



City of Santa Monica
**Addendum to the
6th Cycle 2021-2029
Housing Element Update EIR
(State Clearinghouse
No. 2020100575)**

OCTOBER 2022

Prepared for:

CITY OF SANTA MONICA
Community Development Department
1685 Main Street
Santa Monica, CA 90410

Prepared by:

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

This Page Intentionally Left Blank

TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1.0	Introduction	1
1.1	Project Background	1
1.2	Overview of the Revised Housing Element Update.....	3
1.3	California Environmental Quality Act Compliance	4
1.4	Summary of Significant and Unavoidable Impacts in the Previously Certified Final EIR (SCH No. 2020100575).....	6
1.4.1	Air Quality	6
1.4.2	Cultural Resources	7
1.4.3	Noise	7
1.4.4	Public Services	7
1.4.5	Utilities	8
1.4.6	Transportation.....	8
1.5	Format and Content of this Addendum.....	8
1.6	Preparation and Processing of this Addendum	9
1.7	Initial Study Checklist	9
2.0	Existing Setting and Project Description	10
2.1	Existing Setting and Characteristics	10
2.2	Existing Regulatory Setting	11
2.2.1	Downtown Community Plan.....	12
2.2.2	Bergamot Area Plan	13
2.2.3	Zoning Ordinance	14
2.3	Proposed Revisions to the Previously Adopted Housing Element Update.....	15
3.0	Initial Study Checklist	20
3.1	Aesthetics/Shadows	24
3.2	Agriculture and Forestry Resources	29
3.3	Air Quality	32
3.4	Biological Resources	49
3.5	Cultural Resources	52
3.6	Energy	56
3.7	Geology and Soils	64
3.8	Greenhouse Gas Emissions.....	70
3.9	Hazards and Hazardous Materials	73
3.10	Hydrology and Water Quality.....	78
3.11	Land Use and Planning	83
3.12	Mineral Resources	87
3.13	Noise	88
3.14	Population and Housing	95
3.15	Public Services	98
3.16	Transportation	104
3.17	Tribal Cultural Resources	113
3.18	Utilities and Service Systems	115
3.19	Wildfire	125
3.20	Mandatory Findings of Significance	126
4.0	References.....	129

LIST OF APPENDICES

Appendix A	Air Quality and Greenhouse Gas Study
Appendix B	Transportation Impact Analysis
Appendix C	Fuel Consumption Calculations

LIST OF TABLES

Table 1	Comparison of Suitable Sites Inventory under the Previously Adopted Housing Element Update and the Revised Housing Element Update	4
Table 2	FAR Range Allowed for the Previously Adopted Housing Element Update and the Revised Housing Element Update	16
Table 3	Suitable Sites Inventory Summary under the Revised Housing Element Update	17
Table 4	Unmitigated Individual Project Construction Emissions	36
Table 5	Maximum Daily Construction Emissions for Buildout Scenarios	36
Table 7	Unmitigated Individual Project Operational Emissions	39
Table 8	Future (2030) With Project Scenario Operational Emissions (Minimum Compliance with City Regulations)	39
Table 9	Future (2030) With Project Operational Emissions (Maximum Compliance with City Regulations)	40
Table 10	Estimated Annual Construction Fuel Consumption	57
Table 11	Comparison of Housing Element Construction and County Diesel Fuel Usage	58
Table 12	Estimated Annual Electricity Demand	59
Table 13	Estimated Annual Natural Gas Demand	59
Table 14	Estimated Annual Fuel Demand of the Adopted Housing Element Update and Revised Housing Element Update	62
Table 15	GHG Emissions from Construction Activities Under the Previously Adopted Housing Element Update and the Revised Housing Element Update	71
Table 16	Projected Operational GHG Emissions (MT CO ₂ e per year)	71
Table 17	Summary of Weekday VMT for the Adjusted Baseline (2020), Future (2030) No Project, and Future (2030) With Project Scenarios	109
Table 18	City VMT Threshold 2: Total VMT	110
Table 19	Increased Water Demand under the Housing Element Update	119
Table 20	Increased Wastewater Generation under the Housing Element Update	120
Table 21	Increased Solid Waste Generation under the Revised Housing Element Update	122

ACRONYMS AND ABBREVIATIONS

AADT	annual average daily traffic
AB	Assembly Bill
ACM	asbestos-containing materials
ADU	accessory dwelling units
AF	acre-feet
AFFH	affirmatively furthering fair housing
AFY	acre-feet per year
AIA	Airport Influence Area
ALUP	Airport Land Use Plan
AQMP	Air Quality Management Plan
ARB	Architectural Review Board
ASHRAE	American Society of Heating Refrigerating and Air Conditioning Engineers
BAU	business as usual
BC	Bayside Conservation
bgs	below ground surface
BMP	best management practice
BTV	Bergamot Transit Village
CAAP	Climate Action and Adaptation Plan
CAAQS	California Ambient Air Quality Standards
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CGS	California Geological Service
CIP	Capital Improvement Program
CIS	Coastal Interceptor Sewer
CNEL	Community Noise Equivalent Level
CPA	Clean Power Alliance
dBA	A-weighted decibels
DCP	Downtown Community Plan
DPM	diesel particulate matter
EIR	Environmental Impact Report
EV	electrical vehicle
FAA	Federal Aviation Administration

FAR	floor area ratio
FEM	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
GC	General Commercial
GHG	greenhouse gas
HABS	Historic American Building Survey
HCD	California Department of Housing and Community Development
HRA	Health Risk Assessment
HRI	Historic Resources Inventory
HVAC	heating, ventilation, and air conditioning
HWRP	Hyperion Water Reclamation Plant
I-	Interstate
in/sec	inches per second
IS	Initial Study
kBTU	kilo-British thermal unit
kWh	kilowatt hours
LBP	lead-based paint
LRT	Light Rail Transit
LST	Localized Significance Threshold
LT	Lincoln Transition
LUCE	Land Use and Circulation Element
LUP	Land Use Plan
MERV	minimum efficiency reporting value
MGD	million gallons per day
MUBL	Mixed-Use Boulevard Low
MUC	Mixed-Use Creative
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NC	Neighborhood Commercial
NOMA	North of Montana
NPDES	National Pollutant Discharge Elimination System
NV	Neighborhood Village
OT	Ocean Transition
pph	persons per household
ppm	parts per million
PPV	peak particle velocity
PRMP	Parks and Recreation Maser Plan

PSI	pounds per square inch
PV	photovoltaic
RFP	Request for Proposal
RHNA	Regional
RPA	Registered Professional Archaeologist
RTP/SCS	Regional Transportation Plan / Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SEA	Significant Ecological Area
sf	square feet
SFHA	Special Flood Hazard Area
SMBC	Santa Monica Building Code
SMGB	Santa Monica Groundwater Basin
SMMC	Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Union School District
SMO	Santa Monica Municipal Airport
SMPD	Santa Monica Police Department
SMURRF	Santa Monica Urban Runoff Recycling Facility
SOC	Statement of Overriding Considerations
SoCal Edison	Southern California Edison
SR-	State Route
SSI	Suitable Sites Inventory
SWPPP	Stormwater Pollution Prevention Plan
TA	Transit Adjacent
TAC	Toxic Air Contaminates
TDFM	Travel Demand Forecast Model
TDM	transportation demand management
TPA	transit priority area
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
UST	underground storage tank
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WT	Wilshire Transition

This Page Intentionally Left Blank

1.0 Introduction

This document is an Addendum to the City of Santa Monica (City) 6th Cycle 2021-2029 Housing Element Update (Housing Element Update) Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2020100575), which was previously certified by the City of Santa Monica (City) on October 12, 2021. This addendum has been prepared for the revised September 2022 Housing Element Update, which was drafted in response to correspondence provided by the Department of Housing and Community Development (HCD) on February 7, 2022. (The previously certified Final EIR and the revised Housing Element Update is available at: <https://www.santamonica.gov/housing-element-update>.^{1, 2}) This addendum has been prepared in accordance with the relevant provisions of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the CEQA Guidelines as implemented by the City. According to CEQA Guidelines Section 15164(a), an addendum to a previously certified EIR is the appropriate environmental document in instances when project changes or additions are necessary, but there would be no new or substantially more severe significant environmental effects beyond those identified in the previously certified Final EIR.

Adoption of the Housing Element Update is considered a project under CEQA and is therefore, subject to CEQA compliance (refer to Section 1.3, *EIR Purpose and Legal Authority* in the previously certified Final EIR). CEQA Guidelines Section 15378 explains that where the lead agency could describe the proposed project as either the adoption of a particular regulation or as a development proposal, the lead agency shall describe the proposed project as the development proposal for the purpose of the environmental analysis. For the purposes of CEQA, this addendum focuses upon the buildout / physical changes that would result from the implementation of the revised Housing Element Update, in comparison with the implementation of the previously adopted Housing Element Update that was analyzed in the previously certified Final EIR.

This introduction will discuss: (1) the requirements of CEQA; (2) the previously certified Final EIR for the 6th Cycle 2021-2029 Housing Element Update; (3) the format and content of this addendum; (4) the City's processing requirements to consider the revised Housing Element Update for approval; and (5) an explanation of the Environmental Checklist (Appendix G of the CEQA Guidelines).

1.1 Project Background

As described in Section 1.1, *Housing Element Update Process* in the previously certified Final EIR, the Housing Element Update, which is required by State Housing Law, establishes the City's vision for housing production and supply over the next 8 years. The Housing Element Update provides a comprehensive plan for protecting existing housing in the City and ensuring that the City has the ability to

¹ A redline copy of the revised Housing Element Update (and the updated appendices) is available in the City's June 21, 2022 Staff Report: https://santamoniacityca.igq2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1349&MediaPosition=&ID=4856&CssClass=3.

² The previously certified Final EIR for the 6th Cycle 2021-2029 Housing Element Update is incorporated by reference and is available at: <https://www.santamonica.gov/media/Housing-Element-Update-2021-to-2029/Final%20Draft%206th%20Cycle%20Housing%20EIR.pdf>. The previously certified Final EIR provides an analysis of the previously adopted Housing Element Update.

meet its Regional Housing Needs Allocation (RHNA) of 8,895 dwelling units. The RHNA, issued by the Southern California Association of Governments (SCAG), is a targeted housing number; the obligated to plan for the RHNA and show that under current land use and development standards, there is capacity to accommodate for this number of new dwelling units. Although the City's RHNA is 8,895 units, the guidance provided by HCD states that a jurisdiction's housing element should include a sites inventory that demonstrates capacity for the RHNA as well as a required buffer.

As a first step in complying with the procedural requirements of CEQA, the City conducted a public scoping process consistent with CEQA Guidelines Section 15083. Following the completion of the scoping process, the City prepared and published the Draft EIR for the 6th Cycle 2021-2029 Housing Element on July 1, 2021. The EIR analyzed a total future buildout of up to 11,025 dwelling units in the City through the 8-year period, providing a 24 percent buffer above the City's RHNA. This housing capacity would be achieved through amendments to existing development standards, ranging from a Floor Area Ratio (FAR)³ of 2.25 to 3.25 and heights of 45 to 65 feet. These revisions to FAR and heights, would create capacity for 10,994 new dwelling units. When accounting for residential development projects that had recently been approved and were already in the development pipeline, the EIR provided quantitative impact analyses (e.g., energy, utilities, public services, etc.) of a total future buildout of 11,025 units. The Final EIR for the 2021-2029 6th Cycle Housing Element Update was certified by the City Council on October 12, 2021, followed by adoption and submittal of the Housing Element Update to the HCD for review.

However, on February 8, 2022, HCD reviewed the City's previously adopted 6th Cycle 2021-2029 Housing Element Update and further requested additional revisions to the City's previously adopted Housing Element Update to comply with all aspects of State Housing Law.⁴ HCD asked the City to include more research and detail in its inventory of sites suitable for housing development, particularly in relation to the goal of affirmatively furthering fair housing (AFFH). More specifically, HCD provided the following comments, which have been summarized below:

- *Asked that the Housing Element Update be amended to include: an analysis of how the number of units by income group and location would affect existing housing patterns; more local data and knowledge; and goals and metrics to measure housing mobility enhancement, affordability in high opportunity areas and strategies for displacement protection, and fee/exaction constraints.*
- *Called for more research on recent affordable housing developments to support the City's capacity assumptions for the production of future affordable units, including but not limited to the likelihood of 100 percent nonresidential uses, suitability of nonvacant sites (impediment from existing uses), availability of City owned sites, Accessory Dwelling Unit (ADU) trends, and sufficiency of existing and planned infrastructure sewer capacity.*
- *Raised questions regarding the City's identification of several 15-unit or less sites as viable locations for affordable housing.*

³ Floor Area Ratio (FAR) is defined as the measurement of a building's floor area in relation to the size of the lot/parcel that the building is located on. Additional details for determining FAR are provided at Santa Monica Municipal Code (SMMC) Section 9.04.090.

⁴ HCD's complete correspondence from February 8, 2022 is available at: <https://santamonica.gov/media/Housing-Element-Update-2021-to-2029/IanSantaMonicaAdopt020822.pdf>.

- Requested clarification regarding emergency shelters, permanent supportive housing, and employee housing.
- Requested to commit to modifications to zoning standards and reduction in parking requirements) that the City is proposing in order to meet its housing goals.
- Suggested that the City commit to acreage/site analysis, allowable densities, and anticipated units in its by right approval program. (HCD also requested that sites identified in previous housing element cycles to qualify for by-right approvals if the project includes at least 20 percent affordable housing.)
- Suggested that the City identify more plans to overcome patterns of segregation and foster inclusive communities beyond the City's existing plan to promote accessory dwelling units in single-family zoned neighborhoods.

With the receipt of HCD's comments, City staff prepared revisions to the previously adopted Housing Element Update to respond to HCD's comments. These revisions required increasing the total number of units studied in the previously certified Final EIR. On June 15, 2022, the Planning Commission considered the revised Housing Element Update,⁵ and on June 21, 2022, the City Council directed the transmittal of the revised Housing Element Update to HCD for review and comment.⁶ On September 6, 2022, HCD issued a letter determining that the revised Housing Element Update will comply with State Housing Element Law when it is adopted, submitted to, and approved by HCD. Following receipt of the draft in compliance letter, minor revisions to the implementation dates were made to the revised Housing Element Update to reflect Planning Commission direction. This addendum addresses the revised Housing Element Update, dated September 2022.

1.2 Overview of the Revised Housing Element Update

The revised Housing Element Update would amend the previously adopted Housing Element Update to address the comments and requests provided by HCD on February 8, 2022. Specifically, the proposed revisions focus on the four main topics raised by HCD, including: (1) rezoning to accommodate the RHNA and the required buffer; (2) amendments to the Suitable Sites Inventory (SSI); (3) further commitments related to City-owned sites; and (4) additional approaches to compliance with AFFH, as described further in Chapter 2 of this addendum.

To address HCD's comments, the City has revised the previously adopted Housing Element Update to increase housing capacity, creating a future buildout of up to 13,600 reasonably foreseeable dwelling units, which constitutes an approximately 53-percent buffer, including approximately 6,168 affordable units (see Table 1). Therefore, in comparison to the 11,025 units analyzed in the previously certified Final EIR for the 6th Cycle 2021-2029 Housing Element Update, the proposed revisions would add approximately 2,575 new reasonably foreseeable dwelling units, including an increase of approximately 776 affordable units. While the SSI describes a total of up to 13,600 reasonably foreseeable dwelling

⁵ Planning Commission June 15, 2022 Staff Report (Item 9-A): <https://www.smgov.net/departments/pcd/agendas/Planning-Commission/2022/20220615/s20220615-9A.pdf>.

⁶ City Council June 21, 2022 Staff Report (Item 8.B): <https://santamonicacityca.igam2.com/Citizens/FileOpen.aspx?Type=30&ID=37661>.

units, the impact analysis within this addendum conservatively assumes a maximum development of 14,565 dwelling units; an increase of 3,540 units (see Section 2.4, *Proposed Revisions to the 6th Cycle Housing Element*).⁷

Table 1 Comparison of Suitable Sites Inventory under the Previously Adopted Housing Element Update and the Revised Housing Element Update

	Previously Adopted Housing Element Update		Revised Housing Element Update	
	# Units	# Affordable Unit Capacity	# Units	# Affordable Unit Capacity
Category 1 Approved	1,503	416	2,205	637
Category 1 Pending	680	165	2,168	420
Category 4 City Sites	1,884	1,884	1,880	1,880
Category 11 Religious Sites	257	129	257	130
Category 12 Parking Lots	105	53	96	9
All Remaining Categories	6,289	6,619	6,619	6,619
ADUs	352	232	376	249
Total	11,025	9,168	13,600	9,944
RHNA Targets	8,895	6,168	8,895	6,168
Buffer	+2,175	3,000	+5,670	4,482
	24%		53%	

The increase in housing capacity would be achieved through increased development standards ranging from a FAR of 2.0 to 4.0 and heights of 45 to 84 feet. Based on updated financial feasibility analysis on housing projects and direction from the City Planning Commission to further increase housing potential in the City, the revised Housing Element Update would increase housing potential north of I-10 while slightly reducing the FARs for Main Street, Pico Boulevard, Montana Avenue, and Ocean Park Boulevard (Neighborhood Commercial) (see Section 2.4, *Proposed Revisions to the 6th Cycle Housing Element*).

In addition, since the certification of the Final EIR for the previously adopted Housing Element Update, a number of applications for housing projects were submitted to the City. All of these new project applications are located in the City's transit priority areas (TPAs), and some were previously identified in the SSI of the previously adopted Housing Element. Therefore, the revised Housing Element Update made revisions to the SSI to include these new housing project applications.

1.3 California Environmental Quality Act Compliance

CEQA (Public Resources Code Sections 21000–21177), applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. CEQA

⁷ As described in the revised Housing Element Update, 13,600 units are anticipated in the 6th Cycle housing period. This 13,600 accounts for a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. In addition, per HCD comments, a 15 percent reduction in the potential development capacity of the sites in the SSI was taken to account for the potential that sites may not be developed to their full potential. While the SSI provided in the revised June 2022 Housing Element Update describes a total of 13,600 dwelling units, as described within the methodology for each of the resource areas, the quantitative impact analysis in this addendum conservatively considers an additional 10-percent for a total of 14,565 dwelling units.

generally requires that public agencies identify the environmental consequences of their discretionary actions and consider mitigation measures as well as feasible alternatives that could avoid or substantially reduce significant adverse impacts. If potentially significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an EIR and balance the project's environmental concerns with other goals and benefits in a Statement of Overriding Considerations (SOC).

The previously certified Final EIR is an informational document for the City, acting as Lead Agency, when considering adoption of the Housing Element Update. The EIR is also a fact-finding tool, allowing residents, property owners, agency staff, and decision-makers an opportunity to collectively review and evaluate the potentially significant environmental impacts of the previously adopted Housing Element Update and the ways in which those impacts could be reduced to less than significant levels, either through the implementation of mitigation measures or the adoption of all, or portions, of alternatives to the proposed Project. Consistent with the requirements of a Program EIR, the analysis provided a City-wide assessment of the impacts of the previously adopted Housing Element Update. (The analysis acknowledged that future housing projects in the City would need to be reviewed on a case-by-case basis in the context of the Program EIR to determine if additional environmental documentation is required.)

The CEQA Guidelines allow for reliance upon a previously certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the previously certified EIR. In cases where changes or additions occur with no new significant environmental impacts, an addendum to a previously certified EIR may be prepared, consistent with CEQA Guidelines Section 15164.

Specifically, CEQA Guidelines Section 15164(a) states that:

“The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.”

CEQA Guidelines Section 15162 requires a subsequent EIR where an EIR has already been prepared under the following circumstances:

“Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

Substantial changes occur with respect to the circumstances in which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternative previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

The purpose of this addendum is to address: (1) whether the proposed revisions to the previously adopted Housing Element Update could result in any new significant environmental impacts which were not known or could not have been known in the previously certified Final EIR; or (2) whether previously identified significant impacts would be substantially more severe in comparison to those described in the previously certified Final EIR; or (3) whether any of the other criteria described under CEQA Guidelines Section 15162 are met, requiring the preparation of a subsequent EIR.

As indicated in the analysis provided herein, the previously certified Final EIR retains informational value, and the proposed revisions to the previously adopted Housing Element Update would not constitute a substantial change such that there would be “new significant environmental effects or a substantial increase in the severity of previously identified significant effects.” The City further finds that none of the other factors under CEQA Guidelines Section 15162 have been triggered. On the basis of substantial evidence and in the light of the whole record, the City has determined that an addendum is the appropriate form of CEQA documentation to address the increased number of housing units.

1.4 Summary of Significant and Unavoidable Impacts in the Previously Certified Final EIR (SCH No. 2020100575)

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. As analyzed in the previously certified Final EIR, the previously adopted Housing Element Update would result in potentially significant and unavoidable impacts to the following environmental issue areas:

1.4.1 Air Quality

- **Impact AQ-2** Construction of new residential development planned for under the previously adopted Housing Element Update would result in construction emissions that could potentially exceed the air quality thresholds recommended by the South Coast Air Quality Management District (SCAQMD). Emissions for individual residential developments would be reduced through mitigation measures; however, when taken together, emissions associated residential development planned for under the previously adopted Housing Element Update through the planning horizon of 2030 would likely substantially exceed thresholds. Therefore, this impact was conservatively concluded to be *significant and unavoidable*.

- **Impact AQ-3** The previously adopted Housing Element Update plans for residential development that may exceed the project-specific air quality standards recommended by the SCAQMD. Proposed growth would integrate with and contribute to a sustainable and multi-modal City intended to minimize vehicle trips and reduce operational emissions, particularly given increased affordable housing, which may reduce inbound commuter trips. However, when taken together, the total combined operational emissions from energy use and vehicle trips from residential development planned for under the previously adopted Housing Element Update would exceed SCAQMD recommended thresholds, resulting in a *potentially significant and unavoidable impact*.
- **Impact AQ-4** Construction of new residential development under the previously adopted Housing Element Update may expose sensitive receptors to substantial pollutant concentrations in excess of the established localized significance thresholds (LSTs) during construction. Because no feasible mitigation is available to reduce this impact to a less than significant level, this impact was considered *significant and unavoidable*.

1.4.2 Cultural Resources

- **Impact CR-1** As the previously adopted Housing Element Update does not include individual proposals for residential development projects, detailed information (e.g., project size, type, location) regarding potential effects on specific historic resources are unknown. However, it is conceivable that the demolition or substantial modification of a historic resource could occur as a result of some residential development projects, resulting in the potential for a substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, even with existing State and local regulations and policies in place to protect historic resources, this impact was considered *significant and unavoidable*.

1.4.3 Noise

- **Impact NOI-3** Construction of new residential development planned for under the previously adopted Housing Element Update could potentially expose adjacent persons or structures to temporary, excessive ground-borne vibration levels that would exceed thresholds. Impacts on sensitive receptors from construction vibration were determined to be *potentially significant and unavoidable*.

1.4.4 Public Services

- **Impact PS-1** Increases in the City's residential population anticipated to occur under the previously adopted Housing Element Update would increase the demand for fire protection services and would generate the need for new or physically altered fire protection facilities, the construction of which may result in significant environmental impacts. Planning for such a facility has not yet begun and given the uncertainties regarding the City's future budget, the City cannot guarantee funding for needed future construction or expansion of Santa Monica Fire Department

(SMFD) facilities and staff. This impact was determined to be *potentially significant and unavoidable*.

- **Impact PS-3** New residential development planned for under the previously adopted Housing Element Update would result in expected increases in student enrollment, which would increase the demand on existing school facilities. Notwithstanding Senate Bill (SB) 50, the payment of developer fees to the Santa Monica-Malibu Union School District (SMMUSD) and the previously allocated bond funding measures for facilities improvements would not ensure a reduction in impacts. Therefore, this impact was determined to be *potentially significant and unavoidable*.
- **Impact PS-5** Implementation of the previously adopted Housing Element Update would increase the use of existing neighborhood and regional parks, which could cause the acceleration of substantial physical deterioration of these facilities. Although the City would continue to maintain existing parks and develop new parks consistent with the vision of the City's Land Use and Circulation Element (LUCE) and other City goals, implementation of the previously adopted Housing Element Update would require the construction or expansion of recreational facilities that might have potentially significant adverse physical effect on the environment. Therefore, this impact was determined to be *significant and unavoidable*.

1.4.5 Utilities

- **Impact UT-2** The City's existing and projected water supply would be adequate to meet the increased water demand from the previously adopted Housing Element Update and the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. However, the increase in residential development planned for by the previously adopted Housing Element Update would create substantial increases in water demand which would delay or inhibit the City's ability to achieve water self-sufficiency by 2023, a key City policy goal, which could create inconsistencies with City policy, a *potentially significant impact*.

1.4.6 Transportation

- **Impact T-2** The previously adopted Housing Element Update would not exceed the City's Vehicle Miles Traveled (VMT) Threshold 1: VMT per capita, which requires a project to generate VMT below the existing City-wide average VMT per capita for that particular land use. However, the previously adopted Housing Element Update would exceed the City's VMT Threshold 2: Total VMT, which requires a project's total VMT to be at least 16.8 percent below existing City Business as Usual (BAU) VMT per capita. Therefore, this impact was determined to be *significant and unavoidable*.

1.5 Format and Content of this Addendum

The following components comprise this addendum:

- Introduction (Chapter 1) and Project Description (Chapter 2)
- The completed Environmental Checklist and its associated analysis (Chapter 3), which conclude that the revised Housing Element Update would not result in any new significant environmental impacts or substantially increase the severity of environmental impacts beyond the levels disclosed in the previously certified Final EIR.
- Other technical studies and/or environmental documentation that evaluates the revised Housing Element Update, which are appended to this addendum:
 - Appendix A, Air Quality and Greenhouse Gas Study
 - Appendix B, Transportation Impact Analysis
 - Appendix C, Fuel Consumption Calculations
- Additional materials associated with the Housing Element Update are available at: <https://www.santamonica.gov/housing-element-update>.

1.6 Preparation and Processing of this Addendum

The City directed and supervised the preparation of this addendum. The analysis contained in and the conclusions drawn by this addendum reflect the sole independent judgment of the City.

This addendum will be forwarded, along with the previously certified Final EIR, to the City Council for review as part of its deliberations concerning the Housing Element Update. A public hearing will be held as part of the revised Housing Element Update adoption to: (1) evaluate the revised Housing Element Update; and (2) the adequacy of this addendum. Public comments will be heard at this hearing. At the conclusion of the public hearing, the decision-making body may provide a decision to approve, approve with modifications, or deny approval of the revised Housing Element Update. If approved, the decision-making body will adopt findings relative to the environmental impacts associated with the revised Housing Element Update.

1.7 Initial Study Checklist

The City prepared this Environmental Checklist for the revised Housing Element Update per the requirements described in CEQA Guidelines Section 15063(d)(3) and 15168(c)(4). Appendix G of the CEQA Guidelines includes a suggested checklist to indicate whether the conditions set forth in CEQA Guidelines Section 15162, which would require a subsequent or supplemental EIR, are met and whether there would be any new significant impacts resulting from the revised Housing Element Update not examined in the previously certified Final EIR. The checklist can be found in Chapter 3 of this document. Following the checklist, Sections 3.1 through 3.20 include an explanation and discussion of each significance determination made in the checklist.

The following four possible responses to each of the individual environmental issue areas are included in the checklist:

1. **New Significant Impact.** This response is used to indicate that the proposed revisions to the previously adopted Housing Element Update would result in new significant environmental effects requiring major revisions to the previously certified Final EIR.

2. **Substantially More Severe Impacts.** This response is used to indicate that the proposed revisions to the previously adopted Housing Element Update would substantially increase the severity of previously identified significant effects requiring major revisions to the previously certified Final EIR.
3. **New Ability to Substantially Reduce Significant Impact.** This response is used when there is new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was previously certified; it indicates that there are new mitigation measures or alternatives available to substantially reduce significant environmental impacts associated with the provided revisions to the previously adopted Housing Element Update.
4. **No Substantial Change from Previous Analysis.** This response is used to indicate that the proposed revisions to the previously adopted Housing Element Update would not create a new impact or substantially increase the severity of the environmental impact disclosed in the previously certified Final EIR.

The Environmental Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess the relative environmental impacts of the revised Housing Element Update in the context of the environmental impacts addressed in the previously certified Final EIR. As indicated in the checklist, the proposed revisions would not result in new or substantially severe significant environmental effects.

2.0 Existing Setting and Project Description

The discussion below includes existing setting (see Section 2.1, *Existing Setting and Characteristics*) and regulatory setting (see Section 2.2, *Existing Regulatory Setting*) information to set the context for the revised Housing Element Update. Specific revisions to the programs provided in the previously adopted Housing Element Update are summarized below (see Section 2.3, *Proposed Revisions to the Previously Adopted Housing Element Update*).

2.1 Existing Setting and Characteristics

The City is located in western Los Angeles County along the coast of the Pacific Ocean and is surrounded on three sides by the City of Los Angeles, including the westside communities of Brentwood, Mar Vista, Pacific Palisades, Venice and West Los Angeles. The City comprises approximately 5,280 acres (approximately 8.25 square miles).

- **North** (North of Montana, Wilshire Montana, and Northeast Neighborhoods) – The northern-most area of the City generally consists of lower density, one- to two-story single-family housing on large parcels along tree-lined streets. This area is known as the North of Montana (NOMA) neighborhood and is mostly zoned for single-family or low density housing with the parcels along Ocean Avenue developed with medium density housing. Montana Avenue is the primary commercial corridor in this area, and is characterized by low-scale, one- to two-story, neighborhood-serving retail/restaurant uses. To the south of Montana Avenue and north of Wilshire Boulevard between Ocean Avenue and 21st Street is the Wilshire Montana (Wilmont) neighborhood. This area is developed with multi-family apartment buildings with scattered single-family homes. The northeast portion of the City includes the Northeast Neighborhood which is characterized by mostly single-family homes with a small mix of multi-family buildings. Wilshire Boulevard serves as the southern boundary of the Wilmont and Northeast Neighborhoods and

has a mixed-use character of primarily commercial uses such as office, retail, restaurant, and hotel.

