



City of
Santa Monica

Village Trailer Park
Final Environmental Impact Report
SCH# 2010061036

Volume I
April 2012

Prepared for:

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

Prepared by:

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VILLAGE TRAILER PARK

VOLUME I

FINAL ENVIRONMENTAL IMPACT REPORT

Prepared for:

CITY OF SANTA MONICA

1685 Main Street

Santa Monica, CA 90401

Prepared by

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April 2012

PREFACE

In accordance with the City of Santa Monica Guidelines for implementation of the California Environmental Quality Act (CEQA) and Sections 15088, 15089, and 15132 of CEQA, the City has prepared the Final Environmental Impact Report (EIR) for the proposed Village Trailer Project (the proposed project).

This document makes up the Final EIR as defined in State CEQA Guidelines Section 15132. Pursuant to the CEQA Guidelines Section 15132, a Final EIR shall consist of:

- a) *The Draft EIR or a revision of the Draft.*
- b) *Comments and recommendations received on the Draft EIR, either verbatim or in summary.*
- c) *A list of persons, organizations, and public agencies commenting on the Draft EIR.*
- d) *The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- e) *Any other information added by the Lead Agency.*

Chapter 1.0 through Chapter 7.0 of this document is the Draft EIR that was published in October 2011 with corrections and addition show in underline or ~~strikeout~~. Chapter 8.0 through Chapter 10.0 are the Final EIR. In addition, Chapter 11.0 contains the Mitigation and Monitoring Reporting Program for the proposed project.

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1.0 INTRODUCTION

This document is a Draft Environmental Impact Report (EIR), for the proposed Village Trailer Park Project (the proposed project or the project). The project site is located at 2930 Colorado Avenue between Stewart Avenue and Stanford Street, in the City of Santa Monica, California. The proposed project would include the removal of the existing trailer park uses on-site and development of a mixed-use residential and commercial project. The project is described in Chapter 3.0 Project Description. This section discusses:

- The EIR background
- The legal basis for preparing an EIR
- The scope and content of the EIR
- Lead, responsible, and trustee agencies
- The environmental review process required under the California Environmental Quality Act (CEQA)

1.1 ENVIRONMENTAL IMPACT REPORT BACKGROUND

An Initial Study was prepared for the proposed project, which determined that preparation of an EIR was necessary. A Notice of Preparation (NOP) of an EIR was prepared for the proposed project and distributed on June 10, 2010 for agency and public review for a 30-day review period. The NOP was distributed to the State Clearinghouse, responsible and trustee agencies, interested parties/organizations, and owners and occupants adjacent to the project site. The Initial Study that was prepared for the project is presented in Appendix A, while the NOP and responses are presented in Appendix B.

1.2 PURPOSE AND LEGAL AUTHORITY

The proposed project requires the discretionary approval of the City of Santa Monica City Council (with recommendation from the Planning Commission). Therefore, it is subject to the requirements of CEQA. In accordance with Section 15121 of the State CEQA Guidelines, the purpose of this EIR is to serve as an informational document that:

....will inform public agencies decision-makers and the public generally of the significant environmental effects if a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR has been prepared as a Project EIR, pursuant to Section 15161 of the CEQA Guidelines. A project EIR is appropriate for a specific development project. As stated in the CEQA Guidelines:

This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

This EIR is to serve as an informational document for the public and the City of Santa Monica decision-makers. The process will culminate with Planning Commission and City Council hearings to consider certification of a Final EIR and approval of the project.

1.3 EIR SCOPE AND CONTENT

This EIR analyzes the following environmental issue areas: aesthetics, air quality and greenhouse gases, biological resources, construction effects, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, noise, population and housing, public services, neighborhood effects, transportation/traffic, and utilities. These issues were determined through the

Initial Study (Appendix A) to have the potential for significant impacts. For all other issues considered in the City's environmental checklist, it was determined in the Initial Study that impacts would not occur, would be less than significant, or could be reduced to a less-than-significant level with implementation of standard mitigation measures. Therefore, these issues are not addressed further in the EIR.

This EIR addresses the abovementioned issues and identifies the potentially significant environmental impacts associated with the project, including individual-level and cumulative effects. In addition, the EIR recommends feasible mitigation measures, where necessary, that would eliminate or reduce significant environmental effects.

The EIR references pertinent City policies and guidelines, certified EIRs, adopted CEQA documents, and background documents prepared by the City. A full reference list is contained in Chapter 7.0 Persons and Sources Consulted.

The Alternatives section of the EIR (Chapter 5.0) was prepared in accordance with Section 15126.6 of the CEQA Guidelines. The alternatives discussion evaluates the CEQA-required "no project" alternative and two development alternatives for the site. It also identifies the environmentally superior alternative among the alternatives assessed.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. The CEQA Guidelines provide the standard of adequacy on which this document is based. The Guidelines state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably foreseeable. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure. (Section 15151)

1.4 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

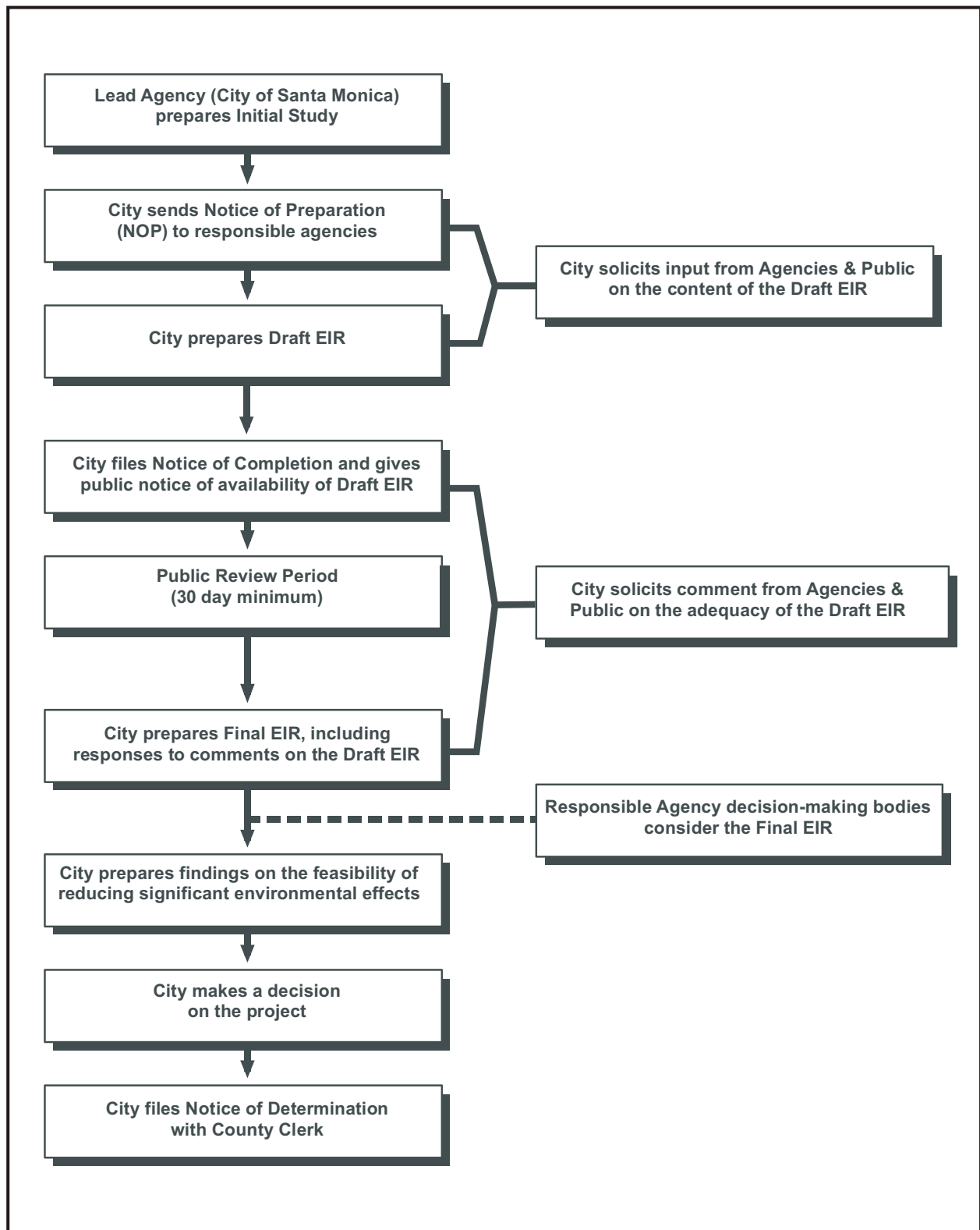
The State CEQA Guidelines define lead, responsible, and trustee agencies. The City of Santa Monica is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project and a trustee agency refers to a State agency having jurisdiction by the law over natural resources affected by the project. There are no responsible or trustee agencies for the proposed project, as no other agencies have approval authority over any aspect of the proposed project.

1.5 ENVIRONMENTAL REVIEW PROCESS

The major steps in the EIR process, as required by CEQA, are outlined below and illustrated on **Figure 1-1**. The steps are presented in sequential order.

Initial Study. After determining that a project is subject to CEQA, the lead agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the agency determines in the Initial Study that there is substantial evidence that the project may cause a significant effect on the environment, the lead agency shall prepare an EIR if the project was not previously adequately addressed in a previously prepared EIR or program EIR (CEQA Guidelines Section 15063).



SOURCE: TAHA, 2011.

Notice of Preparation (NOP). After deciding that an EIR is required, the lead agency must send an NOP soliciting input on the EIR scope to the Office of Planning and Research (State Clearinghouse) and responsible and trustee agencies (CEQA Guidelines Section 15082).

The NOP must be posted in the County Clerk's office for 30 days.

The NOP may be accompanied by an Initial Study that identifies the issue areas for which the proposed project could create significant environmental impacts (CEQA Guidelines Section 15082).

Draft EIR. The lead agency shall prepare a Draft EIR directly or under contract (CEQA Guidelines Section 15084). The Draft EIR must contain:

- Table of contents or index
- Summary
- Project description
- Environmental setting
- Discussion of significant environmental impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts)
- Discussion of mitigation measures to minimize significant effects
- Discussion of alternatives to the proposed project
- Effects not found to be significant
- Organizations and persons consulted

Notice of Completion/Notice of Availability of Draft EIR. A lead agency must file a Notice of Completion with the State Clearinghouse when it completes a Draft EIR and prepares a Public Notice of Availability for the Draft EIR. The lead agency must place the Notice in the County Clerk's office for 30 days (Public Resources Code [PRC] Section 21092) and send a copy of the Notice to anyone requesting it (CEQA Guidelines Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and public, and respond in writing to all comments received (PRC Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse (PRC Section 21091) approves a shorter period.

Final EIR. A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; d) responses to comments; and e) any other information added by the lead agency (CEQA Guidelines Section 15132).

Certification of Final EIR. Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving the project (CEQA Guidelines Section 15090).

Lead Agency Project Decision. A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines Sections 15042 and 15043).

Findings/Statement of Overriding Considerations. For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project at within another agencies jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). If the agency approves a project with unavoidable and significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision (CEQA Guidelines Section 15093).

Mitigation Monitoring and Reporting Program. When the agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (CEQA Guidelines Section 15097).

Notice of Determination (NOD). The lead agency must file a NOD at the County Clerk within five working days after approving a project for which an EIR is prepared (CEQA Guidelines Section 15094). The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

2.0 SUMMARY

2.1 INTRODUCTION

This section presents a summary of the project description and the key findings of this Draft Environmental Impact Report (EIR), including the potential environmental impacts associated with the project, mitigation measures, and level of significance after mitigation.

2.2 SUMMARY OF THE PROPOSED PROJECT

The proposed project involves the closure of the existing Village Trailer Park, located at 2930 Colorado Avenue, and construction of a 399,581-square-foot mixed-use development with approximately 30 percent of the square footage dedicated to commercial use and 70 percent of the square footage dedicated to residential use. **Table 2-1** summarizes the characteristics of the proposed project.

TABLE 2-1: SUMMARY OF PROJECT CHARACTERISTICS	
Total Lot Size	167,706 sq. ft. (3.85 acres)
Total Number of Buildings	4
Proposed Floor to Area Ratio	2.38
Total Proposed Floor Area	399,581 square feet
Proposed Residential	166 apartments, 227 condominiums
Proposed Creative Office	105,334 square feet
Proposed Neighborhood Serving Retail	11,710 square feet
Maximum Building Height	57 feet
SOURCE: Village Trailer Park, LLC, 2010.	

The project's 117,044 square feet of non-residential commercial space would include 105,334 square feet of creative/office space and 11,710 square feet of neighborhood serving retail fronting Colorado Avenue.

The residential uses would include 166 apartment units; 109 of these apartment units would be subject to Santa Monica's rent control ordinance and 52 would be deed restricted as affordable housing. The remaining 57 apartment units would be market-rate apartments. A portion of the apartments would be made available to current Village Trailer Park tenants. The apartments would include 73 single-room (studio) units (of which 38 are affordable housing units) and 93 one-bedroom units (of which 14 are affordable housing units). Provisions related to the rent control and dedication of apartment units for the existing Village Trailer Park residents will be included as part of the Development Agreement (DA) between the City and the project applicant. The proposed project also includes 108 lofts, 83 one-bedroom and 36 two-bedroom units, for a total of 227 condominium units all offered at market rate.

A two-level, 778-stall subterranean parking garage would link all of the development. An additional 26 on-street public parking spaces would be provided along New Road on the western boundary of the site and along the new Pennsylvania Avenue extension. The proposed project also includes courtyard/plaza areas within the project site and a pedestrian paseo that would connect through the site. The adjacent sidewalks along Colorado Avenue would also be enhanced and improved with new landscaping.

The proposed project would include four buildings, two of which would be four stories in height and two of which would be five stories in height.

The proposed project would include the development and dedication of an extension of Pennsylvania Avenue that would cut east-west through the site from Stewart Street to the westerly edge of the site. The

proposed Pennsylvania Avenue extension would be located in an approximately 62 foot right of way comprised of two traffic lanes (one in each direction) and sidewalks on both sides. On the project site, the street would be constructed at grade over a section of the project's subterranean parking garage, which would span both portions of the project site. In addition, a new 24-foot wide north-south road (New Road) would be developed along the site's western border from Colorado Avenue to the Pennsylvania Avenue extension. The New Road would be comprised of two traffic lanes, one in each direction. New Road would provide two-way access to the at-grade public parking stalls in front of Building B. Both new roadways would be constructed in accordance with the City and State Fire Codes to accommodate all Santa Monica Fire Department (SMFD) fire apparatus.

Currently, two properties located directly to the west of the site are under consideration for redevelopment. These properties include 2848-2912 Colorado Avenue and 2834 Colorado Avenue. Directly to the west of the project site is the related project at 2848-2912 Colorado Avenue (Roberts Center Project). This related project is under consideration and has not yet begun the environmental process. Directly to the west of 2848-2912 Colorado Avenue is the related project at 2834 Colorado Avenue (2834 Colorado Creative Studios Project). This related project was recently approved in July 2011 by the City. Both related projects include the development of an extension of Pennsylvania Avenue through their respective properties.

Development of the proposed project and the two related projects identified above would provide a continuous extension of Pennsylvania Avenue from Stewart Street (to the west) to Stanford Street (to the east). The new Pennsylvania Avenue extension would be dedicated to the City as a public right of way and classified as a Neighborhood Street.

A "stand alone" site plan has also been developed to accommodate traffic flow in a scenario where the property adjacent to the west is not developed and thus, the full extension of Pennsylvania Avenue would not occur. Under the stand alone plan, primary vehicle access to the project site would be provided from Stanford Street (via the project's proposed Pennsylvania Avenue extension to the east) and from Colorado Avenue via the New Road (which in this case, would provide a one-way southbound travel lane only). The traffic analysis in this Draft EIR analyzes the two access scenarios (Section 4.15 Traffic and Transportation).

Site preparation would include demolition, excavation, building construction, utilities/infrastructure improvements, paving and landscaping. Excavation would be required to prepare the site for construction. The maximum depth of excavation required for subterranean parking would be approximately 34 feet.

The Development Agreement between the City and the developer ~~will include~~ would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. This process is ongoing, but it is likely that some of the residents will have the opportunity to relocate to the nearby City-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. Additional relocation options for the remaining Village Trailer Park residents will also be identified as part of the Development Agreement relocation plan.

The proposed project intends to achieve Leadership in Energy and Environmental Design (LEED) certification under the US Green Building Council (USGBC). Specifically, the project intends to pursue LEED Silver Certification for New Construction and Major Renovations. Preliminary LEED Scorecards showing possible and likely point allocations are included as Appendix B of this EIR. The scorecards provide an initial benchmark identifying which points could potentially be incorporated into the proposed project. Refinement of specific features will be developed as the project moves further along in the design and entitlements processes and a specific LEED path is determined for the residential component. Regardless of the path determined, the proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials

and Resources, and Indoor Environmental Quality. In addition, to be in compliance with the City's Green Building Code, the proposed project will be required to divert at least 65 percent of project-related construction and demolition material.

The proposed project would also include a Transportation Demand Management (TDM) plan, which would provide trip reduction strategies to be implemented by the applicant. The strategies required in the TDM Plan will be determined by the City. Potential strategies of the TDM plan include a TDM coordinator, area-wide transportation management association, transit pass subsidy, ridesharing, parking cash out, unbundled parking, guaranteed ride home program, bicycle facilities (shower, racks, lockers) flexible work hours, transportation information center, wayfinding signage, and commuter club. As part of the Development Agreement, the applicant would be required to achieve the trip generation rates applied to the proposed project in this Draft EIR (see Section 4.15 Transportation and Traffic). Annual monitoring and reporting would be required. Additionally, the proposed project includes secure bicycle parking for the employees, residents and visitors of the project and would accommodate a minimum of 41 bicycle parking spaces below grade and at grade.

2.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15382 of the State CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance." In order to approve a project with unavoidable and significant impacts, the lead agency must adopt a Statement of Overriding Considerations (in accordance with Section 15093 of the State CEQA Guidelines) indicating that the benefits of approving the proposed project outweigh the negative environmental consequences. Based on the analysis contained in the Draft EIR, the proposed project would create significant and unavoidable impacts related to the following environmental issues:

Construction effects:

- Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied.
- Construction activity would generate vibration levels that exceed the established standards.
- Cumulative effects related to construction air quality and vibration.

Neighborhood effects:

- Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied.
- The proposed project would increase traffic volumes on intersections and neighborhood street segments above adopted thresholds (see below).
- Cumulative traffic effects.

Traffic and Transportation

- Increased traffic volumes would result in significant and unavoidable impacts at 11 intersections under approval year plus project (Year 2011) conditions. These include:
 - 20th Street/Olympic Boulevard (AM peak hour)
 - Yale Street/Broadway (PM peak hour)
 - Stewart Street/Colorado Avenue (AM peak hour)
 - Stanford Street/Colorado Avenue (PM peak hour)
 - Centinela Avenue/Broadway/Ohio Avenue (PM peak hour)
 - Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Centinela Avenue (west)/Olympic Boulevard (PM peak hour) [*impacted under City of Los Angeles criteria only*]

- Centinela Avenue/I-10 Westbound Ramps (AM and PM) [*impacted under City of Los Angeles criteria only*]
- Bundy Drive/Olympic Boulevard (PM peak hour) [*also impacted under City of Los Angeles Criteria*]
- Bundy Drive/Pico Boulevard (PM peak hour) [*also impacted under City of Los Angeles Criteria*]
- Bundy Drive/I-10 Eastbound On-Ramp (AM and PM peak hours) [*also impacted under City of Los Angeles criteria*]
- Increased traffic volumes would result in significant and unavoidable impacts at 10 intersections under the cumulative plus project (Year 2020) conditions. These include:
 - Yale Street/Broadway (PM peak hour)
 - Centinela Avenue/Santa Monica Boulevard (PM peak hour)
 - Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Centinela Avenue/Pennsylvania Avenue/Iowa Avenue (PM peak hour)
 - Centinela Avenue (west)/ Olympic Boulevard (PM peak hour) [*impacted under City of Los Angeles criteria only*]
 - Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours) [*also impacted under City of Los Angeles criteria*]
 - Bundy Drive and Olympic Boulevard (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Bundy Drive/Pico Boulevard (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Bundy Drive/I-10 Eastbound On-Ramp (AM peak hour under City of Santa Monica criteria and PM peak hour under City of Los Angeles criteria)
 - Barrington Avenue/Olympic Boulevard (PM) [*also impacted under City of Los Angeles criteria*]
- The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) conditions:
 - Yale Street north of Colorado Avenue
 - Stanford Street north of Pennsylvania Avenue
 - Stanford Street south of Pennsylvania Avenue
 - Pennsylvania Avenue east of Stanford Street
 - Nebraska Avenue west of Stanford Street
 - Nebraska Avenue east of Stanford Street
- The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the cumulative plus project (Year 2020) conditions:
 - Yale Street north of Colorado Avenue
 - Stanford Street south of Pennsylvania Avenue
 - Pennsylvania Avenue east of Stanford Street
 - Nebraska Avenue west of Stanford Street
 - Nebraska Avenue east of Stanford Street

2.4 IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT

Based on the analysis contained in this Draft EIR, the proposed project would result in the following significant impacts that can be mitigated to less than significant. **Table 2-2**, at the end of this chapter, provides a summary of significant impacts that would result from the implementation of the proposed project and the mitigation measures that would reduce them to less than significant.

Biological Resources:	Migratory Birds
Construction Effects:	Daily Regional Construction Emissions, Construction Traffic, Construction Noise
Geology and Soils:	Fault Rupture, Ground Shaking, Liquefaction, Erosion, Expansive Soils
Hazards and Hazardous Materials:	Asbestos/Lead-Based Paints, Emergency Access (construction)
Hydrology and Water Quality:	Groundwater
Neighborhood Effects:	Daily Construction Emissions, Construction Staging

2.5 LESS-THAN-SIGNIFICANT OR NO IMPACT

Based on the analysis contained in the Draft EIR, the following were found to result in a less-than-significant impact or no impact.

