:

- ~~**Transportation/Traffic** – *Increase Hazards due to Design Features, Inadequate Emergency Access*~~

VIII. PREPARERS OF THE EIR

No corrections or additions are provided.

IX. ACRONYMS AND ABBREVIATIONS

No corrections or additions are provided.

X. REFERENCES

No corrections or additions are provided.

XIII. MITIGATION MONITORING AND REPORTING PROGRAM

1. INTRODUCTION

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with project development. The Environmental Impact Report (EIR) for the proposed 1633 26th Street Office Project includes project-specific mitigation measures to reduce the potential environmental effects of the project.

Monitoring of the implementation of adopted mitigation measures is required by Public Resources Code Section 21081.6. This Mitigation Monitoring and Reporting Program (MMRP) for the project provides project-specific mitigation measures and describes the process whereby the mitigation measures would be monitored. Following certification of the MND and approval of this MMRP by the City, the project-specific mitigation measures included in the MND would be monitored as described in this MMRP.

2. PURPOSE

The purpose of the Mitigation Monitoring Program is to ensure compliance with all mitigation measures to mitigate or avoid potentially significant adverse environmental impacts resulting from the project that were identified in the EIR. Implementation of this MMRP shall be accomplished by the City of Santa Monica. Project-specific mitigation measures will be implemented (1) as part of design development of the project, (2) during project construction, (3) as part of project operations, or (4) on an ongoing basis.

3. RESPONSIBIITIES AND DUTIES

In general, monitoring will consist of demonstrating that mitigation measures were implemented and that the responsible unit monitored the implementation of the measures. Monitoring will consist of determining whether:

- The specific issues identified in the mitigation measures were considered in the design development phase
- Construction contracts included the provisions specified in the mitigation measures
- The required actions specified in the mitigation measures occurred prior to or during construction
- Ongoing administrative activities included the provisions identified in the mitigation measures

Any concerns between monitors and construction personnel shall be addressed by the appropriate City staff. The contractor shall prepare a construction schedule subject to review and approval by the City.

4. LIST OF MITIGATION MEASURES

All project-specific mitigation measures included in the EIR for this project will be monitored as described above. The monitoring program is provided below.

AIR QUALITY

No mitigation measures required.

ENERGY

No mitigation measures required.

GREENHOUSE GAS EMISSIONS

No mitigation measures required.

HAZARDS AND HAZARDOUS MATERIALS

MM D-1	**Soil Management Plan.** 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 Regional Water Quality Control Board (RWQCB), DTSC, SMFD, Santa Monica Public Works Water Resources Division) for review and approval. The soils management plan and transportation plan shall include the following tasks: <u>Soils Management Plan</u> Procedures shall be established for recognizing hazardous materials [e.g., training of construction workers regarding tell-tale signs of contaminated soils (e.g., staining, leakage or odors) in soils during constructed. Soils shall be tested to determine level of contamination. Affected soils shall be either directly loaded into awaiting trucks for immediate offsite disposal or temporarily stockpiled on plastic sheeting prior to load-out and offsite disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came. Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following: <u>Soil and Material Segregation</u> Overburden soils shall be screened with an organic vapor analyzer (OVA) in accordance with SCAQMD Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with federal, state, and local regulations. Soil cuttings during the installation of soldier piles shall be disposed of offsite with any affected soils from the deep excavation. <u>Stockpile Management</u> The stockpiled soils for load-out shall be segregated by waste classification: • Nonhazardous waste. • Volatile Organic Compound (VOC)-contaminated nonhazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm. • VOC-contaminated nonhazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll- off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a tarp for offsite transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan. The temporary stockpiles containing affected soils shall be managed as follows: • The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust. • The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.

	• Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made. • If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations. • During stockpile generation and removal, only the working face of the stockpile shall be uncovered. <u>Decontamination Methods and Procedures</u> Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket. Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the onsite and offsite distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas. Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out. Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated but shall be packaged for appropriate offsite disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures: • Nonphosphate detergent and tap-water wash, using a brush if necessary. • Tap-water rinse. • Initial deionized/distilled water rinse. • Final deionized/distilled water rinse. <u>Truck Loading</u> Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following: • Materials shall be transported to an approved treatment/disposal facility. • No excavated material shall extend above the sides or rear of the truck/trailer.

	• Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened. • The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material offsite. <u>Storm Water Management</u> The good housekeeping practices prescribed in the City's Urban Runoff Mitigation Plan (Municipal Code Section 7.10.060) shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with federal, state, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include: • Pumping the standing water into temporary above-ground storage tanks for reuse onsite for dust suppression. • Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain, subject to approval by the City of Santa Monica Water Resources Protection Programs Division. • Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility. <u>Transportation Plan</u> 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. **Responsible Entity:** Public Works Department and Planning and Community Development Department **Monitor:** Public Works Department **Action by Monitor:** Review Soil Management Plan and Transportation Plan.

LAND USE/PLANNING

No mitigation measures required.

NOISE

No mitigation measures required.

TRANSPORTATION/TRAFFIC

No mitigation measures required.

TRIBAL CULTURAL RESOURCES

No mitigation measures required.

INITIAL STUDY (APPENDIX A)

CULTURAL RESOURCES (ARCHAELOGICAL RESOURCES)

CUL-1	If archaeological resources are encountered during implementation of the proposed project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The Applicant shall immediately notify a qualified archaeologist of the find and coordinate with the archaeologist as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The archaeologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. Treatment may include implementation of archaeological data recovery excavations to remove the resource from the project area or preservation in place. The archaeologist shall prepare a final report about the find and shall be submitted by the Applicant to the lead agency, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. The report shall include documentation and interpretation of the resources recovered including evaluation of the find's eligibility for listing in the California Register of Historic Places. The landowner, in consultation with the archaeologist and the lead agency, shall designate repositories in the event that archaeological material is recovered. The archaeologist shall also determine the need for archaeological monitoring for any ground-disturbing activities thereafter. **Responsible Entity:** Community Development Department **Monitor:** Community Development Department **Action by Monitor:** Evaluation of archaeological resources by qualified archaeologist if discovered during construction; treatment plan and final report upon resource discovery.

GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)

GEO-1	If paleontological resources are encountered during implementation of the proposed project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The Applicant shall immediately notify a qualified paleontologist of the find and coordinate with the paleontologist as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The paleontologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository. **Responsible Entity:** Community Development Department **Monitor:** Project applicant; Community Development Department; Planning Division City approved/qualified paleontologist. **Action by Monitor:** Evaluation of paleontological resources by qualified paleontologist if discovered during construction.

GEO-2	The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. **Responsible Entity:** Community Development Department **Monitor:** Project applicant; Community Development Department; Planning Division City approved/qualified paleontologist. **Action by Monitor:** A Report summarizing the results of the monitoring and salvaging efforts by qualified paleontologist if discovered during construction.

XIII. MITIGATION MONITORING AND REPORTING PROGRAM

1. INTRODUCTION

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with project development. The Environmental Impact Report (EIR) for the proposed 1633 26th Street Office Project includes project-specific mitigation measures to reduce the potential environmental effects of the project.

Monitoring of the implementation of adopted mitigation measures is required by Public Resources Code Section 21081.6. This Mitigation Monitoring and Reporting Program (MMRP) for the project provides project-specific mitigation measures and describes the process whereby the mitigation measures would be monitored. Following certification of the MND and approval of this MMRP by the City, the project-specific mitigation measures included in the MND would be monitored as described in this MMRP.

2. PURPOSE

The purpose of the Mitigation Monitoring Program is to ensure compliance with all mitigation measures to mitigate or avoid potentially significant adverse environmental impacts resulting from the project that were identified in the EIR. Implementation of this MMRP shall be accomplished by the City of Santa Monica. Project-specific mitigation measures will be implemented (1) as part of design development of the project, (2) during project construction, (3) as part of project operations, or (4) on an ongoing basis.

3. RESPONSIBIITIES AND DUTIES

In general, monitoring will consist of demonstrating that mitigation measures were implemented and that the responsible unit monitored the implementation of the measures. Monitoring will consist of determining whether:

- The specific issues identified in the mitigation measures were considered in the design development phase
- Construction contracts included the provisions specified in the mitigation measures
- The required actions specified in the mitigation measures occurred prior to or during construction
- Ongoing administrative activities included the provisions identified in the mitigation measures

Any concerns between monitors and construction personnel shall be addressed by the appropriate City staff. The contractor shall prepare a construction schedule subject to review and approval by the City.

4. LIST OF MITIGATION MEASURES

All project-specific mitigation measures included in the EIR for this project will be monitored as described above. The monitoring program is provided below.

AIR QUALITY

No mitigation measures required.

ENERGY

No mitigation measures required.

GREENHOUSE GAS EMISSIONS

No mitigation measures required.