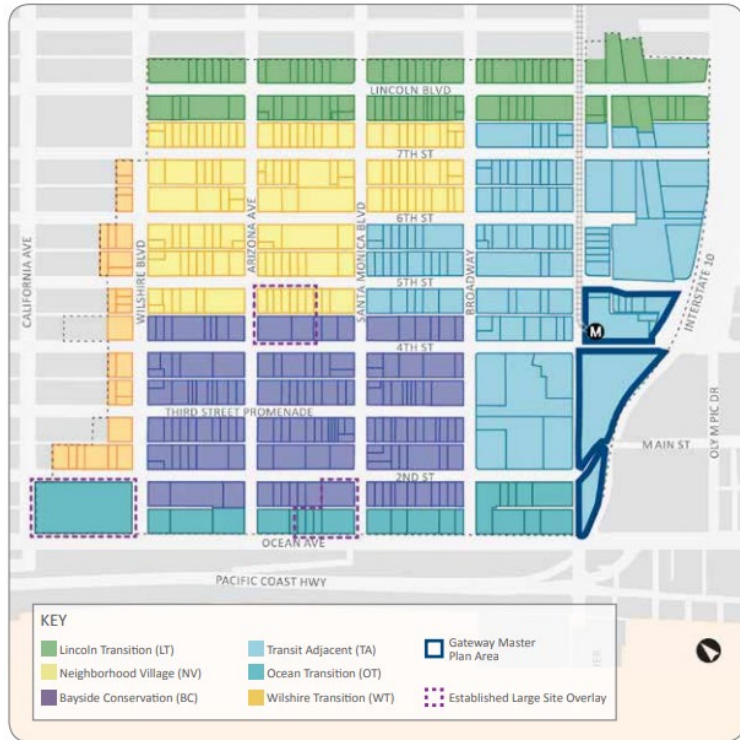
- **East** (Mid-City and Pico Neighborhoods) – The eastern area of the City includes the Mid-City Neighborhood, which is bounded by Washington Avenue to the north, Centinela Avenue to the east, Colorado Avenue (adjacent to the industrial areas) and Santa Monica Boulevard to the south, and 5th Street to the west. The Mid-City neighborhood includes primarily low- to mid-rise, multi-family housing and a range of commercial services along Santa Monica Boulevard and Broadway. In particular, this area includes the City’s two prominent hospitals – University of California, Los Angeles Hospital and Providence Saint John’s Health Center Campus – along with supporting healthcare and medical uses. A significant portion of Santa Monica Boulevard is also lined with automobile dealerships, resulting in its moniker as “auto row.” Further to the south is the Pico Neighborhood which is characterized by a diverse mix of low- to medium-rise multi-family with interspersed single-family residential uses, commercial, and light industrial uses. Commercial uses include the low-scale retail/restaurant uses concentrated along Pico Boulevard, the office uses and light industrial uses within the Bergamot Plan Area, and the light industrial uses near Olympic Boulevard.
- **South** (Ocean Park Neighborhood and Sunset Park Neighborhoods) – In the southern area of the City are the Ocean Park and Sunset Park neighborhoods. Sunset Park neighborhood comprises the southeast portion of the City and is one of the largest residential neighborhoods in Santa Monica, bound by Pico Boulevard to the north, the eastern City limits, the southern City limits, and Lincoln Boulevard to the west. The Sunset Park neighborhood includes the Santa Monica Municipal Airport (SMO) (slated to close December 31, 2028) on the southeast edge of the City as well as the adjacent office campus south of Ocean Park Boulevard that includes a number of large plate office buildings surrounded by swaths of surface parking. To the southwest of the City is the Ocean Park neighborhood bounded by Pico Boulevard to the north, Lincoln Boulevard to the east, the southern City limit to the south and the Pacific Ocean on the west. The Ocean Park neighborhood consists of low- to mid-rise, multi-family with interspersed single-family residential uses. The main commercial area is Main Street, which is home to many retail outlets, restaurants, and neighborhood-serving businesses.
- **West** (Downtown, Civic Center and Ocean Front Districts) – The western edge of the City includes the Downtown District, which is considered the heart of the City, and is a popular regional and local destination. The Downtown is comprised of a diverse mix of uses including retail, restaurant, hotel, entertainment, office, and residential. The Downtown is home to a world class retail district encompassing the Third Street Promenade (Promenade) and Santa Monica Place shopping center, with a mix of restaurants, shops, movie theaters, hotels, and entertainment uses that contribute to the high activity level throughout the day and into the evening hours. Adjacent to the south of the Downtown is the Civic Center district which includes the Los Angeles County Courthouse, Santa Monica City Hall, Tongva Park, Ken Genser Square, Santa Monica Civic Center, Santa Monica High School, RAND, and the Village Mixed-Use Project. West of the Downtown are Palisades Park, the Santa Monica Pier, the beach, and single- and multi-family residential uses.

2.2 Existing Regulatory Setting

For land use planning purposes, the City is divided into 17 land use designations under the LUCE, with development in the Downtown and Bergamot Area of the City governed by adopted specific/area plans and 21 zone district classifications governed by the Zoning Ordinance. The revised Housing Element Update would primarily affect the areas that are described below:

2.2.1 Downtown Community Plan

The DCP encompasses approximately 236 acres (0.37 square miles) in the west-central core of the City adjacent to the Civic Center, Beachfront District, and multi-family residential neighborhoods to the north and east. The Downtown is generally bounded by the north side of Wilshire Boulevard on the north; the east side of Lincoln Boulevard on the east; Interstate (I-) 10 (Santa Monica Freeway) on the south; and Ocean Avenue/Palispades Park on the west. The DCP establishes six land use districts: Lincoln Transition (LT), Ocean Transition (OT), Wilshire Transition (WT), Neighborhood Village (NV), Bayside Conservation (BC), and Transit Adjacent (TA). Each district has its own set of development standards for building height, FAR, and other requirements. The Downtown has accommodated the majority of new residential development within the City over the last decade.



- ***Lincoln Transition District:*** This district includes the properties located on both sides of Lincoln Boulevard. Currently, Lincoln Boulevard is auto-oriented and generally disconnected from the Downtown. In recent years, a number of mixed-use projects (i.e., ground-floor commercial and residential above) have been approved or are under construction along Lincoln Boulevard.
- ***Neighborhood Village District:*** This district extends from 7th Court to 4th Court between Wilshire Boulevard to Santa Monica Boulevard and then from 7th Court to 6th Street between Santa Monica Boulevard and Broadway. This district is an established neighborhood in the Downtown that consists mostly of residential, small floor plate office, civic, religious, and neighborhood-serving retail and restaurant uses.
- ***Transit Adjacent District:*** The Transit Adjacent District includes the properties within an approximately 2.5-block radius from the Downtown Santa Monica Station for the Metro E (Expo) Light Rail Transit (LRT) line (located at 4th Street & Colorado Avenue). This district encompasses a number of different character areas of the Downtown, ranging from the core Downtown uses that include mid-rise hotels and office buildings, through transitional mixed-use areas that include low-scale retail and light industrial uses, to the primary residential areas on the eastern edge. It also includes the Big Blue Bus yards and freeway-adjacent sites.
- ***Bayside Conservation District:*** This district includes the properties from 4th Court to the east side of 2nd Street and the south side of Wilshire Boulevard to the north side of Broadway. The Bayside Conservation District is considered the economic heart of the City, with a broad mix of building types, office space, entertainment, retail, restaurants, cafes, salons and exercise studios.
- ***Wilshire Transition District:*** This district consists of properties on the north side of Wilshire Boulevard between the east side of 2nd Street and west side of 7th Street. Wilshire Boulevard is a

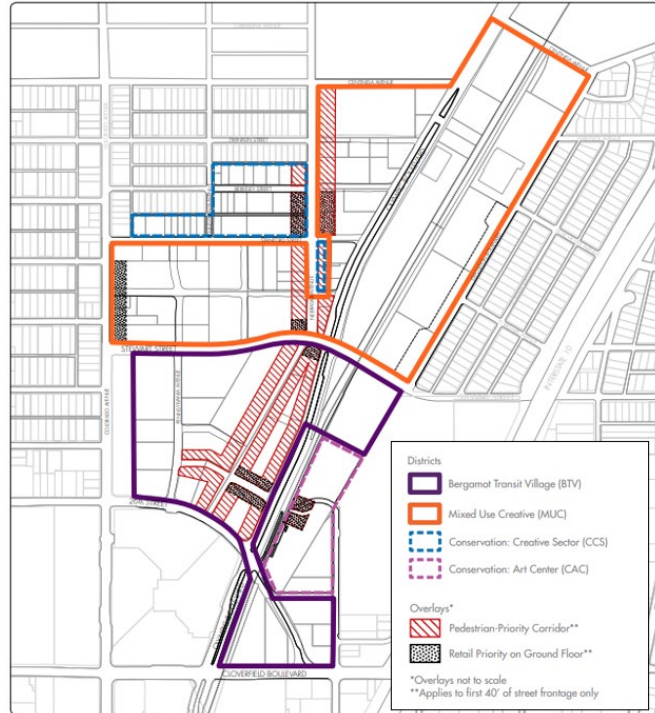
major transportation corridor, providing regional access between the City and West Los Angeles and communities further east. Vehicle traffic volumes drop off sharply west of 4th Street on Wilshire as it terminates at Ocean Avenue.

- ***Ocean Transition District:*** This district extends from the west side of 2nd Street to Ocean Avenue from California Avenue to Colorado Avenue. This district provides panoramic ocean views and is home to the historic Palisades Park as well as hotels and office buildings that range in height from 45 feet to 300 feet.

2.2.2 Bergamot Area Plan

The Bergamot Area is located in the eastern portion of the City, focused around the Bergamot Station for the Metro E (Expo) LRT

line. The Bergamot 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 Bergamot Area is divided into two distinct areas: the Bergamot Transit Village (BTV) in the western portion and the Mixed-Use Creative (MUC) District in the eastern portion, with Steward Street dividing the two areas. The LUCE established the outer parameters of new development in the Bergamot Area Plan; however, the adopted Bergamot Area Plan lowered the Tier 2 development standards for the Bergamot Transit Village and Mixed-Use Creative Districts.⁸



- ***Bergamot Transit Village District:*** The vision of the Bergamot Transit Village District is a vibrant concentration of retail and services, multi-family housing and creative employment and community gathering spaces, especially in proximity to transit. However, since adoption of the Bergamot Area Plan, only a few residential development projects have been approved in this zoning district and no new dwelling units have been constructed to date. This has been attributed in part to the Development Agreement (DA) requirements in this district, which have proved difficult for developers to achieve in the context of the current development environment.
- ***Mixed-Use Creative District:*** The Mixed-Use Creative District emphasizes the continuation of the area's diverse creative and cultural offerings. This zoning district contains primarily a mix of one- to two-story creative offices, the Bergamot Station and the Bergamot Art Center. Within the Mixed-Use Creative District, the Bergamot Area Plan encourages the retention of existing uses along with the balance of new creative arts jobs, housing affordable for the local workforce, and supportive local-serving retail and services. Similar to the Bergamot Transit Village District, since adoption of

⁸ As described further in Section 3.6, *Land Use and Planning* in the previously certified Final EIR, Tier 1 provides a base level for building heights and FARs. The LUCE requires that applicants of Tier 2 and Tier 3 projects (i.e., projects that request taller building heights or greater FARs) provide community benefits.

the Bergamot Area Plan, only a few residential development projects have been approved in this zoning district and only one residential development project has been completed to date.

2.2.3 Zoning Ordinance

- ***Mixed-Use Boulevard Low:*** The Mixed-Use Boulevard Low (MUBL) zoning district includes portions of Colorado Avenue, Broadway, and Lincoln Boulevard, and Santa Monica Boulevard as shown in Figure 2-2 of the previously certified Final EIR. The portion of Broadway designated as Mixed-Use Boulevard Low features a mix of commercial building types and uses, including a row of single-story media/entertainment-related offices on the south side and a combination of parking lots and the Colorado Center along Santa Monica Boulevard, this zoning district includes a mix of auto-related business, medical offices, and a smattering of retail outlets and restaurants serving a primarily auto-based clientele.
- ***Mixed-Use Boulevard:*** The Mixed-Use Boulevard zoning district includes most of Wilshire Boulevard and the portion of Lincoln Boulevard north of the I-10 (Santa Monica Freeway). This zoning district currently includes primarily one to two-story commercial retail, restaurant, neighborhood-serving, and auto-oriented uses such as auto repair shops.
- ***General Commercial:*** The General Commercial (GC) zoning district includes portions of Colorado Avenue, Santa Monica Boulevard, and Broadway. This zoning district is characterized currently by a broad range of commercial uses that provide necessary daily services such as auto sales and auto repair, convenience retail, hotels, hardware stores, and small restaurants.

Properties along Santa Monica Boulevard between 9th Court and 20th Street are zoned General Commercial. This area, which generally known as “auto row,” contains a number of automobile dealerships and service centers, many of which include large surface lots for automobile inventory.

Properties along Lincoln Boulevard south of the I-10 to the southern boundary of the City and along Pico Boulevard between Lincoln Court and the east side of 11th Street are zoned General Commercial. Along these boulevards are a diverse mix of generally older, one-story commercial uses that range from restaurants, retail/personal services, small office, hotel/motel, gas station and auto repair/service uses. Given the location along a major transit corridor and in proximity to a number of retail and services, many of these commercial properties have the potential to turn over and be redeveloped into housing.

- ***Neighborhood Commercial:*** The Neighborhood Commercial (NC) zoning district currently includes one- to two-story neighborhood stores that provide daily goods and services. Ground-floor uses include active, local-serving retail and service commercial uses such as small restaurants, laundromats, dry cleaners, beauty/barber shops, and clothing and grocery stores. Uses above the ground-floor include commercial, office, and some residential uses. This zoning district covers the Main Street and Montana Avenue areas.

Main Street runs north-south in the southern limits of the City, where it borders the Los Angeles community of Venice, and Pico Boulevard, where the Civic Center District begins. Main Street is the main commercial street for the Ocean Park neighborhood and is two blocks from the beach. Main Street contains several prominent historic resources including the Ocean Park Branch Library, the Parkhurst Building, the first Roy Jones House, the Merle Norman Building, and the Horizons West Surf Shop. This street contains primarily one-story buildings occupied with neighborhood-serving retail and restaurant uses.

The Montana Avenue commercial area is located between 6th Court and 17th Street and is enveloped by the NOMA neighborhood to the north, and primarily multi-family residential development to the south. Montana Avenue is home to hundreds of merchants and is the neighborhood's local commercial street with one- and two-story buildings occupied with local-serving retail, restaurants/cafes, personal services, and salons.

- ***Industrial Conservation:*** The Industrial Conservation zoning district is located in two non-contiguous areas within Santa Monica's current industrial lands, separated by the Memorial Park Activity Center Overlay. The western area is bounded on the north by the former railroad right-of-way, on the east by Euclid Court, on the south by I-10 and on the west by Lincoln Court. The eastern area is bounded on the north by the former railroad right-of-way and by Michigan Avenue, on the east by Stewart Street, on the south by I-10 and on the west by 17th Street. This zoning district contains a variety of industrial, light industrial, creative office, and school uses including the City Yards, Crossroads Campus, and the 19th Street Arts Center.

Between 17th Street and Cloverfield Boulevard, new private schools (most notably the Crossroads Campus) art centers, a food bank, a synagogue, and other non-industrial uses have developed in the last 20 years amidst the older light industrial uses and the Southern California Edison (SoCal Edison) electrical substation. Continuing east from Cloverfield, the area has a distinctly different character and is dominated by the City Yards, a combination of one- and two-story storage buildings for maintenance vehicles and materials. Other uses include waste disposal, recycling collection, and transfer facilities. The area to the west of 17th Street is characterized by small-scale industrial and commercial uses, including small manufacturing uses and businesses providing materials and supplies for the building industry.

- ***Office Campus:*** The Office Campus zoning district applies to the Colorado Center, Water Garden, and Lionsgate properties located along Colorado Avenue between Cloverfield Boulevard and Stewart Street as well as the Santa Monica Business Park, north of the airport. The Santa Monica Business Park is an approximately 52-acre site constructed in the mid-1980s in a low density suburban office park style with one- to four-story buildings surrounded by surface parking. Under the City's current Zoning Ordinance, multi-unit dwellings are not permitted in the Office Campus and Industrial Conservation zoning districts.

2.3 Proposed Revisions to the Previously Adopted Housing Element Update

Four main topics were discussed in HCD's February 8, 2022 comment letter on the City's adopted Housing Element Update:

- The City's SSI;
- The shortfall of housing sites/rezoning to meet the City's RHNA;
- The use of City-owned sites to meet the City's lower income targets in the RHNA; and
- Compliance with AFFH.

These topics drove the City's proposed revisions to the previously adopted Housing Element Update as summarized below.

Proposed Amendments to Development Standards Governing Height and FAR

As discussed in Section 1.2, *Overview of the Revised Housing Element Update*, the previously adopted Housing Element Update identified the range of heights and FARs for rezoning. However, HCD’s comments state that the rezoning programs, “...must specifically commit to acreage, allowable densities, anticipated units and meet all requirements pursuant to Government Code Section 65583.2, subdivisions (h) and (i).” In consultation with HCD, it has been clarified that HCD is seeking firm commitments on the number of units and the allowable densities in the revised Housing Element programs, rather than flexibility for the City to adjust a range of FARs.

Based on updated financial feasibility analysis on housing projects and direction from the City Planning Commission to further increase housing potential in the City, the revised Housing Element Update would adjust the originally proposed development standards to further increase housing potential north of I-10 while slightly reducing the FARs for Main Street, Pico Boulevard, Montana Avenue, and Ocean Park Boulevard (Neighborhood Commercial).

Table 2 FAR Range Allowed for the Previously Adopted Housing Element Update and the Revised Housing Element Update

	FAR Range	SSI Capacity	Buffer %
Previously Adopted Housing Element Update	2.25 – 3.25	11,025	24% overall (not sufficient for moderate)
Revised Housing Element Update	2.0 – 4.0	13,600 reasonably foreseeable dwelling units 14,565 maximum theoretical buildout	53% overall

To address HCD’s comment that the rezoning program must include firm commitments, the City also proposes to amend Programs 1J and 1F with tables that show the existing FARs in comparison to the new FARs, the number of acres to be rezoned, and the number of market rate and lower income anticipated units to be produced. As previously described, the addendum focuses upon physical changes to the environment associated with buildout under the revised Housing Element Update.

Suitable Sites Inventory

HCD’s letter states that further revisions are necessary to demonstrate that the sites on the City’s SSI are realistic and have demonstrated potential for residential development. The comments focused on realistic capacity (including the likelihood of 100 percent nonresidential uses occurring), the extent to which existing uses may impede redevelopment, and the appropriateness of small sites to accommodate lower income units. During follow-up conversations, HCD has indicated that the revised Housing Element Update must provide additional evidence to support the use of factors for identifying sites and the need to “connect the dots” in the analysis. In response to HCD’s comments, the City has revised the SSI report for the previously adopted Housing Element Update, including:

1. Providing evidence from past and current housing projects that prove the land improvements value ratio, age and size of building, size of site, and tenancy are valid factors to utilize for identifying redevelopment potential;

2. Including a discount factor to account for the probability of nonresidential uses occurring on an SSI site based on historical trends;
3. Providing a flow chart that clearly shows the methodology used to identify sites and how the capacity of sites was calculated; and
4. Providing tables and maps that show income levels of SSI units by AFFH metrics.

In addition to these revisions, City staff has revised the SSI to account for pending and approved housing applications that have been received since the adoption of the Housing Element Update in October 2021 (see Category 1 in Table 3). All of these new project applications are located in the City's TPAs, and some were previously identified in the SSI of the previously adopted Housing Element Update. Since these recently submitted housing projects would occur regardless of the revised Housing Element Update, they are factual information, and are not caused by the proposed revisions to the Housing Element Update. Therefore, the revised SSI associated with the revised Housing Element Update includes these new housing project applications. These revisions to the SSI as well as changes to FARs, which are discussed previously, would increase the estimated buildout total to 13,600 reasonably foreseeable dwelling units in the next 8 years (see Table 3).

As described in the revised Housing Element Update, a review of the 5th Cycle Housing Element shows that approximately 10 percent of approved and pending projects were withdrawn and/or have had permit approvals expire. Therefore, a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. While the SSI provided in the revised Housing Element Update describes a total of 13,600 dwelling units, as described within the methodology for each of the resource areas, the impact analysis within this addendum conservatively considers maximum theoretical buildout with an additional 10-percent increase, for a total of 14,565 dwelling units.

Table 3 Suitable Sites Inventory Summary under the Revised Housing Element Update

	Total Capacity	Capacity for Affordable Units				
	# Units	# Affordable Units	ELI 30% AMI	VLI 50% AMI	LI 80% AMI	Moderate 120% AMI
Category 1 Approved	2,205	637	127	347	148	15
Category 1 Pending	2,168	420	24	224	41	131
Category 4 City Sites	1,880	1,880	627	627	627	0
Category 11 Religious Sites	257	130	32	32	32	34
Category 12 Parking Lots	96	9	0	0	9	0
All Remaining Categories	6,619	6,619	1,655	1,655	1,655	1,655
ADUs	376	249	56	8	162	23
Total	13,600	9,944	2,521	2,819	2,703	1,901
RHNA Targets	8,895	6,168	1,397	1,397	1,672	1,702
Buffer	+4,705	+3,776	+ 1,124	+ 1,495	+ 1,031	+199
	53%					

Notes: ELI = Extremely Low Income; VLI = Very Low Income; LI = Low Income; Moderate = Moderate Income

The revised Housing Element Update and its associated objectives are designed to address State-wide planning efforts (Government Code Section 65580 et seq.). The RHNA process is a State-mandated

process that determines the amount of future housing growth each city and county must plan for in its Housing Element. This “fair share” allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction’s projected share of regional housing growth across all income categories. The previously certified Final EIR explained that the goals to meet the State-mandated 6th Cycle RHNA for the City, to avoid population displacement, and to locate housing close to daily services and amenities like transportation, jobs, parks, and schools.

The California Supreme Court has explained “the future residents and occupants of development enabled by Project approval would exist and live somewhere else if this Project is not approved” (*Center for Biological Diversity v. Dept. of Fish & Wildlife* [2015] 62 Cal.4th 204, 257). The Legislature has adopted similar findings that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California... Among the consequences of those actions are... reduced mobility, urban sprawl, excessive commuting, and air quality deterioration” (Gov. Code Section 65589.5[a]). The Legislature also recently adopted findings that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives” (Government Code Section 65589.5[a][2][A]). Additionally, the housing crisis was found to harm the environment by “[i]ncreasing greenhouse gas emissions from longer commutes to affordable homes far from growing job centers” (SB 330 Finding 12[B]).

Shortfall of Sites to Accommodate Lower Income Units

State Housing Law requires that when the inventory of sites is insufficient to accommodate the RHNA, the Housing Element Update must identify candidate sites that will be rezoned to meet the shortfall. Assembly Bill (AB) 1398, which took effect on January 1, 2022, requires that the rezoning must occur by October 15, 2023 to accommodate the RHNA.

Appendix F of the previously adopted Housing Element Update identified that the City has a shortfall of approximately 1,109 dwelling units to meet the RHNA for lower income households under current zoning. In compliance with State Housing Law, the previously adopted Housing Element Update included rezoning programs. Specifically, Programs 1F (rezoning of Downtown) and 1J (rezoning of areas other than Downtown) would facilitate rezoning, and Programs 1A (Streamlining) and 1K (Adequate Sites) would address the lower income shortfall.

The housing capacity on City-owned sites – approximately 1,880 dwelling units – would be sufficient to cover the entire shortfall for lower income households. Program 1K requires that uses on City-owned sites identified in the SSI must be at minimum 50 percent residential use with flexibility to have 100 percent residential use, in compliance with Government Code Section 65583.2(h) and (i). In addition, while HCD requires that only candidate sites be rezoned to accommodate the shortfall, Programs 1F and 1J would conservatively rezone entire zoning districts rather than individual sites. This approach allows

for the potential for candidate sites to be removed or sites to be added over the 8-year Housing Element cycle.

Commitment to City-Owned Sites

The previously adopted Housing Element Update identifies five City-owned sites to meet the City's lower income targets in the RHNA. Program 2E in the previously adopted Housing Element Update indicates that approximately 1,884 affordable housing units can be accommodated on City-owned sites.

HCD stated that given the reliance on City-owned sites to accommodate nearly a third of the RHNA's affordable unit allocation, the City would need to demonstrate a greater commitment to facilitate development on City-owned sites in terms of making the land available. HCD also asked that the City describe its efforts (that are within the City's control) to remove barriers to projects that would result in 100 percent affordable housing units on City-owned sites.

To address HCD's comments, the City proposes language revisions to Program 2E that provides further details on the City's commitment for redeveloping City owned sites for affordable housing. These revisions would be based on the following concepts:

- Commitment to minimum number of units (note that if minimum number of units for each City-owned site is not met, then those affordable units must be made up elsewhere in the City, which would potentially mean required upzoning on private property to make up affordable unit capacity);
- Commitment to issue Request for Proposals (RFPs) on a regular and routine schedule for City-owned sites;
- Explanation of the process that the City would pursue to develop City-owned sites;
- Identification of any possible partners that would develop 100 percent affordable housing; and
- List tools that the City has previously used to facilitate affordable housing, such as zoning incentives, streamlined process for 100 percent affordable housing, substantially reduced or free ground rent, funding through local housing trust fund, and support applications for other funding sources for affordable housing.

Compliance with the Mandate to Affirmative Further Fair Housing (AFFH)

Program 4C in the previously adopted Housing Element Update seeks to provide new housing choices and affordability in high opportunity areas – specifically the City's R1 zone neighborhoods. The program seeks to do this by incentivizing additional ADUs in R1 zones. HCD commented that Program 4C is insufficient to demonstrate the City's commitment to fully address the AFFH requirement given the perpetuated segregation in R1 neighborhoods, as noted in the adopted Housing Element Update.

In subsequent conversations, HCD has made clear that the programs in the Housing Element Update must include specific metrics to incentivize housing choice and affordability in R1 zone neighborhoods (which are all high/highest resource areas) in addition to a mid-cycle review to assess whether additional actions need to be taken to achieve established metrics.

Following the preparation of the previously adopted Housing Element Update, SB 9 was passed and became State law. In March 2022, City Council provided direction on concepts to include in a forthcoming ordinance to implement SB 9, including incentivizing a combination SB 9 / ADU projects to produce additional units in larger R1-zoned parcels in the City. Program 4E in the revised Housing Element Update would provide incentives for SB 9 dwelling units in R1 zone neighborhoods. The City shall adopt a local ordinance implementing SB 9, which shall establish an administrative process without any discretionary action, and shall include strong incentives to densify larger parcels in R1 zone neighborhoods by allowing property owners on parcels of at least 10,000 sf to add ADUs as allowed under State Housing Law in addition to SB 9 projects. This would open up the possibility for property owners to construct up to six units through a multi-step process and create more housing choices and affordability in some of the most affluent areas of the City in accordance with Program 4F.

Program 4F would establish a target to increase housing production in R1 zone neighborhoods and would include mid-cycle monitoring to ensure that the City is on track to meet this target. Under the revised Housing Element Update, the City shall aim to issue at least 47 building permits per year for additional housing units and types in R1 zones. The City shall review progress towards targets by December 31, 2025 and if targets are not being met, adjust land use strategies as necessary and appropriate within 1 year.

3.0 Initial Study Checklist

1. Project Title:

City of Santa Monica 6th Cycle 2021-2029 Housing Element Update

2. Lead Agency Name and Address:

City of Santa Monica, 1685 Main Street, Room 212 Santa Monica, California 90407

3. Contact Person and Phone Number:

Rachel Kwok, Environmental Planner
(310) 458-8341

4. Project Location:

City of Santa Monica, California

5. Project Sponsor's Name and Address:

City of Santa Monica, 1685 Main Street, Room 212 Santa Monica, California 90407

6. General Plan Designation:

N/A, City-wide

7. Zoning:

N/A, City-wide

8. **Description of Project** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The proposed Project is defined as the implementation of the revised Housing Element Update, including the amendments to the SSI, rezoning to accommodate the RHNA, further commitment to City-owned sites, and additional approaches to compliance with AFFH, as summarized in Chapter 2 of this addendum. Additional materials related to revised Housing Element Update are available for review at: <https://www.santamonica.gov/housing-element-update>.

9. **Surrounding Land Uses and Setting** (Briefly describe the project's surroundings):

The City of Santa Monica is located in Los Angeles County along the coast of the Pacific Ocean. The City is surrounded on three sides by the City of Los Angeles, including the westside communities of Brentwood, Mar Vista, Pacific Palisades, Venice and West Los Angeles. The City comprises approximately 5,280 acres (approximately 8.25 square miles).

10. **Other Public Agencies whose Approval is Required** (e.g., permits, financing approval, or participation agreement):

HCD

Environmental Factors Potentially Affected

The environmental issue areas checked below would be potentially affected by this project, involving at least one impact that would result in a determination of either "Substantially More Severe Impact" or "New Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics/Shadows | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Neighborhood Effects | <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Public Services and Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

Based on the information and analysis provided in this addendum, pursuant to CEQA Guidelines Section 15162, the City determines the following:

The proposed revisions to the previously adopted Housing Element Update as described in this addendum and any altered conditions since certification of the Final EIR for the 6th Cycle 2021-2029 Housing Element Update:

- Would not result in any new significant or potentially significant environmental effects; and
- Would not substantially increase the severity or intensity of previously identified effects. In addition, no new information of substantial importance has arisen that shows that:
 - The proposed revisions to the Housing Element Update would have new significant or potentially significant effects;
 - The proposed revisions to the Housing Element Update would have substantially more severe effects;
 - Mitigation measures previously found to be infeasible would in fact be feasible; or
 - Mitigation measures that are considerably different from those analyzed in the previously certified Final EIR would substantially reduce one or more significant or potentially significant effects on the environment.

Thus, none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred. For this reason, this Addendum to the Final EIR for the 6th Cycle 2021-2029 Housing Element Update is consistent with CEQA Guidelines Section 15164 and is the appropriate mechanism to address the proposed revisions to the Housing Element Update.