Aesthetics:	Shade/Shadow, Light and Glare
Air Quality:	Daily Emissions, Localized Emissions, TACs, Odors, Consistency with Air Quality Plans
Biological Resources:	Removal of Trees
Cultural Resources:	Historic Resources
Greenhouse Gas Emissions:	GHG Emissions, Consistency with Plans
Hazards and Hazardous Materials:	Hazardous Materials Proximity to a School
Hydrology and Water Quality:	Stormwater Runoff
Land Use:	Division of a community, Consistency with Plans
Neighborhood Effects:	Shade/Shadow, Localized Emissions, TACs, Odors, Construction TACs/Vibration, Noise/Land Use Compatibility, Vibration
Noise:	Traffic noise, Stationary Noise, Noise/Land Use Compatibility, Vibration
Population and Housing:	Population and Housing Growth, Population and Housing Displacement
Public Services:	Police, Fire, School, Parks, Library
Traffic:	Access/Circulation, Congestion Management Program
Utilities:	Water Supply, Water Infrastructure, Wastewater Infrastructure, Solid Waste Generation, Energy usage

2.6 SUMMARY OF ALTERNATIVES

The CEQA statute, the CEQA Guidelines, and related recent court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice.”¹ At the same time, Section 15126.6(b) of the CEQA Guidelines requires that “...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project” and Section 15126.6(f) requires, “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Accordingly, alternatives that would not address potentially significant effects are not

¹Section 15126.6(f).

considered herein. However, the CEQA Guidelines require that a "No Project" alternative must be included and, if appropriate, an alternative site location should be analyzed.² Other project alternatives may involve a modification of the proposed land uses, density, or other project elements at the same project location.

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project's significant environmental effects. The CEQA Guidelines state that "...[t]he EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project."³ The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that "[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations [and] jurisdictional boundaries..."⁴ "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."⁵ Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives. The following three alternatives evaluated for the proposed project are described below.

Alternative 1 – No Project Alternative. The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, "no project" does not mean that development on the project site will be prohibited. The No Project Alternative includes "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (CEQA Section 15126.6 [e][2]). The No Project Alternative assumes any and all scenarios and procedural actions taken whereby the existing mobile home park would remain as is and no project would be developed. This includes a scenario where a resident owned mobile home park subdivision is created or a scenario where the existing mobile home park remains due to City and/or other third party acquisition of the property. Furthermore, it can be assumed that the No Project Alternative could result in all occupation of the existing 109 mobile home lots.

Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for the purposes of this analysis, under the No Project Alternative, the existing uses on-site would remain. The existing mobile homes and their tenants would not be displaced. Pennsylvania Avenue would not be extended and there would not be a connection to Colorado Avenue via a new street. All existing utility infrastructure would remain.

Alternative 2 – Reduced Residential/Increased Commercial Alternative. This alternative would involve reducing the proposed residential component from 71 percent to approximately 40 percent of the total project, resulting in a reduction of 172 residential units and an increase in 125,116 square feet of creative office and neighborhood-serving retail compared to the proposed project. Alternative 2 would include street improvements similar to the proposed project and would be built to the same height and FAR as the proposed project.

²Section 15126.6(e) and Section 15126(f)(2).

³Section 15126.6(e) and Section 15126(f).

⁴Section 15126.6(f)(1).

⁵Section 15126.6(f).

Alternative 3 – Increased Residential/Decreased Office Alternative. This alternative would involve increasing the proposed residential component from 71 percent to approximately ~~80~~ 92 percent of the project, resulting in an increase of ~~50~~ 93 residential units and a reduction of ~~36,324~~ 88,747 square feet of creative office and neighborhood-serving retail compared to the proposed project. ~~Under this Alternative, the developer would be expected to include 89 low income housing units to achieve the density bonus.~~ Alternative 3 would include street improvements similar to the proposed project and would be built to the same height and FAR as the proposed project. The total proposed gross building area would be 395,939 square feet for a FAR of 2.36, which is slightly less than the proposed project.

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
AESTHETICS		
Project structures would cast shadows onto adjacent properties. However, the shadows would not be cast upon shadow-sensitive uses for durations that exceed those identified in City thresholds. Impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would increase the amount of lighting and glare on the project site. However, compliance with existing regulations would ensure that impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulatively considerable impact related to aesthetics.	No mitigation measures are required.	Not cumulatively considerable
AIR QUALITY		
Operation of the proposed project would generate daily air pollutant emissions, but emissions would not exceed SCAQMD regional significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to regional operational emissions.	No mitigation measures are required.	Less than significant
The proposed project would generate off- and on-site localized emissions. Localized emissions would be below significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to localized concentrations.	No mitigation measures are required.	Less than significant
Operation of the proposed project would generate toxic air contaminant emissions, but emissions would not exceed SCAQMD significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to toxic air contaminants.	No mitigation measures are required.	Less than significant
Operation of the proposed project would not generate substantial odors that would create a nuisance. Therefore, the proposed project would result in a less-than-significant impact related to odors.	No mitigation measures are required.	Less than significant
The proposed project would not conflict or obstruct implementation of any air quality plan. Therefore, the proposed project would result in a less-than-significant impact related to AQMP consistency.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
The proposed project would not contribute to a cumulatively considerable impact related to operational air quality.	No mitigation measures are required.	Less than significant
BIOLOGICAL RESOURCES		
The proposed project would remove mature trees that could potentially serve as nesting sites for migratory birds. However, Mitigation Measure BR1 would reduce impacts to less than significant.	BR1 Prior to removal, trees on the project site will be inspected for bird nests by a qualified biologist. Inspection of the trees shall occur prior to the typical breeding/nesting season (March 1 st through August 30 th). If nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established, within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has failed. If no nesting is observe, trees to be removed from within the project site shall be netted to prevent birds from inhabiting the trees prior to removal and construction.	Less than significant
Several mature trees on the project site would be removed to accommodate new development. However, these trees are ornamental landscape trees and are not locally-protected resources. Tree removal and/or replacement would be conducted in accordance with the City's Tree Code. Therefore, impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulatively considerable impact related to biological resources.	No mitigation measures are required.	Not cumulatively considerable
CONSTRUCTION EFFECTS		
Daily regional construction emissions would exceed the SCAQMD significance threshold for volatile organic compounds without mitigation. However, Mitigation Measures CON1 through CON3 would reduce impacts to less than significant.	<p>CON1 The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter⁶).</p> <p>CON2 The construction contractor shall utilize materials that do not require painting when such materials are available.</p> <p>CON3 The construction contractor shall use pre-painted construction materials when such materials are available.</p>	Less than significant

⁶SCAQMD, *Super-Compliant Architectural Coatings Manufacturers and Industrial Maintenance Coatings List*, <http://www.aqmd.gov/prdas/Coatings/super-compliantlist.htm>.

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM _{2.5} and PM ₁₀) after mitigation is applied. Therefore, construction of the proposed project would result in a significant and unavoidable impact related to localized air emissions.	<p>CON4CON2 Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.</p> <p>CON5CON3 The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road:</p> <ul style="list-style-type: none"> • Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; • Pave the surface extending at least 100 feet and at least 20 feet wide; • Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or • Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. <p>CON6CON4 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</p> <p>CON7CON5 Construction activity on unpaved surfaces shall be suspended when wind speed exceed 25 miles per hour (such as instantaneous gusts).</p> <p>CON8CON6 Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).</p> <p>CON9CON7 Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.</p>	Significant and unavoidable
Construction activity would generate toxic air contaminant emissions (e.g., diesel particulate matter). However, sensitive receptors would not be exposed to substantial pollutant concentrations. Therefore, the proposed project would result in a less-than-significant impact related to toxic air contaminants.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
Construction activity would generate odors from various activities (e.g., equipment exhaust). However, sensitive receptors would not be exposed to substantial odors. Therefore, the proposed project would result in a less-than-significant impact related to odors.	No mitigation measures are required.	Less than significant
Construction activity would intermittently generate high noise levels on and adjacent to the project site. This may affect noise sensitive uses in the vicinity and conflict with the City policies. Implementation of Mitigation Measure CON10 <u>CON8</u> through CON15 <u>CON13</u> would reduce impacts to less than significant.	<p>CON10<u>CON8</u> All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.</p> <p>CON11<u>CON9</u> Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment).</p> <p>CON12<u>CON10</u> The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators when electricity is readily available.</p> <p>CON13<u>CON11</u> Construction haul truck and materials delivery traffic shall avoided residential areas whenever feasible.</p> <p>CON14<u>CON12</u> Construction noise levels shall not exceed the City of Santa Monica's noise standards, <u>except for</u> between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.</p> <p>CON15<u>CON13</u> In accordance with Santa Monica Municipal Code Section 4.12.120, the project applicant shall be required to post a sign informing all workers and subcontractors of the time restrictions for construction activities. The sign shall also include the City telephone numbers where violations can be reported and complaints associated with construction noise can be submitted.</p>	Less than significant
Construction activity would generate vibration levels that exceed the established standards. Therefore, the proposed project would result in a significant and unavoidable impact related to construction vibration.	No feasible mitigation exists.	Significant and unavoidable
Project construction and equipment staging would temporarily increase truck traffic in the project area, which could disrupt the normal use of the sidewalk and adjacent streets, and affect parking availability. However, Mitigation Measure CON16 <u>CON14</u> would reduce impacts to less than significant.	<p>CON16<u>CON14</u> The applicant shall prepare, implement, and maintain a Construction Impact Mitigation Plan which shall be designed to:</p> <ul style="list-style-type: none"> • Prevent material traffic impacts on the surrounding roadway network; • Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable; • Ensure safety for both those constructing the project and the surrounding community; and • Prevent substantial truck traffic through residential neighborhoods. 	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p>The Construction Impact Mitigation Plan shall be subject to review and approval by the following City departments: Environmental and Public Works Management (EPWM); Fire; Planning and Community Development; and Police to ensure that the Plan has been designed in accordance with this mitigation measure. This review shall occur prior to commencement of any construction staging for the project. It shall, at a minimum, include the following:</p> <p><i>Ongoing Requirements Throughout the Duration of Construction</i></p> <ul style="list-style-type: none"> • A detailed traffic control plan for work zones shall be maintained which includes at a minimum accurate existing and proposed: parking and travel lane configurations; warning, regulatory, guide and directional signage; and area sidewalks, bicycle lanes and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans must be reviewed and approved by the Transportation Management Division prior to commencement of construction and implemented in accordance with this approval. • Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m., including: dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an After Hours Permit. • Streets and equipment shall be cleaned in accordance with established EPWM requirements. • Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on Santa Monica streets. Limited queuing may occur on the construction site itself. • Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit. • Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division. • Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica. 	

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p><i>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction</i></p> <ul style="list-style-type: none"> • Advise the traveling public of impending construction activities (e.g. information signs, portable message signs, media listing/notification, implementation of an approved traffic control plan). • Approval from the City through issuance of a Use of Public Property Permit, Excavation Permit, Sewer Permit or Oversize Load Permit, as well as any Caltrans Permits required, for any construction work requiring encroachment into public rights-of-way, detours or any other work within the public right-of-way. • Timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Police Department, Fire Department, Environmental and Public Works Management Department, and Planning and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet. • Coordination of construction work with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal. • Approval by the Transportation Management Division of any haul routes involving earth, concrete or construction materials, and equipment hauling. 	
The proposed project would contribute to a cumulative construction air quality and construction vibration impact. Cumulative impacts related to construction traffic and noise would not occur.	No feasible mitigation measures exist.	Cumulatively considerable
CULTURAL RESOURCES		
Construction of the proposed project could cause a substantial adverse change in significance of a historical resource as defined in State CEQA 15064.5. However, the existing structures (permanent and non-permanent) are not historically significant, and therefore, loss of the existing structures will not result in significant impacts to historical resources. This impact would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulatively considerable impact related to cultural resources.	No mitigation measures are required.	Not cumulatively considerable

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
GEOLOGY AND SOILS		
The project site is located in a Fault Hazard Management Zone as designated by the City. Compliance with all applicable provisions of the Santa Monica Building Code and implementation of Mitigation Measure GS1 would reduce impacts to less than significant.	GS-1 At the time of final building plan check, a site-specific Geotechnical Report shall be submitted to the City of Santa Monica Building and Safety Division for review and approval. The Geotechnical Report shall be prepared in accordance with the City's <i>Guidelines for Geotechnical Reports</i> and at a minimum shall address: seismic hazards (fault management zone; groundshaking; liquefaction; subsidence, etc); hydrocollapse potential; and expansive soils. Information obtained from the Geotechnical Report shall be incorporated into the design and construction of the proposed project. The recommendations provided in the Geotechnical Report <u>as well as Santa Monica Building Code requirements</u> regarding foundation design, retaining wall design, excavations and shoring shall be fully implemented.	
Seismically induced ground shaking could expose people or structures on the project site to potential adverse effects. Compliance with all applicable provisions of the Santa Monica Building Code and California Geological Survey Special Publication 117 (Guidelines for Evaluating and Mitigating Seismic Hazards in California [2008]) and implementation of Mitigation Measure GS1 would reduce impacts to less than significant.	Mitigation Measure GS1	Less than significant
Seismic activity could produce sufficient ground shaking to result in liquefaction on-site. Compliance with the City of Santa Monica Building Code and implementation of Mitigation Measure GS1 would reduce this impact to less than significant.	Mitigation Measure GS1	Less than significant
Soil erosion and sedimentation could occur during the grading and excavation phase of the proposed project due to soil transport by wind and water. Compliance with the City's Urban Runoff Pollution Ordinance Requirements and implementation of Mitigation Measures GS1 through GS4 would reduce this impact to less than significant.	GS2 Construction and excavation activities shall adhere to the Best Management Practices (BMPs) set forth by the City of Santa Monica <u>Urban Runoff Pollution Ordinance (Chapter 7.10 of the Santa Monica Municipal Code)</u> . Such BMPs include using plastic coverings to prevent erosion of any unprotected area, such as mounds of dirt or dumpsters, along with devices designed to intercept and safely divert runoff. GS3 Prior to the issuance of a grading permit, the contractor shall notify the City that all grading activities will be scheduled for completion before the start of the rainy season (between November and April). All grading activities shall be scheduled for completion before the start of the rainy season (between November and April) to the extent feasible. If grading events do occur during the raining season, a rain event action plan shall be prepared and designed to protect all exposed portions of the site within 48 hours of any likely precipitation event forecast of 50 percent or greater probability.	

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p>GS4 During the rainy season (between November and April), an <u>An</u> erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Santa Monica Building and Safety Department to minimize potential erosion during construction. The erosion control plan shall be a condition prior to issuance of any grading permit.</p> <p>GS5 Provisions shall be made for adequate surface drainage away from the areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water runoff and the transport of silt and sediment.</p>	
The project site is located on Hanford soils, which have a low potential for expansion; however, without proper site preparation or design features to provide adequate foundations, the proposed project could result in a significant impact related to expansive soils. Compliance with the City of Santa Monica Building Code and implementation of Mitigation Measure GS1 would reduce this impact to less than significant.	Mitigation Measure GS1	Less than significant
The proposed project would not contribute to a cumulative impact related to geology and soils.	No mitigation measures are required.	Not cumulatively considerable
GREENHOUSE GAS		
Operation of the proposed project would generate greenhouse gas emissions, but emissions would not exceed the established significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to GHG emissions.	No mitigation measures are required.	Less than significant
The proposed project would be consistent with greenhouse gas reduction measures of the Climate Action Team, CAPCOA, and the Attorney General. In addition, the proposed project would be consistent with the City's Sustainable City Plan and the LUCE. Therefore, the proposed project would result in a less-than-significant impact related to applicable GHG plans, policies, or regulations.	No mitigation measures are required.	Less than significant
HAZARDS AND HAZARDOUS MATERIALS		
The proposed project would not include uses that would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
<p>The proposed project could potentially uncover asbestos and lead based paint during demolition of existing structures. Therefore, the proposed project could potentially 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. Implementation of Mitigation Measures HM1 and HM2 would reduce this impact to less than significant.</p>	<p>HM1 Prior to issuance of a demolition permit, <u>for the permanent structures on the project site</u> a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the development site.</p> <p>HM2 Prior to issuance of a demolition permit, lead-based paint testing shall be conducted for existing permanent structures <u>and trailers</u> to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.</p> <p>HM3 <u>An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.</u></p>	Less than significant
<p>The proposed project would be located within 0.25 miles of existing schools. However, the uses on the site would not create a hazard to the public. Therefore, impacts would be less than significant.</p>	No mitigation measures are required.	Less than significant
<p>Construction of the proposed project within existing street right-of-ways could potentially impact the use of the adjacent streets during an emergency response or evacuation. However, with mitigation, construction-related impacts on emergency response would be less than significant. Operation of the proposed project would introduce new traffic patterns into the area. However, these new patterns would not conflict with emergency response and evacuation planning. Therefore, impacts would be less than significant.</p>	Mitigation Measure CON16 CON14	Less than significant
<p>The proposed project would not contribute to a cumulative impact related to hazards and hazardous materials.</p>	No mitigation measures are required.	Not cumulatively considerable.
HYDROLOGY AND WATER QUALITY		
<p>The proposed project may require temporary and/or permanent dewatering. Therefore, groundwater impacts would be potentially significant. Implementation of Mitigation Measure HW1 would reduce this impact to less than significant.</p>	<p>HW1 If temporary and/or permanent dewatering on the project site is required, the Applicant shall obtain a dewatering permit from the City of Santa Monica Water Resources Protection Program prior to the issuance of a grading permit. Soil and groundwater testing to a minimum depth of 50 feet shall be conducted to the satisfaction of the Water Resources Protection Program staff. If contaminated groundwater is discovered on-site, treatment and discharge of the contaminated groundwater shall be conducted in compliance with applicable regulatory requirements including the Los Angeles Regional Water Quality Control Board standards.</p>	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
Implementation of the proposed project could increase stormwater runoff from the site to the local stormdrain system. However, this increase would not require the expansion or construction of new major storm drain infrastructure. This impact would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulative impact related to hydrology and water quality.	No mitigation measures are required.	Not cumulatively considerable
LAND USE		
The proposed project would be constructed in an area with a mix of residential and light industrial and residential uses but would not divide an established community or physically alter access to any of the surrounding established communities. Therefore, impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would be consistent with regional and local plans and policies. Impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulative land use impact.	No mitigation measures are required.	Not cumulatively considerable
NEIGHBORHOOD EFFECTS		
Project structures would cast shadows onto adjacent properties. However, the shadows would not be cast upon light-sensitive residential uses nor shade adjacent land uses for longer durations than those identified in City thresholds. Impacts would be less than significant	No mitigation measures are required.	Less than significant
Operation of the proposed project would generate daily air pollutant emissions, but emissions would not exceed SCAQMD regional significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to regional operational emissions.	No mitigation measures are required.	Less than significant
The proposed project would generate off- and on-site localized emissions. Localized emissions would be below significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to localized concentrations.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
Operation of the proposed project would generate toxic air contaminant emissions, but emissions would not exceed SCAQMD significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to toxic air contaminants.	No mitigation measures are required.	Less than significant
Operation of the proposed project would not generate substantial odors that would create a nuisance. Therefore, the proposed project would result in a less-than-significant impact related to odors.	No mitigation measures are required.	Less than significant
Daily regional construction emissions would exceed the SCAQMD significance threshold for volatile organic compounds without mitigation. However, Mitigation Measures CON1 through CON3 would reduce the impacts to less than significant.	<p>CON1 The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter⁷).</p> <p>CON2 The construction contractor shall utilize materials that do not require painting, as feasible.</p> <p>CON3 The construction contractor shall use pre-painted construction materials, as feasible.</p>	Less than significant
Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM _{2.5} and PM ₁₀) after mitigation is applied. Therefore, construction of the proposed project would result in a significant and unavoidable impact related to localized air emissions.	<p>CON4<u>CON2</u> Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.</p> <p>CON5<u>CON3</u> The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road:</p> <ul style="list-style-type: none"> • Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; • Pave the surface extending at least 100 feet and at least 20 feet wide; • Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or • Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. <p>CON6<u>CON4</u> All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</p> <p>CON7<u>CON5</u> Construction activity on unpaved surfaces shall be suspended when wind speed exceed 25 miles per hour (such as instantaneous gusts).</p>	Significant and unavoidable

⁷SCAQMD, *Super-Compliant Architectural Coatings Manufacturers and Industrial Maintenance Coatings List*, <http://www.aqmd.gov/prdas/Coatings/super-compliantlist.htm>.

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p>CON8<u>CON6</u> Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).</p> <p>CON9<u>CON7</u> Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.</p>	
<p>Construction activity would intermittently generate high noise levels on and adjacent to the project site. This may affect noise sensitive uses in the vicinity and conflict with the City policies. Implementation of CON10 through CON15 would reduce the impacts to less than significant.</p>	<p>CON10<u>CON8</u> All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.</p> <p>CON11<u>CON9</u> Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment).</p> <p>CON12<u>CON10</u> The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators when electricity is readily available.</p> <p>CON13<u>CON11</u> Construction haul truck and materials delivery traffic shall avoided residential areas whenever feasible.</p> <p>CON14<u>CON12</u> Construction noise levels shall not exceed the City of Santa Monica's noise standards <u>except for</u> between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.</p> <p>CON15<u>CON13</u> In accordance with Santa Monica Municipal Code Section 4.12.120, the project applicant shall be required to post a sign informing all workers and subcontractors of the time restrictions for construction activities. The sign shall also include the City telephone numbers where violations can be reported and complaints associated with construction noise can be submitted.</p>	<p>Significant and unavoidable</p>
<p>Project construction and equipment staging would temporarily increase truck traffic in the project area, which could disrupt the normal use of the sidewalk and adjacent streets, and affect parking availability. However, Mitigation Measure CON16<u>CON14</u> would reduce the impacts to neighborhoods to less than significant.</p>	<p>CON16<u>CON14</u> The applicant shall prepare, implement, and maintain a Construction Impact Mitigation Plan which shall be designed to:</p> <ul style="list-style-type: none"> • Prevent material traffic impacts on the surrounding roadway network; • Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable; • Ensure safety for both those constructing the project and the surrounding community; and • Prevent substantial truck traffic through residential neighborhoods. 	<p>Less than significant</p>

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p>The Construction Impact Mitigation Plan shall be subject to review and approval by the following City departments: Environmental and Public Works Management (EPWM); Fire; Planning and Community Development; and Police to ensure that the Plan has been designed in accordance with this mitigation measure. This review shall occur prior to commencement of any construction staging for the project. It shall, at a minimum, include the following:</p> <p><i>Ongoing Requirements Throughout the Duration of Construction</i></p> <ul style="list-style-type: none"> • A detailed traffic control plan for work zones shall be maintained which includes at a minimum accurate existing and proposed: parking and travel lane configurations; warning, regulatory, guide and directional signage; and area sidewalks, bicycle lanes and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans must be reviewed and approved by the Transportation Management Division prior to commencement of construction and implemented in accordance with this approval. • Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m., including: dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an After Hours Permit. • Streets and equipment shall be cleaned in accordance with established EPWM requirements. • Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on Santa Monica streets. Limited queuing may occur on the construction site itself. • Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit. • Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division. • Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica. 	