HAZARDS AND HAZARDOUS MATERIALS

MM D-1	**Soil Management Plan.** 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 Regional Water Quality Control Board (RWQCB), DTSC, SMFD, Santa Monica Public Works Water Resources Division) for review and approval. The soils management plan and transportation plan shall include the following tasks: <u>Soils Management Plan</u> Procedures shall be established for recognizing hazardous materials [e.g., training of construction workers regarding tell-tale signs of contaminated soils (e.g., staining, leakage or odors) in soils during constructed. Soils shall be tested to determine level of contamination. Affected soils shall be either directly loaded into awaiting trucks for immediate offsite disposal or temporarily stockpiled on plastic sheeting prior to load-out and offsite disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came. Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following: <u>Soil and Material Segregation</u> Overburden soils shall be screened with an organic vapor analyzer (OVA) in accordance with SCAQMD Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with federal, state, and local regulations. Soil cuttings during the installation of soldier piles shall be disposed of offsite with any affected soils from the deep excavation. <u>Stockpile Management</u> The stockpiled soils for load-out shall be segregated by waste classification: • Nonhazardous waste. • Volatile Organic Compound (VOC)-contaminated nonhazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm. • VOC-contaminated nonhazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll- off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a tarp for offsite transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan. The temporary stockpiles containing affected soils shall be managed as follows: • The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust. • The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.

	• Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made. • If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations. • During stockpile generation and removal, only the working face of the stockpile shall be uncovered. <u>Decontamination Methods and Procedures</u> Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket. Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the onsite and offsite distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas. Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out. Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated but shall be packaged for appropriate offsite disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures: • Nonphosphate detergent and tap-water wash, using a brush if necessary. • Tap-water rinse. • Initial deionized/distilled water rinse. • Final deionized/distilled water rinse. <u>Truck Loading</u> Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following: • Materials shall be transported to an approved treatment/disposal facility. • No excavated material shall extend above the sides or rear of the truck/trailer.

	• Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened. • The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material offsite. <u>Storm Water Management</u> The good housekeeping practices prescribed in the City's Urban Runoff Mitigation Plan (Municipal Code Section 7.10.060) shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with federal, state, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include: • Pumping the standing water into temporary above-ground storage tanks for reuse onsite for dust suppression. • Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain, subject to approval by the City of Santa Monica Water Resources Protection Programs Division. • Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility. <u>Transportation Plan</u> 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. **Responsible Entity:** Public Works Department and Planning and Community Development Department **Monitor:** Public Works Department **Action by Monitor:** Review Soil Management Plan and Transportation Plan.

LAND USE/PLANNING

No mitigation measures required.

NOISE

No mitigation measures required.

TRANSPORTATION/TRAFFIC

No mitigation measures required.

TRIBAL CULTURAL RESOURCES

No mitigation measures required.

INITIAL STUDY (APPENDIX A)

CULTURAL RESOURCES (ARCHAELOGICAL RESOURCES)

CUL-1	If archaeological resources are encountered during implementation of the proposed project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The Applicant shall immediately notify a qualified archaeologist of the find and coordinate with the archaeologist as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The archaeologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. Treatment may include implementation of archaeological data recovery excavations to remove the resource from the project area or preservation in place. The archaeologist shall prepare a final report about the find and shall be submitted by the Applicant to the lead agency, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. The report shall include documentation and interpretation of the resources recovered including evaluation of the find's eligibility for listing in the California Register of Historic Places. The landowner, in consultation with the archaeologist and the lead agency, shall designate repositories in the event that archaeological material is recovered. The archaeologist shall also determine the need for archaeological monitoring for any ground-disturbing activities thereafter. **Responsible Entity:** Community Development Department **Monitor:** Community Development Department **Action by Monitor:** Evaluation of archaeological resources by qualified archaeologist if discovered during construction; treatment plan and final report upon resource discovery.

GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)

GEO-1	If paleontological resources are encountered during implementation of the proposed project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The Applicant shall immediately notify a qualified paleontologist of the find and coordinate with the paleontologist as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The paleontologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository. **Responsible Entity:** Community Development Department **Monitor:** Project applicant; Community Development Department; Planning Division City approved/qualified paleontologist. **Action by Monitor:** Evaluation of paleontological resources by qualified paleontologist if discovered during construction.

GEO-2	The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. **Responsible Entity:** Community Development Department **Monitor:** Project applicant; Community Development Department; Planning Division City approved/qualified paleontologist. **Action by Monitor:** A Report summarizing the results of the monitoring and salvaging efforts by qualified paleontologist if discovered during construction.