Rachel Kwok

Signature

October 3, 2022

Date

Evaluation of Environmental Impacts

CEQA Guidelines Section 15168(c) provides that when the lead agency adopts a Program EIR, subsequent activities in the program are examined in light of the Program EIR to determine whether an additional environmental document must be prepared. If the lead agency finds that pursuant to CEQA Guidelines Section 15162, no new effects could occur or mitigation measures would be required, the activity may be approved as being within the scope of the project covered by the Program EIR (CEQA Guidelines Section 15162[c][2]). Pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162, if the lead agency determines that one or more of the following conditions are met, a subsequent EIR or negative declaration shall be prepared for the project:

1. Substantial project changes are proposed that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the

involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the negative declaration was adopted shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than identified in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
 - D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Where none of the conditions specified in CEQA Guidelines Section 15162 are present, the lead agency can choose not to prepare a subsequent or supplemental EIR (CEQA Guidelines Section 15162[a]), but may prepare a negative declaration, an addendum, or no further CEQA documentation. CEQA Guidelines Section 15164 states that an addendum to an EIR shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”

This addendum reviews the proposed revisions and any pertinent changes to the circumstances that have occurred since the certification of the Final EIR for the 6th Cycle 2021-2029 Housing Element Update. It also reviews any new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time that the Final EIR for the 6th Cycle 2019-2029 Housing Element Update was certified. It further examines whether, as a result of any changes or any new information, a subsequent or supplemental EIR may be required. This examination includes an analysis of the provisions of Public Resources Code Section 21166 and CEQA Guidelines Section 15162 of the and their applicability to the proposed Project.

3.1 Aesthetics/Shadows

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
I. AESTHETICS/SHADOWS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Produce extensive shadows affecting adjacent uses or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR incorporated the aesthetic/shadows findings from the Initial Study (IS), consistent with CEQA Guidelines Section 15128 (refer to Appendix A in the previously certified Final EIR). That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Have a substantial adverse effect on a scenic vista? (*Less Than Significant Impact*)
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? (*Less Than Significant Impact*)

- c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (*Less Than Significant Impact*)
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (*Less Than Significant Impact*)
- e) Produce extensive shadows affecting adjacent uses or property? (*Less than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project have a substantial adverse effect on a scenic vista?*

No Substantial Change from Previous Analysis. Scenic vistas in the City are those associated with public views of the Pacific Ocean, Santa Monica State Beach, Santa Monica Pier, Santa Monica Mountains, and the bluffs. The City's LUCE includes policies intended to preserve public view corridors, focused upon western views of the ocean from east-west streets and boulevards, public views of the ocean and the Pier from Palisades Park, and public views of the City from the Pier. The City's 2018 Land Use Plan (LUP) of the Local Coastal Program also identifies and designates View Corridors and Vantage Points to be protected as community assets.

As with the previously adopted Housing Element Update, implementation of the revised Housing Element Update would plan for new residential development, some of which could occur in proximity to scenic vistas. New residential development may result in new taller structures than currently exist. Programs 1F and 1J in the revised Housing Element Update would rezone the City and include specific minimum FAR / height for new residential development projects. The revised Housing Element Update does not alter the areas where rezoning would occur, but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. The increase in housing capacity under the revised Housing Element Update would be achieved through increased development standards ranging from a FAR of 2.0 to 4.0 FAR and heights of 45 to 84 feet. The revised Housing Element Update would increase housing potential north of I-10 while slightly reducing FARs for Main Street, Pico Boulevard, Montana Avenue, and Ocean Park Boulevard (Neighborhood Commercial).

The increase in FAR and height would not result in substantially more severe impacts to scenic vistas as compared to those described in the previously certified EIR. Scenic vistas are largely focused on the western periphery of the City and the typical public observers would view such areas from street level. Similar to the previously adopted Housing Element Update, all of the sites identified in the revised SSI associated with the revised Housing Element Update are located within the City's TPAs and would be exempt from aesthetics analysis, consistent with Public Resources Code Section 21099[d][1]). Finally, the residential development planned for under the Housing Element Update would remain subject to existing City goals, policies, or programs related to the protection of public scenic vistas.

When compared to the previously adopted Housing Element Update, no new or more severe impacts to scenic vistas would occur as a result of the revised Housing Element Update. The level of impact would not substantially change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?*

No Substantial Change from Previous Analysis. There are no State-designated scenic highways in the City. State Route (SR-) 1 (Pacific Coast Highway) to the west of the Downtown is eligible for State scenic highway designation, but it is not currently designated as scenic by the State. The City's 2018 LUP of the Local Coastal Program identifies and designates View Corridors and Vantage Points to be protected as community assets and discusses scenic open space, such as the public landscape along Ocean Avenue and public art, as among the City's visual resources. The revised Housing Element Update does not alter the areas where rezoning would occur. Future residential development projects in the City would occur within existing infill sites and would comply with the existing policies set forth in the City's LUCE and the 2018 LUP that protect the City's valued scenic resources (e.g., Santa Monica Pier and the coral trees along San Vicente Boulevard and Olympic Boulevard). Future residential development would also be subject to the regulations of the Santa Monica Municipal Code (SMMC), including the Landmarks Ordinance (SMMC Chapter 9.56), which protects scenic historic resources (including Landmark trees) as well as the Tree Ordinance (SMMC Chapter 7.40), which protect public trees. Further, existing City goals, policies, or programs related to the protection of scenic highways would remain applicable to new residential development projects.

When compared to the previously adopted Housing Element Update, no new or more severe impacts would occur as a result of the revised Housing Element Update. The level of impact would not substantially change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- c) *In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

No Substantial Change from Previous Analysis. Implementation of the Housing Element Update would facilitate new residential development within the City. As provided in CEQA (Public Resources Code Section 21099, amended by SB 743), if an infill residential development project is located within a TPA, aesthetic impacts shall not be considered significant impacts on the environment. Similar to the previously adopted Housing Element Update, all of the sites identified in the revised SSI associated with the revised Housing Element Update are located within the City's TPAs. Therefore, pursuant to Public Resources Code Section 21099(d)(1), aesthetic impacts of new residential development projects occurring in the City's TPAs are considered less than significant.

The revised Housing Element Update would not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. The increase in housing capacity would be achieved through increased development standards ranging from a FAR of 2.0 to 4.0 FAR and heights of 45 to 84 feet. As compared to the previously adopted Housing Element Update, the revised Housing Element Update would increase the housing potential north of I-10 while slightly reducing FARs for Main Street, Pico Boulevard, Montana Avenue, and Ocean Park Boulevard (Neighborhood Commercial). While the

residential development planned for under the revised Housing Element Update would slightly change the visual character in some areas, these changes would not be adverse or significant. New higher density developments would replace aging structures or fill in vacant sites in an urban environment thereby activating street frontages and providing improved pedestrian oriented features and access. Future residential development projects under the revised Housing Element Update would also be required to comply with existing policies and standards governing visual character, including those set forth in the LUCE, applicable area and specific plans (e.g., DCP and Bergamot Area Plan), Open Space Element, Urban Forest Master Plan, 2018 LUP of the Local Coastal Program, and the Zoning Ordinance (Divisions 1 through 5 of Article 9 of the SMMC). New development projects under the revised Housing Element Update would be subject to design review either at the staff level and/or the City's Architectural Review Board (ARB) to ensure compliance with State, regional, and City policies and standards governing scenic quality. As required by the ARB, residential development projects within the City would be required to meet the City's development and design standards regarding site design and architecture. As stated, the mission of the ARB is to "preserve existing areas of natural beauty, cultural importance and assure that buildings, structures, signs or other developments are in good taste, good design, harmonious with surrounding developments, and in general contribute to the preservation of Santa Monica's reputation as a place of beauty, spaciousness and quality."

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with visual character and quality would occur as a result of the revised Housing Element Update. The level of impact would not substantially change from the level identified in the previously certified Final EIR. No mitigation measures are required.

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

No Substantial Change from Previous Analysis. Given the urbanized nature of the City, there are numerous existing sources of light and glare. Sources of glare in the City occur with the reflection of sunlight from polished surfaces, such as window glass or reflective materials, or potentially from broad expanses of light-colored surfaces on building windows and facades. Existing light-generating uses in the City include exterior and interior lighting of various residential and commercial buildings, streetlights, and signage lighting. Vehicles, particularly headlights, are also sources of light and glare.

The revised Housing Element Update would not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. As with the previously adopted Housing Element Update, potential new sources of glare associated with new residential development planned for under the revised Housing Element Update would consist of glazing (i.e., windows) on the façades and other reflective materials used in the façade of the proposed structure. However, SMMC Section 9.21.120 (Reflective Materials) requires that no more than 25 percent of the surface area of any façade on any new building contain black or mirrored glass or other mirror-like material that is highly reflective. Further, to ensure compliance with the SMMC, new residential development projects would be subject to design review either at the staff level and/or the ARB to ensure compliance with SMMC Section 9.21.120.

New residential development projects would generate new sources of light in the City. However, such lighting levels are anticipated to be consistent with existing development in the City. All outdoor lighting would be required to comply with SMMC Section 9.21.080, which sets height, shielding, and other standards for new and replacement lighting on residential and nonresidential buildings as well as parking lots and structures. As such, lighting fixtures associated with new residential development planned for under the revised Housing Element Update would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. Similar to the previously adopted Housing Element Update, all of the sites identified in the revised SSI associated with the revised Housing Element Update are located within the City's TPAs and would be exempt from aesthetics analysis, consistent with Public Resources Code Section 21099(d)(1).

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with light and glare would occur as a result of the revised Housing Element Update. While the revised Housing Element Update would provide for an increased number of dwelling units, all residential development projects would be subject to SMMC regulations for light and glare. The level of impact would not substantially change from the level identified in the previously certified Final EIR. No mitigation measures are required.

e) *Would the project produce extensive shadows affecting adjacent uses or property?*

No Substantial Change from Previous Analysis. Facilities and operations considered sensitive to the effects of shading include solar collectors; residential uses; primarily outdoor-oriented retail uses (e.g., certain restaurants); or routinely useable outdoor spaces associated with recreational, institutional (e.g., schools), or residential land uses. These uses are considered sensitive because sunlight is important for function, physical comfort, and/or commerce. In the City, shadow effects are magnified during the winter, when the sun's lower position in the sky creates longer shadows. Winter is also when maximum solar access is more crucial to solar energy and passive heat production.

Implementation of the Housing Element Update would plan for new housing, some of which could occur in proximity to shadow sensitive receptors (e.g., residential uses, solar collectors, etc.). The revised Housing Element Update would not alter the areas where rezoning would occur. As previously described, new residential development planned for under the revised Housing Element Update may result in new structures that are taller than currently existing structures on-site. Potential shading effects of new buildings on shadow sensitive receptors would vary widely depending upon location, time of day and year, surrounding use (e.g., surface parking and height of existing structures), and building design (e.g., height, mass, etc.) of an individual residential development project. For some residential development projects, shading effects on an adjacent shadow sensitive use may exceed 3 hours particularly in the winter. However, as previously described, all of the sites identified in the revised SSI and rezoning associated with the revised Housing Element Update are located within the City's TPAs. Most of these infill sites are already surrounded by high-density development, and would not adversely affect these existing uses/structures. (Site specific changes would be unique to individual parcels and further analysis is considered too speculative to consider in detail at this time.) Finally, similar to the previously adopted Housing Element Update, all of the sites identified in the revised SSI associated with the revised Housing

Element Update are located within the City's TPAs and would be exempt from aesthetics analysis, consistent with Public Resources Code Section 21099(d)(1).

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with extensive shadows would occur as a result of the revised Housing Element Update. The level of impact would not substantially change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or more severe impacts would occur as a result of the revised Housing Element Update. The level of impact would not substantially change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to aesthetics/shadows.

3.2 Agriculture and Forestry Resources

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
c) Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR incorporated the agriculture and forestry findings from the IS, consistent with CEQA Guidelines Section 15128. That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? *(No Impact)*
- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? *(No Impact)*
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])? *(No Impact)*
- d) Result in the loss of forest land or conversion of forest land to non-forest use? *(No Impact)*
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? *(No Impact)*

Proposed Project Significance Determination

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?*
- d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?*

No Substantial Change from Previous Analysis. As discussed in the IS prepared for the previously certified Final EIR, the California Department of Conservation designates the majority of the City as Urban and Built-Up Land and the remainder of the City as Other Land (i.e., land not included in any other mapping category). Therefore, the revised Housing Element Update would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively “Important Farmland”) to non-agricultural use. In addition, the City is fully developed with urban uses and is not utilized or zoned for agricultural or forestry resources. Therefore, the revised Housing Element Update would not conflict with agriculturally zoned land. The implementation of the revised Housing Element Update would not contribute to the loss or conservation of forest land, and would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The revised Housing Element Update would not alter the areas where rezoning would occur. As with the previously adopted Housing Element Update, none of the zoning districts proposed for rezoning include agricultural lands, agricultural zoning, Williamson Act contracts, forestland, or timberland.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with agricultural lands, agricultural zoning, Williamson Act contracts, forestland, or timberland would occur as a result of the revised Housing Element Update. The level of impact associated with the revised Housing Element Update would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with agriculture or forestry resources would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified did not require any mitigation measures related to agriculture or forestry resources.

3.3 Air Quality

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Conflict with or obstruct implementation of the applicable air quality plan? (*Less Than Significant Impact*)
- 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? (*Significant and Unavoidable Impact*)
- c) Expose sensitive receptors to substantial pollutant concentrations? (*Significant and Unavoidable Impact*)
- d) Result in other emissions (such as those leading to odors) affecting a substantial number of people? (*Less Than Significant Impact*)

Proposed Project Significance Determination

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

No Substantial Change from Previous Analysis. As described further in Impact 3.3(b) and (c), construction and operational emissions associated with residential development planned for under the previously adopted Housing Element Update and the revised Housing Element Update are anticipated to exceed the SCAQMD's project-level significance thresholds. However, the threshold used for determining whether the Housing Element Update would conflict with or obstruct an applicable air quality plan is qualitative and is based on whether it would further the objectives and policies of the plan and not obstruct their attainment. The City is located within the South Coast Air Basin (SCAB), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and is within the jurisdictional boundaries of the SCAQMD. The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).⁹ The 2016 AQMP was prepared to bring the SCAB into compliance with the national 24-hour PM_{2.5} air quality standard and to reduce NO_x emissions sufficiently to meet the upcoming national 8-hour O₃ standards by 2023. The 2016 AQMP relies upon growth projections in SCAG's 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). SCAG's growth projections in turn, normally rely upon cities' adopted general plan growth projections. As the regional agency responsible for such actions, SCAG compiles growth estimates received from individual jurisdictions and generates projections for the region. At such time as the SCAG projections are released, regulatory documents such as a general plan or specific plan are considered to be in compliance with SCAG projections, as the information contained in such documents has at that point been incorporated into the SCAG projections. SCAG updates the regional forecasts and projections approximately every 5 years. As time passes, the SCAG updates continue but communities are not always undertaking the process of updating the information that they provide to SCAG at the same time that SCAG is updating their projections.

The AQMP seeks to achieve multiple goals promoting reductions in criteria pollutant, greenhouse gases (GHGs), and toxic risk, as well as increasing efficiencies in energy use, transportation, and goods movement. It encourages accelerated transition of vehicles, buildings, and industrial facilities to cleaner technologies. The AQMP sets forth programs that require integrated planning efforts and the cooperation of Federal, State, and local agencies. The 2016 AQMP also notes that its strategies are to be implemented in partnership with the RTP/SCS, which includes transportation programs, measures, and strategies generally designed to reduce VMT. While the 2022 AQMP has not yet been adopted, it contains similar goals "to realize a sustainable and connected region Connect So Cal includes a Core Vision that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs and transit closer together and increasing investment in transit and complete streets" (SCAG 2022).

⁹ The 2016 AQMP and the 2022 AQMP are available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

SCAG's 2020-2045 RTP/SCS (Connect SoCal) includes a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans, policies, and assumptions at the time. When SCAG adopted Connect SoCal, SCAG recognized that cities and counties will foreseeably update their housing elements and amend their zoning designations, as necessary, to accommodate the 6th Cycle RHNA. For many cities and counties, SCAG acknowledged that the required 6th Cycle RHNA and associated housing element updates may need to accommodate more housing units than reflected in the Connect SoCal's household and population growth projections for the jurisdictions.

Given the discrepancy in the AQMP and RTP/SCS growth forecasts (the latter of which forms the basis of the AQMP projections), the determination of whether the Housing Element Update would conflict with the AQMP is based on an analysis of its consistency with AQMP's goals, instead of its growth assumptions, which do not account for growth required by the State as set forth in the City's 6th Cycle RHNA. Neither the previously adopted Housing Element Update, nor the revised Housing Element Update would conflict with implementation of the 2016 AQMP or the forthcoming 2022 AQMP. Rather, the Housing Element Update would help achieve regional sustainability goals and pollutant emission reduction targets of the 2016 AQMP and the forthcoming 2022 AQMP. As discussed further in Section 3.11, *Land Use and Planning* and Section 3.16, *Transportation*, the Housing Element Update would create housing opportunities for many of the current employees within the City, reducing the environmental impacts associated with long distance commutes (e.g., vehicle emissions). Additionally, the Housing Element Update would implement and/or support many of the transportation control measures that are utilized and assumed in the AQMP's air quality forecasts. These measures include locating jobs and housing near transit, sustainable development, and other transportation demand management (TDM) measures (consistent with the City's TDM Ordinance, SMMC, Article 9, Chapter 9.53; see Section 3.16, *Transportation*).

As with the previously adopted Housing Element Update, the revised Housing Element Update would be consistent with the standards and policies set forth in the 2016 AQMP and the forthcoming 2022 AQMP. As described in the revised Housing Element Update, the City has approximately 80,000 non-resident employees commuting into the City because they cannot afford to live near their job. The Legislature has adopted findings that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California... Among the consequences of those actions are... reduced mobility, urban sprawl, excessive commuting, and air quality deterioration" (Government Code Section 65589.5[a]).

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with consistency with the goals and policies of the 2016 AQMP or the forthcoming 2022 AQMP would occur as a result of the revised Housing Element Update. The level of impact associated with the revised Housing Element Update would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- b) *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?*

Despite the current nonattainment status and local air quality standard exceedances, air quality in the SCAB has improved generally since the inception of air pollutant monitoring in 1976. This improvement is due mainly to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred despite continued population growth.¹⁰ As discussed in the 2012 AQMP for the SCAB as a whole:

“Despite this growth, air quality has improved significantly over the years, primarily due to the impacts of the region’s air quality control program... PM₁₀ levels have declined almost 50 percent since 1990, and PM_{2.5} levels have also declined 50 percent since measurements began in 1999...the only air monitoring station that is currently exceeding or projected to exceed the 24-hour PM_{2.5} standard from 2011 forward is the Mira Loma station in Western Riverside County. Similar improvements are observed with O₃, although the rate of O₃ decline has slowed in recent years.”

As also discussed in the 2016 AQMP for the SCAB:

“Since the end of World War II, the Basin has experienced faster population growth than the rest of the nation. The annual average percent growth has slowed but the overall population of the region is expected to continue to increase through 2023 and beyond... Despite this population growth, air quality has improved significantly over the years, primarily due to the impacts of air quality control programs at the local, State and federal levels... PM_{2.5} levels in the Basin have improved significantly in recent years. By 2013 and again in 2014 and 2015, there were no stations measuring PM_{2.5} in the Basin violating the former 1997 annual PM_{2.5} NAAQS (15.0 µg/m³) for the 3-year design value period with the filter-based federal reference method (FRM). On July 25, 2016, the USEPA finalized a determination that the Basin attained the 1997 annual (15.0 µg/m³) and 24-hour PM_{2.5} (65 µg/m³) NAAQS, effective August 24, 2016.”

Construction

No Substantial Change from Previous Analysis. Total construction emissions associated with the revised Housing Element Update were estimated using CalEEMod Version 2020.4.0 for each stage of construction, including demolition, grading/excavation, construction, paving, and architectural coating, for new residential development projects.

As described in Section 3.3.3, *Impact Assessment and Methodology* in the previously certified Final EIR, construction emissions were modeled for the average development size (i.e., 25 dwelling units per single development) and the maximum development size (i.e., 397 dwelling units per single development). As shown in Table 4, when considered individually the vast majority of residential development projects would not generate construction emissions that would exceed the SCAQMD’s recommended thresholds of significance. This is confirmed by the environmental analysis prepared for recently approved large development projects in the City, including the Ocean Avenue Project (SCH No. 2018121060) and the

¹⁰ Historical air quality data provided by SCAQMD is available at: <http://www.aqmd.gov/home/air-quality/historical-air-quality-data>.

Miramar Hotel Project (SCH No. 2013041091), neither of which exceeded the SCAQMD project-level thresholds.

Table 4 Unmitigated Individual Project Construction Emissions

	CO	VOC	NO _x	SO ₂	PM ₁₀	PM _{2.5}
Average Project Construction Emissions (lbs/day)	15.2	13.0	4.0	<0.1	3.3	1.6
Maximum Project Construction Emissions (lbs/day)	33.7	205.2	6.3	0.1	10.8	4.8
SCAQMD Thresholds of Significance (lbs/day)	550	75	100	150	150	55

However, the previously adopted Housing Element Update and the revised Housing Element Update would facilitate the development of thousands of new dwelling units over the 8-year Housing Element cycle. Therefore, the impact analysis in the previously certified Final EIR and this addendum also considered and disclosed the criteria air pollutant emissions for two buildout scenarios representing the range of overlap in construction activities:

- The Individual Project Mix Scenario considered the average and maximum sized residential development in the City over the last 10 years. This mix includes some low rise condominiums and some high rise apartments, each requiring different construction efforts. The individual project mix scenario modeled for the previously adopted Housing Element Update assumed that 14 average sized development projects (i.e., 25 dwelling units per development) along with 3 maximum development sized projects (i.e., 397 dwelling units per development) would be developed per year through the 8-year Housing Element cycle. The individual project mix scenario modeled for the revised Housing Element Update assumed 15.4 average development size projects and 4 maximum development size projects.
- The Continuous Scenario assumes one single residential development undertaken each year. This assumes a single high rise apartment development and the associated construction emissions. The continuous development scenario modeled for the previously adopted Housing Element Update assumed the development of 1,221 dwelling units per year through the 8-year Housing Element cycle. The individual project mix scenario modeled for the revised Housing Element Update assumed the development of 1,964 dwelling units per year, which accounts for residential development projects that have recently been approved and are already in the development pipeline.

Table 5 below reports that the maximum daily construction emissions from each buildout scenario that were originally disclosed in the previously certified Final EIR.

Table 5 Maximum Daily Construction Emissions for Buildout Scenarios

	CO	VOC	NO _x	SO ₂	PM ₁₀	PM _{2.5}
Maximum Construction Emissions Disclosed in the Previously Certified EIR (lbs/day)	328.0	1,028.5	99.6	0.7	68.5	35.9

	CO	VOC	NO _x	SO ₂	PM ₁₀	PM _{2.5}
Maximum Construction Emissions Resulting from the Revised Housing Element Update (lbs/day)	369.0	1,020.2	86.4	0.7	94.5	44.1
SCAQMD Thresholds of Significance (lbs/day)	550	75	100	150	150	55
Net Change	41.0	-8.3	-13.2	0.0	26.0	8.2

Note: The net reduction in VOC is due to a review and revision to the assumptions for the VOC content for architectural coatings. The modeling now accounts for low VOC paint for residential and non-residential application (50 g/L) consistent with SCAQMD Rule 1113.

The net reduction in NO_x is due to a review and revision of the phasing assumptions between the preparation of the previously certified Final EIR and this addendum. While it is expected that there would be overlapping phases between different construction projects, the original assumption that all construction phases within each individual project also overlap was overly conservative. See Appendix A for additional information regarding the assumptions for the Air Quality and Greenhouse Gas Study.

In comparison to the previously adopted Housing Element Update, there would be a decrease in construction-related VOC and NO_x emissions. As described in Table 6 above, this net reduction is primarily due to adjustments to account for low VOC architectural coating sin compliance with SCAQMD Rule 1113 as well as a review and revision of the phasing assumptions between the preparation of the previously certified Final EIR and this addendum. There would be a slight increase in CO, PM₁₀, and PM_{2.5}.

It should be noted that the precise location, size, and mix of uses within future individual residential development projects is currently unknown, so the impact analysis is highly programmatic in nature. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, prevailing weather conditions. Additionally, MM AQ-1 was adopted as a part of the previously certified Final EIR to further minimize construction-related air pollutant emissions in the City. However, as described in the previously certified Final EIR, the potential reductions resulting from implementation of this mitigation measure cannot be quantified because information on construction scheduling and project size for all individual residential development projects likely to occur in the City are not available.

As described in the Addendum to the IS/MND for the Mira Loma Peaker Project (SCH No. 200612112), the SCAQMD follows the practices outlined by the authoritative interpretive sources when determining the baseline for the purposes of evaluating whether or not modifications to an existing project would result in new or more severe significant effects:

“When an agency is evaluating a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA’s standards limiting the scope of subsequent environmental review. See CEQA Guidelines §15162. Under these standards, once an EIR has been certified or a negative declaration adopted for a project, further CEQA review is limited. These standards apply whether or not the project has been constructed. *Benton v Board of Supervisors*, supra. In effect, the baseline for purposes of CEQA is adjusted such that the originally approved project is assumed to exist.¹¹”

¹¹ Kostka, S.L. and M.H. Zischke. 2016. Practice Under the California Environmental Quality Act, Section 12.23 5 (2nd Editions, updated March 2016).

“The approach set forth...is similar to the one applicable where an agency, after completing an EIR or negative declaration and the approval process for a project, is faced with the question of whether to prepare a ‘subsequent EIR’ or ‘supplement to an EIR’ due to changes in the project, changed circumstances, or new information. See Pub. Resources Code, § 21166; CEQA Guidelines, §§ 15162, 15163. In such a situation, the agency must treat the impacts of the previously approved project, upon build-out, as the ‘baseline’ for determining whether newly revealed environmental impacts are sufficiently severe to justify preparing a second round of environmental review. This approach is proper even where the ‘existing environment’ remains pristine because no physical changes have resulted from the first project approval.¹²”

The increase in construction-related emissions associated with the additional dwelling units under the revised Housing Element Update (i.e., net change) would not exceed the SCAQMD project-level thresholds. Therefore, this increase in construction emissions would not be considered a substantially more severe impact for the purposes of CEQA.

No new construction impacts related to cumulatively considerable net increases in criteria pollutant emissions would occur as a result of the revised Housing Element Update. While construction-related emissions would increase as a result of the additional units included in the revised Housing Element Update (refer to Tables 5 and 6), with the implementation of MM AQ-1, the level of impact would not be substantially more severe than the level described in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Operation

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, the Basin is in nonattainment for O₃, PM₁₀, and PM_{2.5} and the Housing Element Update could result in a contribution to the existing nonattainment status for these criteria air pollutants. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities. Stationary area source emissions would be generated by space and water heating devices, operation of landscape maintenance equipment, use of household products, etc. Mobile emissions would be generated by vehicles traveling to and from the new residential development sites and destination sites within the City.

The total daily operational emissions that could potentially be generated over the life of the revised Housing Element Update were estimated using the CalEEMod Version 2020.4.0. The Air Quality and Greenhouse Gas Study prepared for the revised Housing Element Update included the implementation of existing City regulations aimed at reducing operational air emissions (e.g., Green Building Code, Zero Net Energy Ordinance, and Solar Ordinance requirements). As shown in Table 7, when considered individually the residential development projects under the revised Housing Element Update would not exceed SCAQMD thresholds, even under unmitigated conditions.

¹² Remy, M.H., T.A. Thomas, J.G. Moose, and C.M. Whitmen. 20016. Guide to CEQA.

Table 7 Unmitigated Individual Project Operational Emissions

	CO	VOC	NO _x	SO ₂	PM ₁₀	PM _{2.5}
Average Project Construction Emissions (lbs/day)	8.7	1.2	0.9	<0.1	1.7	0.5
Maximum Project Construction Emissions (lbs/day)	94.9	14.4	8.7	0.1	15.7	4.5
SCAQMD Thresholds of Significance (lbs/day)	550	55	55	150	150	55

However, as described in Section 3.3.3, *Impact Assessment and Methodology*, the previously adopted Housing Element Update and the revised Housing Element Update would facilitate thousands of new dwelling units. Therefore, the impact analysis in the previously certified Final EIR and this addendum also considered and disclosed the combined operational emissions from residential development projects developed over the 8-year Housing Element cycle (see Table 8).

Table 8 Future (2030) With Project Scenario Operational Emissions (Minimum Compliance with City Regulations)

		CO	VOC	NO _x	SO ₂	Total PM ₁₀	Total PM _{2.5}
Previously Adopted Housing Element Update Emissions (lbs/day)	Area	1,087.1	256.5	185.0	1.2	19.7	19.7
	Energy	15.5	4.1	35.4	0.2	2.9	2.9
	Mobile	1,338.0	90.6	492.6	6.8	733.5	221.4
	Total	2,440.6	351.3	713.0	8.1	756.0	243.9
Revised Housing Element Update Emissions (lbs/day)	Area	1,389.4	350.4	236.5	1.5	25.1	25.1
	Energy	21.5	5.4	46.4	0.3	3.7	3.7
	Mobile	1,443.3	170.7	158.8	2.9	365.4	98.7
	Total	2,854.2	526.5	441.7	4.6	394.2	127.6
SCAQMD Thresholds of Significance (lbs/day)		550	55	55	150	150	55
Net Change		413.6	175.2	-271.3	-3.5	-361.8	-116.3

Note: The net reduction in NO_x, SO₂, PM₁₀, and PM_{2.5} is due to reductions in mobile source emissions associated with the inclusion of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021 - 2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule), which increases the stringency of fuel economy and CO₂ emissions standards. These assumptions have been reviewed and revised, as appropriate, between the preparation of the previously certified Final EIR and this addendum. See Appendix A for additional information regarding the assumptions for the Air Quality and Greenhouse Gas Study.

In comparison to the previously adopted Housing Element Update, there would be a decrease in NO_x, SO₂, PM₁₀, and PM_{2.5}. As described in Table 8 above, this net reduction is primarily due to a reduction in mobile source emissions associated with the inclusion of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021 - 2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule), which increases the stringency of fuel economy and CO₂ emissions standards.

In addition to the minimum requirements of City regulations analyzed for the Future (2030) With Project Scenario in Table 8 above, the Air Quality and Greenhouse Gas Study also estimated operational emissions for this scenario with maximum implementation of compliance-based measures that would further reduce operational emissions associated with development under the revised Housing Element

Update (e.g., maximum compliance with City Green Building Ordinance, City Solar Ordinance, etc.) (see Table 9).