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p><i>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction</i></p> <ul style="list-style-type: none"> • Advise the traveling public of impending construction activities (e.g. information signs, portable message signs, media listing/notification, implementation of an approved traffic control plan). • Approval from the City through issuance of a Use of Public Property Permit, Excavation Permit, Sewer Permit or Oversize Load Permit, as well as any Caltrans Permits required, for any construction work requiring encroachment into public rights-of-way, detours or any other work within the public right-of-way. • Timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Police Department, Fire Department, Environmental and Public Works Management Department, and Planning and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet. • Coordination of construction work with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal. • Approval by the Transportation Management Division of any haul routes involving earth, concrete or construction materials, and equipment hauling. 	
The proposed project would generate stationary noise from mechanical equipment, truck loading, parking activity, and recreational activity. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to stationary noise.	No mitigation measures are required.	Less than significant
The proposed project would include residential land uses. It is imperative that these residences are located in a noise-compatible environment. Existing ambient noise levels are compatible with City guidelines for residential land uses. Therefore, the proposed project would result in a less-than-significant impact related to noise/land use compatibility.	No mitigation measures are required.	Less than significant
The proposed project would generate vibration as a result of trucks accessing in the project site. This vibration would not be perceptible to sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact related to vibration.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the existing plus project conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the future plus project conditions. Therefore, without mitigation, the proposed project would result in a significant impact related to neighborhood traffic.	No feasible mitigation exists to reduce this impact.	Significant and unavoidable
The cumulative growth in housing and development associated with the proposed project and related projects in the neighborhood would lead to an increased level of traffic in the project vicinity, thereby resulting in potential traffic impacts to neighborhood street segments. No feasible mitigation measures were identified to reduce the significant impact related to neighborhood traffic to less than significant. Therefore, the proposed project would contribute to a cumulative impact related to neighborhood traffic.	No feasible mitigation exists to reduce this impact	Cumulatively considerable
NOISE		
The proposed project would increase traffic and associated roadway noise levels in the project area. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to mobile noise.	No mitigation measures are required.	Less than significant
The proposed project would generate stationary noise from mechanical equipment, truck loading, parking activity, and recreational activity. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to stationary noise.	No mitigation measures are required.	Less than significant
The proposed project would include residential land uses. Existing ambient noise levels are compatible with City guidelines for residential land uses. Therefore, the proposed project would result in a less-than-significant impact related to noise/land use compatibility.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
The proposed project would generate vibration as a result of trucks accessing in the project site. This vibration would not be perceptible to sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact related to vibration.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulative stationary source or vibration impact.	No mitigation measures are required.	Not cumulatively considerable.
POPULATION AND HOUSING		
The proposed project would directly increase population area, by providing 393 new housing units. The new units would potentially result in a population of 672 residents in the City of Santa Monica. Project growth would not exceed population and housing growth projections. Therefore, this impact would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would displace 109 mobile home lots at the project site. However, these rent controlled housing units would be replaced, on a one-for-one basis in the new development so no net loss of rent controlled housing occurs. The proposed project would include a mix of rent-control, affordable, and market rate housing units on the project site, resulting in a net increase in housing. Therefore, no net loss of housing is anticipated, and this impact would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would displace existing residents living on the project site. The proposed project would require approval of a relocation plan for existing residents. Residents would be given the option to relocate to the new affordable units constructed as part of the proposed project. If the resident does not want to relocate to one of these affordable housing units, they would be assisted in their relocation efforts. Therefore, this impact would be less than significant.	No mitigation measures are required.	Less than significant
Cumulative population impacts would be less than significant.	No mitigation measures are required.	Less than significant
PUBLIC SERVICES AND RECREATION		
The proposed project would incrementally increase the demands on the SMFD. However, the increase would not significantly affect ratios, response times, or other performance objectives and would not require the construction of new fire protection facilities. Impacts would be less than significant.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
The proposed project would incrementally increase demand on the SMPD. However, the increase would not significantly affect services ratios, response times, or other performance objectives and would not require the construction of new police facilities. Impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would be expected to generate additional school-age students. However, with payment of required school impact fees, impacts would be reduced to less than significant.	No mitigation measures are required.	Less than significant
The proposed project would incrementally increase demand on local parks. However, this demand would not exceed the capacity of local parks. Therefore, impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would incrementally increase the demand for public libraries. However, the increase would not result in the construction for new or expanded facilities. Therefore, impacts would be less than significant.	No mitigation measures are required.	Less than significant
Cumulative impacts on public services would be less than significant.	No mitigation measures are required.	Less than significant
TRAFFIC AND TRANSPORTATION		
The proposed project would generate a net new of 2,360 daily trips, including a net new of 155 weekday AM trips and 179 weekday PM peak hour trips under Approval Year Plus Project (Year 2011) Conditions. The increase in vehicles traveling on the surrounding roadway network would result in significant traffic impacts at 14 of 56 study area intersections. Implementation of Mitigation Measures T1 through T4 would reduce impacts at four affected intersections to a less-than-significant level. However, increased traffic volumes would result in significant and unavoidable impacts under approval year plus project conditions at 11 intersections.	T1 23rd Street/Ocean Park Boulevard. Add an exclusive right-turn lane on the eastbound approach of Ocean Park Boulevard. The mitigation measure was proposed due to the heavy existing eastbound through movement volumes. The proposed mitigation would require shifting the existing eastbound through lane approach approximately two feet to the north to provide room for a functional right-turn lane. The proposed mitigation would require implementation of peak period parking restrictions for the first 75 feet of parking (approximately three parking spaces) closest to the intersection (eastbound on Ocean Park Boulevard, west of 23 rd Street) so vehicles can make eastbound right-turns onto 23 rd Street from Ocean Park Boulevard during the peak periods or when there is available space outside of peak periods. The proposed mitigation measure would require some restriping and peak period parking restriction signage at the eastbound approach of this intersection.	Significant and unavoidable

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
	<p>T2 Cloverfield Boulevard/Santa Monica Boulevard. The left-turn phasing for the westbound leg of the Cloverfield Boulevard/Santa Monica Boulevard intersection shall be modified from a protected phase to a permitted-protected phase to decrease delay at the worst approach of the intersection to address the AM peak hour impact. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. Implementation of this mitigation measure would necessitate the provision of a combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.</p> <p>T3 Stewart Street/Olympic Boulevard. The traffic signal at the Stewart Street/Olympic Boulevard intersection shall be modified to provide protected-permitted left-turn phasing for northbound and eastbound approaches to decrease delay at the worst approaches of the intersection to address the impact. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. Implementation of this mitigation measure would necessitate the provision of a combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.</p> <p>T4 Centinela Avenue/I-10 Westbound Ramps. The traffic signal at the Centinela Avenue/I-10 Westbound Ramps intersection shall be modified to provide protected-permitted left-turn phasing for northbound approach to decrease delay at the worst approach of the intersection to address. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the permitted-protected left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. Since this intersection is shared by the City of Santa Monica and City of Los Angeles, this mitigation measure must be approved by LADOT. <u>The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.</u></p>	

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
<p>The proposed project would generate an estimated net new 2,278 daily trips, including a net new of 144 weekday AM peak hour trips and 170 weekday PM peak hour trips under Cumulative Plus Project (Year 2020) Conditions. The increase in vehicles traveling on the surrounding roadway network would result in significant traffic impacts at 13 of 56 study area intersections. Implementation of Mitigation Measures T1, T3 through T6 would reduce impacts at three affected intersections to a less-than-significant level. However, increased traffic volumes would result in significant and unavoidable impacts at 10 intersections.</p>	<p>Mitigation Measures T1, T3, and T4</p> <p>T5 26th Street & Wilshire Boulevard. Convert the protected permitted phasing for the eastbound and westbound left turn movements to permitted phasing. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. This mitigation measure would require temporary signage during a period of adjustment for motorists and the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues</p> <p>T6 Barrington Avenue/Olympic Boulevard. Convert the eastbound left-turn phasing from permitted to protected permitted. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the protected-permitted left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors and/or signal heads. Furthermore this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. <u>The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.</u></p>	<p>Significant and unavoidable</p>
<p>The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) Conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) Conditions. Therefore, without mitigation, the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.</p>	<p>No feasible mitigation measures exist to reduce this impact.</p>	<p>Significant and unavoidable</p>
<p>Driveways would provide adequate access to the project site. Parking for the proposed project would be provided in a two-level subterranean parking structure with two ingress/egress points. Therefore, the proposed project would result in less-than-significant impacts related to site access and circulation.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
The proposed project would not impact arterial intersections or mainline freeway locations identified in the CMP. In addition, the proposed project would not impact the regional transit system serving the project area. Therefore, the proposed project would result in less-than-significant impacts related to the CMP.	No mitigation measures are required.	Less than significant
The proposed project would contribute to a cumulatively considerable impact on intersection operations.	Mitigation Measures T1 through T6	Cumulatively considerable
UTILITIES AND SERVICE SYSTEMS		
Construction activity could temporarily increase demand for water. This demand would be short-term and offset by reductions in water consumption from removal of existing uses. This would be a less-than-significant impact.	No mitigation measures are required.	Less than significant
Operation of the proposed project would result in an increase in water demand over existing conditions. However, the City has adequate water supplies to serve the proposed project. This would be a less-than-significant impact.	No mitigation measures are required.	Less than significant
The proposed project could require new water connections or conveyance systems. However, the project would not require or result in the construction of new or expanded water treatment facilities, the construction of which could cause a significant environmental effect. Compliance with Santa Monica Municipal Code requirements would reduce the proposed project's impacts related to water infrastructure to less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulative water impact.	No mitigation measures are required.	Not cumulatively considerable
Construction activities would result in a temporary increase in wastewater generation on-site; however this increase would be offset by the removal of existing uses from the project site. Project construction generated wastewater would not exceed capacity of existing wastewater infrastructure, nor would it require the construction of new or expanded facilities. Therefore, impacts would be less than significant.	No mitigation measures are required.	Less than significant

TABLE 2-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES		
Potential Significant Impacts	Mitigation Measures	Significance After Mitigation
Development of the proposed project would result in an increase in wastewater flows from the project site. However, this would not exceed the capacity of existing wastewater infrastructure, nor would it require the construction of new, or expansion of existing, wastewater treatment facilities or conveyance systems that could cause significant environmental effects. Impacts would be less than significant.	No mitigation measures are required.	Less than significant
The proposed project would not contribute to a cumulative wastewater impact.	No mitigation measures are required.	Not cumulatively considerable
Construction activities would generate debris on-site; however, existing landfills have sufficient capacity to accommodate the estimated solid waste generated during the proposed project's construction.	No mitigation measures are required.	Less than significant
Implementation of the proposed project would result in an increase in solid waste generation on-site; however, existing landfills would have sufficient capacity to accommodate solid waste generated during the operation of the proposed project.	No mitigation measures are required.	Less than significant
Implementation of the proposed project would not encourage the wasteful or inefficient use of energy. This is a less-than-significant impact.	No mitigation measures are required.	Less than significant
SOURCE: TAHA, 2011.		

3.0 PROJECT DESCRIPTION

3.1 PROJECT APPLICANT

Village Trailer Park, LLC
2444 Wilshire Boulevard, Suite 320
Santa Monica, CA 90403

3.2 PROJECT LOCATION

The project site is located at 2930 Colorado Avenue on the south side of Colorado Avenue between Stewart Avenue and Stanford Street, in the City of Santa Monica, County of Los Angeles. The project site is comprised of two parcels, Assessor's Parcel Numbers 4268-002-006 and 4268-002-009. Together these parcels create an "L" shaped project site. The project site is bounded by Colorado Avenue on the north, Stanford Street on the east, and existing commercial/light industrial uses to the west and south. The Pacific Ocean is located approximately two miles west of the project site. The site encompasses 167,706 square feet or approximately 3.85 acres.

The Santa Monica Freeway (I-10) is located less than one mile to the south of the site and provides regional access via the Cloverfield Boulevard exchange. The San Diego Freeway (I-405), located approximately two miles east of the project site, also provides regional access. The site of the future Bergamot Station for the Exposition Light Rail Line, scheduled to open in 2015, is located approximately 0.25 miles to the south of the project site at Olympic Boulevard and 26th Street. Local access to the project site is currently provided via Colorado Boulevard on the north and Stanford Street on the east. **Figure 3-1** illustrates the location of the project site in its regional context, and **Figure 3-2** shows the immediate project vicinity.

3.3 EXISTING SITE CHARACTERISTICS

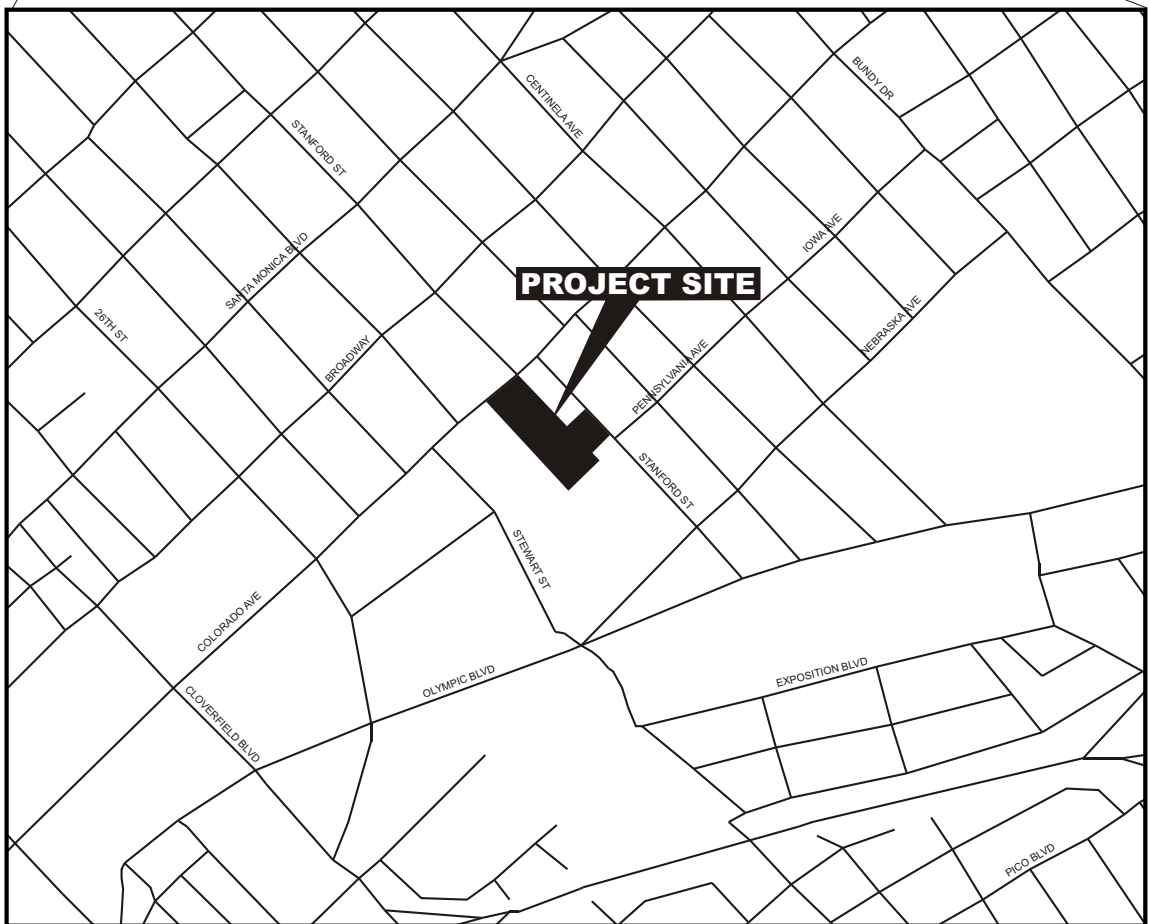
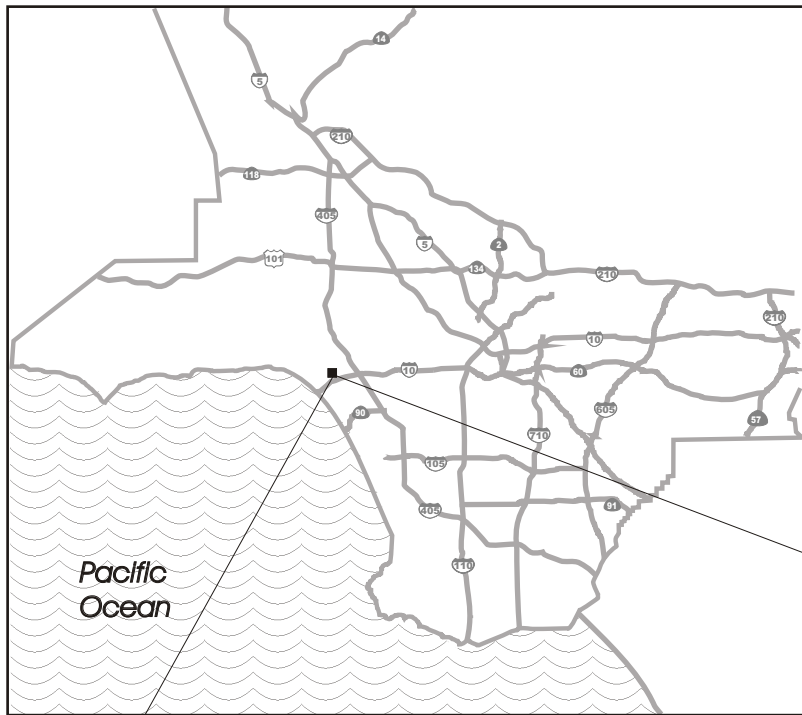
3.3.1 Existing Development and Uses

The project site consists of two parcels and is developed as the Village Trailer Park with 108 trailer home spaces, although 109 units are currently registered with the City's Rent Control Board. The project site has been in use as a trailer park since the 1950s. Approximately 76 of the 108 spaces are occupied by trailers. The site has a total of 96 at-grade parking spaces provided for residents and guests. **Figure 3-3** shows existing conditions on the project site.

The existing buildings on-site are one-story. ~~The only permanent structure is the~~ one-story office located at the entrance of the mobile home park, ~~which is one-story~~ and is built in a typical mid-century modern style with low-slung buildings, distinct lines and large slanted windows. The adjacent pool is surrounded by a chain link fence. In addition to the office, the project site is occupied with a manager's residence and laundry facility. The remaining uses on-site are RVs, trailers, and mobile homes (collectively referred to in this document as "mobile homes") in various styles and conditions, as well as surface parking. Many of the mobile homes on-site have been customized by the owners with exterior decoration such as awnings, plants and other foliage.

The empty mobile home lots have a concrete pad and ornamental landscape. The landscape generally consists of typical ornamental species such as ficus, yucca, and pistachio trees. A variety of ornamental shrubs and flowers are also planted on the project site. The project site does not contain natural water features.

Land uses in the vicinity of the project site include a mix of one- and two-story industrial, commercial, office and residential uses. The majority of the uses along the south side of Colorado Boulevard are light/industrial, commercial and/or creative office, while many of the uses on the north side of Colorado



LEGEND:

■ Project Site

SOURCE: TAHA, 2011.

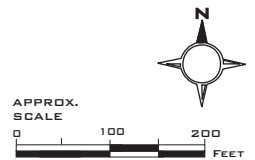




LEGEND:

 Project Site

SOURCE: TAHA, 2011.





Typical Unit 1



Typical Unit 2



Typical Unit 3



Typical Unit 4

SOURCE: TAHA, 2010.

Boulevard are one- and two-story residential uses. A one-story (approximately 15 feet tall) storefront church, the Westside Christian Fellowship, is located immediately to the east of the project site. Along Stanford Street further east of the site is surface parking and additional industrial uses. Residential structures, both single- and multi-family, are interspersed with industrial structures located along Colorado Avenue, as well as along Stewart Street. In general, the multi-family residences along Colorado Avenue to the north of the project site are two-stories in height with minimal setbacks (approximately five feet). The single-family residential buildings are one-story with slightly greater setbacks from the street. To the south of the project site is the Southern California Gas Company utility yard. To the west of the project site are light industrial and/or post-production uses. **Figures 3-4** and **3-5** show the existing development surrounding the project site.

3.3.2 Regulatory Setting

The Land Use and Circulation Element (LUCE) was adopted on July 6, 2010. The LUCE establishes a land use designation for the project site as “Mixed-Use Creative” which encourages the combination of studio-related uses (such as film and music production and post-production) with affordable, workforce and market rate housing. Ground floor, active, local-serving retail, service, commercial, and creative arts uses are allowed. In addition, the Mixed-Use Creative designation sets a Tier 1 base height of 32 feet (two-story) or if affordable housing is provided on-site, 36 feet (three story). The base FAR is 1.5. Subject to a discretionary review process Tier 2 projects in this land use designation may be permitted to be developed to a maximum allowable height of 47 feet and FAR of 2.0 with the provision of community benefits and Tier 3 projects may be developed to a maximum height of 57 feet and FAR of 2.5 with additional community benefits. The proposed project is a Tier 3 project that requires the processing of a Development Agreement.