**Table 9 Future (2030) With Project Operational Emissions
(Maximum Compliance with City Regulations)**

		CO	VOC	NO _x	SO ₂	Total PM ₁₀	Total PM _{2.5}
Unmitigated Revised Housing Element Emissions (lbs/day)	Area	1,389.4	350.4	236.5	1.5	25.1	25.1
	Energy	21.5	5.4	46.4	0.3	3.7	3.7
	Mobile	1,443.3	170.7	158.8	2.9	365.4	98.7
	Total	2,854.2	526.5	441.7	4.6	394.2	127.6
Mitigated Revised Housing Element Update Emissions (lbs/day)	Area	1,289.3	322.8	14.9	0.1	7.2	7.2
	Energy	21.5	5.4	46.4	0.3	3.7	3.7
	Mobile	899.6	144.6	98.6	1.6	183.0	49.5
	Total	2,210.4	472.8	159.8	1.9	193.9	60.4
Emissions Reductions		-634.80	-53.70	-281.90	-2.7	-200.3	-67.2
SCAQMD Thresholds of Significance (lbs/day)		550	55	55	150	150	55

It should be noted that Table 9 still provides a highly conservative estimate of the actual emissions, considering that CalEEMod does not account for the City's participation in CPA or the recent rules and regulations around electric vehicles (e.g., CARB Advanced Clean Cars II Rule and EO N-79-20). Nevertheless, based on the air quality modeling results for the revised Housing Element Update, when taking into account buildout in the Future (2030) With Project Scenario, the increase in emissions for CO, VOC, NO_x, PM₁₀, and PM_{2.5} would continue to exceed SCAQMD regional thresholds for daily emissions. This is consistent with the findings for the previously adopted Housing Element Update described in the previously certified Final EIR.

Again, it should be noted that SCAQMD significance thresholds for criteria pollutants do not distinguish between land use plans/programs and individual development projects. The Housing Element Update is a component of the City's General Plan that addresses residential development on a programmatic level and would involve several simultaneous developments throughout the planning horizon. Therefore, the application of the SCAQMD thresholds to a program-level EIR is highly conservative. In addition, it should also be noted that this analysis overestimates increases in emissions as the Housing Element Update is intended to increase the proportion of those workers that currently both reside and work in the City from approximately 9.4 percent of the total workforce to a higher, but unknown level, and consequently, would decrease mobile emissions related to commute trips. This would occur due to the substantial amounts of new housing that would be developed, including increases in affordable housing under the revised Housing Element Update, which would create substantial new housing opportunities for workers from the City's service, retail, and hospitality sectors to both live and work in the City..

Both the previously adopted Housing Element Update and the revised Housing Element Update are consistent with the 2016 AQMP's strategies to reduce regional air pollutant emissions. Specifically, the revised Housing Element Update would guide residential development throughout the City in a way that would continue to integrate the Metro E (Expo) LRT line and Next Gen Bus Plan as well as other forms of

public transit, bicycle facilities, and pedestrian facilities thereby reducing mobile source air pollutant emissions from vehicles. Additionally, the revised Housing Element Update would implement and/or support many of the transportation control measures that are utilized and assumed in the AQMP's air quality forecasts (SCAQMD 2017). These measures include locating housing near jobs and transit, sustainable development, and other TDM measures (consistent with the City's TDM Ordinance, SMMC, Article 9, Chapter 9.53; see Section 3.16, *Transportation*). The implementation of these measures would ensure that the proposed Housing Element Update would reduce VMT per capita.

Finally, the revised Housing Element Update and its associated objectives are designed to address State-wide planning efforts (Government Code Section 65580 et seq.). The RHNA process is a State-mandated process that determines the amount of future housing growth each city and county must plan for in its Housing Element. This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction's projected share of regional housing growth across all income categories. The previously certified Final EIR explained that the goals to meet the State-mandated 6th Cycle RHNA for the City, to avoid population displacement, and to locate housing close to daily services and amenities like transportation, jobs, parks, and schools.

The operational emissions associated with the revised Housing Element Update would otherwise be occurring within the air basin regarding of whether or not the revised Housing Element Update is implemented. As previously described in Section 2.3, *Proposed Revisions to the Previously Adopted Housing Element Update*, the California Supreme Court has explained "the future residents and occupants of development enabled by Project approval would exist and live somewhere else if this Project is not approved" (*Center for Biological Diversity v. Dept. of Fish & Wildlife* [2015] 62 Cal.4th 204, 257). The Legislature has adopted similar findings that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California... Among the consequences of those actions are... reduced mobility, urban sprawl, excessive commuting, and air quality deterioration" (Gov. Code Section 65589.5[a]). The Legislature also recently adopted findings that "California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state's environmental and climate objectives" (Government Code Section 65589.5[a][2][A]). Additionally, the housing crisis was found to harm the environment by "[i]ncreasing greenhouse gas emissions from longer commutes to affordable homes far from growing job centers" (SB 330 Finding 12[B]).

The City's discretion around the revised Housing Element Update is limited (*McCorkle Eastside Neighborhood Group. V. City of St. Helena* [2018] 31 Cal. App. 5th 80.) The City is subject to the State's mandatory RHNA process, and only has limited discretion about where to site the housing within the City's boundaries. Further, all the development in the revised SSI has been sited within the City's TPAs, which has the least potential for transportation-related air quality emissions.

When compared to the previously adopted Housing Element Update, no new operational impacts related to cumulatively considerable net increases in criteria pollutant emissions would occur as a result of the revised Housing Element Update.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Localized Significance Thresholds

No Substantial Change from Previous Analysis. The exact location and construction details of individual residential development projects planned for under the previously adopted Housing Element Update and the revised Housing Element Update are unknown; therefore, localized air quality impacts are evaluated programmatically (i.e., using a generalized, rather than a site-specific approach). The air quality analyses for various large projects in the City, such as the recently approved Miramar Project¹³ and Ocean Avenue Project,¹⁴ demonstrated that the individual projects would not exceed the LSTs for construction. However, the air quality analysis for the 5th and Colorado Hotel Projects determined that construction-related emissions would exceed the LSTs for particulate matter, where construction would generate 8.3 lbs/day of PM_{2.5} and 13 lbs/day PM₁₀ in close proximity to immediately adjacent residential uses (refer to Table 3.3-15 in the previously certified Final EIR). Therefore, depending on the size of each individual project, the amount of demolition, excavation, and grading, and the proximity of the individual construction sites to sensitive receptors, individual residential development projects could result in construction-related emissions of CO, NO_x, and PM₁₀ that exceed the LSTs for construction. This is particularly true for multiple projects that are constructed concurrently on the same or adjacent blocks (such as the 5th and Colorado Hotel Projects), which would be likely given the amount of residential development planned for under the Housing Element Update.

Compliance with existing City polices and regulations as well as SCAQMD rules, including the limiting of grading activities during high winds and the application of soil stabilizers to prevent fugitive dust, would reduce air pollutant emissions from construction activities. MM AQ-1, which was adopted as a part of the previously certified Final EIR, would further reduce construction-related air emissions. However, as previously described, the potential reductions in construction-related emissions resulting from implementation of this mitigation measure cannot be quantified because information on construction scheduling and project size for all individual residential development projects likely to occur within the City are not available. Without such information, it is not possible to conclude that air pollutant emissions resulting from construction activities would be reduced to below LSTs for construction.

When compared to the previously adopted Housing Element Update, no new construction impacts related to LSTs for construction would occur as a result of the revised Housing Element Update. While the revised Housing Element Update would provide for increased number of new units, all residential development projects would be subject to SCAQMD rules and MM AQ-1. With the implementation of MM AQ-1, the level of impact would not be substantially more severe than the level described in the

¹³ Miramar Hotel Project Final EIR (SCH No. 2013041091). Available at: <https://ceqanet.opr.ca.gov/2013041091>.

¹⁴ Ocean Avenue Project Final EIR (SCH No. 2018121060). Available at: <https://ceqanet.opr.ca.gov/2018121060>.

previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Toxic Air Contaminants

No Substantial Change from Previous Analysis. Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. Health effects from carcinogenic air toxics are usually described in terms of cancer risk. Cancer risks are defined as the number of cancer cases that are projected to be generated per million people exposed. The SCAQMD has established a significance threshold for cancer risk of 10 cancer cases per million (1.0×10^{-5}).

The exact location and construction details of individual residential development projects planned for under the revised Housing Element Update are unknown; therefore, impacts of the revised Housing Element Update to the sensitive receptors within the City are evaluated programmatically. The individual lifetime cancer risk represents the chance that an individual would contract cancer after exposure to the TACs emitted during construction associated with residential development through the 8-year Housing Element cycle. It should be noted that the maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer as a result of implementation of the revised Housing Element Update.

Operation of heavy equipment and vehicles associated with new residential development would temporarily generate TACs from exhaust of diesel particulate matter (DPM). Pollutant levels from exhaust emissions would fluctuate depending on the level and type of construction activity; however, temporary exposures associated with construction activities would not generally create a substantial risk. Impacts associated with individual construction projects would occur incrementally over time for short periods, and localized impacts would be reduced through standard measures on a project-by-project basis, thereby addressing the City-wide effect incrementally over time. Impacts from City-wide diesel construction equipment emissions to the year 2030 would represent a small percentage of total emissions in the Basin.

The potential for TACs to have an operational effect on sensitive receptors would occur if the revised Housing Element Update would allow for residential development located near an existing significant source of TACs or if it would generate TACs in quantities that may have an adverse effect on sensitive receptors. The California Air Resources Board (CARB) identifies high-volume freeways and roads, dry cleaners, and large gas stations as potential sources of TACs, while typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and auto repair shops.

According to CARB's Air Quality and Land Use Handbook: A Community Health Perspective (2005), it is recommended to maintain 500 feet of separation between residences and dry cleaners using perchloroethylene, 500 feet between residences and a major freeway that generates more than 100,000 annual average daily traffic (AADT), and more than 50 feet from a typical gas station. However, this is not always possible, particularly where there is an elevated health risk over large geographical areas (e.g., urbanized areas of Southern California). Both the previously adopted Housing Element Update and the

revised Housing Element Update anticipate that new residential development could be constructed within 500 feet of I-10. Although no specific project details (e.g., proposed site plans) are available, future projects in this zone may locate sensitive uses, such as new dwelling units, outdoor open spaces, and recreational facilities (e.g., tennis courts, swimming pools, etc.) within 500 feet of I-10, which receives from 150,000 to 194,000 AADT within the City boundaries. Therefore, the siting of future residential uses within 500 feet of I-10 could result in exposure of sensitive receptors to elevated levels of TACs.

Consistent with CARB recommendations, a Health Risk Assessment (HRA) was prepared for the previously adopted Housing Element Update to determine the actual cancer risk at sensitive receptors near I-10 and SR-1 after an exposure of TAC emissions for 30 years (refer to Appendix A in the previously certified Final EIR). As summarized in further detail below, the potential impacts that were modeled in the HRA were determined based on traffic levels on the highways and not the proposed development scenarios. Therefore, the results of the HRA, which are summarized in further detail below, remain applicable to the revised Housing Element Update.

The HRA identified cancer risk levels in exceedance of SCAQMD's threshold along all analyzed segments of I-10 and SR-1. The estimated peak cancer risks from the highways varies depending on the location of the highway. For example, the areas to the north along I-10 (as far as 1,300 feet), where the highest traffic flows occur, experience higher cancer risks than the areas west of SR-1 (as far as 250 feet), which generates much lower traffic volumes (refer to Figure 3.3-1 in the previously certified Final EIR). The HRA identified a total of 1,842 parcels (approximately 7.8 percent of parcels in the City) located in zones that would experience a cancer risk of 10 cancer cases per million or greater in 2030 from traffic volumes along I-10 and SR-1. The revised Housing Element Update would not substantially change the number of parcels located in zones that would experience a cancer risk of 10 cancer cases per million or greater in 2030 from traffic volumes along I-10 and SR-1.

While the revised Housing Element Update would provide for increased number of new units, all residential development projects would be subject to MM AQ-2. MM AQ-2, which was adopted as a part of the previously certified Final EIR, would reduce the exposure of sensitive receptors to TAC emissions from freeway operations for applicable new residential development within the air quality assessment zone. These measures could reduce exposure to DPM emission by up to 50 percent for outdoor areas and over 90 percent for indoor areas. Therefore, mitigated DPM emissions anticipated at new sensitive residential receptors within the City would not exceed SCAQMD thresholds for cancer risk. The revised Housing Element Update would not result in new or substantially more severe impacts on sensitive receptors (health risk) than what was assessed in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Health Impacts of Carbon Monoxide

No Substantial Change from Previous Analysis. Traffic-congested roadways and intersections have the potential to generate localized areas where ambient concentrations exceed Federal and/or State standards for CO. Such areas are often referred to as "CO hotspots." Future City traffic would contribute to increases in traffic volumes at nearby intersections, resulting in longer vehicle idling times and additional vehicle emissions at City intersections. Increased congestion and vehicle idling could lead to

the creation of CO hotspots that may affect adjacent sensitive receptors. The potential for the revised Housing Element Update to cause or contribute to CO hotspots has been evaluated by comparing City intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations.

In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard & Veteran Avenue is the most congested intersection in Los Angeles County, with an AADT volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to I-405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 parts per million (ppm) (1-hour average) and 3.2 (8-hour average) at Wilshire Boulevard & Veteran Avenue, exclusive of ambient background CO concentrations. When added to the existing background CO concentrations, the screening values would be 7.6 ppm (1-hour average) and 5 ppm (8-hour average), which are still well below the CAAQS of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).

As discussed in Section 3.12, *Transportation* in the previously certified Final EIR, the most heavily trafficked intersection within the City that would be affected by the planned residential development is the Palisades Beach Road/California Incline, which currently experiences less than 80,000 vehicle trips per day (see Appendix B). The residential development planned for under the revised Housing Element Update would increase average daily trips, but even with the anticipated increase in dwelling units and the associated increase in daily vehicle trips, none of the intersections within the City, including the Palisades Beach Road/California Incline intersection, would experience 100,000 vehicles per day evaluated at the Wilshire Boulevard & Veteran Avenue intersection in the CO Plan for the 2003 AQMP. As a result, CO concentrations are expected to be far less than those estimated in the 2003 AQMP for the most congested intersection in Los Angeles and would not create a CO hotspot or exceed the CAAQS for CO concentrations. As such, the revised Housing Element Update would neither directly result in nor substantially contribute to a CO hotspot.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

d) *Would the project create objectionable odors affecting a substantial number of people?*

No Substantial Change from Previous Analysis. The previously certified Final EIR found that the impacts associated with creating objectionable odors would be less than significant. Land uses and industrial operations associated with odor complaints generally include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As with the previously adopted Housing Element Update, the revised Housing Element Update would enable the construction and operation of residential developments, which do not typically generate nuisance odors perceptible to sensitive receptors. Standard construction requirements would be imposed upon project applicants to minimize odors from construction. Any odors that may be generated would be localized and temporary in nature, and would not affect a substantial number of people or result in a

nuisance as defined by SCAQMD Rule 402. Operationally, odors that would be expected from planned residential development would typically be associated with solid waste (i.e., refuse) storage typical of urban uses. However, these odors would be similar to those generated by existing residential and commercial uses throughout the City. These odors would be confined to the immediate vicinity of new residential development. Additionally, it is expected that any individual project-generated refuse would be stored in covered containers and removed regularly consistent with the City's solid waste and recycling pick-up requirements.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with objectionable odors would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe air quality impacts would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following mitigation measures related to air quality, which remain applicable to the revised Housing Element Update:

- MM AQ-1 **Criteria Pollutant Emissions Reduction Measures.** New residential development planned for under the proposed 6th Cycle 2021-2029 Housing Element Update shall be required to comply with the following conditions during construction:
1. Diesel-powered equipment shall be retrofitted with after-treatment products (e.g., engine catalysts and diesel particulate filters). The engine catalysts shall achieve a minimum reduction of 15 percent for nitrogen oxides (NO_x). The diesel particulate filters shall meet U.S. Environmental Protection Agency (USEPA) Tier 3 standards, consistent with California Air Resources Board (CARB) approved Truck and Bus Regulation requirements in affect at the time the contract is approved. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit.
 2. All heavy-duty diesel-powered equipment operating and refueling shall use low-NO_x diesel fuel to the extent that it is readily available and cost effective (up to 125 percent of the cost of CARB diesel) in the South Coast Air Basin. (This does not apply to diesel-powered trucks traveling to and from the construction site.) Contract specifications shall be included in project construction documents, which shall be reviewed by the City prior to issuance of a grading permit.
 3. All heavy-duty diesel-powered equipment operations shall utilize a phased-in emission control technology in advance of a regulatory

requirement such that 30 percent of the fleet shall meet USEPA Tier 4 engine standards for particulate matter control (or equivalent) starting in 2021 and for the duration of construction, consistent with CARB approved Truck and Bus Regulation requirements in affect at the time the contract is approved.

4. Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction. Contract specifications shall be included in project construction documents, which shall be reviewed by the City prior to issuance of a grading permit.
5. Construction operations shall rely on the electricity infrastructure surrounding the construction site if available rather than electrical generators powered by internal combustion engines. Contract specifications shall be included in project construction documents, which shall be reviewed by the City prior to issuance of a grading permit.
6. Consistent with SCAQMD Rule 403, fugitive dust control measures shall be implemented during each phase of project development to reduce the amount of particulate matter entrained in the ambient air. These measures shall include, but not be limited to, the following:
 - a) Application of soil stabilizers to inactive construction areas;
 - b) Quick replacement of ground cover in disturbed areas;
 - c) Watering of exposed surfaces three times daily;
 - d) Watering of all unpaved haul roads three times daily;
 - e) Covering all stock piles with tarp;
 - f) Reduction of vehicle speed on unpaved roads;
 - g) Post signs onsite limiting traffic to 15 miles per hour (mph) or less;
 - h) Sweep streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads;
 - i) Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas; and
 - j) Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.
7. Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes. Consistent with the CARB Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 California Code of Regulations [CCR] Section 2485), diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds shall be turned off when not in use for more than 5 minutes.
8. Architectural coating (paint and primer) products shall comply with the low volatile organic compound (VOC) requirements set forth in SCAQMD Rule 1113. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City.

9. Building materials that do not require painting shall be used during construction to the extent feasible. Contract specifications shall be included in the project construction documents, which shall be approved by the City. Pre-painted construction materials should be used to the extent feasible.

MM AQ-2

Interior Air Quality Protection. Applicants of new residential development projects in the City that propose siting sensitive land uses within the following zones shall be required to include design features necessary to reduce exposure to diesel particulate matter (DPM) as a part of the early project design process:

Distance from I-10

- 1,300 feet from I-10 centerline (Pico Boulevard to Cloverfield Boulevard)
- 1,000 feet from I-10 centerline (Cloverfield Boulevard to SR-1)
- 600 feet from I-10 centerline (SR-1 [South] to Ocean Avenue)

Distance from SR-1

- 250 feet from SR-1 centerline

New residential development within these zones shall be required to incorporate project design measures, which as an example could include any one or more of the following:

- Installation of heating, ventilation, and air conditioning (HVAC) infrastructure within the building to circulate and purify outdoor air sources sufficiently to reduce diesel particulate matter and vehicle emissions. HVAC control systems shall include an air filtration system, such as the Lennox PureAir system, with particulate filters that have a minimum efficiency reporting value (MERV) of 12 to 15 (depending on the specific distance of the parcel from I-10 or SR-1) for enhanced particulate removal efficiency capable of removing a significant portion of the sub-1.0 micrometer sized particles expected from diesel combustion as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.
- Avoidance of operable windows on the side of the building facing I-10 or SR-1.
- Incorporation of dual-pane windows on all windows to make the building exterior as “airtight” as possible to minimize air infiltration. The exterior pressure envelope of the units should be sealed to achieve a tested air leakage rate of no more than 3.0 unit volumes per hour using the blower door ACH50 leak test, or equivalent.
- Location of any vents and roof penetrations or other air intakes facing away from I-10 or SR-1 wherever possible. Doorways and entryways should also be located away from I-10 or SR-1 to the extent feasible.
- Though not required, location of outdoor areas away from I-10 or SR-1 (e.g., behind thick vegetation screens or within the interior courtyard portions of the development).

Applicants shall be responsible for the preparation of a brief technical memorandum that describes the effectiveness of the selected measures – within the context of the Health Risk Assessment (HRA) prepared for the proposed Housing Element Update – in reducing DPM emissions below SCAQMD cancer risk thresholds of 10 cancer cases per million (1.0×10^{-5}).

The City shall codify this requirement such that review of the applicant-prepared, site-specific analysis by City staff would be required as a part of the entitlement and ministerial design review process. The proposed HVAC systems and other design measures shall also be reviewed and approved by the City prior to occupancy of new residential developments within the zones identified above.

3.4 Biological Resources

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The certified Final EIR incorporated the biological resources analysis from the IS, consistent with CEQA Guidelines Section 15128. That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (*No Impact*)
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (*No Impact*)
- c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (*No Impact*)
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (*No Impact*)
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (*Less Than Significant Impact*)
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan? (*No Impact*)

Proposed Project Significance Determination

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

- c) *Would the project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?*

No Substantial Change from Previous Analysis. As previously analyzed, there are no riparian or sensitive habitats known to occur in the City. The City has little undisturbed native vegetation. In addition, there are no blueline streams or wetlands within the City. The City is not recognized as an existing or proposed Significant Ecological Area (SEA) that links wildlife populations. No habitat conservation plans, natural community conservation plans, or other approved local, regional, or State habitat conservation plans apply to the City. Consequently, neither the previously adopted Housing Element Update nor the revised Housing Element Update would affect any sensitive habitats or sensitive species, wetlands, or SEAs. The implementation of the revised Housing Element Update would result in residential redevelopment on infill sites that are already fully developed, and as such, would not disturb any protected biological resources.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with biological resources or an adopted Habitat Conservation Plan would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Substantial Change from Previous Analysis. Implementation of the revised Housing Element Update would be subject to all applicable Federal, State, regional, and local policies and regulations related to the protection of biological resources. Specifically, the individual residential development projects would be required to comply with the Federal Endangered Species Act, Migratory Bird Treaty Act, California Endangered Species Act, California Fish and Game Code, and the SMMC, Chapter 7.40 Tree Code. Implementation of the Housing Element Update would plan for new residential development, some of which could require the removal of existing City trees. As with the previously adopted Housing Element Update, residential development under the revised Housing Element Update could occur in proximity to existing City trees potentially resulting in removal or damage of trees. However, all street trees are protected and maintained in place during construction in accordance with the requirements of the City's Tree Code (SMMC Section 7.40.160) and the Urban Forest Master Plan. Compliance with City regulations would be addressed on a project-by-project basis.

Compliance with the Federal Endangered Species Act, Migratory Bird Treaty Act, California Endangered Species Act, California Fish and Game Code, and the SMMC, would ensure that no new or more severe impacts associated with local policies or ordinances protecting biological resources would occur as a

result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with biological resources would occur, and the level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to biological resources.

3.5 Cultural Resources

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? (*Significant and Unavoidable Impact*)
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? (*Less Than Significant Impact With Mitigation Incorporated*)
- c) Disturb any human remains, including those interred outside of formal cemeteries? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?*

No Substantial Change from Previous Analysis. The proposed revisions to the Housing Element Update, including the increase in the number of dwelling units in the revised SSI, would result in similar impacts to historical resources as those described for the previously adopted Housing Element Update. The revised Housing Element Update does not propose the construction of any individual residential development project, instead it identifies potentially suitable housing sites as well as goals, policies, and programs that would be implemented to encourage the development of new dwelling units necessary to meet the RNHA, consistent with State Housing Law. Historically significant resources would be identified on a project-by-project basis through site-specific, on-site reconnaissance prior to approval. Any future residential development projects planned for under the revised Housing Element Update would be required to comply with applicable Federal, State, and local polices and regulations that protect historical resources. Nevertheless, individual residential development projects, while not currently proposed as part of the revised Housing Element Update, could result in direct impacts to historic architectural resources through alteration and/or demolition of historical structures. Additionally, indirect impacts could occur as a result of off-site ground-borne vibration during construction or through the loss of historical character/setting, such as potentially siting new large-scale structures next to potentially smaller historic structures or other alterations to historic character.

The revised Housing Element Update does not alter the areas where rezoning would occur. When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with historical resources would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?*

No Substantial Change from Previous Analysis. The revisions to the Housing Element Update, including the increase in the number of dwelling units, would result in similar impacts to potential prehistoric and historic archaeological deposits. As described in the previously certified Final EIR, future residential development projects, including construction of new buildings, streetscape enhancements, and circulation/mobility improvements (e.g., new driveways, etc.), could involve grading and excavation in areas that could potentially uncover significant subsurface archaeological remains. This could include artifact-rich waste dumps, trash pits, sheet refuse, privies, and wells, as well as documented and undocumented structural remains dating from 1875 to the 1950s. If improperly handled, buried archaeological deposits could be damaged. The protection of such resources would be assured through implementation of mitigation measures MM CR-2a and MM CR-2b, which were adopted as a part of the previously certified Final EIR.

The revised Housing Element Update does not alter the areas where rezoning would occur. When compared to the previously adopted Housing Element Update, no new impacts to archaeological

resources would occur as a result of the revised Housing Element Update. With the implementation of MM CR-2a and MM CR-2b, the level of impact would not be substantially more severe than the impact described in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

No Substantial Change from Previous Analysis. As analyzed in the previously certified Final EIR, the City is generally considered to be sensitive for prehistoric archaeological deposits (refer to Section 3.4.1, *Environmental Setting* in the previously certified Final EIR) and the possibility exists that such remains could be uncovered during development in the City. However, existing regulations through California Health and Safety Code Section 7050.5 et seq. state that if human remains are discovered during project construction, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code, Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition of the remains has been made. If the County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted within a reasonable time. Subsequently, the NAHC shall identify the most likely descendant. The most likely descendant shall then make recommendations and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Given the required compliance with existing regulations pertaining to the discovery of human remains, neither the previously adopted Housing Element Update nor the revised Housing Element Update would adversely affect human remains.

Compliance with existing regulations pertaining to the discovery of human remains, would ensure that no new or more severe impacts would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are otherwise required.

Conclusion

In conclusion, no new or more severe impacts associated with cultural resources would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following mitigation measures related to cultural resources, which remain applicable to the revised Housing Element Update:

- MM CR-1a **Incentives for Housing Projects.** To encourage the preservation, rehabilitation, restoration, and/or adaptive reuse of existing buildings, the City shall consider adoption of an Adaptive Reuse Ordinance that could provide incentives to project

applicants, including but not limited to an expedited approval process, reduced parking requirements, fee reductions, and other benefits.

MM CR-1b **Historic American Building Survey (HABS) Documentation.** Prior to the demolition or alteration of an identified historic resource on the Historic Resources Inventory (HRI) that cannot comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties, historical resources shall be documented to the standards of the HABS Document Level II.

MM CR-2a **Archaeological Data Recovery.** For residential development projects that have the potential to inadvertently uncover buried prehistoric or historic-period archaeological resources, the City shall apply a program that combines resource identification, significance evaluation, and mitigation efforts into a single combined effort. This approach would combine the discovery of deposits (Phase 1), determination of significance and assessment of the project's impacts on those resources (Phase 2), and implementation of any necessary mitigation (Phase 3) into a single consolidated investigation. This approach must be driven by a Treatment Plan that sets forth explicit criteria for evaluating the significance of resources discovered during construction and identifies appropriate data recovery methods and procedures to mitigate project effects on significant resources. For project sites where substantial evidence (e.g., detailed descriptions, maps, photographs, etc.) has been presented to the City to suggest the potential for previously unknown buried archaeological resources, a Treatment Plan shall be prepared prior to issuance of building permits by a Registered Professional Archaeologist (RPA) who is familiar with urban historical resources. At a minimum, the Treatment Plan shall include:

- A review of historic maps, photographs, and other pertinent documents to predict the locations of former buildings, structures, and other historical features and sensitive locations within and adjacent to the specific development area;
- A context for evaluating resources that may be encountered during construction;
- A research design outlining important prehistoric and historic-period themes and research questions relevant to the known or anticipated sites in the study area;
- Specific and well-defined criteria for evaluating the significance of discovered remains; and

- Data requirements and the appropriate field and laboratory methods and procedures to be used to treat the effects of the project on significant resources.

The Treatment Plan shall also provide for a final technical report on all cultural resource studies and for curation of artifacts and other recovered remains at a qualified curation facility, to be funded by the developer. To ensure compliance with State and City preservation laws, this plan shall be reviewed and approved by the Historic Landmarks Commission and the City of Santa Monica Community Development Department prior to issuance of building permits.

MM CR-2b **Inadvertent Discoveries.** In the event of any inadvertently discovered prehistoric or historic-period archaeological resources during construction, the developer shall immediately cease all work within 50 feet of the discovery. The proponent shall immediately notify the City of Santa Monica Community Development Department and shall retain a Registered Professional Archaeologist (RPA) to evaluate the significance of the discovery prior to resuming any activities that could impact the site. If the archaeologist determines that the find may qualify for listing in the California Register of Historic Resources (California Register), the site shall be avoided or a data recovery plan shall be developed pursuant to MM CR-2a. Any required testing or data recovery shall be directed by an RPA prior to construction being resumed in the affected area. Work shall not resume until authorization is received from the City.

In addition to MM CR-1a and -1b and MM CR-2a and -2b, MM NOI-1, and MM TCR-1 also apply.

3.6 Energy

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VI. ENERGY – Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (*Less Than Significant Impact*)
- b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

Construction Energy Use

No Substantial Change from Previous Analysis. Diesel fuel would be required to power heavy construction equipment and heavy haul trucks for each individual residential development projects planned for under the revised Housing Element Update. The annual construction-related fuel consumption that is projected to be required as a result of buildout residential development planned for under the revised Housing Element Update is estimated to be 905,408 gallons. The total fuel consumption associated with the revised Housing Element Update would be approximately 7,243,262 gallons. As shown in Table 9, this is a 4.5-percent increase in construction-related fuel consumption as compared to the previously Housing Element Update.

Table 10 Estimated Annual Construction Fuel Consumption

	Fuel Consumption from Construction Equipment (Gallons)		Fuel Consumption from Construction Vehicle Trips (Gallons)		Total Construction (Gallons)	
	Annual	Total	Annual	Total	Annual	Total
Previously Adopted Housing Element Update	483,912	3,871,292	382,398	3,059,185	866,310	6,930,477
Revised Housing Element Update	437,101	3,496,806	468,307	3,746,456	905,408	7,243,262
Net Change	-46,811*	-374,486*	85,909	687,271	39,098	312,785

Notes: "Annual" estimated fuel consumption refers to the estimated average number of units that would be developed per year under the Housing Element Update.