The project site also has a zoning designation of Residential Mobile Home Park District (R-MH). According to Section 9.04.08.06.010 of the Santa Monica Municipal Code (SMMC), permitted uses within the R-MH zone include, but are not limited to, mobile homes and small family day care homes. Child care facilities are allowed in the R-MH zone provided a Conditional Use Permit (CUP) is obtained. The project includes several components that are not consistent with the R-MH zone; however, the proposed Development Agreement between the City and the project applicant may establish the type and mix of allowable land uses so long as they are consistent with the LUCE.

3.4 PROJECT CHARACTERISTICS

3.4.1 Land Uses

The proposed project would involve the closure of the existing Village Trailer Park and development of a 399,581-square-foot mixed-use project with 393 residential units, 105,334 square feet of creative office, and 11,710 square feet of neighborhood-serving retail. Approximately 30 percent of the square footage is dedicated to commercial use and 70 percent of the square footage is dedicated to residential use. **Table 3-1** summarizes the characteristics of the proposed project.

TABLE 3-1: SUMMARY OF PROJECT CHARACTERISTICS	
Total Lot Size	167,706 sq. ft. (3.85 acres)
Total Number of Buildings	4
Proposed Floor to Area Ratio	2.38
Total Proposed Gross Floor Area	399,581 square feet
Proposed Residential	393 residential units
Proposed Creative Office	105,334 square feet
Proposed Neighborhood Serving Retail	11,710 square feet
Maximum Building Height	57 feet
SOURCE: Village Trailer Park, LLC, 2010.	



Easternmost driveway along Stanford Street.



Looking east toward church, east of the project site.



Looking east at adjacent building to the west.



Industrial property, to the west of the project site.

SOURCE: TAHA, 2010.



Apartments across from the project site on Colorado Avenue.



Additional apartments across from the project site on Colorado Avenue.



Typical Stanford Street Buildings.



Restaurant west of the project site on Colorado Avenue.

SOURCE: TAHA, 2010.

The proposed project’s 117,044 square feet of commercial space would include 105,334 square feet of creative/office space and 11,710 square feet of neighborhood serving retail fronting Colorado Avenue.

The residential uses would include 166 apartment units; 109 of these apartment units would be subject to Santa Monica’s rent control ordinance with approximately 52 deed restricted as affordable housing. The remaining 57 apartment units would be market-rate apartments. A portion of the apartments would be made available to current Village Trailer Park tenants. The apartments would include a mix of studio and one-bedroom units. Provisions related to the rent control and dedication of apartment units for the Village Trailer Park residents will be included as part of the Development Agreement between the City and the project applicant. **Table 3-2** summarizes the project housing characteristics. The proposed project also includes 227 market rate condominium units consisting of lofts, one-bedroom, and two-bedroom units.

TABLE 3-2: HOUSING CHARACTERISTICS	
Total Number of Units	393
Total Apartments (studios/one-bedrooms)	166
Total Condominium	227
Loft/One-Bedroom	191
Two-Bedroom	36
SOURCE: Village Trailer Park, LLC, 2010.	

A two-level, 778-space subterranean parking garage would be provided under the proposed development. In addition, on-street public parking spaces would be provided along New Road on the western boundary of the site and along the new Pennsylvania Avenue extension (discussed below). The proposed project also includes courtyard/plaza areas within the project site and a pedestrian paseo that would connect through the site. The adjacent sidewalks along Colorado Avenue and new Pennsylvania Avenue extension would also be enhanced and improved with new landscaping. **Figures 3-6** through **3-13** show proposed plans for each level of the proposed project.

The proposed project would include four buildings, one of which would be four stories in height and three of which would be five stories in height. **Figure 3-14** shows an architectural rendering of the proposed project.

Building A. Building A would be approximately 180,517 gross square feet and range in height from 36 to 57 feet. The ground floor would include 37,863 sf of commercial space, including 11,710 square feet of neighborhood serving retail. The remaining ground floor space would be dedicated for creative office space. The second through fifth floors would include 185 condominium units.

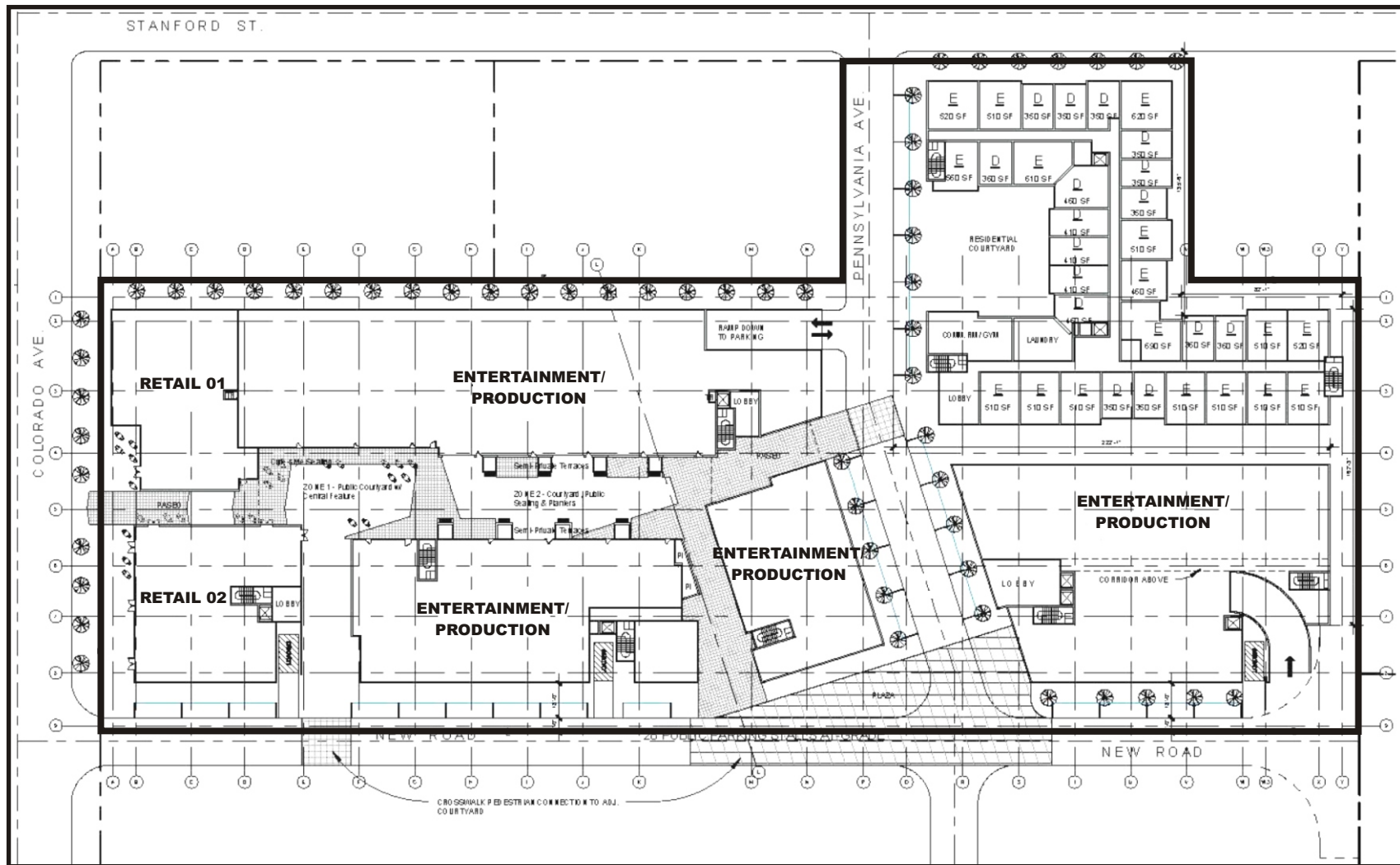
Building B. Building B would be approximately 50,036 gross square feet and range in height of from 46.5 to 57 feet. The ground floor would include 12,041 square feet of creative office space while the second through fourth floors would include 42 condominium units. The building will also provide a rooftop level and deck with a pool, gym and restroom facilities to serve as a common area amenity for the residents.

Building C. Building C would be approximately 67,140 square feet with heights ranging from 43.5 to 57 feet. All of Building C would be dedicated to creative office/production uses.

Building D. Building D would be approximately 101,888 square feet with heights ranging from 31 to 52 feet. This building would be dedicated to the 166 apartment units.

3.4.2 Site Access

The proposed project would include the development and dedication of the proportionate extension on the project site of Pennsylvania Avenue from Stewart Street to Stanford Street. The Pennsylvania Avenue extension would be located in an approximately 62-foot right-of-way potentially comprised of two travel lanes (one in each direction), parking lanes, and sidewalks on both sides. On the project site, the street



LEGEND:

 Project Site

SOURCE: Cuninghams Group, 2010.

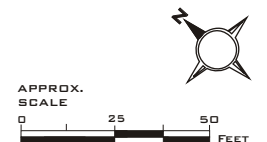


FIGURE 3-6

GROUND FLOOR PLAN



LEGEND:

 Project Site

SOURCE: Cuningham Group, 2010.

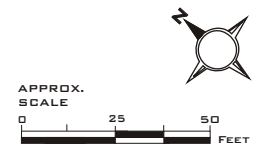
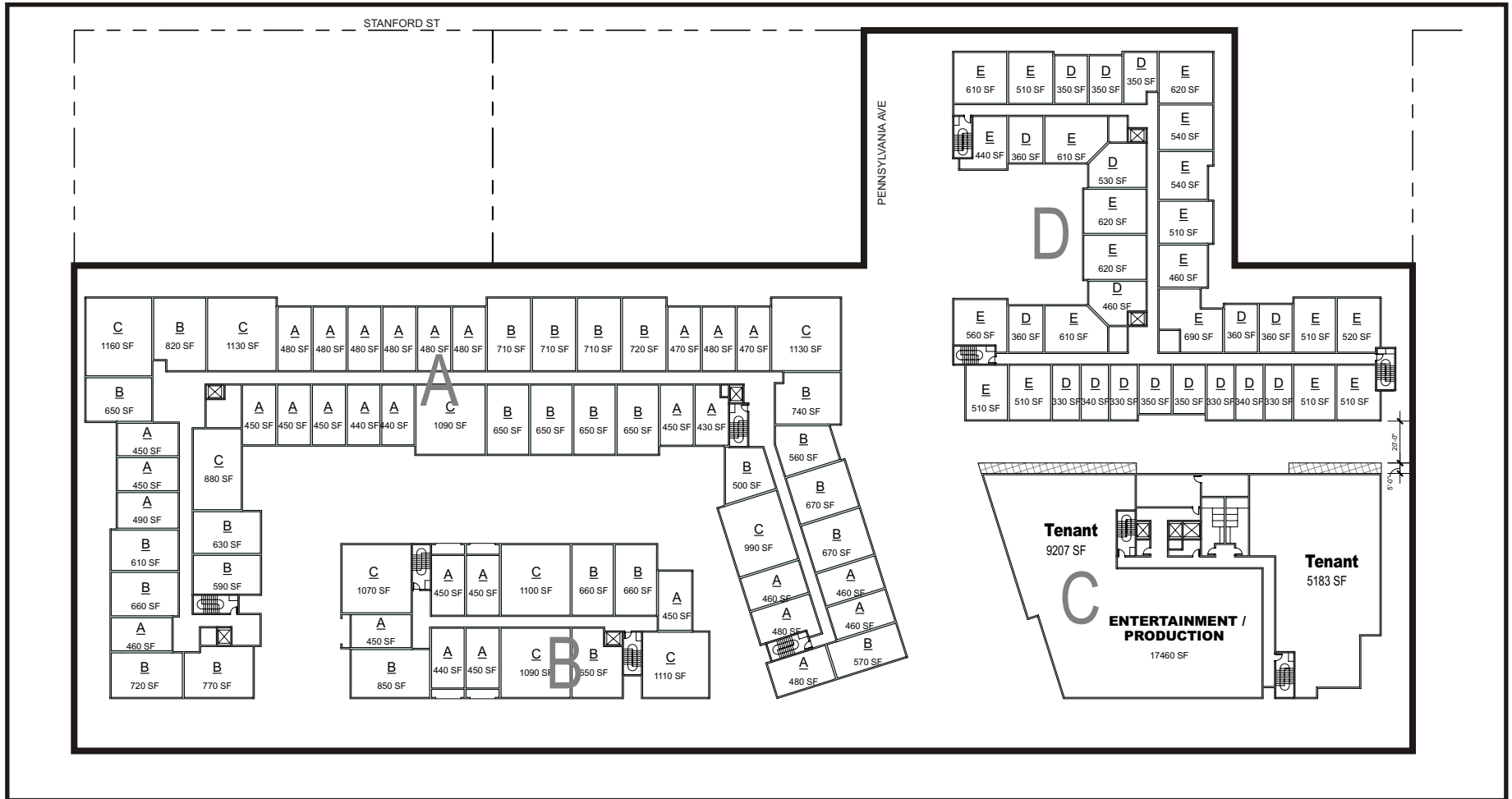


FIGURE 3-7

LEVEL TWO FLOOR PLAN



LEGEND:

 Project Site

SOURCE: Cuningham Group, 2010.

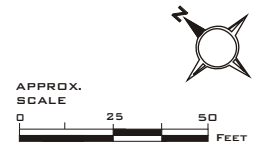


FIGURE 3-8

LEVEL THREE FLOOR PLAN



LEGEND:

 Project Site

SOURCE: Cuningham Group, 2010.

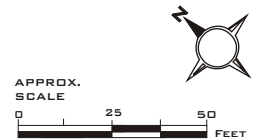
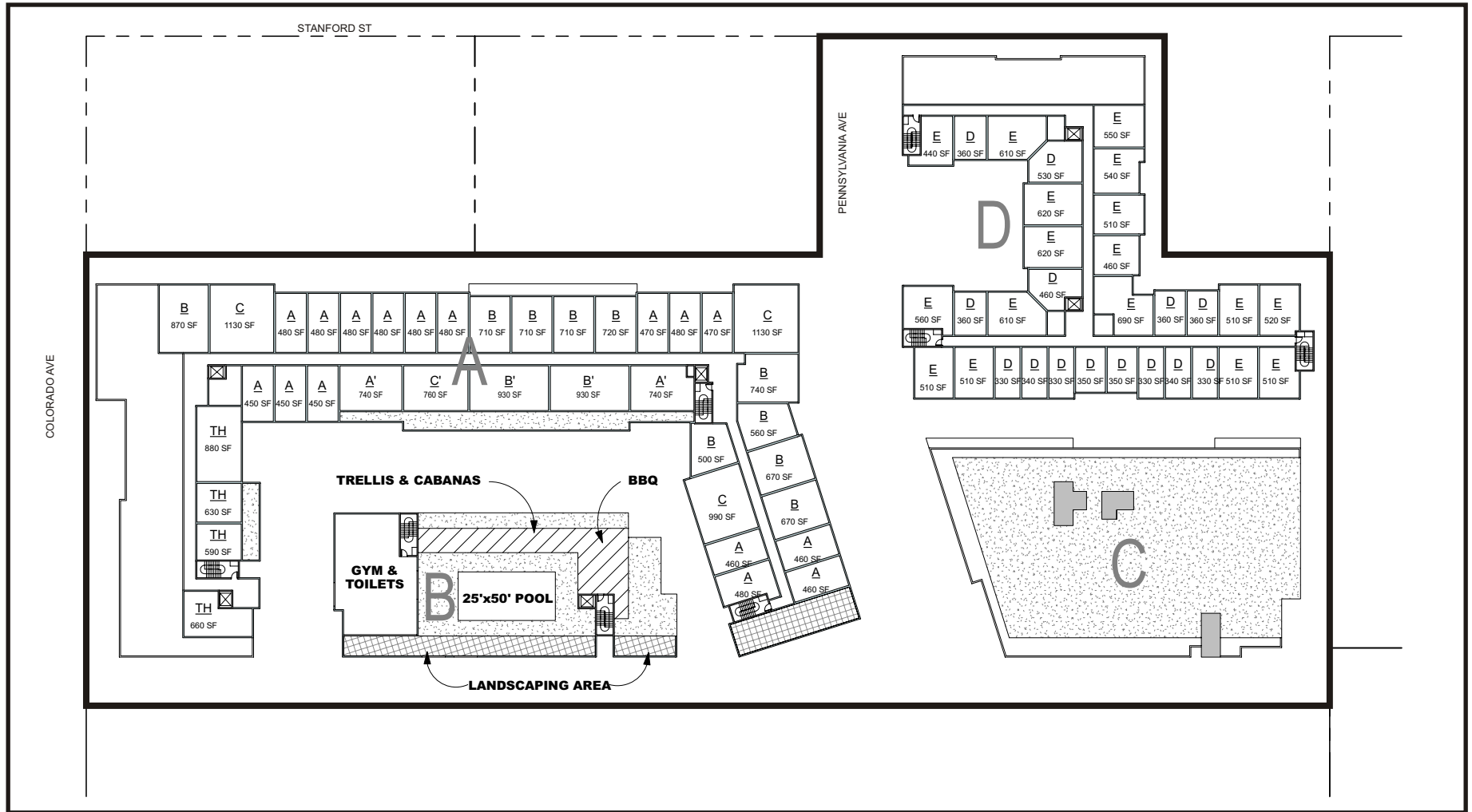


FIGURE 3-9

LEVEL FOUR FLOOR PLAN



LEGEND:

Project Site

SOURCE: Cuningham Group, 2010.

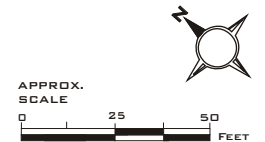
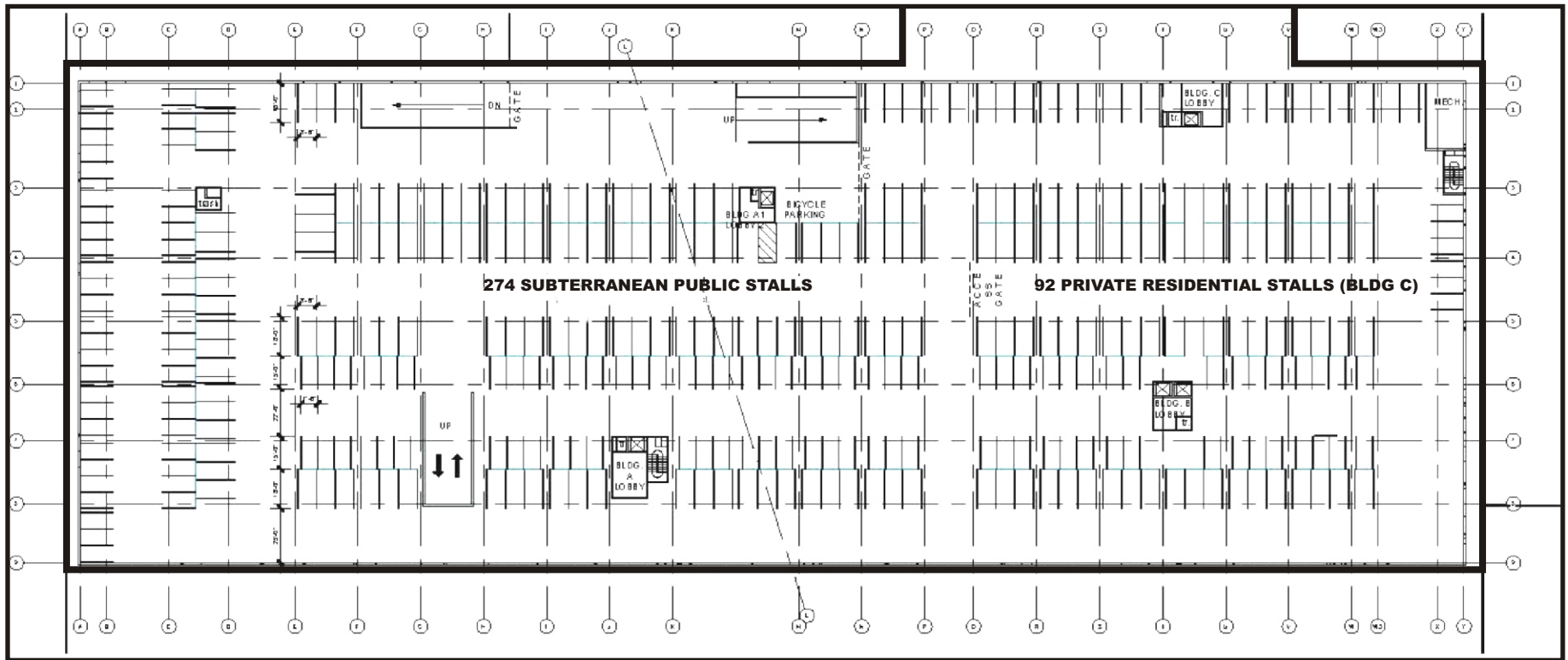


FIGURE 3-10

LEVEL FIVE FLOOR PLAN



LEGEND:

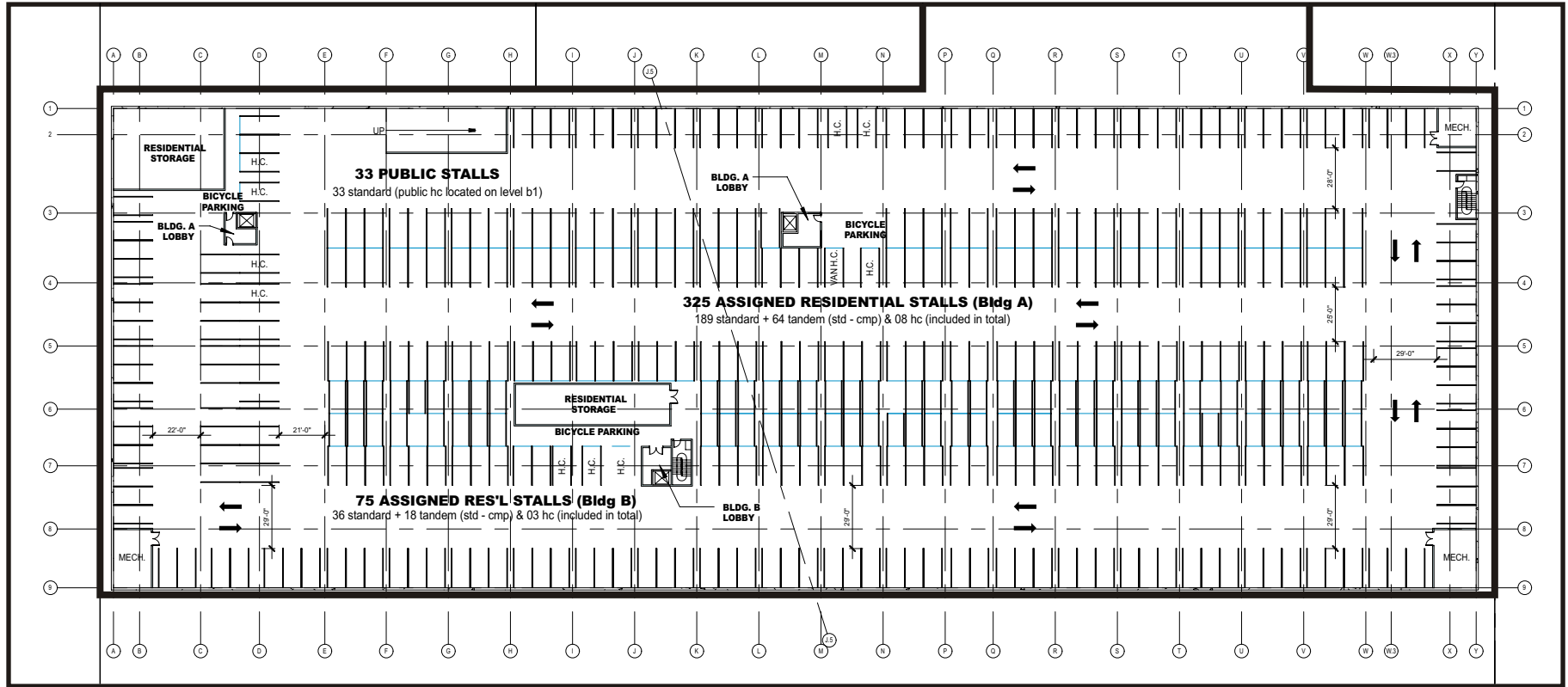
 Project Site

SOURCE: Cuningham Group, 2010.