Refer to Section 3.5, Energy in the previously certified Final EIR for a detailed discussion of assumptions and consumption rates used to estimate projected fuel consumption.

*This net reduction in NO_x is due to a review and revision of the phasing assumptions between the preparation of the previously certified EIR and this addendum. While it is expected that there would be overlapping phases between different construction projects, the original assumption that all construction phases within each individual project also overlap was overly conservative. See Appendix A for additional information regarding the assumptions for the Air Quality and Greenhouse Gas Study.

Source: See Appendix C.

For comparison purposes, the energy demand from transportation fuel associated with the revised Housing Element Update have been compared to the Los Angeles County transportation fuel sales. As

shown in Table 11, the revised Housing Element Update would represent a very small fraction – less than 1 percent – of the County’s annual fuel consumption.

Table 11 Comparison of Housing Element Construction and County Diesel Fuel Usage

	Diesel Fuel Consumption (Gallons)
Los Angeles County (2018)	228,000,000
Annual Construction during Buildout of the Revised Housing Element Update	905,408

Source: See Appendix C.

Compliance with the State and City policies – including California Idling Regulations as defined by CARB, which prohibit heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than 5 minutes (refer to Section 3.3, *Air Quality*) – and the temporary nature of construction would result in a more efficient construction-related energy used and would minimize or eliminate wasteful and unnecessary consumption of energy. In addition, it should be noted that the State has determined that the construction of housing pursuant to each city’s or county’s RHNA is essential and necessary to protect the general health and welfare of the residents of the City and the Greater Los Angeles Area. Additionally, the inclusion of transit and job access as major factors in the RHNA calculation methodology align with local and regional energy reduction strategies. Therefore, the Housing Element Update would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with construction-related energy use would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Operational Energy Use

No Substantial Change from Previous Analysis. As described in the previously certified Final EIR, residential development planned for under the revised Housing Element Update would permanently increase the demand for electricity and natural gas primarily for building heating and cooling. However, development under the Housing Element Update would, at a minimum, comply with the requirements of the California Green Building Standards Code (CALGreen) and the City’s Green Building Standards Code. Specifically, each new residential development with a height of four or more stories would be constructed to comply with the City’s 2020 Energy Reach Code, which requires:

- All-Electric Building: shall be designed to code established by the 2019 California Energy Code.
- Mixed-Fuel Building: shall be designed to be 5 percent more efficient than the 2019 California Energy Code.

Conservatively assuming that each new residential development planned for under the revised Housing Element Update is designed as mixed-fuel (electric and natural gas), the revised Housing Element Update would generate a net new annual electricity demand of 102,976,946 kilowatt hours (kWh) per

year (see Table 12) and a net new annual natural gas demand of 767,180,383 kilo-British thermal unit (kBTU) per year (see Table 13). These estimates correspond with approximately 13.1-percent and 27.9-percent increase in electricity and natural gas consumption, respectively, relative to the electricity and natural gas consumption for the City in 2018. While the City's 2020 Energy Reach Code currently allows for new buildings to choose between an all-electric design or mixed-fuel design, the City anticipates that in the near future, the code will be modified to mandate an all-electric design.

Table 12 Estimated Annual Electricity Demand

	Previously Adopted Housing Element Update			Revised Housing Element Update		
	Projected Increase	Consumption Factor	Annual Usage (kWh/year)	Projected Increase ¹	Consumption Factor	Annual Usage (kWh/year)
Residential						
Estimated Net Annual	1,221 units ¹	5,626.50 kWh/unit/year	6,869,957	1,964 units ²	5,626.50 kWh/unit/year	11,050,446
Total	10,994 units ¹		61,857,741	14,565 units ²		81,949,973
Commercial						
Estimated Net Annual	40,525	13.63 kWh/sf/year	5,69,148	192,837	13.63 kWh/sf/year	2,628,372
Total	405,246		5,691,452	1,542,698		21,026,973
Projected Net Total Demand Increase	-	-	67,381,244	-	-	102,976,946
Existing Demand (2018)	-	-	787,770,753	-	-	787,770,753
Percent Increase	-	-	8.6%	-	-	13.1%

Notes: Refer to Section 3.5, *Energy* in the previously certified Final EIR for a detailed discussion of assumptions for consumption factors used to estimate projected electricity demand.

¹ It should be noted that while the previously certified Final EIR described a total of up to 11,025 dwelling units, the quantitative impact analyses (e.g., energy, utilities, public services, etc.) accounted for residential development projects that had recently been approved and were in the development pipeline. Therefore, these analyses assess the net increase of 10,944 units in the Future Year (2030) as compared to the Adjusted Baseline (2020).

² As described in the revised Housing Element Update, a review of the past 5th Cycle Housing Element shows that approximately 10 percent of approved and pending projects were withdrawn and/or have had permit approvals expire. Therefore, a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. While the SSI provided in the revised Housing Element Update describes a total of 13,600 dwelling units, the quantitative impact analysis conservatively considers an additional 10-percent for a total of 14,565 dwelling units.

Table 13 Estimated Annual Natural Gas Demand

	Previously Adopted Housing Element Update			Revised Housing Element Update		
	Projected Increase	Consumption Factor	Annual Usage (kBTU/year)	Projected Increase ²	Consumption Factor	Annual Usage (kBTU/year)
Residential						
Estimated Annual	1,221 units ¹	49,919 kBTU/unit/year	60,951,099	1,964 units ²	49,919 kBTU/unit/year	98,040,916
Total	10,994 units ¹		548,809,486	14,565 units ²		727,707,235
Commercial						
Estimated Annual	40,525	26 kBTU/sf/year	1,053,650	192,837	26 kBTU/sf/year	5,013,768
Total	405,246		10,536,396	1,542,698		40,110,148
Projected Total Demand Increase³	-	-	559,345,882	-	-	767,180,383
Existing Demand (2018)	-	-	2,753,150,000	-	-	2,753,150,000

	Previously Adopted Housing Element Update			Revised Housing Element Update		
	Projected Increase	Consumption Factor	Annual Usage (kBTU/year)	Projected Increase ²	Consumption Factor	Annual Usage (kBTU/year)
Percent Increase	-	-	20.3%	-	-	27.9%

Notes: Refer to Section 3.5, *Energy* in the previously certified Final EIR for a detailed discussion of assumptions for consumption factors used to estimate projected natural gas demand.

¹ It should be noted that while the previously certified Final EIR described a total of up to 11,025 dwelling units, the quantitative impact analyses (e.g., energy, utilities, public services, etc.) accounted for residential development projects that had recently been approved and were in the development pipeline. Therefore, these analyses assess the net increase of 10,944 units in the Future Year (2030) as compared to the Adjusted Baseline (2020).

² As described in the revised Housing Element Update, a review of the past 5th Cycle Housing Element shows that approximately 10 percent of approved and pending projects were withdrawn and/or have had permit approvals expire. Therefore, a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. While the SSI provided in the revised Housing Element Update describes a total of 13,600 dwelling units, the quantitative impact analysis conservatively considers an additional 10-percent for a total of 14,565 dwelling units.

Compliance with the City’s regulations related to energy use (e.g., Santa Monica Solar Ordinance [SMMC Section 8.106.055], electric vehicle charging station requirements [SMMC Chapter 9.23.160], and other sustainable design features consistent with LUCE Policies 5.5, 5.6, and 6.1), which go above and beyond typical State requirements, would ensure implementation of the revised Housing Element Update would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner. Additionally, the Clean Power Alliance (CPA) – which serves all residential and commercial users in the City – buys electricity from renewable sources and partners with SoCal Edison to distribute electricity to residential and commercial customers throughout the City. The City has chosen 100 percent Green Power as a step to reaching carbon neutrality. However, the City and CPA allow for the individual user’s selection of lower percent renewable power or to stay with SoCal Edison’s renewable generation percentage (refer to Section 3.5.1.1, *Electricity* in the previously certified Final EIR).

The combination of energy-saving and energy-generating features included in the Housing Element Update demonstrates the City’s commitment to use of renewable energy supplies and energy conservation ensures that buildout under the Housing Element Update would not use energy in a wasteful or inefficient manner. As such, implementation of the Housing Element Update would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with operational energy would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Operational Vehicle Fuel Consumption

No Substantial Change from Previous Analysis. New residential development planned for under the revised Housing Element Update would result in increases in daily consumption of vehicle fuel for trips. As described in Section 3.16, *Transportation*, the increase in residential development planned for under the revised Housing Element Update is anticipated to result in an increase in daily VMT. Under Future With Project (2030) conditions, the future population of 123,425 residents is estimated to produce a total of 207,731 daily trips and 1,189,292 daily residential VMT, with an average of 9.6 miles per capita. The

98,640 employees are estimated to generate a total of 123,206 commute trips and 1,407,858 commute VMT, with an average of 14.3 miles per employee. Using estimated vehicle fleet mix data provided in Appendix C and average fuel economy information provided by the Bureau of Transportation Statistics, the increase in VMT would result in the consumption of approximately 143,811,933 gallons per year (see Table 14). (See Section 3.16, *Transportation* for additional discussion regarding projected VMT associated with the revised Housing Element Update.)

Although the increase in City-wide VMT associated with the revised Housing Element Update would result an increase in the localized consumption of transportation fuels, the revised Housing Element Update would increase housing opportunities in the jobs-rich City, and would not result in impacts when considering the region as a whole. As described in the revised Housing Element Update, the City has approximately 80,000 non-resident employees commuting into the City because they cannot afford to live near their job. The Legislature has adopted similar findings that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California... Among the consequences of those actions are... reduced mobility, urban sprawl, excessive commuting, and air quality deterioration” (Government Code Section 65589.5[a]).

Only 9 percent of workers in the City live within the City. The revised Housing Element Update would plan for the development of a minimum of new dwelling units (of which 69 percent must be provided at lower income levels), thus creating opportunities for many of the City’s workers to live closer to their jobs and thereby reducing VMT and associated fuel consumption on a regional basis. New residents would also have access to the City’s extensive pedestrian facilities, bicycle network, and transit options such as the Big Blue Bus routes, Metro routes, and Metro E (Expo) LRT line. As described further in Section 3.16, *Transportation*, new residential development planned for under the Housing Element Update would also be required to comply with SMMC Chapter 9.53, which requires the implementation of TDM programs (e.g., development of short- and/or long-term bicycle parking spaces to encourage residents and employees to use alternative modes of transportation such as bicycling).

The combination of providing new housing opportunities in the jobs-rich City along with the City’s requirements for the provision of electrical vehicle (EV) charging stations and implementation of TDM measures would help reduce VMT and associated fuel consumption and avoid the unnecessary use of energy in a wasteful or inefficient manner. Therefore, buildout under the revised Housing Element Update would not cause wasteful, inefficient, or unnecessary use of energy.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with operational energy use would occur under the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Table 14 Estimated Annual Fuel Demand of the Adopted Housing Element Update and Revised Housing Element Update

Vehicle Type	Percent of Vehicle Trips	Previously Adopted Housing Element Update			Revised Housing Element Update		
		Daily VMT	Average Fuel Economy (mi/gal)	Total Daily Fuel Consumption (gal)	Daily VMT	Average Fuel Economy (mi/gal)	Total Daily Fuel Consumption (gal)
Passenger Cars	54.8	3,652,023	23.3	156,739	3,862,633	23.3	165,778
Light/Medium Duty Vehicles	36.9	2,459,118	17.1	143,808	2,600,933	17.1	152,101
Heavy Duty Vehicles/Other	7.8	519,814	7.3	71,207	549,791	7.3	75,314
Motorcycles	0.5	33,321	43.4	768	35,243	43.4	812
Total Daily	-	6,664,276	-	372,522	7,048,600	-	394,005
Annual	-	2,432,460,740	-	135,970,676	2,572,739,000	-	143,811,933

b) *Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

No Substantial Change from Previous Analysis. As explained in the previously certified Final EIR, the revised Housing Element Update would support the City's energy conservation and GHG reduction goals and policies established in the LUCE, Sustainable City Plan, City's Climate Action and Adaptation Plan (CAAP), 2020 Energy Reach Code, and Green Building Standards Code. As required by the City's 2020 Energy Reach Code, new residential development projects would be designed to be all electric or if designed as mixed-fuel buildings, consume at least 5 percent less energy than required by the California Energy Code. Further, new residential development projects would be required to incorporate green building design features intended to reduce overall energy impacts. For example, new developments would install solar photovoltaic (PV) systems as required by the City's Green Building Standards Code and Santa Monica Solar Ordinance (SMMC Section 8.106.080) and EV charging stations as required by SMMC Section 9.23.160. Implementation of these sustainable design features as well as the other sustainable design features described in Impact EN-1 of the previously certified Final EIR demonstrate the City's commitment to reduced power demand, reliance on renewable energy supplies, and efficient and non-wasteful energy use, as called for in the City's LUCE, Sustainable City Plan, CAAP, 2020 Energy

Reach Code, and Green Building Standards Code. The 2022 California Energy Code, which was adopted after the preparation of the previously adopted Housing Element Update and certification of the Final EIR, increases the amount of solar PV installed. The revised code now requires solar PV for all multi-family structures taller than three stories (24 CCR Sections 150.1[c][14] and 140.10). Additionally, under the revised Housing Element Update, the residents occupying the new dwelling units would be anticipated to move from older dwelling units within the region into new dwelling units built under modern and more energy efficient building standards.

With regard to transportation energy, as with the previously adopted Housing Element Update, the revised Housing Element Update would promote energy efficient sustainable development. The revised Housing Element Update would provide significant housing opportunities, including additional lower income housing units, in the jobs-rich City, which would reduce long distance commutes. Further, the implementation of required TDM program for each residential development project would further minimize vehicle trips and VMT. The revised Housing Element Update would be consistent with and support the goals and benefits of Connect SoCal. As a result, the revised Housing Element Update would support State, regional, and City efforts to improve transportation energy efficiency and would not conflict with or obstruct plans for renewable energy or energy efficiency.

The City's discretion in these circumstances is limited (*McCorkle Eastside Neighborhood Group. V. City of St. Helena* [2018] 31 Cal. App. 5th 80). The City is subject to the State's mandatory RHNA process, and only has limited discretion about where to site the housing within the City's boundaries. As previously described, all the development in the revised SSI has already been sited within the City's TPAs, which has the least potential for transportation-related energy demands.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with the potential to conflict with energy plans would occur under the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with energy would occur, and the level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to energy.

3.7 Geology and Soils

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
where sewers are not available for the disposal of wastewater?				
f) Directly or indirectly destroy a unique paleontological resource site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The certified Final EIR incorporated the geology and soils analysis from the IS, consistent with CEQA Guidelines Section 15128. That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (*Less Than Significant Impact*)
 - ii. Strong seismic ground shaking? (*Less Than Significant Impact*)
 - iii. Seismic-related ground failure, including liquefaction? (*Less Than Significant Impact*)
 - iv. Landslides? (*Less Than Significant Impact*)
- b) Result in substantial soil erosion or the loss of topsoil? (*Less Than Significant Impact*)
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (*Less Than Significant Impact*)
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (*Less Than Significant Impact*)
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (*No Impact*)
- f) Directly or indirectly destroy a unique paleontological resource site or unique geological feature? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving:*
 - i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

ii) Strong seismic ground shaking?

No Substantial Change from Previous Analysis. The IS prepared for the previously certified Final EIR addressed the seismic characteristics of the City. These conditions would remain unchanged, and the proposed revisions to the Housing Element Update would not affect the seismic risks, such as fault rupture.

The closest known fault in the City is the Santa Monica Fault, which is comprised of various segments with several strands that cross through the City. In January 2018, the California Geological Service (CGS) established Alquist-Priolo Fault Zones around the Santa Monica Fault. As with the previously adopted Housing Element Update, future residential development projects under the revised Housing Element Update could occur near the Santa Monica Fault. The State does not prohibit housing in an active fault zone, but instead requires that structures built for human occupancy be assessed for potential fault rupture risks. Consistent with State requirements, the City's Building and Safety Division requires the submittal of a Fault Rupture Study to assess potential fault rupture, groundshaking, and liquefaction risks of a site and identify measures as necessary to mitigate such risks. Additionally, the design and construction of new buildings are required to be engineered to withstand the seismic ground acceleration that may occur during an earthquake, pursuant to the Santa Monica Building Code (SMBC), which incorporates applicable provisions of the California Building Code (CBC), including 24 CCR Chapter 18, *Soils and Foundation*, which regulates structures built in seismically active areas and liquefaction zones. The City also requires new buildings to submit a Design-Level Geotechnical Report to the City's Building and Safety Division prior to building permit issuance in accordance with the requirements of the City's Guidelines for Geotechnical Reports, the Seismic Hazard Mapping Act (Public Resources Code Sections 2690 et seq. and 14 CCR Sections 3720 et seq.), and the Alquist-Priolo Act (Public Resources Code Sections 2621 et seq. and 14 CCR Sections 3600 et seq.). All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design to minimize seismic hazards. Additionally, under the revised Housing Element Update, the residents occupying the new dwelling units would be anticipated to move from older dwelling units within the region into new dwelling units built under modern more stringent seismic standards, thereby improving safety in comparison to baseline conditions.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with fault rupture would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

iii) Seismic-related ground failure, including liquefaction?

The CGS Seismic Hazard Zone Map that covers the City identifies the beach front areas and a small eastern portion of the City between Olympic Boulevard and Pearl Street as having liquefaction risk. As described for the previously adopted Housing Element Update, the revised Housing Element Update could result in future residential development in liquefaction areas. Liquefaction risks are addressed

through the City's building permit process. The design and construction of new buildings are required to be engineered to address potential liquefaction risks pursuant to the SMBC and CBC (24 CCR Chapter 18, *Soils and Foundation*). Additionally, the City requires developers of new buildings to submit a Design-Level Geotechnical Report in accordance with the requirements of the City's Guidelines for Geotechnical Reports, the Seismic Hazard Mapping Act (Public Resources Code Sections 2690 et seq. and 14 CCR Sections 3720 et seq.) and the Alquist-Priolo Act (Public Resources Code Sections 2621 et seq. and 14 CCR Sections 3600 et seq.). The Geotechnical Report is required to include a site-specific soils investigation to determine liquefaction potential on the site. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design prior to building permit issuance to minimize liquefaction risks

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with seismic-related ground failure would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

iv) Landslides?

No Substantial Change from Previous Analysis. The main areas of landslide concern within the City are confined to the areas along SR-1 below the Palisades bluffs, at the southwestern edge of the City. The City has implemented a number of projects in the past decade to reduce landslide risks and soil instability at the bluffs including the California Incline Bridge Replacement Project and the Santa Monica Palisades Bluff Stabilization Project. The geotechnical reports for these two projects were submitted to the California Coastal Commission, California Department of Transportation (Caltrans), and the City, and each agency concluded that the planned construction improvements on the bluff would be safe and not cause or contribute to erosion or degradation of geologic stability. In addition, several slope stabilization and dewatering measures have been implemented by the City, which has decreased the rate of erosion and improved the stability of the bluffs. As a result of these measures, landslide risks below the bluffs are considered low.

The properties in the northern portion of the City (near the Santa Monica Mountains) and in the Bryn Mawr Avenue residential area near Marine Park are characterized by steeper slopes. The design and construction of new buildings in these areas are required to be engineered to minimize landslide risks and soil instability, pursuant to the SMBC and CBC. The City also requires new buildings to submit a Design-Level Geotechnical Report prior to building permit issuance in accordance with the requirements of the City's Guidelines for Geotechnical Reports. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design to minimize landslide and soil collapse hazards.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with landslides would occur as a result of the revised

Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures are required.

- c) *Would the project result in substantial soil erosion or the loss of topsoil?*
- d) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- e) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, the construction of new residential development planned for under the revised Housing Element Update could involve excavation and grading that could result in substantial soil erosion or the loss of topsoil. Additionally, these residential development projects could be located on a geologic unit or soil that is unstable or on expansive soils. Such risks are site-specific and are addressed through the City's building permit process. The design and construction of new buildings are required to be engineered to address potential soil risks, pursuant to the SMBC and CBC. Additionally, as previously described, the City requires developers of new buildings to submit a Design-Level Geotechnical Report in accordance with the requirements of the City's Guidelines for Geotechnical Reports. The Geotechnical Report is required to include a site-specific soils investigation to determine liquefaction potential on the site. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design prior to building permit issuance to minimize risks associated with soil loss, unstable soils, and expansive soils.

Additionally, the SWRCB regulates storm water runoff from construction activities under Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ. Construction activities subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit include sites that disturb at least 1 acre, and small construction sites less than 1 acre but part of a larger common plan of at least 1 acre. The Order requires that, prior to beginning any construction activities, the permit applicant must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent (NOI) and an adequate Storm Water Pollution Prevention Plan (SWPPP). The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of storm water discharges; and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in storm water and non-storm water discharges. Required elements of a SWPPP include: (1) site description addressing the elements and characteristics specific to the site; (2) descriptions of BMPs for erosion and sediment controls; (3) BMPs for construction waste handling and disposal; (4) implementation of approved local plans; (5) proposed post-construction controls, including a description of local postconstruction erosion and sediment control requirements; and (6) non-storm water management. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "nonvisible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. As noted above, the updated SSI parcels include infill sites located in paved flat areas of the

City were substantial erosion is unlikely. These regulations further ensure that construction will not result in substantial erosion or loss of top soil.

Therefore, when compared to the previously adopted Housing Element Update, no new or more severe impacts associated with expansive soils would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Substantial Change from Previous Analysis. The City is entirely supported by existing municipal wastewater infrastructure (see Section 2.17, *Utilities and Service Systems* in the previously certified Final EIR). New residential buildings planned for under the Housing Element Update would connect directly to the municipal sanitary sewer system and would not require septic tanks or any other alternative wastewater disposal systems.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with the adequacy of soils and septic systems would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

No Substantial Change from Previous Analysis. As described in the previously certified Final EIR, there are no known unique geologic features that would be affected by the revised Housing Element Update. Construction of new residential development projects under the revised Housing Element Update could involve excavation and grading in areas with moderate to high sensitivity for paleontological resources. Public Resource Code Section 5097.5 states that “a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” Additionally, Policy HP1.10 of the LUCE requires “[r]eview proposed developments for potential impacts on unique archaeological resources, subsurface historical resources, and paleontological resources, and incorporate appropriate mitigation measures to protect or document the resource, as appropriate to avoid significant impacts.”

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. Consequently, the proposed amendments would not increase the

amount of excavation or grading. When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with the adequacy of paleontological resources and unique geologic features would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or more severe impacts associated with geology and soils would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to geology and soils.

3.8 Greenhouse Gas Emissions

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (*Less Than Significant Impact*)
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (*Less Than Significant Impact*)

Proposed Project Significance Determination

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

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

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element construction activities throughout the 8-year Housing Element cycle would result in temporary GHG emissions. Such emissions are difficult to quantify as the details of construction, design/size, and timing of each individual residential development project under the Housing Element Update is unknown. As such, this projection is meant to serve as an illustration of the possible construction-related GHG emissions that could occur under the revised Housing Element Update.

Table 15 GHG Emissions from Construction Activities Under the Previously Adopted Housing Element Update and the Revised Housing Element Update

	Previously Adopted Housing Element Update GHG Emissions (MT CO ₂ e)	Revised Housing Element Update GHG Emissions (MT CO ₂ e)
Individual Project Mix	6,501.41	7,124.8
Amortized over 30 years	216.71 per year	237.49 per year

Notes: see Appendix A.

Based on the forecasted amount of net new residential and ground-floor commercial uses, the revised Housing Element Update could result in localized emissions up to 87,151 MT CO₂e per year (see Table 15). These total City-wide emissions, which would occur over the life of the Housing Element Update, represent a conservative worst-case scenario and do not account for all energy efficiency measures as well as future energy standards that might be applied to new residential development projects. Based on projected employment and population growth, the implementation of the previously adopted Housing Element Update could result in up to 1.2 MT CO₂e/year per service population. In comparison, implementation of the revised Housing Element Update could result in up to 0.7 MT CO₂e/year per service population. As described in Table 16 below, this net reduction in GHG emissions is primarily due to the inclusion of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021 – 2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule), which increases the stringency of fuel economy and CO₂ emissions standards. It should be noted that the operational emissions presented in Table 16 still provide a highly conservative estimate of the actual GHG emissions, considering that CalEEMod does not account for the City's participation in CPA nor the updated 2022 Energy Code (e.g., solar on multi-family developments).

Table 16 Projected Operational GHG Emissions (MT CO₂e per year)

Emission Source		Revised Housing Element Update
Area Source ¹	2,737	3,497
Energy	26,369	25,067
Mobile ^{2, 3}	100,895	47,839
Waste	3,039	4,356
Water Use	6,791	6,390
Annual Total	139,831	87,151

Emission Source		Revised Housing Element Update
Projected Service Population in 2030	116,245	123,425
Annual Total / Service Population (MT CO₂e / year per service population)	1.2	0.7
Exceeds 2.7 MT CO ₂ e / year per service population?	No	No

Notes: ¹ Area and energy emissions are based on existing land uses from the City's land use database as well as proposed land use changes under the revised Housing Element Update. An area source is defined as one emitting less than 10 tons per year of criteria or hazardous air pollutant or less than 25 tons per year of a combination of pollutants. Commercial and residential buildings generally are assigned to this category.

² Mobile source emissions are based on City-wide trip generation identified in the Transportation Impact Analysis (see Appendix B) prepared for the revised Housing Element Update, and include the beneficial effects of trip generation reducing measures proposed under the revised Housing Element Update.

³ This net reduction in mobile source emissions is primarily due to the inclusion of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021 - 2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule), which increases the stringency of fuel economy and CO₂ emissions standards. These assumptions have been reviewed and revised, as appropriate, between the preparation of the previously certified Final EIR and this addendum.

Source: See Appendix A.

As described above, the revised Housing Element Update would generate localized increases in GHG emissions from both the construction and operation of new land uses over the 8-year Housing Element cycle (refer to Tables 15 and 16). However, the CalEEMod analysis does not fully account for the regional reduction in mobile GHG emissions that would be likely to occur due to the benefits of increased housing opportunities in the City. The revised Housing Element Update would create more housing opportunities for many of the employees within the City, potentially reducing the environmental impacts associated with long distance commutes. Additionally, the revised Housing Element Update would generally increase housing proximate to transit, employment, commercial and entertainment opportunities, thus reducing VMT and associated GHG emissions on a regional basis. This is supported by SCAG's inclusion of transit and job access as major factors in the RHNA methodology. As described in the previously certified Final EIR, residential development in the mixed-use, jobs-rich, and transit-served City would generally be consistent with the City's GHG reduction goals and policies established in the LUCE, Sustainable City Plan, and CAAP to reduce GHG emissions. Further, the City's existing land use policy and regulatory framework as well as the goals, policies, and programs contained in Housing Element Update would ensure that new residential development project would occur in the most sustainable manner possible in a way that minimizes

As previously described in Section 2.3, *Proposed Revisions to the Previously Adopted Housing Element Update*, the City's discretion in these circumstances is limited (*McCorkle Eastside Neighborhood Grp. v. City of St. Helena* [2018] 31 Cal. App. 5th 80). The City is subject to the State's mandatory RHNA process, and only has limited discretion about where to site the development within the City's boundaries. As noted above, all the development in the revised SSI has already been sited within the City's TPAs, which has the least potential transportation-related GHG emissions.

When compared to the previously adopted Housing Element Update, no new or substantially more severe long-term operational impacts associated with applicable GHG reduction plans, policies, or regulations would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR for the Housing Element Update. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with GHG emissions would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to GHG emissions.

3.9 Hazards and Hazardous Materials

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (*Less Than Significant Impact*)
- 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? (*Less Than Significant Impact*)
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (*Less Than Significant Impact*)
- 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 it create a significant hazard to the public or the environment? (*Less Than Significant Impact*)
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (*Less Than Significant Impact*)
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (*Less Than Significant Impact*)
- g) Expose people or structures directly or indirectly to a significant risk of loss, injury or death involving wildland fires? (*No Impact*)

Proposed Project Significance Determination

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

- b) *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?*
- c) *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?*
- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Short-Term Construction Impacts

As discussed in the IS prepared for the previously certified Final EIR, potential impacts associated with hazardous materials would be negligible because the City is highly urbanized and existing local, State, and Federal regulations are in place to mitigate associated effects.

As described for the previously adopted Housing Element Update, construction activities required for new residential development projects under the revised Housing Element Update would involve the use and storage of a variety of hazardous materials, including fuel, oil, grease, solvents, and paints. These materials would be handled, stored, used, and disposed of in accordance with all Federal, State, and local laws regulating the management and use of hazardous materials. Improper handling and/or use of these materials during construction would represent a potential risk to the public and the environment. Construction contractors are responsible for accident prevention and containment, and construction specifications typically include provisions to properly manage hazardous substances and wastes. All contractors are required to comply with applicable regulations and Occupational Safety and Health Administration guidelines regarding the transport, use, and disposal of hazardous materials and hazardous waste. Examples of hazardous materials management include providing completely enclosed containment for all refuse generated in the planning area. In addition, all construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed and transported to a permitted waste facility for treatment, storage, and/or disposal. Compliance with applicable regulations and Occupational Safety and Health Administration guidelines would ensure that proper use and disposal of these materials would not pose a significant risk to the public and the environment. In addition, new residential development projects greater than 1 acre would be required to comply with the Construction General Permit. This would require preparation of a SWPPP and development of best management practices (BMPs) for potential pollutants created by all phase of construction activity. As a result, the use of these hazardous materials for their intended use would not pose a significant threat.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. As described for the previously adopted Housing Element Update, new residential development projects under the revised Housing Element Update could occur on sites containing hazardous materials, such as lead-based paint (LBP), asbestos-containing materials (ACM), and/or contaminated soils and groundwater. However, the revised Housing Element Update would not

make changes to existing regulations that address hazards associated with LBP, ACM, or contaminated soils and groundwater. Additionally, the revised Housing Element Update does not propose standards or requirements that would conflict with existing regulations. New residential development projects would be required to conform to all applicable regulations that address hazardous materials including asbestos, lead, underground storage tanks (USTs), and contaminated soils and groundwater. Additionally, new residential development projects that are subject to discretionary review would continue to be reviewed under CEQA to evaluate potentially hazardous conditions at the sites.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with construction-related hazards would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. The additional dwelling units provided for under the revised Housing Element Update would not change the previous determinations in the IS prepared for the previously certified Final EIR. Following construction, typical activities at residential uses would continue to involve the storage, use, and disposal of various hazardous materials, including chemical reagents, pesticides, solvents, fuels, paints, and cleansers. All hazardous materials generated and/or used would be managed in accordance with all relevant Federal, State, and local laws, including the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5), Occupational Safety and Health Administration Standards, and the Hazardous Waste Control Regulations (22 CCR Section 4.5). Given compliance with these regulations, the transport, use, and disposal of hazardous materials would not pose a significant hazard to the public or the environment.