FIGURE 3-11

BASEMENT PARKING PLAN - LEVEL ONE



LEGEND:

 Project Site

SOURCE: Cunningham Group, 2010.

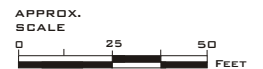
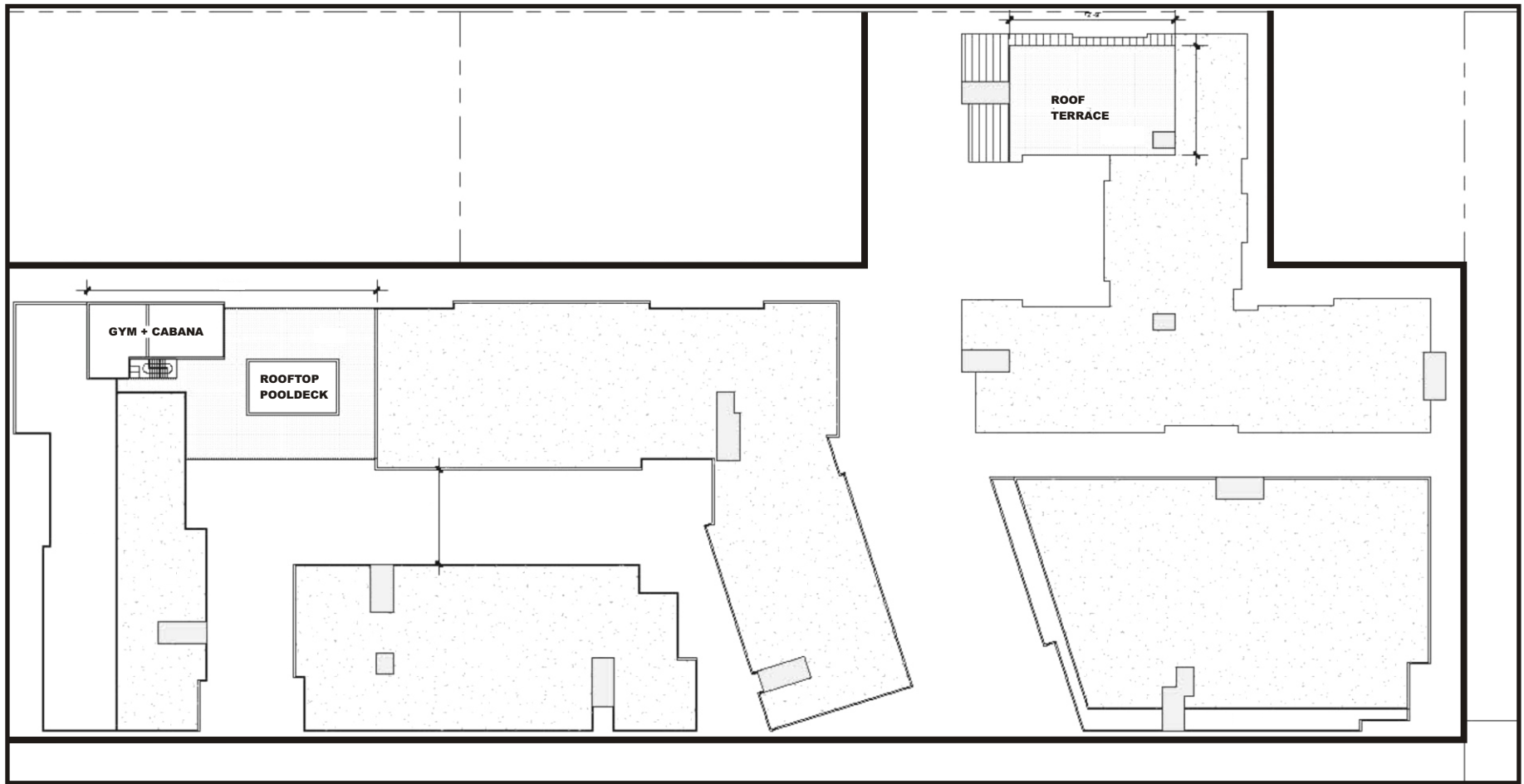


FIGURE 3-12

BASEMENT PARKING PLAN - LEVEL TWO



LEGEND:

 Project Site

SOURCE: Cunningham Group, 2010.

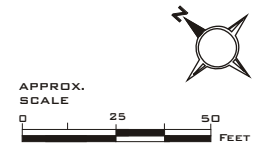


FIGURE 3-13

ROOF PLAN



View from Colorado Avenue looking south.

SOURCE: Cuningham Group, 2010.

would be constructed at grade over a section of the project's subterranean parking garage. In addition, a new north-south road (New Road) would be developed along the site's western border from Colorado Avenue to the site's southern property line. The New Road would also be located within a 62-foot right-of-way comprised of two travel lanes, parking lanes, and sidewalks. New Road would be shared with the adjacent property to the west and provide access into the project site. Both the Pennsylvania Avenue extension and the New Road would be constructed in accordance with the City and State Fire Codes to accommodate all Santa Monica Fire Department (SMFD) fire apparatus.

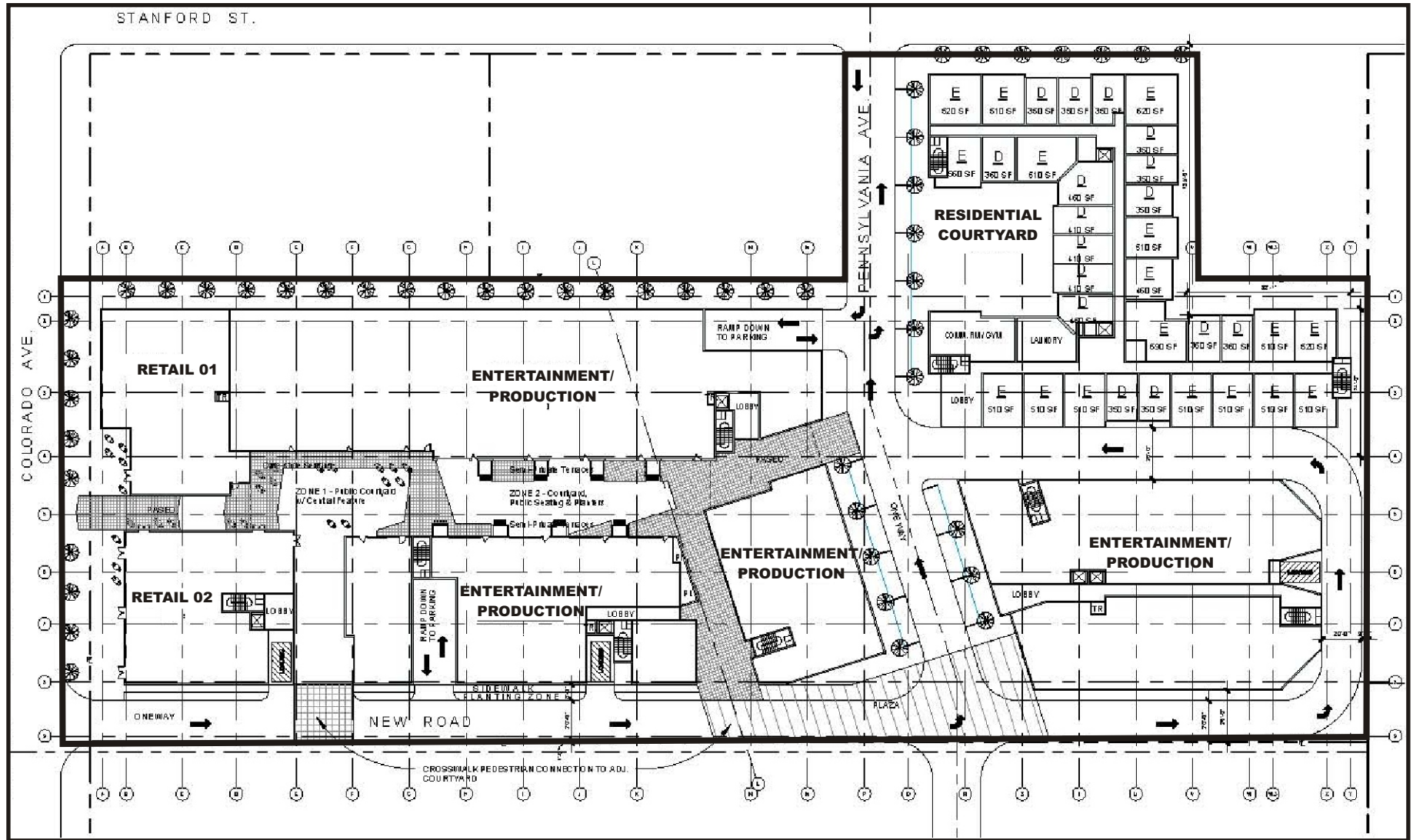
Currently, two properties located directly to the west of the site are under consideration for redevelopment. These properties include 2848-2912 Colorado Avenue and 2834 Colorado Avenue. These two related projects are listed in **Table 3-3** List of Related Projects, at the end of this chapter. Both related projects are located within the LUCE Mixed Use Creative land use designation, which includes a district-wide land use mix target for new development of 50 percent non-residential to residential uses with allowance for a 5 percent deviation in either direction.

Directly to the west of the project site is the related project at 2848-2912 Colorado Avenue (Roberts Center Project). This related project is under consideration and has not yet begun the environmental review process. As currently proposed, this related project is a mixed use project with approximately 11,500 square feet of neighborhood commercial space, up to 150-170 units of housing, and approximately 100,000 square feet of production office space. This related project includes the portion of New Road along its western property line and also includes the extension of Pennsylvania Avenue through its property.

Directly to the west of 2848-2912 Colorado Avenue is the related project at 2834 Colorado Avenue (2834 Colorado Creative Studios Project – Lionsgate Project SCH#2008121107). This related project was approved by the City in July 2011. This related project would include the demolition of the existing one- and two-story buildings on-site and construction of a four-story creative office/post-production and retail building. The related project would include approximately 107,500 square feet of post-production space, 75,500 square feet of administrative creative office, 13,000 square feet of storage, and 9,000 square feet of community-serving retail space. This related project also includes the extension of Pennsylvania Avenue through its property.

Development of the proposed project and the two related projects identified above would provide a continuous extension of Pennsylvania Avenue from Stewart Street (to the west) to Stanford Street (to the east). The new Pennsylvania Avenue extension would be dedicated to the City as a public easement and classified as a Neighborhood Street, as indicated in the Circulation Element Street Network Map.

In order to address project access as either an interim condition, pending development of adjacent properties, or a permanent improvement should adjacent properties to the west not develop, a "stand alone" site plan (**Figure 3-15**) has also been developed to accommodate traffic flow in such a scenario and thus, the full extension of Pennsylvania Avenue between Stanford Street and Stewart Street would not occur. The "stand alone" access configuration does not prohibit the potential expansion of New Road or the accommodation of the Pennsylvania Avenue extension from the adjacent property to the west. Under the stand alone plan, primary two-way vehicle access to the project site would be provided from Stanford Street (via the project's proposed Pennsylvania Avenue extension to the east) and from Colorado Avenue via the New Road (which in this case, would provide a one-way southbound travel lane only). The traffic analysis in this Draft EIR analyzes the two access scenarios (Section 4.15 Transportation and Traffic).



LEGEND:

 Project Site

SOURCE: Cunningham Group, 2010.

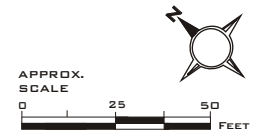


FIGURE 3-15

ALTERNATE ACCESS PLAN

3.4.3 Construction Activities

Site preparation would include demolition, excavation, building construction, utilities/infrastructure improvements, paving and landscaping. Excavation would be required to prepare the site for construction. The maximum depth of excavation required for subterranean parking would be approximately 26 feet.⁴ Construction activities would last for approximately 33 months and would be phased as follows:

Demolition

- Duration: 3 months
- Daily Building Volume Demolished: 8,800 cubic feet
- Daily On-Road Truck Travel: 122 vehicle miles traveled (VMT)

Site Preparation

- Duration: 6 months
- Maximum Daily Acreage Disturbed: 3.85
- Exported Soil: Approximately ~~79,000~~ 146,813 cubic yards.
- Daily On-Road Truck Travel: ~~1,278~~ 1,854 VMT

Trenching

- Duration: 3 months

Paving

- Duration: 1 month
- Acres to be Paved: 0.4

Building

- Duration: 18 months

3.4.4 Other Project Features

The proposed project intends to achieve Leadership in Energy and Environmental Design (LEED) certification under the US Green Building Council (USGBC). Specifically, the project intends to pursue LEED Silver Certification for New Construction and Major Renovations. Refinement of specific features will be developed as the project moves further along in the design and entitlements processes and a specific LEED path is determined for the residential component.

Regardless of the path determined, the proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality. In addition, in compliance with the City's Green Building Code, the proposed project would be required to divert at least 65 percent of project-related construction and demolition material.

The proposed project would also include a Transportation Demand Management (TDM) plan, which would provide trip reduction strategies to be implemented by the applicant. The strategies required in the TDM Plan will be determined by the City. Potential strategies of the TDM plan include a TDM coordinator, area-wide transportation management association, transit pass subsidy, ridesharing, parking cash out, unbundled parking, guaranteed ride home program, bicycle facilities (shower, racks, lockers) flexible work hours, transportation information center, wayfinding signage, and commuter club. As part

⁴While the maximum depth of excavation is estimated to be approximately 26 feet below ground surface (bgs), the construction air quality analysis within this Draft EIR estimates a conservative depth and excavation of approximately 34 feet bgs.

of the Development Agreement, the applicant would be required to achieve the trip generation rates applied to the proposed project in this Draft EIR (Section 4.15 Transportation and Traffic). Annual monitoring and reporting would be required. Monitoring would include morning and afternoon trip counts at the project driveway, as well as observations around the project site to determine pickup/drop-off activity and other site-generated vehicle trips such as deliveries. The applicant would be required to summarize the results of the trip monitoring program, determine whether trip rates are being achieved, and describe the TDM efforts currently in place to reduce vehicular trip making in an annual report delivered to the City.

Additionally, the proposed project includes secure bicycle parking for the employees, residents and visitors of the project and would accommodate a minimum of 41 bicycle parking spaces below grade and at-grade.

The Development Agreement between the City and the developer would be informed by a tenant impact report, as required by California law, and would include a relocation plan for existing Village Trailer Park residents, which must be approved by the City Council. This entitlement process is ongoing, and relocation options include the opportunity to relocate to the nearby City-owned Mountain View Mobile Home Park and the rent controlled apartment units to be developed as part of the project. Additional relocation options for the remaining Village Trailer Park residents would also be identified as part of the Development Agreement process. In addition, provisions related to the rent control and dedication of units for the Village Trailer Park residents will be included as part of the Development Agreement and associated relocation plan.

As required during the Development Agreement and project approval process, the applicant would be required to consult with the Santa Monica Police Department regarding crime prevention features appropriate for the design of the proposed project and subsequently, would be required to submit plot plans for review and comment. The plans would be required to incorporate design guidelines relative to security and semi-public and private spaces which may include, but not be limited to, access control to buildings, secured parking facilities, wall/fences with key systems, well-illuminated public and semi-public and private spaces, which may include access control to buildings, secured parking facilities, walls/fences with key systems, well-illuminated public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provisions of security guard patrol if needed. The applicant 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 SMPD. Any additional design features identified by the SMPD would be incorporated into the proposed project's final design and to the satisfaction of SMPD, prior to issuance of a Certificate of Occupancy for the project.

Furthermore, the Santa Monica Fire Department would review site and building plans as well as the structures prior to issuance of a Certificate of Occupancy to ensure that the required fire protection safety features, including building sprinklers and emergency access, are implemented.

3.5 PROJECT OBJECTIVES

The objectives of the project are to:

- Close the existing mobile home park pursuant to applicable California law and the City's Rent Control Charter Amendment and construction of a use consistent with the City's adopted Land Use and Circulation Element;
- Provide a mix of jobs, neighborhood serving commercial uses and housing on the same site to reduce trips;
- Contribute to the affordable housing stock of the City by providing on-site affordable housing units for existing mobile home park residents and qualifying Santa Monica residents;

- Increase the diverse housing supply in the City by providing a mix of rent control, affordable, and market rate housing;
- Construct a sustainable project that will maximize energy efficiency and minimize vehicle trips;
- Enhance existing streetscapes by designing pedestrian-scale buildings, active ground floor uses, open space, and sidewalk improvements;
- Provide for the extension of Pennsylvania Avenue and the creation of a new road connecting Colorado Avenue with Pennsylvania Avenue, improving traffic circulation, reducing congestion, and providing pedestrian access through the project area and adjacent project areas to the proposed Bergamot Station;
- Maximize housing and job opportunities near the future Bergamot Station for the Exposition Light Rail Line, scheduled to open in 2015, located approximately 0.25 miles to the south of the project site;
- Attract and retain entertainment companies by providing creative office space with sufficiently sized floor plates and amenities; and
- Maximize the creation of good-paying jobs and revenue to the City by including creative office space.

3.6 CUMULATIVE IMPACTS

Cumulative impacts are the anticipated impacts of the proposed project in combination with the impacts of related cumulative development. As stated in Section 15130(b)(1) of the CEQA Guidelines, this reasonably foreseeable growth may be based on either of the following, or a combination thereof:

- A list of past, present, and probably future projects producing related or cumulative impacts, or
- A summary of projections contained in an adopted general plan or related planning document which describe or evaluate regional or area wide conditions.

For the purposes of this EIR, the potential cumulative effects of the proposed project are based upon a list of related projects identified by the City which includes the two related projects described above. The list of related projects is provided in **Table 3-3** below.

TABLE 3-3: LIST OF RELATED PROJECTS				
Project		Location	Use	Size
1	Fast Food/Retail/Office	1540 2 nd Street	Mixed Use	68,000 SF
2	12-Unit Condominium	858 3 rd Street	Residential	12 DU
3	12-Unit Condominium	860 3 rd Street	Residential	12 DU
4	5-Unit Condominium	947 4 th Street	Residential	5 DU
5	AMC Movie Theater DA	1318 4 th Street	Movie Screens Retail	83,000 SF 2,100 SF
6	Retail/Office	1427 4 th Street	Office Retail	44,200 SF 11,500 SF
7	62-Unit Mixed-Use Building	1539 4 th Street	Residential	62 DU
8	5-Unit Condominium	914 5 th Street	Residential	5 DU
9	Retail/Residential	1241 5 th Street	Residential Retail	49 DU 2,794 SF
10	Multi-Family Residential	1410 5 th Street	Residential Retail Retail	56 DU 5,086 SF 2,800 SF
11	Mixed-Use	1437 5 th Street	Residential Retail	26 DU 3,300 SF
12	Retail	1450 5 th Street	Retail	3,860 SF
13	Mixed-Use	1548 5 th Street	Affordable Apartments Commercial	46 DU 720 SF
14	Mixed-Use	1244 6 th Street	Residential Retail	50 DU 2,400 SF
15	Mixed-Use	1548 6 th Street	Residential	38 DU

TABLE 3-3: LIST OF RELATED PROJECTS				
Project		Location	Use	Size
16	Mixed-Use DA	1317 7 th Street	Residential Retail Retail	57 DU 3,000 SF 1,947 SF
17	Multi-Family Residential	1418 7 th Street	Residential Retail	50 DU 49,500 SF
18	Multi-Family Residential	1427 7 th Street	Residential Retail	50 DU 1,677 SF
19	Senior Housing	1514 7 th Street	Senior Apartments	26 DU
20	8-Unit Condominium	2510 7 th Street	Residential	8 DU
21	5-Unit Condominium	1211 9 th Street	Residential	5 DU
22	5-Unit Condominium	1027 10 th Street	Residential	5 DU
23	13-Unit Condominium	1224 10 th Street	Residential	13 DU
24	6-Unit Condominium	1318 10 th Street	Residential	6 DU
25	6-Unit Condominium	1531 10 th Street	Residential	6 DU
26	5-Unit Condominium	1750 10 th Street	Residential	5 DU
27	6-Unit Condominium	1804 10 th Street	Residential	6 DU
28	5-Unit Condominium	1038 11 th Street	Residential	5 DU
29	8-Unit Condominium	1444 11 th Street	Residential	8 DU
30	5-Unit Condominium	1518 11 th Street	Residential	6 DU
31	5-Unit Condominium	1524 11 th Street	Residential	5 DU
32	5-Unit Condominium	1544 11 th Street	Residential	5 DU
33	Artists Lofts	1639 11 th Street	Artists Lofts	66 DU
34	15-Unit Condominium (Turtle Villas)	1211 12 th Street	Residential	15 DU
35	16-Unit Condominium	1652 12 th Street	Residential	16 DU
36	5-Unit Condominium	914 14 th Street	Residential	5 DU
37	6-Unit Condominium	1434 14 th Street	Residential	6 DU
38	Mixed-Use	1458 14 th Street	Senior Apartments Retail	20 DU 2,500 SF
39	Media Production	1551 14 th Street	Media Production	5,776 SF
40	30-Unit Apartment	1511 15 th Street	Residential	30 DU
41	5-Unit Condominium	1105 18 th Street	Residential	5 DU
42	Outpatient Surgery & Treatment Center	1217-1231 16 th Street	Medical Office Building	45,000 SF
43	5-Unit Condominium	1537 16 th Street	Residential	5 DU
44	11-Unit Condominium	1803 16 th Street	Residential	10 DU
45	8-Unit Condominium	908 17 th Street	Residential	8 DU
46	5-Unit Condominium	919 17 th Street	Residential	5 DU
47	7-Unit Condominium	1807 17 th Street	Residential	7 DU
48	6-Unit Condominium	1949 17 th Street	Residential	6 DU
49	6-Unit Condominium	1753 18 th Street	Senior Apartments	18 DU
50	6-Unit Subdivision	1927 18 th Street	Residential	6 DU
51	5-Unit Condominium	811 19 th Street	Residential	5 DU
52	5-Unit Subdivision	851 19 th Street	Residential	5 DU
53	8-Unit Condominium	917 19 th Street	Residential	8 DU
54	5-Unit Condominium	1035 19 th Street	Residential	5 DU
55	8-Unit Condominium	941 20 th Street	Residential	8 DU
56	5-Unit Condominium	1119 20 th Street	Residential	5 DU
57	Office Building	1507 20 th Street	Office	4,612 SF
58	101-Unit Affordable Housing	1671 20 th Street	Affordable Housing	101 DU
59	5-Unit Condominium	1818 20 th Street	Residential	5 DU
60	6-Unit Condominium	853 21 st Street	Residential	6 DU
61	5-Unit Condominium	1027 21 st Street	Residential	5 DU
62	5-Unit Condominium	1120 21 st Street	Residential	5 DU
63	19-Unit Condominium	2002 21 st Street	Residential	19 DU
64	St. Johns Medical Center (North Campus) DA	1328 22 nd Street	Hospital	470,000 SF

TABLE 3-3: LIST OF RELATED PROJECTS				
Project	Location	Use	Size	
65	Bergamot Transit Village (Papermate DA)	1681 26 th Street	Creative/Media Production Residential Specialty Retail	495,000 SF 325 DU 47,000 SF
66	8-Unit Condominium	2323 28 th Street	Residential	8 DU
67	6-Unit Condominium	2401 28 th Street	Residential	6 DU
68	10-Unit Condominium	2512 28 th Street	Residential	10 DU
69	Multi-Family Residential	1751 Appian Way	Residential	39 DU
70	Mixed-Use	603 Arizona Ave	Residential Retail	39 DU 2,500 SF
71	Mixed-Use	702 Arizona Ave	Residential Retail	46 DU 6,600 SF
72	Skilled Nursing Facility	1131 Arizona Ave	Rehabilitation Center	48 Beds
73	7-Unit Condominium	217 Bicknell	Residential	7 DU
74	Mixed-Use	401 Broadway	Residential Commercial	56 DU 10,420 SF
75	Mixed-Use	525 Broadway	Condominium Restaurant	125 DU 9,000 SF
76	Mixed-Use	626 Broadway	Affordable Apartments Retail	48 DU 4,000 SF
77	SRO	829 Broadway	Residential	97 DU
78	32-Unit Condominium	1502 Broadway	Residential	32 DU
79	Mixed-Use	1906 Broadway	Residential Retail	32 DU 400 SF
80	33-Unit Affordable Housing	2602 Broadway	Affordable Apartments	33 DU
81	5-Unit Condominium	1902 California Ave	Residential	5 DU
82	8-Unit Condominium	1311 Centinela Ave	Residential	8 DU
83	Self Storage Facility	1707 Cloverfield Blvd	Self Storage	31,400 SF
84	16-Unit Condominium	1940 Cloverfield Blvd	Condominium Retail	16 DU 17,000 SF
85	Big Blue Bus	612 Colorado Ave	Maintenance Facility	75,600 SF
86	26-Housing Units	711 Colorado Ave	Affordable Housing	26 DU
87	Lionsgate/Post-Production Facility DA	2834 Colorado Ave	Post-Production Retail	171,000 SF 9,000 SF
88	Village Trailer Park Mixed-Use DA	2930 Colorado Ave	Residential Retail Post-Production	393 DU 12,000 SF 105,000 SF
89	Roberts Center	2848 Colorado Ave	Post-Production Retail Residential	97,000 SF 22,700 SF 170 DU
90	13-Unit Condominium	1134 Euclid Street	Residential	6 DU
91	5-Unit Condominium	1327 Euclid Street	Residential	5 DU
92	6-Unit Condominium	1171 Franklin Street	Residential	6 DU
93	5-Unit Condominium	1243 Franklin Street	Residential	5 DU
94	45-Unit Affordable Condominium	1943-59 High Place	Residential	45 DU
95	6-Unit Condominium	3214-18 Highland Ave	Residential	6 DU
96	6-Unit Condominium	2015 Idaho Ave	Residential	6 DU
97	Edison School	2425 Kansas	Elementary School	65,000 SF
98	SRO Project	1447 Lincoln Blvd	Affordable Housing	97 DU
99	Mixed-Use	1650 Lincoln Blvd	Affordable Housing Retail	90 DU 1,500 SF
100	Mixed-Use	1660 Lincoln Blvd	Affordable Housing Retail	82 DU 1,500 SF
101	Walgreens	1907 Lincoln Blvd	Retail/Pharmacy	12,000 SF
102	Mixed-Use	2001 Main Street	Retail Residential	4,150 SF 14 DU
103	Mixed-Use	212 Marine Street	Residential Commercial	24 DU 9,000 SF
104	6-Unit Condominium	1920 Montana Ave	Residential	6 DU

TABLE 3-3: LIST OF RELATED PROJECTS				
Project	Location	Use	Size	
105	5-Unit Condominium	1719 Ocean Front Walk	Residential	5 DU
106	8-Unit Condominium	1332 Ocean Park Blvd	Residential	8 DU
107	20-Unit Condominium	301 Ocean Ave	Residential	20 DU
108	Miramar Hotel Revitalization Plan DA	1133 Ocean Ave	Hotel Residential Specialty Retail Food and Beverage Space Meeting Place	265 Rooms 120 DU 6,400 SF 1,208 SF 11,500 SF
109	Shangri La Hotel	1301 Ocean Ave	Hotel Addition	20 Rooms
110	Hill Street Partners DA	1333-1337 Ocean Ave	Hotel Restaurant	75 Rooms 3,000 SF
111	Travelodge Hotel	1515 Ocean Ave	Hotel	173 Rooms
112	New Roads	3131 Olympic Blvd	Private School	1,153 SF
113	9-Unit Condominium	125 Pacific Street	Residential	9 DU
114	5-Unit Condominium	126 Pacific Street	Residential	5 DU
115	Public Recreational and Meeting Facility (Annenberg Beach House)	415 Palisades Beach Road	Pool Housing, Entry Pavilion, Event House, North House	23,000 SF
116	32-Unit Affordable Housing	430-530 Pico Blvd	Affordable Apartments	32 DU
117	18-Unit Condominium	1112 Pico Blvd	Residential	18 DU
118	Mixed-Use	2222 Pico Blvd	Residential	2 DU
119	Mixed-Use	2802 Pico Blvd	Affordable Housing Retail Retail	33 DU 2,399 SF 600 SF
120	Mixed-Use Residential and Retail	3205 Pico Blvd	Residential	5 DU
121	Mayfair Theater	212 Santa Monica Blvd	Residential Retail	38 DU 9,700 SF
122	Mixed-Use	519 Santa Monica Blvd	Retail Residential	9,044 SF 39 DU
123	32-Units/Mixed-Use	1802 Santa Monica Blvd	Residential Commercial	32 DU 9,400 SF
124	Affordable Housing	2601 Santa Monica Blvd	Residential	44 DU
125	Mixed-Use Building	3107 Santa Monica Blvd	Residential	10 DU
126	22-Unit Condominium/Synagogue	130 San Vicente Blvd	Residential	22 DU
127	Research & Development (Agencies)	1800 Stewart Street	Research & Development	153,000 SF
128	12-Unit Condominium	2121 Virginia Ave	Residential	12 DU
129	Residential	2345-49 Virginia Ave	Residential	47 DU
130	Multi-Family Residential	507 Wilshire Blvd	Residential Commercial	50 DU 5,351 SF
131	Mixed-Use Hotel	710 Wilshire Blvd	Hotel Retail Restaurant	285 Rooms 6,700 SF 9,730 SF
132	Paseo Nebraska DA	3020 Nebraska	Residential Retail	545 DU 80,000 SF
133	Mixed-Use	2300 Wilshire Blvd	Residential Retail Restaurant	30 DU 22,300 SF 2,700 SF
134	Mixed-Use	2919-23 Wilshire Blvd	Residential Retail Supermarket	26 DU 3,095 SF 8,500 DU
135	6-Unit Condominium	1319 Yale Street	Residential	6 DU
136	Santa Monica UCLA Hospital	Wilshire to the north, Arizona to the south, 16 th to the east, 15 th to the west	N/A	N/A

TABLE 3-3: LIST OF RELATED PROJECTS				
Project	Location	Use	Size	
137	Civic Center Specific Plan	Colorado to the north, Pico to the south, 4 th to the east, Ocean to the west	Residential Office Restaurant/Retail City Service Building Auditorium Expansion Early Childhood Center Park Soccer Field	325 DU 53,000 SF 25,000 SF 40,000 SF 20,000 SF 12,500 SF 12,800 SF 1 Field
138	Pier Bridge Widening and Pier Ramp	Colorado Ave/Santa Monica Pier	Widen pier bridge and construct ramp to PCH1440/1550 Lot	
139	Exposition Light Rail Construction	East City Limits to Colorado Avenue	Light Rail	
140	Virginia Ave Park Expansion	Pico and Cloverfield Blvds	City Park Addition	3.65 Acre
141	Westside Medical/Bundy Village (City of Los Angeles)	Olympic Blvd/Bundy Dr	Mixed-Use	
142	Mixed-Commercial (City of Los Angeles)	11122 West Pico Blvd	Residential Target Supermarket	538 DU 212,000 SF 54,000 SF
143	Downtown Santa Monica Parking Program	Wilshire Blvd to the north, 6 th Court to the east, Colorado Ave to the South, and 4 th Court to the west	Rebuild/Seismic Retrofit of Parking Structures	
144	Mixed-Use (City of Los Angeles)	100 Sunset Ave	Retail	10,000 SF
145	Condominiums	1621 Franklin Street	Residential	5 DU
146	Salvation Army Rehabilitation Center	1665 10 th Street	Rehabilitation Center	86 Beds
147	Daycare Reoccupation of Exiting Space	1920 Colorado Ave	Daycare	13,000 SF
148	St. Monica School Expansion	725 California Ave	Church/Community Center School	27,500 SF 7,500 SF
149	Pico Branch Library	2200 Virginia Avenue	Library	7,500 SF
150	New Courtroom by Marriot DA	1554 5 th Street	Hotel	136 Rooms
151	New Hampton In and Suites DA	501 Colorado Ave	Hotel	136 Rooms
152	Santa Monica College AET Campus Expansion	1660 Stewart St	School Production Space	20,000 SF 28,000 SF
153	Colorado Esplanade	Colorado Avenue between 4 th and Ocean Ave	Pedestrian Promenade	
154	5-Unit Condominium	1533 11 th Street	Residential	5 DU

DU= Dwelling Units, SF = Square Feet
/a/ The list of related projects includes those projects since 2007, when traffic counts were taken.
SOURCE: City of Santa Monica 2011.

3.7 INTENDED USES OF THIS EIR

This EIR has been prepared to analyze environmental impacts associated with the construction and operation of the proposed project and also to identify appropriate feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. This document is intended to serve as an informational document. Additionally, this EIR will provide the primary source of environmental information for the lead agency to consider when exercising any permitting authority or approval power direction related to implementation of the proposed project.

This EIR is intended to provide decision-makers and the public with information that enables them to intelligently consider the environmental consequences of the proposed action. This EIR identifies significant or potentially significant environmental effects, as well as ways in which those impacts can be reduced to less-than significant levels, whether through imposition of mitigation measures or through the implementation of specific alternatives to the proposed project. In a practical sense, EIRs function as a technique for fact-finding, allowing an applicant, concerned citizens, and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

3.8 REQUIRED APPROVALS

The following approvals would be required for the project:

- Certification of the Final EIR (City Council with Recommendation from the Planning Commission)
- Approval of Tentative and Final Tract Maps (Planning Commission and City Council)
- Approval of a Development Agreement, with associated Tenant Impact Report and Relocation Plan (City Council)
- Approval of building design and materials, as well as landscaping and signage (Architectural Review Board)
- Demolition and Building Construction Permits (Building and Safety Division)
- Any other incidental discretionary approvals needed for the construction and operation of the proposed project

4.0 ENVIRONMENTAL IMPACTS

This chapter evaluates the significant environmental impacts that could result from the implementation of the proposed project. These potential impacts are analyzed for the following environmental issues: aesthetics; air quality; biological resources; construction effects; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; neighborhood effects; noise; population and housing; public services and recreation; transportation and traffic; and utilities and service systems. Discussion is focused on the identification of effects that may be considered to be environmentally significant (a substantial, or potentially substantial, adverse physical change in the environment) relative to the existing environmental conditions. Analysis of each environmental issue is organized to include the following subsections:

EXISTING SETTING – A description of the existing physical environmental conditions that in the vicinity of the proposed project. As stated under CEQA Guidelines Section 15064.7(a), existing physical environmental conditions are the conditions that “exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”

REGULATORY FRAMEWORK – An identification of applicable federal, State and local regulations.

THRESHOLDS OF SIGNIFICANCE – The criteria by which the project components are measured to determine if the proposed project would cause a substantial or potentially substantial adverse change in the existing environmental conditions.

IMPACTS – An analysis of the beneficial and adverse effects of the proposed project, including, where appropriate, assessments of the significance of potential adverse impacts relative to established thresholds. Wherever significant adverse impacts relative to existing conditions are identified, appropriate and reasonable measures are recommended to avoid or minimize impacts to the extent feasible. In addition, a discussion of whether a significant and unavoidable impact would be reduced to a less-than-significant level or remain significant and unavoidable is provided.

CUMULATIVE IMPACTS – An analysis of past, present, and ~~probably~~ probable future projects producing related or cumulative impacts. CEQA defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects.

4.1 AESTHETICS

This section addresses the potential impacts to light and glare and shadows that could result from the implementation of the proposed project. Specifically, this section discusses the potential for the proposed project to create light and glare effects on nearby uses, as well as cast shadows on shade-sensitive uses.

Light and Glare

The analysis of light impacts assesses the effects of project nighttime lighting from both point sources (i.e., illuminated signage, street light poles, and vehicle headlights) and indirect sources (i.e., reflected light) on light sensitive land uses, such as residences, healthcare facilities, and hotels. These land uses are recognized as light sensitive because they are typically occupied by persons who have expectations for privacy during evening hours and who are subject to disturbance by bright light sources.

Glare is a primarily daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light sensitive land use. The analysis of glare assesses potential impacts on glare-sensitive uses, such as residences and transportation corridors (i.e., roadways).

Most of the City of Santa Monica is built out with urban commercial and residential uses; therefore, a significant amount of ambient light from urban uses already exists. Similar to other developed urban areas, sources of light and glare include glass building façades, building signage, security lighting, streetlights, parking lot lighting, and automobile headlights.

Shade and Shadow

Shading is a common and expected occurrence in urban areas and is often considered a beneficial feature of the environment when it provides cover from excess sunlight and heat. However, shading can have an adverse impact if it substantially interferes with the enjoyment or performance of sun-related activities. While some incidental shading on shadow sensitive uses is commonly acceptable, shading that occurs over extended periods of time can be considered a detriment. Therefore, the analysis of project shading impacts assesses several shade-related factors, including local topography, the height and bulk of the proposed project's structural elements, the sensitivity of surrounding uses, the season of the year, and the duration of shadow projection.

EXISTING SETTING

The existing buildings on-site are one-story. The only permanent structure is the office located at the entrance of the mobile home park, which is one story and in a typical mid-century modern style with low-slung buildings, distinct lines and large slanted windows. The adjacent pool is surrounded by chain link fence. The remaining uses on-site are mobile homes in various styles and conditions, as well as surface parking. Many of the mobile homes on-site have been customized by the owners with exterior decoration such as awnings, plants and other foliage. The mobile home park is surrounded by one-and two-story uses to the north (along Colorado Boulevard), to the east (along Stanford Street) and to the west (along Stewart Street). In addition, the two properties to the west is under consideration for development and is anticipated to be developed with uses of a similar height and scale as that of the proposed project (maximum height of 57 feet and floor area ratio of 2.5 for the Mixed Use Creative District).

The area surrounding the project site is developed with a mix of industrial, commercial, office and residential uses. The majority of the uses along the south side of Colorado Boulevard are light industrial, commercial and/or post-production uses, while many of the uses on the north side of Colorado Boulevard are one- and two-story residential uses. A one-story (approximately 15 feet tall) storefront church, the Westside Christian Fellowship, is located immediately to the east of the project site. Along Stanford Street to the east of the site is surface parking and additional industrial uses. Residential structures, both single- and multi-family, are interspersed with industrial structures located along Colorado Avenue, as well as along Stewart Street. In general, the multi-family residences to the north of the project site across Colorado Avenue are two-stories in height with minimal setbacks (approximately five feet). The single-family residential buildings are one-story with slightly greater setbacks from the street. **Figures 4.1-1 and 4.1-2** show the project site and surrounding uses.

Light and Glare. Nearby light sensitive uses include the residences on the north side of Colorado Boulevard that face the street and could be affected by project generated light and glare. On-site structures are used for residential and office uses and do not generate substantial nighttime lighting. Sources of light in the vicinity of the project site include street lighting and lighting on the exterior of commercial buildings and mobile homes. The existing residential structures are primarily composed of non-glossy materials in a variety of styles and finishes. In addition, due to the setback nature of the project site, and the landscaping along the exterior of the site, the structures on site generate a low amount of glare toward Stewart Street and Colorado Avenue. Primary glare sources include the sun's reflection from metallic or glass surfaces on vehicles parked on the project site and in surrounding parking lots and from glass surfaces on the windows of the existing buildings.

Shadows. Facilities and operations that are typically considered sensitive to the effects of shading include solar collectors; nurseries, primarily outdoor-oriented retail uses (e.g., certain restaurants); or routinely used outdoor spaces associated with recreational, institutional (e.g., schools), or residential land uses. These uses are considered sensitive because sunlight is important to function, physical comfort, and/or commerce. The closest shadow sensitive use to the project site is the residential neighborhood north of the project site across Colorado Avenue.

REGULATORY FRAMEWORK

Aesthetics and neighborhood character are addressed in several City policies, including those contained in the City's Land Use Plan. These topics are further addressed in the City's Zoning Ordinance through a range of development standards that are applied by district, and in Section 2.0 of the Land Use and Circulation Element (LUCE) including:

Policy LU1.5 Design Comparability. *Require that new infill development be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.*

Policy LU1.6 Complete Green Streets and Open Spaces. *Encourage neighborhood streets to function as neighborhood gathering places that promote sociability and human interaction, and feature pedestrian- and bicycle-friendly design, within a rich canopy of street trees and parkway landscaping.*

Policy LU2.6 Active Spaces. *Focus new development in defined districts to create active spaces that can support diverse local-serving retail and services, walkability, arts, and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections.*



View of Village Trailer Park entrance along Colorado Avenue.



View of existing trailer homes.



View of existing trailer homes.



View of the office on the project site.

SOURCE: TAHA, 2010.



View of the Westside Christian Fellowship Church to the north of the project site.



View of industrial use to the north of the project site.



View of multi-family residences to the west of the project site.



View of industrial use adjacent to the south of the project site.

SOURCE: TAHA, 2010.

Policy LU10.1 Maximum Allowable Base Height. Establish a by-right maximum allowable building height and density for each commercial land use designation as a baseline.

Policy LU13.1 Maintain Character. Reinforce the City's distinctive natural, social, and environmental characteristics including its beachfront connections to the water, civic and cultural institutions, terrain and climate and the geographic fabric of neighborhoods and boulevards.

Policy LU13.2 Neighborhoods. Recognize, maintain and enhance existing neighborhoods as defined by their distinctive character, design and pattern of development and the high-quality environment they provide for a diversity of households.