When compared with the previously adopted Housing Element Update, no new or more severe long-term operational impacts associated with creation of a hazard to the public or the environment due to hazardous materials would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

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

No Substantial Change from Previous Analysis. No private airstrips are located near the City. As described for the previously adopted Housing Element Update, new residential development under the revised Housing Element Update would not be located within an airport land use plan, but could be located within 2 miles of SMO. Individual residential development projects would be subject to applicable environmental review and evaluated on a project-by-project basis. Further, the City and the Federal Aviation Administration (FAA) signed a settlement agreement that will lead to the eventual closure of SMO after 2028. The eventual closure of SMO in 2028 would ensure that people residing or working in the vicinity of the airport are not exposed to safety hazards or excessive noise levels. The revised Housing Element Update would not exacerbate these issues.

When compared with the previously adopted Housing Element Update, no new or more severe impacts associated with public airport and private airstrip hazards would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, construction associated with the implementation of the revised Housing Element Update could result in a temporary increase in construction in the City. However, access to local roads would be maintained during construction of the new residential development projects; therefore, emergency access would be ensured and would not interfere with an emergency evacuation plans.

As with the previously adopted Housing Element Update, implementation of the revised Housing Element Update could result in changes in circulation as a result of individual residential development projects. However, there would not be significant impacts to evacuation plans. New buildings would be developed in accordance with the CBC and California Fire Code requirements that address building safety and emergency exits. Development proposals would be reviewed on a project-by-project basis by the SMFD to ensure that adequate emergency access is provided and that City-wide evacuation and emergency response plans would not be adversely affected.

When compared with the previously adopted Housing Element Update, no new or more severe impacts associated with emergency response or evacuation plans would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- g) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

No Substantial Change from Previous Analysis. The City is urbanized with surrounding commercial, residential, and industrial uses, and does not include any areas designated as a High or Very High Fire Hazard Severity Zone (FHSZ). The closest wildlands are north of the City within the Santa Monica Mountains near the Will Rogers Historic State Park, approximately 1 mile away. As described for the previously adopted Housing Element Update, due to the intervening distance between the City and Will Rogers Historic State Park, the implementation of the revised Housing Element Update would not expose people or structures to wildland fires.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. When compared with the previously adopted Housing Element Update, no new or more severe impacts associated with wildland fires would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or more severe impacts associated with hazards and hazardous materials would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to hazards and hazardous materials.

3.10 Hydrology and Water Quality

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
substantial additional sources of polluted runoff?				
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR incorporated the hydrology and water quality findings from the IS, consistent with CEQA Guidelines Section 15128. That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (*Less Than Significant Impact*)
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (*Less Than Significant Impact*)
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i. result in substantial erosion or siltation on- or off-site? (*Less Than Significant Impact*)
 - ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (*Less Than Significant Impact*)
 - iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (*Less Than Significant Impact*)
 - iv. impede or redirect flood flows? (*Less Than Significant Impact*)
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (*Less Than Significant Impact*)
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (*Less Than Significant Impact*)

Proposed Project Significance Determination

a) *Would the project violate any water quality standards or waste discharge requirements?*

No Substantial Change from Previous Analysis. As described in the IS prepared for the previously certified Final EIR, the Housing Element Update would result in beneficial environmental effects on water quality and stormwater runoff as new residential development projects would comply with the most recent and increasingly more sustainable site regulations that address water quality and stormwater runoff. For example, construction contractors in the City are required to implement BMPs and pollutant control measures during construction activities to minimize pollutants and reduce runoff to levels in accordance with the City of Santa Monica Urban Runoff Pollution Ordinance (SMMC Chapter 7.10). Specifically, polluted runoff, including wash water from construction equipment, during construction shall not leave the construction site. Additionally, for the operational life of a new project, good housekeeping practices and BMPs to minimize polluted runoff are required, including the use of secondary containment structures, enclosing trash areas and connecting them to the sanitary sewer, and diverting roof drainage away from trash storage areas. New residential development projects are also required to prepare an Urban Runoff Mitigation Plan to show that the new development would store and use (i.e., for non-potable purposes), infiltrate, or evapotranspire project-generated runoff during a 0.75-inch storm event, or alternatively, the project applicant would pay the City an urban runoff reduction fee. Further, new residential development projects would be subject to Chapter 9.26 (Landscaping) of the Zoning Ordinance which sets forth requirements for new landscaping that would protect water quality and reduce stormwater runoff. For example, new residential development projects would be required to include planting of new vegetated areas, such as landscaped buffers and setbacks, to allow for increased stormwater infiltration and reduced potential for erosion. Additionally, new parking lots would be required to provide adequate drainage and a minimum of 20 percent permeable surfaces to allow for stormwater infiltration.

The revised Housing Element Update would not conflict with the applicable City regulations for new development that protect water quality and reduce stormwater runoff. While the revised Housing Element Update would increase the number of new units in the City, new residential development projects would comply with the most recent and increasingly more sustainable site regulations that address water quality and stormwater runoff as described in the previously certified Final EIR. Therefore, no new or more severe short-term construction impacts associated with water quality standards, existing drainage patterns, or stormwater drainage system capacity would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

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

No Substantial Change from Previous Analysis. As described in the IS prepared for the previously certified Final EIR, the Housing Element Update would result in beneficial environmental effects on groundwater quality as new residential development projects would comply with the most recent and more sustainable site regulations that address stormwater runoff and groundwater. Specifically, new residential development projects would be required to include the planting of new vegetated areas, such as landscaped buffers

and setbacks, allowing for increased stormwater infiltration in accordance with Chapter 9.26 (Landscaping) of the Zoning Ordinance. Additionally, new residential development projects would be required to conform to all applicable regulations that address groundwater, including those set forth by the Los Angeles Regional Water Quality Control Board (RWQCB) for groundwater dewatering.

When compared to the previously adopted Housing Element Update, no new or more severe short-term construction or long-term operational impacts associated with groundwater supplies or groundwater recharge would occur as a result of the revised Housing Element Update. While the revised Housing Element Update would increase the number of new units in the City, new residential development projects would include new landscaping and planting areas and would be required to comply with applicable regulations related to groundwater (e.g., low impact development requirements, etc.). The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i) *result in substantial erosion or siltation on- or off-site?*
 - ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
 - iii) *create or contribute runoff water which would exceed the capacity of existing or planning stormwater drainage systems or provide substantial additional sources of polluted runoff?*
 - iv) *impede or redirect flood flows?*

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, construction of new residential development projects planned for under the revised Housing Element Update would include earthwork activities that could potentially result in erosion and create or contribute runoff water. However, compliance with applicable City regulations would ensure that new construction projects would not result in adverse erosion, siltation, runoff, or flood effects. For example, all residential development projects on sites over 15,000 square feet (sf) would be subject to the City's Runoff Conservation and Sustainable Management Ordinance requirements. This would include preparation and implementation of a Runoff Mitigation Plan to minimize polluted runoff in accordance with the City's Ordinance. In addition, the projects would be required to store and use (for non-potable purposes), infiltrate, or evapotranspire project-generated runoff during a 0.75-inch storm event, or alternatively, pay the City an urban runoff-reduction fee. New residential development projects would also be required to comply with landscaping requirements (Chapter 9.26) of the Zoning Ordinance, which includes landscaping requirements to protect water quality and reduce stormwater runoff such as the planting of new vegetated areas, including landscaped buffers and setbacks, to allow for increased stormwater infiltration and reduced potential for polluted runoff. Additionally, new parking lots would be required to provide adequate drainage and a minimum of 20 percent permeable surfaces to allow for stormwater infiltration. Drainage infrastructure and drainage patterns associated with new residential development projects would also be reviewed by the City's Public Works Department as part of plan

checks to ensure compliance with existing development guidelines and the implementation of general site regulations that address water quality and stormwater runoff.

The City constructed the Santa Monica Urban Runoff Recycling Facility (SMURRF) to treat dry weather storm drain discharges from excess irrigation, spills, construction sites, pool draining, car washing and other activities that would otherwise drain into the Santa Monica Bay. Treated dry weather discharges are recycled for irrigation and dual plumbing purposes.

When compared with the previously adopted Housing Element Update, no new or more severe short-term construction impacts associated with water quality standards, existing drainage patterns, or stormwater drainage system capacity would occur as a result of the revised Housing Element Update. While the revised Housing Element Update would increase the number of new units in the City, new residential development projects would comply with the City's Runoff Conservation and Sustainable Management Ordinance as described in the previously certified Final EIR. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

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

No Substantial Change from Previous Analysis. Based on the City's Flood Rate Insurance Maps, 85 beach front properties along SR-1 in the City are within a Special Flood Hazard Area (SFHA) as defined by the Federal Emergency Management Agency (FEMA). SMMC Chapter 7.68 (Floodplain Management Regulations) requires new construction in the SFHAs to obtain a floodplain development permit and implement safety requirements addressing flood risks.

Inundation by tsunami can also affect the low-lying beachfront properties of the City. In the event of a tsunami, the City has established designated tsunami evacuation routes to direct City residents and visitors away from the tsunami hazards quickly and efficiently. The City also adopted a Multi Hazard Functional Emergency Plan, which sets forth a plan of action to reduce risk and prevent loss from large scale emergencies, including tsunamis.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. As with the previously adopted Housing Element Update, the revised Housing Element Update would densify areas of the City by facilitating development of residences and commercial uses; however, the majority of new development would not occur within the FEMA SFHA or within low-lying beachfront areas. In fact, none of the sites identified in the revised SSI associated with the revised Housing Element Update are located within these areas. Therefore, the revised Housing Element Update would not risk the release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone.

When compared with the previously adopted Housing Element Update, no new or more severe long impacts associated with release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

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

No Substantial Change from Previous Analysis. The City water supply consists of local groundwater, imported water from Metropolitan Water District of Southern California (MWD), and urban treated runoff water from the SMURRF. The City's primary sources of water supply include groundwater drawn from the Santa Monica Groundwater Basin and imported water supplies provided by MWD. The City's 2020 Urban Water Management Plan (UWMP) indicates that sufficient water supply exists to serve the projected number of residents under the previously adopted Housing Element Update through the planning horizon of 2030. The revised Housing Element Update would further increase City-wide water demand. As shown in Table 20 in Section 3.17, *Utilities and Service Systems*, water demand would increase by approximately 496 acre-feet per year (AFY) as compared to the previously adopted Housing Element Update and by approximately 788 AFY as compared to the planned water supply in the 2020 UWMP. Therefore, the Normal Year buffer of 4,624 acre-feet (AF) and Single Dry Year buffer of 2,066 AF planned for under the 2020 UWMP would be adequate for City-wide water demand, including additional water demand from the proposed increase in new residential units under the revised Housing Element Update.

When compared with the previously adopted Housing Element Update, no new or substantially more severe impacts associated with implementation of a water quality control plan or sustainable groundwater management plan would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with hydrology and water quality would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to hydrology and water quality.

3.11 Land Use and Planning

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Physically divide an established community? (*Less Than Significant Impact*)
- b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project physically divide an established community?*

No Substantial Change from Previous Analysis. The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. The changes to zoning densities under the revised Housing Element Update would increase the potential number of dwelling units in the City, but would not create new infrastructure, such as roadways, that could physically divide an established community. As with the previously adopted Housing Element Update, new residential development planned for under the revised Housing Element Update would occur on underutilized infill sites and would generally redevelop existing structures or vacant properties (e.g., surface parking lots). The revised Housing Element Update would also allow new residential uses in commercial areas that previously did not permit housing (e.g., areas zoned for Office Campus, Industrial Conservation, and Creative Conservation) creating more integrated, sustainable neighborhoods.

As described for the previously adopted Housing Element Update, all such new residential development under the revised Housing Element Update would occur under the guidance and requirements of adopted City plans such as the LUCE, which even when amended, would continue to ensure that new residential development proceeds in a manner that would not create physical land use conflicts. In summary, increased housing opportunities throughout the City would be guided by and required to be consistent with policies designed to maintain overall community cohesiveness and would not divide an established community but rather would create more inclusive communities.

When compared with the previously adopted Housing Element Update, no new or more severe impacts associated with the physical division of an established community would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

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

The emphasis of the land use and planning analysis is on consistency with existing applicable land use plans and identifying whether any inconsistencies would result in any new significant physical environmental effects not already addressed in previous CEQA-compliant environmental documentation. As with the previously adopted Housing Element Update, the revised Housing Element Update would be considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans. A given project need not be in perfect conformity with each and every policy nor does State law require precise conformity of a project with every policy or land use designation. Courts have also acknowledged that general and specific plans attempt to balance a range of competing interests, and that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. Additionally, in reaching such consistency conclusions, the City may also consider the consequences of denial of a project, which can also result in other policy inconsistencies. For example, Government Code Section 65589.5 explains that the potential consequences of limiting the approval of housing are... reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.

No Substantial Change from Previous Analysis. The previously certified Final EIR determined that the previously adopted Housing Element Update would not conflict with any State and regional plans, laws, and regulations, including SCAG's 6th Cycle RHNA and Connect SoCal. As described in under Impact LU-2 in the previously certified Final EIR, SCAG acknowledged that the required RHNA and Housing Element Update may need to accommodate more housing units than reflected in the Connect SoCal's household and population growth projections for the jurisdictions.

The revised Housing Element Update does not alter the areas where rezoning would occur but rather would make revisions to the proposed FARs and heights in the previously adopted Housing Element Update to increase housing capacity. As with the previously adopted Housing Element Update, the revised Housing Element Update would remedy potential inconsistencies through proposed amendments to the LUCE as well as the DCP, Bergamot Area Plan, and the City's Zoning Ordinance. With these amendments, the revised Housing Element Update would not conflict with applicable land use plans, policy, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Although the revised Housing Element Update would plan for an increase in dwelling units as compared to the previously adopted Housing Element Update, the revised Housing Element Update would not result in land use conflicts as the City's land use policy framework within adopted plans (e.g., LUCE) would minimize such conflict and ensure that new development be sensitive to the context of existing neighborhoods.

As with the previously adopted Housing Element and consistent with HCD guidance, the revised Housing Element Update would further incentivize lower income housing in the current R1 neighborhoods of the City to address equity issues, which may be areas that are not immediately adjacent to major transportation systems. The revised Housing Element Update would still be consistent with the overall key LUCE principles such as the interrelationship between land use and transportation and ensuring that housing is located within easy access to daily services remain. Further, new residential development planned for under the revised Housing Element Update would lead to more integrated and diverse neighborhoods, districts, and boulevards that accommodate lower income housing. Additionally, from a broader perspective, the physical effects of increased housing would have a beneficial effect on further the City's existing adopted housing and social equity goals considering the housing crisis and inequities in housing that exist. As analyzed and discussed throughout the previously certified Final EIR, while the Housing Element Update would result in significant impacts on air quality, cultural resources, noise, public services, utilities, and transportation, which must be addressed through mitigation measures or future funding for improvements or increased services/programs, the revised Housing Element Update would have the beneficial effects of addressing the existing housing shortage and affirmatively furthering fair housing.

Similar to the previously adopted Housing Element Update, the revised Housing Element Update, would amend the LUCE, DCP, Bergamot Area Plan, and the City's Zoning Ordinance to avoid potential inconsistencies. When compared with the previously adopted Housing Element Update, no new or more severe impacts associated with applicable land use plans, policies, and regulations would occur as a result of the revised Housing Element Update. The increase in dwelling units as a result of the revised Housing Element would support local and regional goals to address housing need, link housing to transit, and achieve per capita reduction in energy use, air pollutant and GHG emissions. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or more severe impacts associated with land use and planning would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to land use and planning.

3.12 Mineral Resources

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR incorporated the mineral resources findings from the IS, consistent with CEQA Guidelines Section 15128. That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (*No Impact*)
- b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? (*No Impact*)

Proposed Project Significance Determination

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

No Substantial Change from Previous Analysis. No mineral extraction operations occur in the City. Additionally, the City does not contain existing mineral resource extraction areas designated by the State of California. Given that the City is highly urbanized and all of the sites identified within the revised SSI associated with the revised Housing Element Update have been previously disturbed by existing and/or previous development, the potential for mineral resources to be encountered is low.

The revised Housing Element Update does not alter the areas where rezoning would occur. When compared with the previously adopted Housing Element Update, no new or more severe impacts associated with mineral resources would occur as a result of the revised Housing Element Update. The

level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or more severe impacts associated with the mineral resources would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to mineral resources.

3.13 Noise

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XIII. NOISE – Would the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- 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? (*Less Than Significant Impact*)
- b) Generation of excessive ground-borne vibration or ground-borne noise levels? (*Significant and Unavoidable Impact*)
- 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 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *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?*

Short-Term Construction Impacts

No Substantial Change from Previous Analysis. The revised Housing Element Update would result in similar temporary increases to ambient noise levels as those described for the previously adopted Housing Element Update. Impacts associated with noise from project-related construction activities would be less than significant with the implementation of MM NOI-1, which was adopted as a part of the previously certified Final EIR. MM NOI-1 requires each individual residential development project to comply with the requirements of the City's Noise Ordinance. Given that each individual residential development project would comply with City regulations and requirements – including the preparation of a Construction Noise Management Plan, as necessary – construction noise impacts would be less than significant.

The construction of new residential buildings in the City would require the use of heavy construction equipment, generators, power tools, and other sources of noise for various types of construction activities. As such, construction activities would result in temporary noise impacts that could affect noise sensitive receptors. However, the increased number of dwelling units is unlikely to increase the severity of these temporary noise impacts. As shown in Table 3.8-8 of the previously certified Final EIR, the U.S. Department of Transportation (USDOT) and USEPA have compiled data regarding the noise generating characteristics of typical construction activities. As described in Section 3.8.1, *Fundamentals of Sound and Environmental Noise* in the previously certified Final EIR, these noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 A-weighted decibels (dBA) per doubling of distance at acoustically hard locations. For example, a noise level of 86 dBA measured at 50 feet from the noise source to the receptor would reduce to 80 dBA at 100 feet from the source to the receptor and reduce by another 6 dBA (to 74 dBA) at 200 feet from the source to the receptor. Potential construction-related noise impacts on sensitive uses would be dependent on the relative distance of the sensitive use from construction activities. In some cases, it can be expected that construction activities would occur immediately adjacent to sensitive receptors, with setbacks of as little as 20 to 50 feet. Where construction activities are located within 20 feet of a sensitive receptor, maximum noise levels could reach as high as 94 dBA at the exterior of adjacent sensitive receptors during the grading and finishing

construction phases of potential future projects. Where a sensitive receptor is within 50 feet of an individual construction project requiring the use of a pile driver, unmuffled noise exposure could reach peaks of up to 101 dBA L_{eq} at 50 feet.

According to SMMC Section 4.12.060 (Exterior Noise Standards), noise from construction activities shall not exceed 20 dBA over the exterior noise standards specified for the noise zone. As identified under SMMC Section 4.12.110(d), construction noise can exceed those standards discussed above so long as it occurs between the hours of 10:00 A.M. and 3:00 P.M. Further, SMMC Section 4.12.110 limits construction activities to the hours of 8:00 A.M. to 6:00 P.M. on weekdays and 9:00 A.M. to 5:00 P.M. on Saturdays. No construction activities would be allowed on Sundays or public holidays. As such, individual projects that would not comply or are not anticipated to comply with the City's Noise Ordinance would be required to implement a Construction Noise Management Plan to ensure that the noisiest activities be limited to between the hours of 10:00 A.M. and 3:00 P.M., consistent with SMMC Section 4.12.110(d). The Construction Noise Management Plan would also require the implementation of noise attenuation, as necessary, including the use of noise barriers (e.g., sound walls) or noise blankets (e.g., sound absorbing materials). In addition, a Construction Noise Management Plan may require that construction staging areas and earthmoving equipment be located as far as possible from noise and vibration sensitive land uses, further reducing construction-related noise levels of individual residential development projects. The proposed changes would not result in new significant construction noise impacts, nor would they result in substantial increases in the severity of impacts or the need for new mitigation measures. Additionally, existing and new residential structures are required to incorporate noise insulation, which would further reduce exterior noise levels (24 CCR Section 1206).

When compared with the previously adopted Housing Element Update, no new construction-related noise impacts would occur as a result of the revised Housing Element Update. Although there would be an increase in dwelling units under the revised Housing Element Update, with the implementation of MM NOI-1, the level of impact would not be substantially more severe than the level described in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. The previously certified Final EIR found that even with the additional dwelling units, increases in ambient noise from traffic volumes, permanent ambient noise from stationary sources (e.g., deliveries and trash hauling, mechanical equipment, and parking garages), and temporary and periodic sources of ambient noise from operation of land uses (e.g., ground floor commercial uses, such as cafes, restaurants, or bars) would not constitute long-term or extensive, high-level exposures involving potential health impacts. The revised Housing Element Update would not change the land use types as planned for in the previously adopted Housing Element Update, but would plan for an increase in the number of dwelling units. Therefore, the revised Housing Element Update would result in similar sources of operational noise as described for the previously adopted Housing Element Update. Additionally, the revised Housing Element Update would result in similar temporary increases to ambient noise levels as those described for the adopted Housing Element Update.

Under typical circumstances, and where roadway conditions are constant (i.e., size, configuration, and speed limit), projected traffic volumes generally need to double over existing volumes in order for associated noise levels to increase by approximately 3 dBA, the increase in noise level that is generally perceptible to the human ear. The previously certified Final EIR determined that based on the projected traffic volumes anticipated to occur in the City under the previously adopted Housing Element Update, estimated future transportation noise levels are not expected to increase by 3 dBA or more from the Adjusted Baseline (2020) to the Future (2030) No Project scenarios; therefore, the increased noise levels at these roadway segments would generally not be perceptible to nearby sensitive receptors (refer to Table 3.8-10 in the previously certified Final EIR). Given the minimal increase in vehicle trips (see Section 3.16, *Transportation*), operational noise impacts from vehicle trips generated under the revised Housing Element Update would not generate traffic volumes resulting in a 3 dBA increase in noise levels.

The previously certified Final EIR evaluated operational noise related to deliveries and trash hauling, traffic, mechanical equipment (e.g., HVAC systems), and parking garages and found that they would cause some increase in ambient noise levels. Routine delivery of goods and weekly trash hauling are typical in the urban noise environment. Potential noise from hauling and deliveries would be similar to existing sources at individual project sites and would not permanently increase ambient noise. Large HVAC systems associated with new development can result in noise levels that average between 50 dBA L_{eq} and 65 dBA L_{eq} at a distance of 50 feet from the equipment. However, potential noise from mechanical equipment would be subject to SMMC Section 4.12.060 (Exterior Noise Standards), which requires that all mechanical equipment comply with the City's requirements to minimize exterior noise. Individual residential development projects would also be subject to SMMC Section 4.12.130, which requires a noise analysis for the mechanical equipment to demonstrate compliance with SMMC Section 4.12.60 (Exterior Noise Standards) prior to the issuance of a building permit. Parking garages can generate L_{eq} noise levels of between 49 dBA L_{eq} (tire squeals) and 74 dBA L_{eq} (car alarms) at a distance of 50 feet from the source. While this would present an additional source of noise in the City, new parking would be located within a subterranean parking garage or enclosed within an above ground parking structure, further reducing audible noise at the street level. Additionally, existing and new residential structures are required to incorporate noise insulation, which would further reduce exterior noise levels (24 CCR Section 1206).

The potential for increased peak noise levels in the early morning and late at night from ground floor operational uses (e.g., cafes, restaurants, bars, nightclubs, etc.) could result in sleep disturbance for residents. General administrative practice of the City includes striving for an 8-hour period of downtime regarding noise generation for businesses, which would help to reduce the generation of nuisance noise in these areas. In addition, SMMC Sections 4.12.140 and 4.12.170 include requirements for nighttime noise reduction and a review process for new residential developments. Therefore, the City's Noise Ordinance, in conjunction with project development review and approval process, would reduce impacts relating to temporary or periodic noise increases to on- or off-site sensitive uses.

When compared with the previously adopted Housing Element Update, no new or substantially more severe long-term operational impacts associated with noise would occur as a result of the revised Housing Element Update. Although there would be an increase in new dwelling units, operational noise

levels would be substantially the same as that analyzed in the Final EIR. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- b) *Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

Short-Term Construction Impacts

No Substantial Change from Previous Analysis. The previously certified Final EIR found that impacts related to ground-borne vibration during construction would be significant and unavoidable. Construction-related ground-borne vibration could result in short-term impacts on noise sensitive receptors within the City, depending on the location of the individual construction site. Construction-related vibration would have the greatest potential to impact sensitive uses which are located adjacent to or in close proximity to the construction site. For typical construction activities occurring within 25 feet of sensitive receptors, caisson drilling could generate vibration levels reaching 0.089 inches per second (in/sec) at the receptors.

If construction occurs within 25 feet or immediately adjacent to sensitive receptors, vibration levels could potentially exceed the threshold of 0.1 in/sec. Further, the use of pile driving would have the potential to generate significant vibration levels exceeding 0.1 in/sec at nearby sensitive receptors. The revised Housing Element Update would result in similar temporary increases to ground-borne vibration as those described for the previously adopted Housing Element Update (refer to Table 3.8-11 in the previously certified Final EIR).

MM NOI-1, which was adopted as a part of the previously certified Final EIR, would protect nearby vibration sensitive land uses from excessive vibration impacts. To reduce the potential for construction-related vibration effects to structures, prior to the issuance of a building permit, the project applicant shall perform an inventory of the structural condition of any structures that are listed in the HRI or that are more than 40 years of age and located within 50 feet of the construction site. MM NOI-1 would protect nearby vibration sensitive land uses from excessive vibration impacts. However, given that construction vibration levels could exceed the threshold of 0.1 in/sec at nearby sensitive receptors even with implementation of MM NOI-1 residual impacts are assumed to be significant and unavoidable as described for the previously adopted Housing Element Update.

When compared with the previously adopted Housing Element Update, no new construction-related vibration impacts would occur as a result of the revised Housing Element Update. While potential construction-related vibration impacts would remain significant and unavoidable, with the implementation of MM NOI-1, the level of impact would not be substantially more severe than the level described in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, residential land uses under the revised Housing Element Update are not anticipated to generate

excessive levels of ground-borne vibration. The revised Housing Element Update does not plan for any changes related to industrial or commercial uses (e.g., airports, waste facilities, etc.) that would generate ongoing ground-borne vibration. Occasionally, vibration could occur as a result of large truck travel to and from individual residential developments for periodic deliveries and garbage pick-up. However, such incidences would be temporary in nature and would not be expected to exceed the threshold of 0.1 in/sec.

When compared with the previously adopted Housing Element Update, no new or more severe long-term vibration impacts associated with operational noise would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- 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 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?*

No Substantial Change from Previous Analysis. Aircraft operations at SMO generate noise in the eastern portion of the City. As with the previously adopted Housing Element Update, the revised SSI associated with the revised Housing Element Update indicates that new residential development would not be located within an airport land use plan, but could be located within 2 miles of SMO property. No private airstrips are located near the City. The Los Angeles County Airport Land Use Plan establishes policies and programs to protect the public health, safety, and welfare through ensuring the appropriate development or expansion of airports and development of land uses that are compatible with airports. Local actions, including rezoning and new housing projects located within an Airport Influence Area (AIA) must be submitted to the Airport Land Use Commission for review. However, as with the previously adopted Housing Element Update, the revised Housing Element Update would not make changes to existing zoning for properties located within the Los Angeles County Airport Land Use Plan boundaries or properties located within the SMO Community Noise Equivalent Level (CNEL) noise contours. Further, the eventual closure of SMO in 2028 would ensure that people residing or working in the vicinity of the airport are not exposed to excessive noise levels.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with noise in the vicinity of a private airstrip, an airport land use plan, or within 2 miles of a public airport would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with noise would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following applicable mitigation measure related to noise, which remain applicable:

MM NOI-1 **Measures to Reduce Ground-borne Vibration.** To reduce the potential for construction-related vibration effects to structures, prior to the issuance of a building permit, the project applicant shall perform an inventory of the structural condition of any structures that are listed in the Historic Resources Inventory (HRI) or that are more than 40 years of age and located within 50 feet of the construction site. Based on a survey of the buildings' structural condition, a vibration specialist will determine the appropriate Caltrans vibration structural damage potential criteria, and for each piece of equipment, assess a standoff distance from the building. The construction contractor(s) shall restrict the use of vibration-generating equipment, within the minimum applicable standoff distances to not exceed the building's applicable structural damage criteria. If the vibration-generating construction equipment is required to be used within these minimum applicable distances, the construction contractor(s) shall implement one of the following measures:

Restrict the use of large bulldozers and other similarly large vibration-generating equipment, so that the vibration-generating portion of the equipment (i.e., the motor, engine, power plant, or similar) remains at the minimum standoff distances unless it can be demonstrated to the satisfaction of the City based on in-situ measurements (prior to initiation of full-scale construction activities) that vibration levels can be kept below the applicable structural damage potential criteria, as determined by the vibration specialist, through any combination of revised setbacks, alternative equipment and methods, alternative sequencing of activities, or other vibration-reducing techniques.

Install and maintain at least one continuously operational automated vibrational monitor on the side of the building facing the construction activity and capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to 0.05 in/sec peak particle velocity (PPV) less than the appropriate Caltrans vibration structural damage potential criteria and a regulatory alarm level equivalent to the Caltrans vibration structural damage potential criteria. The monitoring system must produce real-time specific alarms (via text message and/or e-mail to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity of the affected building shall be halted and the building visually inspected for damage by individual project applicants, with monitoring by the City of Santa Monica Community Development Department. Results of

the inspection must be logged. In the event damage occurs, such damage shall be repaired. Such repairs shall be conducted in consultation with a qualified preservation consultant and, if warranted, in a manner that meets The Secretary of the Interior's Professional Qualification Standards.

3.14 Population and Housing

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (*Less Than Significant Impact*)
- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (*Less Than Significant Impact*)
- c) Displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, the revised Housing Element Update plans for, but does not directly propose the construction of new residential development. The revised Housing Element Update provides the goals, policies, and programs to guide new residential over the next 8 years. Planning for the increase in housing is necessary to accommodate for unmet housing demand, to comply with the State-mandated 6th Cycle RHNA of 8,895 dwelling units as well as the required buffer. As compared to the previously adopted Housing Element Update that analyzed up to 11,025 new dwelling units, reasonably foreseeable future buildout under the revised Housing Element would be 13,600 total dwelling units in the City through 8-year Housing Element cycle (refer to Table 3). Assuming a population of 2.0 persons per household (pph), the implementation of the revised Housing Element Update would result in a population forecast of between 17,790 and 27,200 (with the buffer). This is between a 0- and 23-percent increase (with the buffer) over the estimate for the previously adopted Housing Element Update. However, the revised Housing Element Update would not induce substantial growth, but rather would accommodate already growth in the region that has been projected by the State. As described in the previously certified Final EIR, the projected increases in residential development and associated population growth under the revised Housing Element Update would be greater than the projections anticipated in SCAG's Connect SoCal. However, as described in Section 3.11, *Land Use and Planning*, when adopting Connect SoCal, SCAG recognized that cities and counties will foreseeably update their housing elements as part of general plans and amend zoning designations to accommodate the 6th Cycle RHNA. For many cities and counties, SCAG acknowledged that the required RHNA and Housing Element may need to accommodate more housing units than reflected in the Connect SoCal's household and population growth projections for the jurisdictions. Therefore, it is anticipated that the next update of the RTP/SCS will incorporate the latest population and housing growth projections from the 6th Cycle RHNA and the housing elements of cities and counties within the region. Further, neither SCAG nor Connect SoCal precludes a local jurisdiction from planning and approving growth that is different in terms of total units or geographic extent.

Additionally, as described in the previously certified Final EIR, more than 90 percent of the City's daytime workforce (approximately 91,000 people) live outside the City boundaries and commute in for their jobs. These employees within the City, especially low and moderate income employees in the retail, food service, and entertainment industries, tend to reside in less expensive inland communities often with relatively long commutes. These longer commutes increase VMT, energy use, air pollutant and GHG emissions with associated environmental impacts. The increase in affordable housing planned for under the revised Housing Element Update would create housing opportunities for many of the employees within the City, potentially reducing the environmental impacts associated with long distance commutes. By allowing employees within the City to live closer to their place of employment, the Housing Element Update would foster uses of walking, bicycling, and the use of public transit, limiting growth in VMT and associated adverse impacts to the physical environment. Therefore, employees who make up the City's daytime population may in turn, become part of the City's residential population as well, with associated environmental benefits. As described for the previously adopted Housing Element Update, the revised Housing Element Update would not induce growth but rather would accommodate the housing needs of the existing daytime population within the City.

No new or more severe impacts associated with population growth would occur as a result of the revised Housing Element Update, which would result in a future buildout of 13,600 reasonably foreseeable dwelling units in the City. The increase in additional dwelling units as a result of the revised Housing Element Update would be aligned with regional goals to meet housing demand. Further, as previously stated, it is anticipated that the next update of the RTP/SCS will incorporate the latest population and housing growth projections from the 6th Cycle RHNA and the housing elements of cities and counties within the region. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- b) *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*
- c) *Would the project displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere?*

No Substantial Change from Previous Analysis. Although the revised Housing Element Update would plan for an increase in dwelling units as compared to the previously adopted Housing Element Update, all of the programs addressing the protection of housing and displacement of existing residents (e.g., *Program 3A – Restrict The Removal Of Existing Rental Units For Site Redevelopment And Require That Protected Units Are Replaced*) would remain.

Notwithstanding all of these goals, policies, and programs for tenant protections, some residential development projects may result in the demolition of existing residential units in order to develop an increased number of new housing units. Temporary displacement impacts would be evaluated on a project-specific basis and may include a relocation analysis and plan in accordance with existing State and local requirements.

The revised Housing Element Update does not alter the areas where rezoning would occur. Further, since the revised SSI associated with the revised Housing Element Update's primarily identifies parcels that do not have existing residential uses, it is not anticipated that substantial numbers of existing housing or people would be displaced. The development standards included in the revised Housing Element Update would not increase the potential for displacement as compared with the previously adopted Housing Element Update. With the proposed goals, policies, and programs addressing housing stability, the revised Housing Element Update would not substantially contribute to or facilitate the displacement of housing or people.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with the displacement of housing or people would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or more severe impacts associated with population and housing would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR did not require any mitigation measures related to population and housing.

3.15 Public Services

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks and recreation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - i. Fire protection? (*Significant and Unavoidable Impact*)
 - ii. Police protection? (*Less Than Significant Impact*)
 - iii. Schools? (*Significant and Unavoidable Impact*)
 - iv. Parks and recreation? (*Significant and Unavoidable Impact*)
 - v. Other public facilities? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*
- i) *Fire protection?*

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, the revised Housing Element Update anticipates increases in the City's residential population which would increase the demand for fire protection services. This increase in demand would generate the need for new or physically altered fire protection facilities, the construction of which may result in significant environmental impacts. Planning for such a facility has not yet begun and given the uncertainties regarding the City's future budget, the City cannot guarantee funding for needed future construction or expansion of SMFD facilities and staff. This increase would strain fire protection services in some areas of the City and exacerbate delays in emergency responses beyond accepted standards. As described for the previously adopted Housing Element Update, the increase in dwelling units and population associated with the revised Housing Element Update would be significant and unavoidable.

Multiple State and local policies and programs are in place to reduce potential fire safety impacts associated with new residential development. For instance, current standards in the City Fire Code (SMMC Chapter 8.40) are intended to provide for the maximum protection of life and property to the extent feasible, and include stringent requirements addressing fire prevention and fire suppression for new buildings. Requirements include but are not limited to the installation of fire alarms, fire sprinklers, and fire communication systems; the use of more fire-resistant building materials; and the provision of adequate emergency access, fire hydrants, visible address signage, and minimum fire flow rates for water mains. Further, as part of the City's plan check process, the SMFD provides initial project plan review and comments to ensure that individual projects are designed to meet minimum site requirements relating to adequate emergency access. As another step in the fire prevention review process, SMFD reviews detailed building plans for all new structures prior to issuance of Certificate of Occupancy to ensure that the required fire protection safety features in the City Fire Code are implemented to reduce overall demand for fire protection services, including building sprinklers, fire alarm, water supply, and emergency access.

As with the previously adopted Housing Element Update, new residential development projects planned for under the revised Housing Element Update would facilitate the redevelopment of existing structures or construction of new buildings that meet the most current and stringent City Fire Code requirements. This would reduce the level of potential fire risk on sites within the City, as compared to existing conditions. Proper engineering of buildings to meet City Fire Code and SMFD requirements as well as the installation of fire sprinkler systems would substantially reduce the risk exposure for both building occupants and firefighters. With the anticipated increase in residential population, response times would be adversely affected. This would likely require at least one replacement facility and one newly sited facility for the Fire Department in the next 10 years. The revised Housing Element Update would contribute to the need for

the construction of new or expanded fire protection facilities, the construction of which may have result in significant environmental impacts.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with fire protection would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

ii) Police protection?

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, new residential development as planned for under the revised Housing Element Update would result in an increase in resident population, which would increase the demand for police protection services. Such population increases would not result in the exceedance of City service standards or the need for new or physically altered police facilities. As described in the previously certified Final EIR, this impact would be less than significant.

New residential development projects planned for under the revised Housing Element Update would be required to comply with existing building and site development standards, including improvements such as open space, building frontage, and streetscape features. These features may include access control to buildings, secured parking facilities, walls/fences with key systems, and well-illuminated public, semi-public, and private spaces (e.g., courtyards or other private gathering spaces) designed with a minimum of dead space to eliminate areas of concealment. Applicants for individual projects would also be required to provide the local Commanding Officer with access routes and other information that might facilitate police response, as requested by the Santa Monica Police Department (SMPD). These measures would help reduce impacts on police services by deterring criminal activity at new housing sites. Increased resident populations associated with the revised Housing Element Update would incrementally increase the demand for police protection services, potentially affecting staffing levels, calls for service, response times, equipment needs, and the potential need for new facilities.

Population growth associated with the revised Housing Element Update would result in additional calls for service, creating higher demand for existing law enforcement and police protection services and potentially causing an associated increase in the SMPD's average response time. As described in Section 3.10.2.1, *Environmental Setting – Law Enforcement and Police Protection* in the previously certified Final EIR, Part I calls to the SMPD totaled 5,439 crimes in 2018 and 4,585 in 2019, representing a Part I crime rate decrease from approximately 59.1 in 2018 to 50.1 Part I calls per 1,000 City residents. Using the City's 2019 ratio of 50.1 Part I calls per 1,000 City residents, implementation of the revised Housing Element Update is expected to increase annual Part I calls for service by up to a maximum of 1,557 (an additional 4 calls per day), based on an anticipated population of 123,425 under the revised Housing Element Update. Given the large proportion of employees, visitors, and tourists that make up the daytime population within the City, it is likely that the annual increase in Part I calls for service associated with the residential development under the revised Housing Element Update would be much less than this potential maximum.

The SMPD is funded through general fund revenues and pier fund revenues generated by property, sales, and transient occupancy taxes, all of which are expected to increase in proportion to the new residential development planned for under the revised Housing Element Update. Such revenues would be used by the SMPD to hire additional officers and purchase equipment to maintain or improve SMPD service levels over time to meet changing demands. However, the need for additional facilities (e.g., new or expanded police stations) would not be necessary, given that the population increase associated with the revised Housing Element Update would result in a maximum of 4 additional calls per day and any increases in necessary SMPD staffing would operate from the main City police headquarters.

As described for the previously adopted Housing Element Update, the implementation of the revised Housing Element Update, in combination with regional growth, would not result in new or substantially more severe contribution to cumulatively considerable impacts to law enforcement and police protection services. No mitigation measures are required.

iii) Schools?

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, new residential development planned for under the revised Housing Element Update would result in expected increases in student enrollment, which would increase the demand on existing school facilities. Notwithstanding SB 50, the payment of developer fees to the SMMUSD and the previously allocated bond funding measures for facilities improvements would not ensure a reduction in impacts. Therefore, as described in the previously certified Final EIR, the impacts could be potentially significant and unavoidable.

The previously adopted Housing Element Update was anticipated to result in approximately 2,179 new school children, a 21-percent increase above the existing 2019-2020 SMMUSD enrollment.¹⁵ Based on the same assumption of 0.18 school-aged students per household, buildout under the revised Housing Element Update would result in approximately 2,622 new school-aged children, a 29-percent increase above the existing 2019-2020 SMMUSD enrollment. While enrollment has been declining, with this projected 29-percent increase, the total enrollment within SMMUSD would reach approximately 11,548 students by 2030. Assuming that approximately 1,964 new dwelling units are constructed per year, there would be an increase in enrollment of approximately 353 students across the public schools in Santa Monica each year, an approximately 2-percent annual increase. As described in the previously certified Final EIR, over the short-term, SMMUSD would need to employ strategies to increase capacity. Many of the tools SMMUSD has are limited or problematic including, but not limited to: providing additional classroom space using portable facilities, which are a temporary solution and require funding and available land; adjusting classroom size, which is limited due to the collective bargaining agreement with the Santa Monica-Malibu Classroom Teachers' Association; increasing staffing levels, which would be difficult due to the ongoing budget deficit to sustain current operations; and transferring teachers from one campus to another to accommodate fluctuating student enrollment. Another option would be redrawing the District boundaries, which would transfer students from an overcrowded school to another neighboring school with available capacity. Changing boundaries is a very unpopular tactic and would not

¹⁵ This factor is based on 9,311 school-aged children (i.e., 5-18) from the 2019 American Community Survey (ACS)-Survey and 52,529 households from the 2020 California Department of Finance data.

easily be enacted. Over the long-term, permanent increases in capacity (e.g., construction of new buildings, satellite schools, or new schools) may become necessary.

The revised Housing Element Update may contribute to the need for the construction of new or expanded public school facilities, the construction of which may have result in significant environmental impacts. Any such development with the potential to create impacts to the physical environment would be subject to environmental review under the CEQA process to ensure impacts would be mitigated to the greatest extent feasible. Given the limited revenue available through developer fees for school facilities and the lack of availability of bond funds for facility improvement through Measures BB, ES, and SMS, impacts on school facilities associated with the revised Housing Element Update would be potentially significant and unavoidable.

Despite District-wide trends showing a decreasing annual enrollment, demand within SMMUSD is anticipated to increase as a result of implementation of the revised Housing Element Update and the continued implementation of the General Plans for the City of Santa Monica and the City of Malibu. Depending on the decision by the Los Angeles County of Education Committee on School District Organization, the formation of a separate Malibu Unified School District could reduce the tax base and funding per student within the City of Santa Monica, thereby making it more difficult to accommodate a long-term increase in enrollment as a result of the revised Housing Element Update.

Given the total net increase of 443 students over the 8-year Housing Element cycle, no new or substantially more severe impacts associated with school facilities would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

iv) Parks and recreation?

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, the implementation of the revised Housing Element Update is anticipated to increase the use of existing neighborhood and regional parks, which could cause the acceleration of substantial physical deterioration of these facilities. Although the City would continue to maintain existing parks and develop new parks consistent with the vision of the LUCE and other City goals, implementation of the revised Housing Element Update would require the construction or expansion of recreational facilities that might have potentially significant adverse physical effect on the environment. Therefore, impacts would remain significant and unavoidable.

As previously described in Section 3.10.5.1, *Environmental Setting – Parks and Recreation* in the Final EIR, the City currently has more than 375 acres of available recreational space (including 245 acres of beach), which exceeds the Quimby Act parkland standard (i.e., 3 acres per 1,000 residents). The revised Housing Element Update would plan for up to a total of 14,565 dwelling units, potentially generating an increase in population of approximately 31,068 people. This would cause the existing parkland ratio to decrease from 3.22 acres per 1,000 residents under the previously adopted Housing Element Update to 3.03 under the revised Housing Element Update. When factoring out the regional beach and open space areas, the parkland ratio for local park space would decrease from 1.15 acres per 1,000 residents under

the previously adopted Housing Element Update to 1.05 acres per 1,000 residents under the revised Housing Element Update.

The City strives to ensure that every resident is within a 10-minute walk of a park or beach, consistent with the goals of the Urban Land Institute and the National recreation and Park Association. Currently, most of the City's parks and recreational areas are located in the western edge of the City. As indicated in the Suitable Sites Inventory, the revised Housing Element Update would increase the number of dwelling units in the City's "park-poor" areas and therefore, would cause or accelerate the deterioration of parks and recreational facilities if no new parks or recreational facilities are added.

MM PS-1, which was adopted as a part of the previously certified Final EIR, requires the City to resume the update to the Parks and Recreation Maser Plan (PRMP) to develop and guide parks and recreation improvements, intended to increase the availability and accessibility of parks. MM PS-2 requires potential revisions to the Parks and Recreation Development Impact Fee. Additionally, MM PS-3 requires continued investigation and planning for the development of a great park at SMO following its closure. Consistent with the City's on-going long-range planning efforts, it is anticipated that the City would implement the recommendations of the PRMP, as practicable given City-funding limitations. Nevertheless, it is unknown at this time what specific parks and recreation improvements would be implemented therefore, this impact would remain significant and unavoidable. In addition, SMMC Chapter 6.80 requires project developers to pay a Park and Recreation Facilities tax for each new dwelling unit constructed in the City. All revenues collected from this tax are deposited into a Park and Recreation Facilities Fund to be used solely for the acquisition, improvement and expansion of public park, playground and/or recreation facilities. Therefore, as described for the previously adopted Housing Element Update, the revised Housing Element Update would not substantially contribute to cumulatively considerable impacts related to parks and open space areas.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with recreational facilities would occur as a result of the revised Housing Element. With the implementation of MM PS-1 through -3 the level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

v) *Other public facilities?*

No Substantial Change from Previous Analysis. Although library use and demand for resources would be expected to increase under implementation of the revised Housing Element Update due to resident population growth, it is not anticipated that the construction of new facilities would be necessitated under the Housing Element Update. Any necessary increases in staffing and resources could be accommodated within existing facilities, particularly given anticipated increases in online digital media, drop-off / pick-up services, etc. In addition, future individual projects with potential to impact public services would be subject to environmental review by the City and would be required to mitigate environmental impacts to the maximum extent feasible, as appropriate.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with other public facilities would occur as a result of the revised Housing Element Update. The

level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with public services would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following mitigation measures related to public services, which remain applicable to the revised Housing Element Update:

- MM PS-1 **Parks and Recreation Master Plan (PRMP) Update.** The City shall resume the update of the PRMP, as soon as funding permits. The PRMP shall incorporate policies that support the development of new parks in park poor areas in an effort to achieve the Urban Land Institute and the National recreation and Park Association goal of ever resident being located within a 10-minute walk of a park or beach.

- MM PS-2 **Parks and Recreation Development Impact Fee Update.** The City shall ensure adequate financing for funding of parks and recreation improvements through and update to the parks and recreation development impact fee. The fees shall be used to fund parks and recreation capital facilities, including land acquisition, parks improvements, and facilities in an effort to achieve the Urban Land Institute and the National recreation and Park Association goal of ever resident being located within a 10-minute walk of a park or beach.

- MM PS-3 **Great Park at Santa Monica Airport.** The City shall continue to develop plans for establishing a new public park at the Santa Monica Airport after its closure on December 31, 2028 through a public process that considers expansion of public space as well as possible bike lane infrastructure and high frequency transit service to connect the potential park with other neighborhoods across the City.

3.16 Transportation

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XVI. TRANSPORTATION AND CIRCULATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
transit, roadway, bicycle, and pedestrian facilities?				
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? (*Less Than Significant Impact*)
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (*Significant and Unavoidable Impact*)
- c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (*Less Than Significant Impact*)
- d) Result in inadequate emergency access? (*Less Than Significant Impact*)

Proposed Project Significance Determination

- a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

No Substantial Change from Previous Analysis. As described in Section 3.10, *Land Use and Planning*, the revised Housing Element Update would be consistent with all applicable goals of Connect SoCal. As described for the previously adopted Housing Element Update, the revised Housing Element Update would reduce VMT on a regional basis by increasing housing opportunities in the jobs-rich City. Currently, only 9.4 percent of employees within the City live within the City. The revised Housing Element Update would plan for additional dwelling units, thus creating more opportunities for many of the employees within the City to live closer to their jobs, and thereby shortening commutes and reducing VMT. Additionally, as described for the previously adopted Housing Element Update, all individual residential development projects under the revised Housing Element Update would be required to prepare and implement a TDM plan with transit and carpool incentives for residents and employees (SMMC Chapter

9.53), which would further reduce vehicle trips and VMT. Therefore, the revised Housing Element Update would remain consistent with these State and regional plans and regulations.

The LUCE set a policy-driven cap of 60,100 PM peak hour trips, based on the anticipated growth in the City through 2030. The City's Travel Demand Forecast Model (TDFM) was developed as part of the LUCE, and was originally developed to a base year of 2008, based on 2008 land use data and 2008 traffic counts. Since that time, the City's TDFM has been updated and recalibrated to reflect 2019 land uses, traffic volumes on local roadways, trip lengths, and the overall distribution and origin-destination patterns for the various trip purposes. In order to more accurately evaluate VMT generated within the City, Fehr & Peers also obtained average trip length and trip distribution data for various trips originating or arriving in the City using StreetLight location-based service data from 2019, prior to the onset of the coronavirus (COVID-19) pandemic (refer to Section 3.12.3.2, *Impact Assessment Methodology* in the previously certified Final EIR for a detailed discussion of the methodology used for this analysis). The current TDFM estimates that there were 56,000 PM peak hour trips under baseline (2020) conditions. However, because the TDFM was updated and recalibrated to 2019 conditions, the current estimate cannot be directly compared to the policy-driven threshold of 60,100 PM peak hour trips that was produced by the earlier version of the TDFM. It is possible, however, to make direct comparisons of actual traffic counts on the City streets over the past decade. These comparisons uniformly show that, on a City-wide level, traffic volumes have decreased. The TDFM estimates 56,000 PM peak hour trips in the Adjusted Baseline (2020) and approximately 55,200 PM peak hour trips in 2030 with implementation of the revised Housing Element Update. Therefore, the revised Housing Element Update is consistent with the City-wide No Net New PM Peak Hour Trips policy articulated in the LUCE.

With implementation of MM T-1 through -3, no new or more severe impacts associated with conflicting with an applicable circulation plan, ordinance, or policy, including the regional congestion management program, would occur, and the level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

The revised Housing Element Update, inclusive of the proposed changes, was reviewed against the City's VMT screening criteria in the Transportation Impact Analysis (see Appendix B) to determine if a VMT analysis would be required. Projects meeting the VMT screening criteria are deemed to have a less than significant impact and no further VMT analysis is necessary. The City's VMT screening criteria are based on the individual project's land use type, size, and distance to a transit stop (see Appendix B for a detailed discussion of the City's VMT screening criteria). Achieving the RHNA allocation of 8,895 units throughout the City within the next 8 years would result in housing projects that would fall within and outside of the pre-screened thresholds. Each residential development project would be subject to subsequent individual review to determine CEQA compliance and analysis of VMT as necessary. Because the revised Housing Element Update cannot be screened out, detailed VMT analysis was conducted relative to the City's two VMT significance thresholds to assess potential VMT impacts from implementation of the revised Housing Element Update.

VMT Threshold 1

The City's VMT Significance Threshold 1 relates to VMT per capita. A project's VMT per capita must not exceed the existing City-wide average VMT per capita for that particular land use. Based on the most recent data available from the City's travel demand forecasting model, the Adjusted Baseline (2020) City-wide average daily residential VMT per capita is 11.1 and the existing Adjusted Baseline (2020) City-wide average daily work VMT per employee is 15.3. Therefore, these are the current thresholds applied to the revised Housing Element Update.

Table 17 presents results from the City's TDFM runs for the previously adopted Housing Element Update and the revised Housing Element Update for the Adjusted Baseline (2020), Future No Project (2030), and Future (2030) With Project scenarios. Under Future (2030) With Project conditions, the revised Housing Element Update is estimated to produce a total of 207,731 daily trips and 1,189,292 daily residential VMT, with an average of 9.6 miles per capita. The 98,640 employees are estimated to generate a total of 123,206 commute trips and 1,407,858 commute VMT, with an average of 14.3 miles per employee. As compared to the previously adopted Housing Element Update the average miles per capita would be slightly lower and the average miles per employee would be slightly higher (refer to Table 17). Nevertheless, as described for the previously adopted Housing Element Update, the daily VMT per capita and VMT per employee under implementation of the revised Housing Element Update would not exceed the City's VMT Significance Threshold 1.

VMT Threshold 2

The City's VMT Significance Threshold 2 specifies that a project's combined total VMT for residents and commercial employees must be at least 16.8 percent below existing City-wide BAU VMT per capita. BAU VMT is defined as what the calculated VMT for the project would be if it were to generate VMT per capita at the existing City-wide average. The Future (2030) With Project Scenario would have an estimated 123,425 residents and 98,640 employees. In terms of the City's VMT Significance Threshold 2, the sum of residential and employee VMT are estimated at 2,879,210 miles calculated with the BAU residential VMT per capita and VMT per employee. Under Future (2030) With Project Scenario, the residential VMT per capita would be reduced by 13.5 percent (from 11.1 to 9.6 percent) and the work VMT per employee would be reduced by 6.5 percent (from 15.3 to 14.3 percent). Applying the future VMT values to the projected number of future residents and employees yields a total of 2,597,150 residential and employee VMT, which is 9.8 percent lower than the BAU residential and employment VMT. This reduction would be slightly less than the 11.6-percent reduction described for the previously adopted Housing Element Update.

The Future (2030) With Project Scenario shows a reduction in VMT, but a lesser reduction than the 16.8 percent threshold of significance. Under implementation of the revised Housing Element Update, the decrease in City-wide average VMT is greater for employee trips than for residential trips as shown in Table 18. This may reflect the improved jobs-housing balance under implementation of the revised Housing Element Update and the fact that existing TDM activities are more effective in reducing commute trips than home-based trips. The total residential and employee VMT under implementation of the revised Housing Element Update would exceed the City's VMT Significance Threshold 2. Since the VMT per capita and VMT per employee would not exceed VMT Significance Threshold 1 but would exceed

Significance Threshold 2, the revised Housing Element Update would have a significant impact on VMT, similar to that described for the adopted Housing Element Update.

It should be noted that the 16.8 percent lower than BAU VMT target was based in part on achieving the City's CAAP GHG reduction goals and was established by CARB to help the State achieve its GHG emissions reduction goals. While the revised Housing Element Update would create significant housing opportunities for many of the workers in the City and would decrease VMT per capita, meeting the 16.8 percent lower than BAU VMT target would require complementary investments in the City's transportation network and mobility programs as described for the previously adopted Housing Element Update. Merely providing housing closer to jobs would not be sufficient to reduce total City-wide VMT to below the targeted goal. Therefore, MM T-1 through -3 would continue to be required to reduce potential VMT impacts.

Table 17 Summary of Weekday VMT for the Adjusted Baseline (2020), Future (2030) No Project, and Future (2030) With Project Scenarios

VMT Metrics		Adjusted Baseline (2020)	Previously Adopted Housing Element Update		Revised Housing Element Update	
			Future (2030) No Project ¹	Future (2030) With Project	Future (2030) No Project ¹	Future (2030) With Project
Socioeconomic Data	Population	92,357	101,583	116,245	105,733	123,425
	Employment	90,992	95,409	92,760	98,605	98,640
Vehicle Trips	Total Vehicle Trips	954,436	989,249	995,832	1,009,019	1,038,644
	Home-Based Vehicle Trips	164,861	181,047	198,651	185,956	207,731
	Home-Based Work Vehicle Trips	118,939	121,163	117,070	124,038	123,206
	Home-Based Vehicle Trips per capita	1.8	1.8	1.7	1.8	1.7
	Home-Based Work Vehicle Trips per employee	1.3	1.3	1.3	1.3	1.3
VMT	Total VMT	6,617,899	6,975,327	6,664,276	7,226,206	7,048,600
	Home-Based VMT	1,025,163	1,127,571	1,162,450	1,107,140	1,189,292
	Home-Based Work VMT	1,392,162	1,383,431	1,233,708	1,480,303	1,407,858
	Home-Based VMT per capita (i.e., VMT Threshold #1)	11.1	11.1	10.0	10.5	9.6
	Home-Based Work VMT per employee (i.e., VMT Threshold #1)	15.3	14.5	13.3	15.0	14.3

Notes: ¹ Future (2030) No Project includes pending and approved projects, buildout occurring under the DCP, anticipated accessory dwelling units, and prior SSI sites.
Source: see Appendix B.

Table 18 City VMT Threshold 2: Total VMT

	Housing Element Population	City Average VMT per Capita/Employee	BAU Daily VMT
Business As Usual (BAU) Baseline			
Residential	123,425	11.1	1,370,018
Commercial Employee	98,640	15.3	1,509,192
Total Resident + Employee VMT			2,879,210
Future (2030) With Project			
Residential	123,425	9.6	1,189,292
Commercial Employee	98,640	14.3	1,407,858
Total Resident + Employee VMT			2,597,150
Difference between BAU and Project			-282,060

Is Total Resident + Employee Future VMT at least 16.8% lower than Total BAU VMT?

No, the estimated reduction of 282,060 VMT is 9.8% less than Total BAU VMT.

Source: see Appendix B.

Given that it cannot be assured that these measures would be fully effective in reducing total VMT to below adopted VMT Significance Threshold 2, the impact would be considered to remain significant and unavoidable. No new or substantially more severe impacts associated with VMT would occur as a result of the revised Housing Element Update. With the implementation of MM T-1 through -3, the level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

- c) *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)?*

Short-Term Construction Impacts

No Substantial Change from Previous Analysis. As described for the previously adopted Housing Element Update, increased construction-related traffic under the revised Housing Element Update, particularly haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, construction traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation. To avoid construction-related safety hazards, individual project applicants would be required to prepare a Construction Management Plan in accordance with the City's Construction Management Ordinance (SMMC Chapter 8.98). The Construction Management Plan would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking. The Construction Management Plan would also establish procedures for coordination with local emergency services, training for flagman for emergency vehicles traveling through the work zone, and other measures as necessary to facilitate automobile, pedestrian, and bicyclist safety. The Construction Management Plan would also outline designated haul routes and construction staging areas, construction crew parking, emergency access provisions, traffic control procedures, and avoidance of traffic impacts during construction. Thus, the Construction Management Plan would address temporary traffic impacts that could occur during each construction activity.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. As analyzed in the previously certified Final EIR, while the Housing Element Update provides a framework to increase housing opportunities throughout the City, it does not include any site-specific project plans or circulation schemes that can be evaluated for transportation hazards. Rather, individual projects proposed for development subsequent to approval of the revised Housing Element Update would be subject to, and designed in accordance with, existing standards and specifications. All individual projects as planned for under the revised Housing Element Update would be subject to City permits and compliance with adopted Santa Monica Standard Design Standards, including City standard street improvement details, standards for driveway ramps from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, etc.