Policy LU13.3 Districts and Boulevards. Support the City's diverse districts and boulevards and develop urban design principles, guidelines and standards tailored to each area that respect, reinforce and enhance the defining form and character of that area.

Policy LU15.2 Respect Existing Residential Scale. New Commercial or mixed-use buildings adjacent to residential districts shall be contained within a prescribed building envelope designed to maintain access to light and air and to preserve the residential character.

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

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

Policy LU15.8 Building Articulation. Building facades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.

Policy LU15.10 Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standard should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.

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

Policy LU15.12 Ground Floor Gathering Spaces. Buildings should have their primary façades located at the back side of the sidewalk or on the property line. However, to encourage a well-landscaped streetscape with places for people to gather, small landscaped, people gathering spaces are encouraged where they will attract people without interrupting the pedestrian retail experience. The intent is to have an overall ground coverage of 80 percent on each block.

Policy LU15.15 Preserve Light, Air and Privacy between Commercial and Residential Properties. Buildings that share a property line with a residentially designated property are required to be setback at least 10 feet from the abutting residential property line. Further, to assure privacy and access to sunlight and air for the adjacent residential use, all new buildings and additions to existing buildings shall not project except for permitted projections, beyond a building envelope commencing at 25 feet in height above the property line abutting the residential property or where there is an alley abutting the residentially-designated property, the centerline of the alley, and from that point, extending at a 45 degree angle from vertical towards the interior of the site.

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

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

Santa Monica Municipal Code Section 9.04.10.02.270. This section of the Santa Monica Municipal Code (SMMC) requires that all outdoor lighting associated with commercial uses be shielded and directed away from surrounding residential uses. In addition, this section of the SMMC restricts the amount of spillover lighting that may extend beyond the project site.

Santa Monica Architectural Review Board. In addition, architectural design of new projects is reviewed by the City's Architectural Review Board, whose mission is to "[a]ssure 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." Architectural Review Board approval is required for new construction, additions or remodel of an existing building, in all zones except R1.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to aesthetics if it would:

- Substantially degrade the existing visual character or quality of the site and its surroundings;
- Substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area; and/or
- Result in shadow-sensitive uses shaded by the project related structures for more than three hours between 9:00 a.m. and 3:00 p.m. PST between late October and early April (including Winter Solstice), or for more than four hours between early April and late October (including Summer Solstice).

IMPACTS

As discussed in the Initial Study (Appendix A to this EIR), the proposed project would not result in significant impacts on visual character/quality of the project site and area, scenic vistas, and scenic resources. Therefore, these issues will not be discussed further. The impacts analysis which follows is limited to potential shadow impacts and light and glare effects associated with the proposed project.

Impact AE-1 Project structures would cast shadows onto adjacent properties. However, the shadows would not be cast upon shadow-sensitive uses for durations that exceed those identified in City thresholds. Impacts would be less than significant.

The proposed project would vary from four to five stories in height and, at its maximum, would be 57 feet tall. The current uses on the site (office and trailers) are one story and a maximum of ten feet. Therefore, the proposed project would be taller and cast longer shadows than currently exist. However, shadows cast by the proposed project would be cast on shadow-sensitive uses for durations that exceed those identified in City thresholds. In general, shadows cast by project buildings would be longest during the winter solstice and would shorten through the equinox season until their shortest length during the summer.

The projected summer solstice (June 21) shadows are illustrated in **Figure 4.1-3**. During summer mornings, shadows would be cast partially northward onto Colorado Avenue. During summer afternoons, shadows would shorten through midday and would extend to the east in the afternoon. Shadows would fall onto the adjacent storefront church to the east of the project site during the summer afternoons, but this building does not have usable outdoor space and shadows would not be cast on this building for more than four hours. No shadow-sensitive uses would be shaded during the summer. As project-generated summertime shadow would not be cast on shadow-sensitive uses for greater than four hours between 9:00 a.m. and 3:00 p.m. between early April and late October, impacts would be less than significant.

The projected winter solstice (December 21) shadows are illustrated in **Figure 4.1-4**. During winter mornings, shadows would be cast northward onto residences across Colorado Avenue. However, shadows from trees (approximately 12 feet in height) lining Colorado Avenue currently shade these residential uses north of the project site. Project-generated shadows would not shade any shadow sensitive uses that are not currently shaded by adjacent trees on Colorado Avenue. Shadows would shorten and move eastward during the day. At noon, shadows would be cast eastward onto the adjacent industrial building and storefront church, as well as onto Stanford Avenue at the southern portion of the project site. As described above, the storefront church does not include usable outdoor space, while the area of Stanford Street that would be shaded includes surface parking which is not a shade-sensitive use. At 3:00 p.m., shadows would lengthen eastward and would continue to shade these uses. The duration of the shadow effect on adjacent land uses, including the residences, church and industrial buildings, would not exceed a period of three hours between 9:00 a.m. and 3:00 p.m. in the winter. As project-generated wintertime shadows would not be cast on shadow-sensitive uses for greater than three hours between 9:00 a.m. and 3:00 p.m. between late October and early April, impacts would be less than significant.

Mitigation Measures

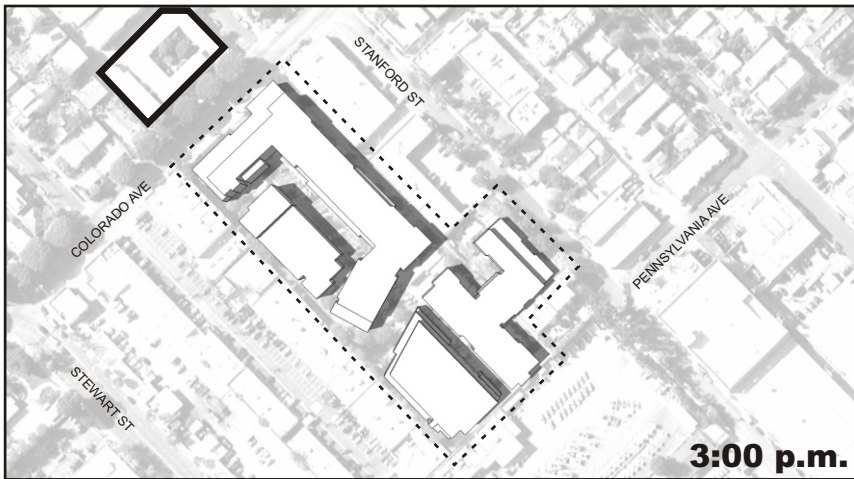
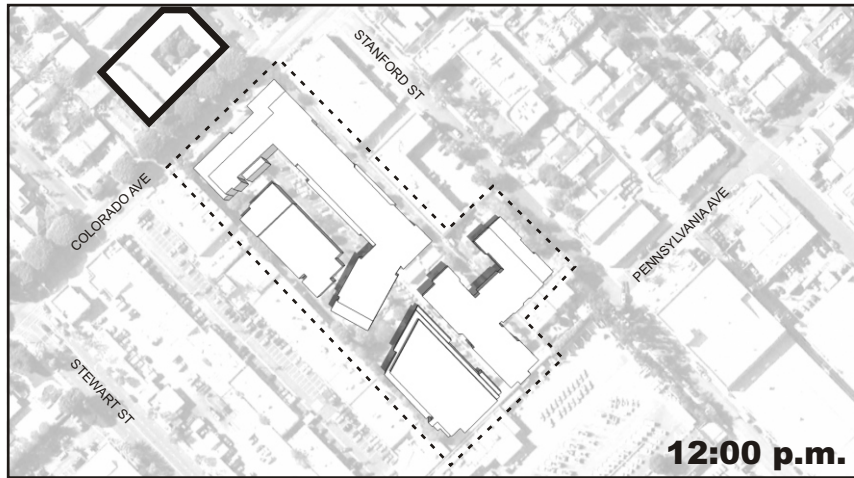
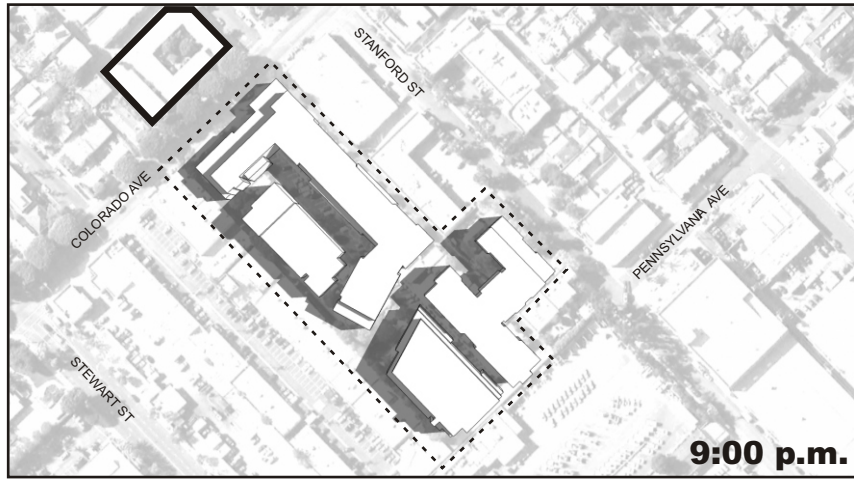
Shadow impacts would be less than significant; no mitigation measures are required.

Level of Significance After Mitigation



Impacts would be less than significant without mitigation.

Impact AE-2 The proposed project would increase the amount of lighting and glare on the project site. However, compliance with existing regulations would ensure that impacts would be less than significant.

Development of the proposed project would create new sources of light from exterior building illumination and lighted courtyard/common areas, as well as glare from reflective building surfaces or the headlights of increased vehicular traffic. These new sources of permanent light or glare could affect day or nighttime views of nearby light-sensitive uses, including the residential uses to the north of the project site across Colorado Avenue.



LEGEND:

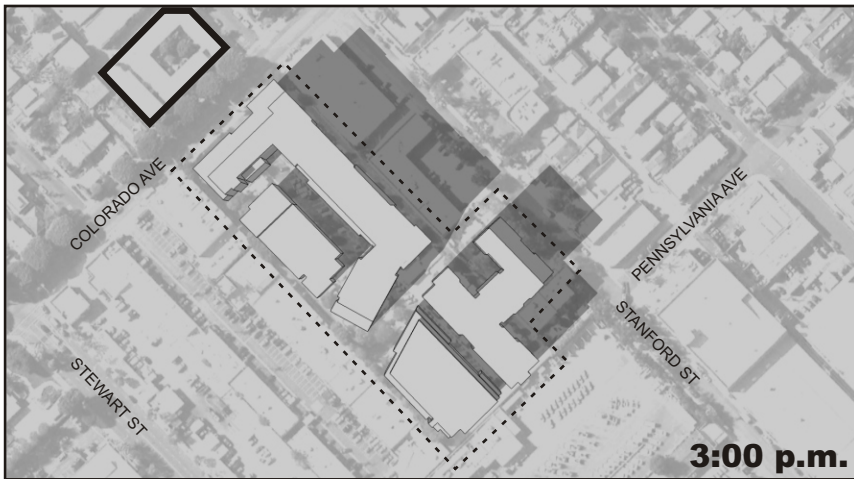
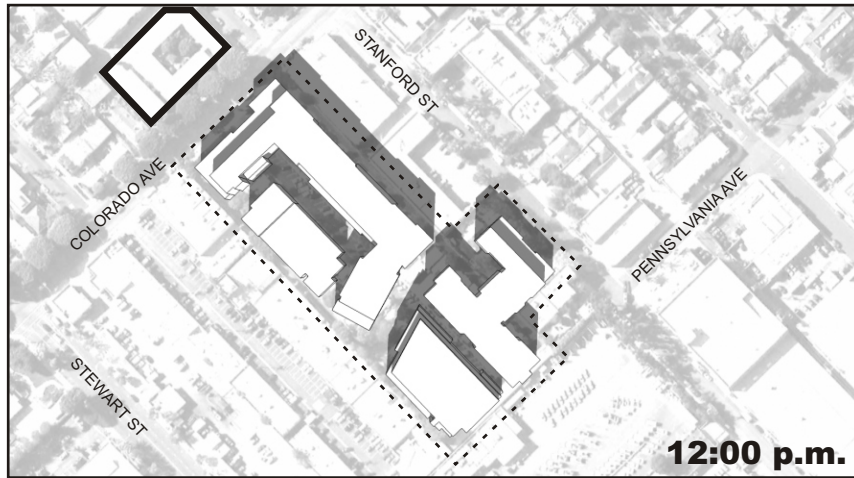
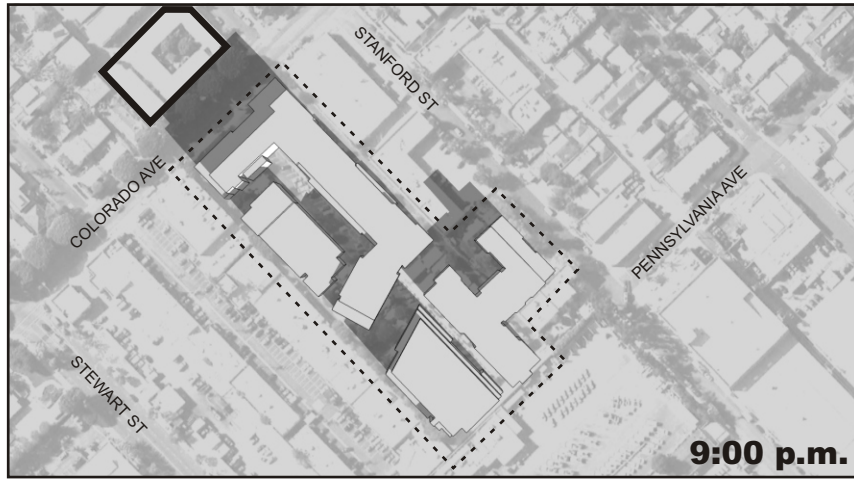
-  Project Site
-  Shade Sensitive Residential Land Uses

SOURCE: TAHA, 2011.





FIGURE 4.1-3

SUMMER SOLSTICE SHADOWS



LEGEND:

-  Project Site
-  Shade Sensitive Residential Land Uses

SOURCE: TAHA, 2011.

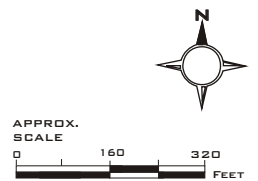


FIGURE 4.1-4

WINTER SOLSTICE SHADOWS

Nighttime lighting used during construction would consist primarily of security lights, although lighting may be used for construction activities occurring during morning or evening hours, particularly in the winter. This lighting will be temporary in nature and would not result in any substantial long-term light or glare impacts.

New permanent exterior nighttime lighting would be used to define the pedestrian realm and create a secure nighttime environment. Lighting would be used to highlight architectural elements, landscaping and courtyards and building exteriors. Security and safety lighting would be provided, as necessary, in open areas and building exteriors. Further, increased vehicular traffic resulting from the increase in new residential uses could result in more opportunities for vehicular headlights to affect existing light-sensitive uses near ingress/egress points.

Project lighting would be required to comply with Section 9.04.10.02.270 of the City's Municipal Code, which requires that all outdoor lighting associated with commercial uses be shielded and directed away from the surrounding uses to limit light spillover. Further, the proposed project would be subject to design review by the City's Architectural Review Board. The Architectural Review Board ensures that new uses are compatible with their surroundings, and therefore, do not include materials that could create new sources of substantial glare that would adversely affect daytime views. Therefore, the proposed project would not create a new source of substantial light and glare; impacts would be less than significant.

Mitigation Measures

Light and glare impacts would be less than significant; no mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. Cumulative development of buildings of greater height would generally increase shadowing throughout the City. The shadow effects of individual buildings would need to be addressed on a case-by-case basis since shadowing is dependent upon building height, massing, and location, as well as the immediately surrounding uses. Based on a review of Table 3-3, there are two related projects immediately to the west of the project site at 2848-2912 Colorado Avenue (Roberts Center project) and 2834 Colorado Avenue (Lionsgate project). Similar to the proposed project, both related projects would be subject to the LUCE's maximum Tier 3 height of 57 feet in the Mixed Use Creative District. As a result, shadows cast by these related projects would be similar to the proposed project. As previously discussed, the residential uses to the north across Colorado Avenue are already shaded by street trees on Colorado Avenue. Therefore, shadows from the proposed project and related projects would not shade sensitive uses (that are not currently shaded) for longer than four hours during the winter. Cumulative shadow impacts would be less than significant.

The proposed project in combination with other related projects in Santa Monica would increase light and glare in the immediate vicinity of the proposed project site. This increase in lighting is consistent with most typical urban environments. In addition, similar to the proposed project, related projects in the City would be subject to the City's Architectural Review Board which ensures that new uses are compatible with their surroundings and do not include materials that could create substantial light and glare. Furthermore, new lighting associated with related projects would be required to comply with Section 9.04.10.02.270 of the City's Municipal Code, which requires that all outdoor lighting associated with commercial uses be shielded and directed away from the surrounding uses to limit light spillover. Therefore, the cumulative impacts related to light and glare would be less than significant.

4.2 AIR QUALITY

This section provides an overview of existing air quality conditions and evaluates the operational air quality impacts associated with the proposed project. Supporting data and calculations are included in Appendix C to this EIR. Long-term effects related to the ongoing operation of the proposed project are discussed in this section. This analysis focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the quantity of pollutants released into the air, measured in pounds per day (ppd). “Concentrations” refer to the amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The following defines the pollutants discussed in this analysis.

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations to protect public health. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Criteria air pollutants include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($\text{PM}_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb).

In addition, there are toxic air contaminants which are “non-criteria” air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or may pose a present or potential hazard to human health.

These pollutants are discussed below.

Carbon Monoxide. CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the project site, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.¹ The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood’s ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Ozone. O_3 is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG), which includes volatile organic compounds (VOC), and nitrogen oxides (NO_x) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x , the components of O_3 , are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically

¹Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.

observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Dioxide. NO₂, like O₃, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. NO₂ also contributes to the formation of PM₁₀. High concentrations of NO₂ can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase of bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 ppm.

Sulfur Dioxide. SO₂ is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO₂ are coal and oil used in power plants and industries. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel. Sulfur oxide (SO_x) refers to any of several compounds of sulfur and oxygen, the most important of which is SO₂.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM_{2.5} and PM₁₀ represent fractions of particulate matter. Fine particulate matter, or PM_{2.5}, is roughly 1/28 the diameter of a human hair. PM_{2.5} results from fuel combustion (e.g. motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as SO₂, NO_x, and VOC. Inhalable particulate matter, or PM₁₀, is about 1/7 the thickness of a human hair. Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Lead. Pb in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern. Lead monitoring is done periodically for major stationary sources since the primary sources of atmospheric lead (leaded gasoline and lead-based paint) are no longer an issue.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans. A toxic substance released into the air is considered a toxic air contaminant (TAC). TACs are identified by State and federal agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management was designed to protect residents from the health effects of toxic substances in the air. The complete list of TACs can be found on-line at www.arb.ca.gov/toxics/id/taclist.htm.

EXISTING SETTING

Air Pollution Climatology

The project site is located within the Los Angeles County portion of the South Coast Air Basin (Basin). Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the Basin. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south (**Figure 4.2-1**).

The Basin is in an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.


The Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO₂ react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO₂ emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.).

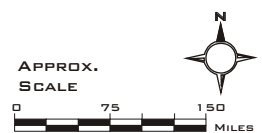
In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO emissions are produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. NO₂ concentrations are also generally higher during fall and winter days.



LEGEND:

 South Coast Air Basin

 State of California



SOURCE: California Air Resources Board, State and Local Air Monitoring Network Plan, May 2008.

FIGURE 4.2-1

SOUTH COAST AIR BASIN

Local Climate

The mountains and hills within the Basin contribute to the variation of rainfall, temperature, and winds throughout the region. As recorded at the West Los Angeles Wind Monitoring Station for the project site and its vicinity, the average wind speed is approximately 2.8 miles per hour with calm winds occurring approximately 19 percent of the time. Wind in the vicinity of the project site predominately blows from the southwest.

The annual average temperature in the vicinity of the project site is 63°F with an average high temperature of approximately 67°F and an average low temperature of approximately 55°F.² Total precipitation in the project area averages approximately 13 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately ten inches during the winter, approximately four inches during the spring, approximately two inches during the fall, and less than one inch during the summer.³

Air Monitoring Data

The South Coast Air Quality Management District (SCAQMD) monitors air quality conditions at 37 locations throughout the Basin. The project site is located in SCAQMD's Coastal Air Monitoring Subregion, which is served by the West Los Angeles VA Hospital Monitoring Station, and located approximately 1.25 miles northeast of the project site in the City of Los Angeles (**Figure 4.2-2**). Historical data from the West Los Angeles VA Hospital Monitoring Station was used to characterize existing conditions in the vicinity of the project site. Criteria pollutants monitored at the Los Angeles VA Hospital Monitoring Station include O₃, CO, and NO₂. However, the Los Angeles VA Hospital Monitoring Station does not monitor SO₂, PM_{2.5} and PM₁₀. The next most representative monitoring stations located in the project vicinity that measure the remaining criteria pollutants is the Los Angeles-North Main Street Monitoring Station in downtown Los Angeles. Historical data from these stations was used to characterize existing SO₂, PM_{2.5} and PM₁₀ levels.