Additionally, the projected increase in vehicle trips associated with the implementation of the revised Housing Element Update has the potential to result in additional congestion and queuing at signalized and stop-sign controlled intersections. However, City's transportation network is generally laid out in a well-spaced grid network, which would continue to distribute vehicle trips limiting increases in congestion from individual residential and mixed-use development projects enabled under the Housing Element Update. Substantial increases in congestion and queuing would be limited to: (1) the areas where the grid system breaks down within the vicinity of I-10 (Santa Monica Freeway) and SR-1 (Pacific Coast Highway); and (2) the streets immediately north and south of Olympic Boulevard. Increased queuing in these areas would continue to be addressed, as necessary by the Mobility Division, which leads the City's transportation policy and programs, oversees parking operations, and manages Santa Monica's traffic signal system. The City's Capital Improvement Program (CIP) organizes, prioritizes, and allocates funding for the numerous infrastructure maintenance and improvement efforts taking place each year. As described in the previously certified Final EIR, the City would continue to fund mobility-related CIP projects, particularly as they relate to complete streets and implementation of Vision Zero to reduce the potential for pedestrian-vehicle and bicycle-vehicle conflicts. As a result, future residential development projects under the revised Housing Element Update would not substantially increase hazards due to design features or incompatible uses.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with hazardous design features would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

d) *Would the project result in inadequate emergency access?*

No Substantial Change from Previous Analysis. The revised Housing Element Update would not result in additional or more severe impacts to emergency access within the City. As analyzed in the previously certified Final EIR, emergency access for individual residential developments would continue to be required at the project-level. Future residential development projects would be required to comply with applicable building and fire safety regulations, such as the California Fire Code and SMMC Section 9.04.10.08.060(d). The California Fire Code requires compliance with emergency access design

standards and sets standards for road dimension, design, grades, and other fire safety features as part of new construction of roads. SMMC Section 9.04.10.08.060(d) requires approval by the Parking and Traffic Engineer for the design, location, or position of any parking layout, entry, driveway, approach, or access from any street or alley. Site plan approval from the City and SMFD would ensure that individual projects provide sufficient access for emergency vehicles prior to issuance of a building permit. Therefore, emergency access would be maintained following construction of individual projects under the revised Housing Element Update.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with emergency access would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with transportation would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following mitigation measures related to transportation, which remain applicable to the revised Housing Element Update:

- MM T-1 **Residential Transportation Demand Management (TDM) Program.**
The City shall conduct a future study of programmatic TDM activities to reduce residential automobile trips, such as promoting: (1) resident travel support and incentives to reduce vehicle-based trips; (2) the expansion of carsharing businesses/activities in the City; (3) the expansion of micromobility services in City; (4) autonomous and/or low-emission goods delivery (e.g., e-bicycles and other land-based delivery modes) and other programs and services. Collaborate with private sector partners and the Transportation Management Organization to improve and expand use of these services.

- MM T-2 **City-wide Transportation Impact Fee (TIF) Update.** The City shall prepare an update to the TIF to change the basic metric from trips to vehicle miles traveled (VMT). The nexus study conducted when the City's TIF was adopted in 2013 reflects the costs associated with specified transportation improvements and the amount of new vehicle trips that can be attributed to projected land use changes. Using VMT as the metric to relate the trip fee to land uses would better align with the City's current analytical framework for analyzing transportation impacts. TIF revenues are used to construct infrastructure that support transit, bicycle, pedestrian and active transportation trips for all purposes.

- MM T-3 **Connections to Purple Line.** The City shall investigate the potential for improving bus transit connections through higher frequency service and route adjustments between Santa Monica and the planned stations on the Metro Purple Line (D Line) at the West Los Angeles Veterans Affairs

Campus station or from the Westwood station. Construction on this section of the subway extension began in 2019 and operation is planned to begin in 2027. Investigate the potential for creating a protected bicycle facility to complement high frequency transit service to the Metro Purple Line (D Line).

3.17 Tribal Cultural Resources

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XVII. TRIBAL CULTURAL RESOURCES:				
a) 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) 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)? (*Less Than Significant Impact With Mitigation Incorporated*)
- 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? (*Less Than Significant Impact With Mitigation Incorporated*)

Proposed Project Significance Determination

- a) *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)?*
 - 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

No Substantial Change from Previous Analysis. As described in the previously certified Final EIR, the construction of residential developments as planned for under the Housing Element Update could involve grading and excavation in areas that could potentially uncover significant subsurface tribal cultural resources. Due to the nature of buried tribal cultural resources and the logistical constraints of conducting soil pit test excavations in an urban built environment, comprehensive archaeological testing at properties throughout the City is impractical. Effects on tribal cultural resources can only be determined after a specific development has been proposed because the effects are highly dependent on both the individual site conditions (e.g., whether the site has been previously grading) and the characteristics of the proposed development (e.g., extent of grading and depth of excavation). While the revised Housing Element Update would plan for additional dwelling units, the nature of potential impacts to tribal cultural resources during construction projects would remain the same as described for the previously adopted Housing Element Update. Implementation of MM TCR-1, which was adopted as a part of the previously certified Final EIR, would require the presence of a Native American monitor for individual residential developments, if requested by the Gabrieleño Band of Mission Indians – Kitz Nation.

When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with tribal cultural resources would occur as a result of the revised Housing Element Update. With the implementation of MM TCR-1, the level of impact would not change from the level identified in

the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Conclusion

In conclusion, no new or more severe impacts associated with tribal cultural resources would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following mitigation measure related to tribal cultural resources, which remains applicable to the revised Housing Element Update:

- MM TCR-1 Tribal Consultation for Residential Developments.** For new residential and mixed-use developments requiring grading/excavation greater than 5 feet below ground surface (bgs), prior to demolition, the project developer or project construction contractor shall consult with the Gabrieleño Band of Mission Indians – Kizh Nation regarding the cultural sensitivity of the project site and the potential for tribal cultural resources to occur on-site. If required substantial evidence (e.g., detailed descriptions, maps, photographs, etc.) is presented by the Tribe to the City to suggest the potential for Tribal Cultural Resources to be affected, the project developer shall retain a Native American monitor to be present during project construction excavations such as clearing/grubbing, grading, trenching, or any other excavation activities. If, during initial ground disturbance, the Native American monitor determines that the ground disturbing activities have little or no potential to impact tribal resources, and/or the Native American monitor determines that ground disturbances would occur within previously disturbed and nonnative soils, full-time field observation shall be reduced to part-time inspections or ceased entirely.

3.18 Utilities and Service Systems

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects? (*Less Than Significant Impact With Mitigation Incorporated*)
- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? (*Significant and Unavoidable Impact*)
- c) Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects? (*Less Than Significant Impact With Mitigation Incorporated*)
- d) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (*Less Than Significant Impact*)

- e) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (*Less Than Significant Impact*)
- f) Comply with federal, state, and local statutes and regulations related to solid waste? (*No Impact*)

Proposed Project Significance Determination

- a) *Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

Water Distribution System

No Substantial Change from Previous Analysis. As described under Impact UT-1 in the previously certified Final EIR, the increase in water demand from new residential development planned for under the Housing Element Update may trigger the need for construction of new laterals and/or the replacement/expansion of existing water mains, necessary to provide adequate water supply and water pressure. The increase in dwelling units and the associated increase in water demand under the revised Housing Element Update would similarly result in the potential for areas to have deficiency due to water pressure falling below 50 pounds per square inch (PSI). However, the California Fire Code and California Plumbing Code require that developers demonstrate that there is adequate water flow and pressure for both domestic supply and fire protection to serve the property. If pressure to the property is low, individual project developers would need to provide pumps on the property of the new development or pay for the City to install a loop line to ensure adequate pressure. Therefore, with existing regulations, implementation of project-specific upgrades (e.g., the construction of laterals to tie into the existing domestic water supply infrastructure) and the assurance of adequate funds under MM UT-1 to finance the CIP projects (e.g., replacement/expansion of water mains), as necessary, water pressure for future development in the City would be adequate.

Additionally, as described under Impact UT-1, the construction of laterals, and to a larger extent, the potential replacement and/or expansion of water mains in the City may also create secondary short-term periodic construction impacts, such as potential disturbance of previously unknown buried cultural resources, criteria air pollutant emissions, noise, and potential disruption of the local transportation network flows.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with water treatment facilities would occur as a result of the revised Housing Element Update. With the implementation of MM UT-1, the level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

Water Production and Treatment Capacity

No Substantial Change from Previous Analysis. As described further under Impact 3.20(b) below, the City has sufficient water supplies available from a combination of the Santa Monica Groundwater Basin

(SMGB) and MWD imported water sources to meet water demand under the revised Housing Element Update. Therefore, no additional major infrastructure improvements (e.g., production, treatment, or storage facilities) would be required to enhance the City's water production and treatment capacity in order to meet the future demand – including the projected growth under the revised Housing Element Update. However, the projected growth with the revised Housing Element Update would impact the City's goal of achieving water self-sufficiency (e.g., 100 percent local water resources) where the City would likely still need to purchase between 10 and 20 percent of its domestic water supply from MWD.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with water treatment facilities would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

No Substantial Change from Previous Analysis. As described under Impact UT-2 in Section 3.11, *Utilities and Service Systems* in the previously certified Final EIR, the 2020 UWMP Update has accounted for projected population growth through 2040 – including population growth as a result of the 6th Cycle RNHA of 8,895 units, assuming a population of 2.0 pph. As shown in Table 3.11-8 and Table 3.11-9 in the previously certified Final EIR, the City's projected water supply in 2030 is 18,626 AF. With the previously adopted Housing Element Update (which covers the RHNA and required buffer), there would be an adequate water supply to meet the projected water demand associated with the Housing Element Update in 2030 and through to 2040. During a Normal Year, there would be a buffer of approximately 4,624 AF and during a Single Dry Year there would be a buffer of 2,066 AF.

The revised Housing Element Update would increase the required buffer and therefore further increase City-wide water demand than what was analyzed in the previously certified Final EIR. As shown in Table 19, water demand would increase by approximately 496 AFY as compared to the previously adopted Housing Element Update and by approximately 641 AFY as compared to the planned water supply in the 2020 UWMP. Therefore, the Normal Year buffer of 4,624 AF and Single Dry Year buffer of 2,066 AF would be adequate for City-wide water demand, including additional water demand from the proposed increase in new residential units. While the City can continue to rely upon the Tier 1 water allocation of 7,406 AFY from MWD to supplement local water supplies, the development of new dwelling units would delay or inhibit the City's ability to achieve the goal of water self-sufficiency if no new water conservation measures or programs are implemented. As described in the previously certified Final EIR, while the City would have sufficient supplies to meet projected future demand during normal, dry, and multiple dry years, this potential conflict with adopted City water self-sufficiency goals would be considered a potentially significant impact.

Table 19 Increased Water Demand under the Housing Element Update

	2020 UWMP Projected Increase in Units ¹	# of Buffer Units Beyond UWMP Projection through 2030	Water Demand Factor ⁴	Additional Water Demand Increase Beyond UWMP Projection
Previously Adopted Housing Element Update	8,895	2,099 units ²	124 gal/unit/day	260,276 gal/day (292 AFY)
Revised Housing Element Update	8,895	5,670 units ³		703,080 gal/day (788 AFY)
Net Change				442,804 gal/day (496 AFY)

Notes: ¹ The 2020 UWMP projected an increase of 8,895 dwelling units.

² While the previously certified Final EIR described a total of up to 11,025 dwelling units, the quantitative impact analyses (e.g., energy, utilities, public services, etc.) accounted for residential development projects that had recently been approved and were in the development pipeline. Therefore, these analyses assess the net increase of 10,944 units in the Future Year (2030) as compared to the Adjusted Existing Baselines (2020).

³ As described in the revised Housing Element Update, a review of the past 5th Cycle Housing Element shows that approximately 10 percent of approved and pending projects were withdrawn and/or have had permit approvals expire. Therefore, a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. While the SSI provided in the revised Housing Element Update describes a total of 13,600 dwelling units, the quantitative impact analysis in this addendum conservatively considers an additional 10-percent for a total of 14,565 dwelling units.

⁴ The estimated increase in water demand was calculated using demand factors from the LUCE Program EIR (SCH No. 2009041117), which do not take into account water conservation factors.

The revised Housing Element Update would further increase City-wide water demand than what was analyzed in the previously certified Final EIR. As shown in Table 19, water demand would increase by approximately 496 AFY as compared to the previously adopted Housing Element Update and by approximately 641 AFY as compared to the planned water supply in the 2020 UWMP. Therefore, the Normal Year buffer of 4,624 AF and Single Dry Year buffer of 2,066 AF would be adequate for City-wide water demand, including additional water demand from the proposed increase in new residential units. While the City can continue to rely upon the Tier 1 water allocation of 7,406 AFY from MWD to supplement local water supplies, the development of up to 14,565 dwelling units would delay or inhibit the City's ability to achieve the goal of water self-sufficiency if no new water conservation measures or programs are implemented. As described in the previously certified Final EIR, while the City would have sufficient supplies to meet projected future demand during normal, dry, and multiple dry years, this potential conflict with adopted City water self-sufficiency goals would be considered a potentially significant impact.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with water supply would occur as a result of the revised Housing Element Update under the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

- c) *Would the project require or result in the construction of new or expanded wastewater treatment facilities, the construction of which could cause significant environmental effects?*

No Substantial Change from Previous Analysis. The City's wastewater flows to the Hyperion Water Reclamation Plant (HWRP) for wastewater treatment and disposal. Cumulative growth and planning for that plant are addressed in the Hyperion Sewer System Management Plan (SSMP), which was updated

in 2019.¹⁶ As discussed therein, the City of Los Angeles performs ongoing flow monitoring, hydraulic modeling, and inspections for current and projected cumulative conditions. The City of Los Angeles uses a dynamic GIS-based hydraulic model of the system, including economic data and population growth. Additionally, exiting cumulative development is becoming more water efficient through existing water conservation programs. For example, SB 407 (Civil Code Section 1101.1 et seq.) requires water saving fixtures to be incorporated into existing development, typically for most renovations and at the time of sale of the property. New residential development as planned for under the revised Housing Element Update would generate increased localized wastewater flows within the existing sewer system; therefore, further increasing demand on the sewer system than what was analyzed in the previously certified Final EIR. The California Plumbing Code is codified in 24 CCR Part 5 contains regulations including, but not limited to, plumbing materials and provisions requiring the installation of low flow fixtures and toilets. The revised Housing Element Update would increase the amount of wastewater transported by the local sewer system in the City by up to 715,265 gallons per day (GPD) or 0.72 million gallons per day (MGD) over flows estimated for the previously adopted Housing Element Update and 2.45 MGD over existing flows (see Table 20). As described in Section 3.11.2.1, *Environmental Setting – Wastewater Collection, Conveyance, and Treatment* in the previously certified Final EIR, the Coastal Interceptor Sewer (CIS), which ultimately conveys the City’s wastewater to the HWRP for wastewater treatment and disposal, has a capacity of 51.7 MGD. Given the City’s existing average wastewater flow of 12 MGD, the revised Housing Element Update would increase total flows from the City to 14.45 MGD, and the CIS would have a remaining capacity of 37.25 MGD, with sufficient capacity for maximum peak instantaneous flows.

Table 20 Increased Wastewater Generation under the Housing Element Update

	Projected Increase	Wastewater Generation Factor ³	Estimated Flow
Previously Adopted Housing Element Update	10,994 units ¹	150 gal/unit/day	1,649,100 gal/day
	405,246 sf	0.20 gal/sf/day ⁴	81,050 gal/day
	Total		1,730,150 gal/day
Revised Housing Element Update	14,565 units ²	150 gal/unit/day	2,184,750 gal/day
	1,303,324 sf	0.20 gal/sf/day ²	250,665 gal/day
	Total		2,445,415 gal/day

Notes: ¹ While the previously certified Final EIR described a total of up to 11,025 dwelling units, the quantitative impact analyses (e.g., energy, utilities, public services, etc.) accounted for residential development projects that had recently been approved and were in the development pipeline. Therefore, these analyses assess the net increase of 10,944 units in the Future Year (2030) as compared to the Adjusted Existing Baselines (2020).

² As described in the revised Housing Element Update, a review of the past 5th Cycle Housing Element shows that approximately 10 percent of approved and pending projects were withdrawn and/or have had permit approvals expire. Therefore, a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may

¹⁶ The Hyperion SSMP is available at: <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf>.

never proceed to construction. While the SSI provided in the revised Housing Element Update describes a total of 13,600 dwelling units, the quantitative impact analysis conservatively considers an additional 10-percent for a total of 14,565 dwelling units.

³ The estimated wastewater flow was calculated using wastewater generation factors from the City's Civil Engineering Report. These factors are based on residential land use for the previously adopted Housing Element Update and the revised Housing Element Update.

⁴ The commercial wastewater generation demand has been estimated using the office water demand factor from the LUCE Program EIR, which is more conservative than other commercial uses (e.g., retail 0.10 gals/sf/day).

As described for the previously adopted Housing Element Update, development of land uses under the revised Housing Element Update would likely require only limited need for expansion or replacement of individual sewer line segments to meet increased residential wastewater demand by 2030.

Implementation of MM UT-2, which was adopted as a part of the previously certified Final EIR, would ensure adequate funds to finance the CIP projects (e.g., replacement/expansion of sewer mains), as necessary. However, replacement of sewer mains and lines for residential construction could create secondary short-term periodic construction impacts through 2030, including potential disturbance of previously unknown buried cultural resources, criteria air pollutant emissions, noise, and potential disruption of the local transportation network flows. These impacts are considered part of development and buildout of update the revised Housing Element Update.

No new or substantially more severe impacts associated with wastewater treatment facilities would occur as a result of the revised Housing Element Update. With the implementation of MM UT-2, the level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible or are otherwise required.

- d) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

No Substantial Change from Previous Analysis. As discussed under Impact 3.17(c) above, wastewater flows from the City are treated at the HWRP, which has a dry weather capacity of approximately 450 MGD processed through full secondary treatment and an 850 MGD wet weather capacity. Currently this facility receives and treats 340 MGD of wastewater, 12 MGD (3.5 percent) of which is wastewater from the City. The proposed changes to the Housing Element Update plan for additional dwelling units and associated potential ground-floor commercial development, which would add up to 2.45 MGD (0.54 percent of dry weather capacity and 0.29 percent of wet weather capacity). The increased wastewater flow from implementation of the revised Housing Element Update would not exceed capacity of the wastewater treatment facility. The HWRP would have sufficient capacity to serve the projected increase in demand associated with changes to the Housing Element Update in addition to the provider's existing commitments.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with wastewater treatment facilities would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

- e) *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of*

solid waste reduction goals?

No Substantial Change from Previous Analysis. Buildout under the revised Housing Element Update would increase solid waste generation in the City, as described for the previously adopted Housing Element Update under Impact UT-5 of the previously certified Final EIR. The revised Housing Element Update would result in an increase in municipal solid waste generation in the City of up to 9,706 tons per year over the previously adopted Housing Element Update and up to 36,093 tons per year over existing generation (see Table 21). Assuming the existing diversion rate of 81 percent, this would result in up to 29,235 tons per year that would need to be disposed in one or more landfills serving the City.

As described in Section 3.11.3.1, *Environmental Setting – Solid Waste Management Services* in the previously certified Final EIR, a total of 14 solid waste landfill disposal facilities currently serve the City, including 13 landfills and 1 refuse-to-energy facility. The combined remaining capacity of the 12 landfills with remaining life years within the 8-year Housing Element cycle is 634.7 million tons. The combined maximum permitted daily capacity of the 14 solid waste facilities is 70,004 tons, although only 54,470 tons per day are disposed on average in these facilities daily (approximately 77.8 percent of daily capacity). The additional solid waste that is anticipated to be generated by implementation of the revised Housing Element Update would be a nominal increase to the current 70,004 solid tons per day of the 14 solid waste facilities expected to serve the City in 2030. The revised Housing Element Update would not conflict with the City’s implementation of the Zero Waste Strategic Operations Plan and 2019 Zero Waste Plan Update that will enable the City to reach its zero waste goal of 95 percent diversion by 2030.

Table 21 Increased Solid Waste Generation under the Revised Housing Element Update

	Land Use	Projected Increase	Wastewater Generation Factor ³	Estimated Flow
Previously Adopted Housing Element Update	Residential	10,994 units ¹	12.23 lbs/unit/day	134,456 lbs/day (24,538 tons/year)
	Commercial	405,246 sf	25 lbs/1,000 sf/day	10,131 lbs/day (1,849 tons/year)
	Total			144,587 lbs/day (26,387 tons/year)
Revised Housing Element Update	Residential	14,565 units ²	12.23 lbs/unit/day	178,130 lbs/day (30,147 tons/year)
	Commercial	1,303,324 sf	25 lbs/1,000 sf/day	32,583 lbs/day (5,946 tons/year)
	Total			210,713 lbs/day (36,093 tons/year)

Notes: ¹ While the previously certified Final EIR described a total of up to 11,025 dwelling units, the quantitative impact analyses (e.g., energy, utilities, public services, etc.) accounted for residential development projects that had recently been approved and were in the development pipeline. Therefore, these analyses assess the net increase of 10,944 units in the Future Year (2030) as compared to the Adjusted Existing Baselines (2020).

² As described in the revised Housing Element Update, a review of the past 5th Cycle Housing Element shows that approximately 10 percent of approved and pending projects were withdrawn and/or have had permit approvals expire. Therefore, a 10-percent discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may

never proceed to construction. While the SSI provided in the revised Housing Element Update describes a total of 13,600 dwelling units, the quantitative impact analysis conservatively considers an additional 10-percent for a total of 14,565 dwelling units.

³ Estimated solid waste generation was calculated using the most conservative waste generation rates presented by CalRecycle.

When compared to the previously adopted Housing Element Update, no new or substantially more severe long-term impacts associated with permitted landfill capacity would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

f) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

No Substantial Change from Previous Analysis. As with the previously adopted Housing Element Update, individual residential development projects in the City under the revised Housing Element Update would be required to comply with all applicable solid waste regulations in effect at the time of operation, including solid waste diversion requirements described in SMMC Section 5.08.400. Additionally, individual projects would comply with the Construction and Demolition Ordinance (SMMC Section 8.108.010 Subpart C) by submitting a waste management plan to the City and diverting at least 70 percent of construction and demolition debris from landfills. Implementation of the revised Housing Element Update would not conflict with the goals or requirements of AB 939, AB 341, the City's Zero Waste Strategic Operations Plan, or the SMMC.

When compared to the previously adopted Housing Element Update, no new or substantially more severe impacts associated with solid waste statutes and regulations would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

Conclusion

In conclusion, no new or substantially more severe impacts associated with utilities and service systems would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No new mitigation measures have become feasible.

Previously Adopted Mitigation Measures Applicable to Proposed Project

The previously certified Final EIR required the following mitigation measures related to utilities, which remain applicable to the revised Housing Element Update:

- MM UT-1 **Public Infrastructure Financing Program.** In addition to required improvements to the water delivery system for individual projects under the Housing Element Update, as needed, the City shall ensure adequate financing for funding of infrastructure improvements to serve the City either through the City's Capital Improvement Program (CIP) or alternatively through a Public Infrastructure Financing Program, including preparation of an Assembly Bill (AB) 1600 fee justification study. If pursued, the Public Infrastructure Financing Program shall be completed within 2 years of

adoption of the proposed Housing Element Update. All new residential development under the proposed Housing Element Update shall be conditioned to be subject to payment of its fair share of any impact fees identified under this program. The program shall determine the costs of and establish a funding program for the following capital improvements to upgrade water delivery as needed to serve the demands of new land uses anticipated to occur under the proposed Housing Element Update.

The Public Infrastructure Financing Program shall:

- a) Identify the cost of improvements to or replacement of undersized lines within the City.
- b) Clearly apportion existing and projected demand on these facilities and costs between existing users, the City, and proposed future development.
- c) Identify potential funding mechanisms for water line construction, including the equitable sharing of costs between new development, the City, and existing users, including development impact fees, grants, assessments, etc.
- d) Identify development impact fees for all residential development to ensure that development pays its fair share of public infrastructure costs.
- e) Include a regular fee update schedule, consistent with the City's CIP.
- f) Require the first update of the Public Financing Plan within 5 years following adoption of the proposed Housing Element Update.

MM UT-2

Public Infrastructure Financing Program. In addition to required improvements to the domestic water supply system for projects, as needed under the proposed Housing Element Update, the City shall ensure adequate financing for funding of wastewater infrastructure improvements to serve the City either through the City's Capital Improvement Program (CIP) or alternatively through a Public Infrastructure Financing Program. All new development under the Housing Element Update shall be conditioned to be subject to payment of its fair share for any impact fees identified under this program. The program shall determine the costs of and establish a funding program for the capital improvements to upgrade wastewater collection as needed to serve the demands of new land uses anticipated to occur under the proposed Housing Element Update.

In addition to MM UT-1 and MM UT-2, each of the applicable State and local regulations referenced in Section 3.3, *Air Quality*, Section 3.4, *Cultural Resources*, Section 3.8, *Noise*, Section 3.12, *Transportation*, and Section 3.13, *Tribal Cultural Resources* of the EIR as well as MM AQ-1, MM CUL-1a and -1b, MM CUL-2a and -2b, MM NOI-1, and MM TCR-1 also apply.

3.19 Wildfire

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XIX. WILDFIRE – If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff post-fire slope instability or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The previously certified Final EIR incorporated the wildfire findings from the IS, consistent with CEQA Guidelines Section 15128. That analysis determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (*No Impact*)
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (*No Impact*)
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (*No Impact*)

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff post-fire slope instability or drainage changes? (*No Impact*)

Proposed Project Significance Determination

- a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c) *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff post-fire slope instability or drainage changes?*

No Substantial Change from Previous Analysis. As described in Section 3.9, *Hazards and Hazardous Materials*, the City is highly urbanized and does not include any areas designated as a High or Very High Fire Hazard Severity Zone. The nearest wildfire zones are to the north of the City associated with the Santa Monica Mountains. As described for the previously adopted Housing Element Update, new residential development under the revised Housing Element Update would not exacerbate wildfire risks. The revised Housing Element Update would not involve installation of any infrastructure such as high-tension electricity lines that would exacerbate wildfire risk and would not increase public exposure to wildfires (i.e., placing residential uses in areas of high wildfire risk). Further, the City is not located on a significant downslope of any potential high fire hazard areas and would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations.

The revised Housing Element Update does not alter the areas where rezoning would occur. When compared to the previously adopted Housing Element Update, no new or more severe impacts associated with wildfire risk would occur as a result of the revised Housing Element Update. The level of impact would not change from the level identified in the previously certified Final EIR. No mitigation measures are required.

3.20 Mandatory Findings of Significance

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	Substantially More Severe Impact	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Previous Significance Determination

The IS prepared for the previously certified Final EIR determined that implementation of the previously adopted Housing Element Update would result in the following:

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (*Potentially Significant Impact*)
- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a 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.) (*Potentially Significant Impact*)
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (*Potentially Significant Impact*)

Proposed Project Significance Determination

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

No Substantial Change from Previous Analysis. As described in Section 3.4, *Biological Resources*, there are no riparian or sensitive habitats known to occur in the City. As a result of previous development, the City has little undisturbed native vegetation. In addition, there are no blueline streams or wetland habitat within the City. The City is not recognized as an existing or proposed SEA that links wildlife populations. No habitat conservation plans, natural community conservation plans, or other approved local, regional, or State habitat conservation plans apply to Santa Monica. Consequently, the revised Housing Element Update would not affect any sensitive habitats or sensitive species, wetlands, or SEA.

The overall drainage pattern within the City is to the southwest. An underground storm drain system intercepts surface runoff through a series of catch basins, connector pipes, and mainlines and carries the majority of the stormwater to the Santa Monica Bay portion of the Pacific Ocean. All residential and mixed-use development projects on sites over 15,000 sf would be subject to the City's Runoff Conservation and Sustainable Management Ordinance requirements. This would include preparation and implementation of a Runoff Mitigation Plan to minimize polluted runoff in accordance with the City's Ordinance. In addition, the projects would be required to store and use (for non-potable purposes), infiltrate, or evapotranspire project-generated runoff during a 0.75-inch storm event, or alternatively, pay the City an urban runoff-reduction fee. New development projects would also be required to comply with landscaping requirements of the Zoning Ordinance (Chapter 9.26) which includes landscaping requirements to protect water quality and reduce stormwater runoff such as the planting of new vegetated areas, including landscaped buffers and setbacks, to allow for increased stormwater infiltration and reduced potential for polluted runoff. Therefore, no impact on sensitive habitats, wildlife population, wetlands, migratory wildlife, and habitat conservation areas would occur and the revised Housing Element Update would not disturb protected biological resources.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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.)*

No Substantial Change from Previous Analysis The previously certified Final EIR determined that the previously adopted Housing Element would contribute to cumulatively considerable impacts related to air quality (refer to Section 3.3, *Air Quality*), cultural resources (Section 3.5, *Cultural Resources*), fire protection, public schools, and recreational facilities (refer to Section 3.15, *Public Services*) and water supply and infrastructure (refer to Section 3.18, *Utilities and Public Services*). As described in this addendum, the revised Housing Element Update would also contribute to these cumulatively considerable impacts. Given the increase in dwelling units under the revised Housing Element Update,

the contribution to these cumulatively considerable impacts would be slightly greater. However, as demonstrated in Section 3.1 through 3.19 of this addendum, the revised Housing Element Update would not result in substantially more severe significant environmental effects beyond those identified in the previously certified Final EIR.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

No Substantial Change from Previous Analysis. As described in Sections 3.3, *Air Quality*, Section 3.5, *Cultural Resources*, Section 3.13, *Noise*, and Section 3.15, *Public Services* implementation of the revised Housing Element Update could potentially create substantial adverse effects on human beings, either directly or indirectly, as discussed throughout this addendum. Additional residential development projects under the Housing Element Update may expose sensitive receptors to substantial criteria air pollutant concentrations in excess of the established LSTs during construction. Given that no feasible mitigation is available to reduce this impact to a less than significant level, this impact would be considered significant and unavoidable. Construction-related ground-borne vibration could result in short-term impacts on vibration sensitive receptors within the City, depending on the location of the individual construction site. Construction-related vibration would have the greatest potential to impact sensitive uses which are located adjacent to or in close proximity to the construction site. Increases in the City's residential population which would increase the demand for fire protection services. This increase would strain fire protection services in some areas of the City and exacerbate delays in emergency responses beyond accepted standards. As a result, the Housing Element Update could generate the need for new or physically altered fire protection facilities, the construction of which may result in significant environmental impacts. Similarly, the Housing Element Update would also reduce the parkland ratio in the City. Consistent with the City's on-going long-range planning efforts, it is anticipated that the City would implement the recommendations of the PRMP, as practicable given City-funding limitations. Nevertheless, it is unknown at this time what specific parks and recreation improvements would be implemented. For these reasons, as described for the previously adopted Housing Element Update, implementation of the revised Housing Element Update could result in substantial adverse effects on human beings. However, as demonstrated in Section 3.1 through 3.19 of this addendum, the revised Housing Element Update would not result in substantially more severe significant environmental effects beyond those identified in the previously certified Final EIR.

4.0 References

A complete list of references supporting the analysis in this addendum is provided in Section 8, *References* of the previously certified Final EIR for the 6th Cycle 2021-2029 Housing Element Update.

This Page Intentionally Left Blank