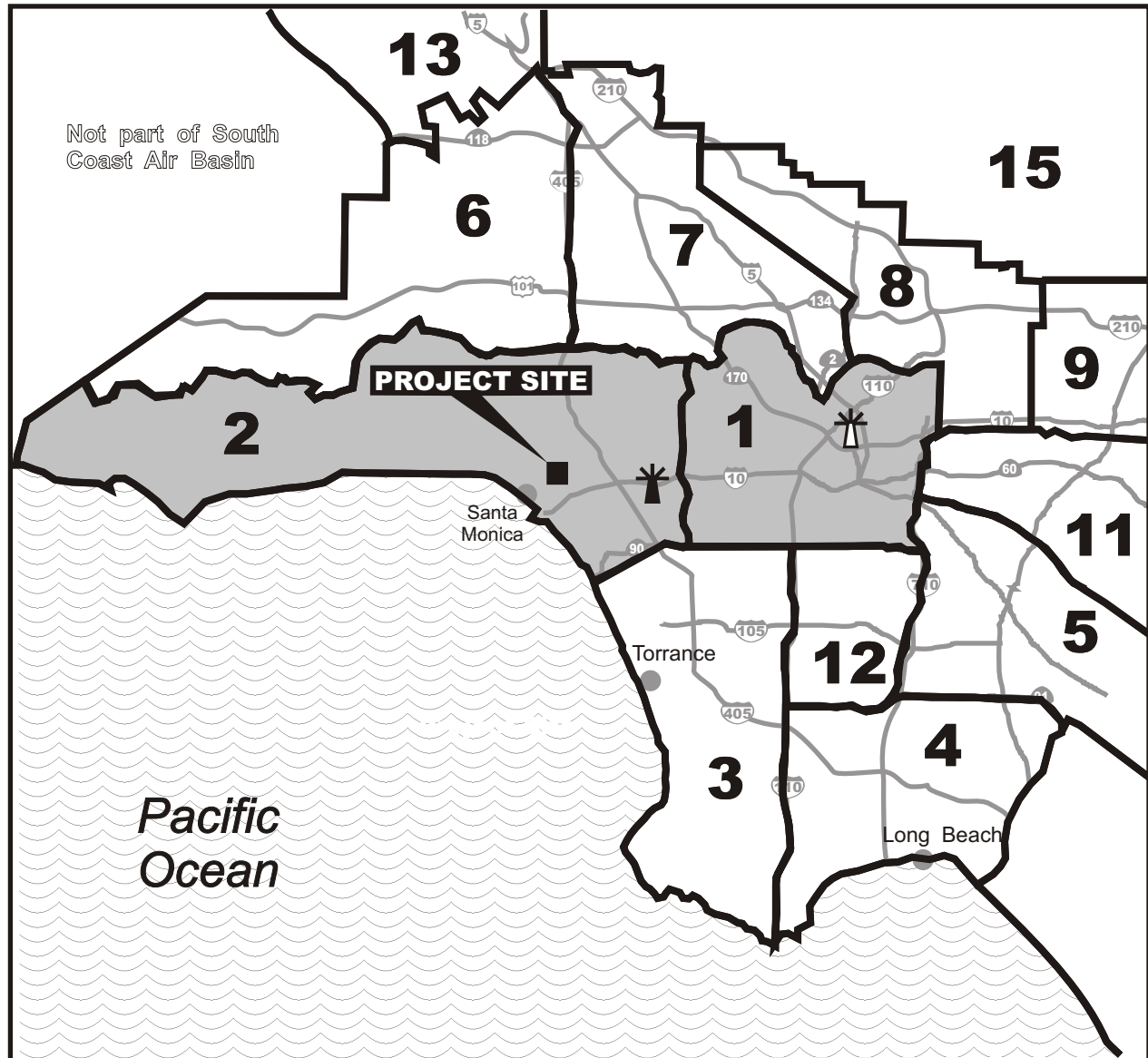
Table 4.2-1 shows pollutant levels, State standards, and the number of exceedances recorded at the West Los Angeles VA Hospital and Los Angeles-North Main Street Monitoring Station. Criteria pollutants CO, NO₂, and SO₂ did not exceed the CAAQS during the 2007 to 2010 period. The one-hour State standard for O₃ was exceeded two to six times during this period. The 24-hour State standard for PM₁₀ was exceeded two to five days while the annual State standard for PM_{2.5} was also exceeded between the 2007 to 2010 period. The selected monitoring stations recorded concentrations of O₃ were similar to that of the general forecast area and PM₁₀ was higher than the general forecast area.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The California Air Resources Board (CARB) has identified the following typical population groups who are most likely to be affected by air pollution: children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

²Western Regional Climate Center, Historical Climate Information, available at <http://www.wrcc.dri.edu>, accessed September 16, 2010.

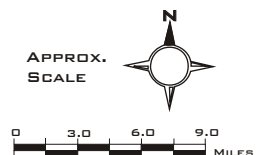
³*Ibid.*



LEGEND: Los Angeles VA Monitoring Station Los Angeles N. Main Street Monitoring Station

Air Monitoring Areas in Los Angeles County:

- | | |
|---------------------------------|--------------------------------------|
| 1. Central Los Angeles | 8. West San Gabriel Valley |
| 2. Northwest Coastal | 9. East San Gabriel Valley |
| 3. Southwest Coastal | 10. Pomona/Walnut Valley (not shown) |
| 4. South Coastal | 11. South San Gabriel Valley |
| 5. Southeast Los Angeles County | 12. South Central Los Angeles |
| 6. West San Fernando Valley | 13. Santa Clarita Valley |
| 7. East San Fernando Valley | 15. San Gabriel Mountains |



SOURCE: South Coast Air Quality Management District Air Monitoring Areas Map, 1999.

FIGURE 4.2-2

AIR MONITORING LOCATIONS

TABLE 4.2-1: 2007-2010 AMBIENT AIR QUALITY DATA IN PROJECT VICINITY					
Pollutant	Pollutant Concentration & Standards	Los Angeles VA, and Los Angeles- North Main Street Monitoring Stations			
		Number of Days Above State Standard			
		2007	2008	2009	2010
Ozone	Maximum 1-hr Concentration (ppm)	0.12	0.11	0.13	0.07
	Days > 0.09 ppm (State 1-hr standard)	2	3	6	0
Carbon Monoxide	Maximum 1-hr concentration (ppm)	3	3	2	n/a
	Days > 20 ppm (State 1-hr standard)	0	0	0	n/a
	Maximum 8-hr concentration (ppm)	1.9	2.0	1.5	1.2
Nitrogen Dioxide	Days > 9.0 ppm (State 8-hr standard)	0	0	0	0
	Maximum 1-hr Concentration (ppm)	0.08	0.09	0.08	0.06
PM ₁₀	Days > 0.18 ppm (State 1-hr standard)	0	0	0	0
	Maximum 24-hr concentration (µg/m ³)	77	66	70	77
PM _{2.5}	Days > 50 µg/m ³ (State 24-hr standard)	5	2	4	n/a
	Maximum 24-hr concentration (µg/m ³)	64	78	64	n/a
Sulfur Dioxide	Exceed State Standard (12 µg/m ³)	Yes	Yes	Yes	n/a
	Maximum 24-hr Concentration (ppm)	<.0.01	<.0.01	<.0.01	<.0.01
Sulfur Dioxide	Days > 0.04 ppm (State 24-hr standard)	0	0	0	0

SOURCE: SCAQMD, Historical Data by Year, available at <http://www.aqmd.gov/smog/historicaldata.htm>, accessed June 30, 2011.
CARB, Ambient Air Quality Monitoring Top 4 Summary, available at <http://www.arb.ca.gov/adam/topfour/topfour1.php>, accessed June 30, 2011.

As shown in **Figure 4.2-3**, sensitive receptors near the proposed project site include:

- Westside Christian Fellowship (childcare center) adjacent to the east
- Multi-family residences approximately 50 feet to the east
- Single and multi-family residences approximately 75 feet to the north
- Evergreen Community School approximately 400 feet to the west
- Santa Monica Baha'i Center approximately 500 feet to the northwest
- Little Dolphins by the Sea Preschool approximately 900 feet to the southwest
- Dreamland Preschool approximately 980 feet to the north
- Maohr Hatorah Synagogue (childcare center) approximately 1,180 feet to the north
- Lighthouse Church Preschool approximately 1,220 feet to the northwest

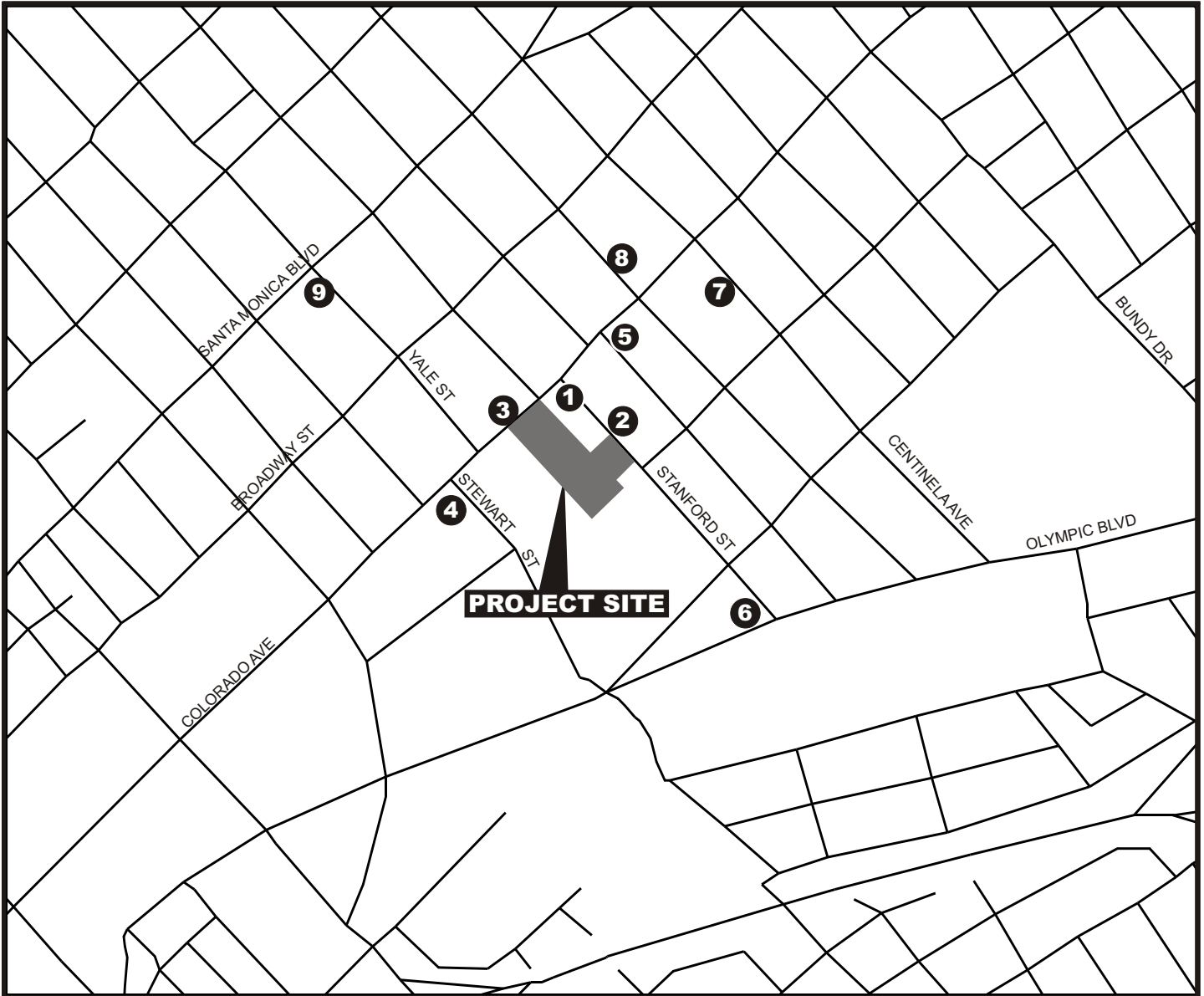
The above sensitive receptors represent the nearest sensitive receptors to the site with the potential to be impacted by air emissions. Additional sensitive receptors are located further from the project site in the surrounding community and would be less impacted by air emissions than those listed above.

REGULATORY FRAMEWORK

Federal

The Clean Air Act. The Federal Clean Air Act (CAA) governs air quality in the United States. The United States Environmental Protection Agency (USEPA) is responsible for enforcing the CAA. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The federal standards are summarized in **Table 4.2-2**. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The USEPA has classified the South Coast Air Basin as attainment for SO₂ and Pb, maintenance for CO and nonattainment for O₃, PM_{2.5}, and PM₁₀. The USEPA has not classified NO_x as attainment, nonattainment, or maintenance. An area is designated as unclassified for a pollutant if available information does not support a designation of attainment or nonattainment.



LEGEND:

 Project Site

 Sensitive Receptor Locations

- | | |
|---------------------------------------|--------------------------------|
| 1. Westside Christian Fellowship | 6. Little Dolphins by the Sea |
| 2. Multi-family residences | 7. Dreamland Preschool |
| 3. Single and multi-family residences | 8. Maohr Hatorah Synagogue |
| 4. Evergreen Community School | 9. Lighthouse Church Preschool |
| 5. Santa Monica Baha'i Center | |

SOURCE: TAHA, 2011

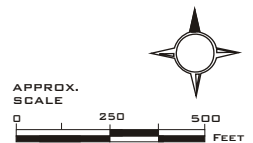


FIGURE 4.2-3

State

California Clean Air Act. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, the CCAA is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels. The CARB is responsible for meeting the State requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). CAAQS are generally more stringent than the corresponding federal NAAQS standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The State standards are summarized in **Table 4.2-2**.

TABLE 4.2-2: STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS FOR THE SOUTH COAST AIR BASIN					
Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	-- /a/	0.075 ppm (147 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Nonattainment
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	15.0 µg/m ³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (190 µg/m ³)	n/a
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	--
	3-hour	--	--	--	--
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Nonattainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Attainment

/a/ The CARB has not designated 8-hour ozone attainment status.
SOURCE: CARB, *Ambient Air Quality Standards*, September 8, 2010; CARB, *2010 State Area Designation*, March 25, 2010; UESPA, *National Area Designation*, September 3, 2010.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM_{2.5}, and PM₁₀.⁴

Local

South Coast Air Quality Management District. The 1977 Lewis Air Quality Management Act created the SCAQMD to coordinate air quality planning efforts throughout Southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in Southern California. Under the Act, renamed the Lewis-Presley Air Quality Management Act in 1988, the SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. The SCAQMD Rule Book includes air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

Air Quality Management Plan. All areas designated as nonattainment under the CCAA are required to prepare plans showing how the area would meet the State air quality standards by its attainment dates. The Air Quality Management Plan (AQMP) is the SCAQMD plan for improving regional air quality. It addresses CAA and CCAA requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the Basin must demonstrate that daily construction and operational emissions thresholds, as established by the SCAQMD, would not be exceeded. The environmental review must also demonstrate that individual projects would not increase the number or severity of existing air quality violations.

The 2007 AQMP was adopted by the SCAQMD on June 1, 2007. The 2007 AQMP proposes attainment demonstration of the federal PM_{2.5} standards through a more focused control of SO_x, directly-emitted PM_{2.5}, and NO_x supplemented with VOC by 2015. The eight-hour ozone control strategy builds upon the PM_{2.5} strategy, augmented with additional NO_x and VOC reductions to meet the standard by 2024. The 2007 AQMP also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2007 AQMP highlights the significant amount of reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the time frames allowed under the CAA.

Toxic Air Contaminants. The SCAQMD has a long and successful history of reducing air toxics and criteria emissions in the Basin. SCAQMD has an extensive control program, including traditional and innovative rules and policies. These policies can be viewed in the SCAQMD's *Air Toxics Control Plan for the Next Ten Years* (March 2000). To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study (MATES-III), conducted by the SCAQMD. The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer

⁴CARB, Area Designation Maps, available at <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed June 16, 2010.

from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-III found that the cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million.

An addendum to the plan was completed in March 2004 that included a status update on the implementation of the various mobile and stationary source strategies. Revised projections were based on accomplishments thus far and a new inventory was included.

As part of the Community Health Program, the CARB has developed the *Air Quality and Land Use Handbook*, which is intended to serve as a general reference guide for evaluating and reducing toxic air contaminant-related air pollution impacts associated with new projects that go through the land use decision-making process.⁵ Recommendations or considerations contained in the Handbook are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. Relevant recommendations include avoid siting new sensitive land uses within 500 feet of a freeway, 300 feet of a dry cleaning operation that uses perchloroethylene, or 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

In 1998, following an exhaustive ten year scientific assessment process, the CARB identified particulate matter from diesel-fueled engines as a toxic air contaminant. Subsequent to this determination, the SCAQMD initiated MATES-II. MATES-II showed that diesel particulate matter (DPM) accounts for more than 70 percent of the cancer risk. Subsequently, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.⁶

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to air quality if:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollutant concentrations; and/or
- Create objectionable odors affecting a substantial number of people.

The SCAQMD has developed specific CEQA significance thresholds to assess operational air quality impacts. The proposed project would have a significant impact related to air quality if:

Regional

- Daily operational emissions were to exceed SCAQMD regional operational emissions thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀, as presented in **Table 4.2-3**;
- The proposed project would not be consistent with the AQMP.

Localized

- Project-related traffic causes localized CO concentrations at study intersections to violate the CAAQS for either the one- or eight-hour period. The CAAQS for the one- and eight-hour periods are 20 ppm and 9.0 ppm, respectively;
- Daily operational emissions were to exceed SCAQMD localized operational emissions thresholds for NO_x, CO, PM_{2.5}, or PM₁₀.

⁵CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.

⁶SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, August 2003.

TABLE 4.2-3: SCAQMD DAILY OPERATIONAL EMISSIONS THRESHOLDS		
Criteria Pollutant	Pounds Per Day	
	Regional Significance Thresholds	Localized Significance Thresholds /a/
Volatile Organic Compounds (VOC)	55	--
Nitrogen Oxides (NO _x)	55	196
Carbon Monoxide (CO)	550	1,296
Sulfur Oxides (SO _x)	150	--
Fine Particulates (PM _{2.5})	55	1.7
Particulates (PM ₁₀)	150	2.7
/a/ Localized significance thresholds were developed for a four-acre project site (as in the case of the proposed project site) and a 25-meter receptor distance (the distance from the project site to the nearest sensitive receptor). SOURCE: SCAQMD, 2010.		

Toxic Air Contaminants

- The proposed project would generate significant emissions of TACs that exceed a risk of ten persons in one million; and/or

Odors

- The proposed project would create an odor nuisance.

IMPACTS

Methodology

The air quality analysis is consistent with the methods described in the SCAQMD *CEQA Air Quality Handbook* (1993 edition), as well as the updates to the *CEQA Air Quality Handbook*, as provided on the SCAQMD website. Regional and Localized emissions were estimated using URBEMIS2007. URBEMIS employs EMFAC2007 emission rates, which reflects the CARB's current understanding of how vehicles travel and how much they pollute.

Impact AQ-1 Operation of the proposed project would generate daily air pollutant emissions, but emissions would not exceed SCAQMD regional significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to regional operational emissions.

Long-term project emissions would be generated by mobile and area sources, such as natural gas combustion. Traffic generated by the proposed project would be the predominate source of long-term project emissions. As shown in Section 4.15 Transportation and Traffic, the proposed project would generate 2,360 net daily vehicle trips under the Approval Year Plus Project (Year 2011) Conditions and 2,278 net new daily vehicle trips under the Cumulative Plus Project (Year 2020) Conditions.⁷ Operational daily emissions associated with the proposed project under both scenarios are shown in **Table 4.2-4**. Regional daily operational emissions for both scenarios would not exceed SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀. Therefore, the proposed project would not exceed regional operational emissions thresholds; impacts would be less than significant.

⁷Fehr & Peers Transportation Consultants, Draft *Traffic Study for the Village Trailer Park Project*, October 2011.

TABLE 4.2-4: REGIONAL OPERATIONAL EMISSIONS						
	Pounds Per Day					
	VOC	NO_x	CO	SO_x	PM_{2.5}	PM₁₀
APPROVAL YEAR (YEAR 2011) CONDITIONS						
Area Source	5	1	5	<1	<1	<1
Mobile Source	2	3	23	<1	1	4
Approval Year (Year 2011) Regional Emissions	7	4	28	<1	1	5
APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS						
Area Source	22	5	10	<1	<1	<1
Mobile Source	23	33	251	<1	9	45
Approval Year Plus Project (Year 2011) Regional Emissions	45	38	261	<1	9	45
Net Regional Emissions (Approval Year (Year 2011) Plus Project)	38	34	233	<1	8	40
Regional Significance Threshold	55	55	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
CUMULATIVE BASE (YEAR 2020) CONDITIONS						
Area Source	5	1	5	<1	<1	<1
Mobile Source	1	1	12	<1	1	4
Cumulative Base (Year 2020) Regional Emissions	6	2	17	<1	1	4
CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS						
Area Source	22	5	10	<1	<1	<1
Mobile Source	12	13	129	<1	8	43
Cumulative Plus Project (Year 2020) Regional Emissions	34	18	139	<1	8	43
Net Regional Emissions (Cumulative Plus Project (Year 2020) Conditions)	28	16	122	<1	7	39
Regional Significance Threshold	55	55	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
SOURCE: TAHA, 2011.						

Mitigation Measures

Regional operational emissions would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact AQ-2 The proposed project would generate off- and on-site localized emissions. Localized emissions would be below significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to localized concentrations.

Localized air quality impacts could occur as a result of CO hotspots. The State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. An exceedance of the State CO standards at an intersection is referred to as a CO hotspot. The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios are increased by two percent at intersections with a LOS of D or worse or when an intersection decreases in LOS to E or F.

Based on the traffic analysis (see Section 4.15 Transportation and Traffic), the Centinela Avenue (West)/Olympic Boulevard intersection requires a CO hotspot analysis for the Cumulative Plus Project (Year 2020) scenario. The USEPA CAL3QHC micro-scale dispersion model was used to calculate the

CO concentrations. The one-hour proposed project CO concentration at the Centinela Avenue (West)/Olympic Boulevard intersection would be 1 ppm at worst-case sidewalk receptors. The eight-hour CO concentration would be 1.0 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Therefore, under the Cumulative Plus Project (Year 2020) scenario, the proposed project would result in a less-than-significant impact related to localized CO concentrations.

Regarding the Approval Year Plus Project (Year 2011) Conditions, the one-hour CO concentration at the Centinela Avenue (West)/Olympic Boulevard intersection would be 3 ppm at worst-case sidewalk receptors. The eight-hour CO concentration would be 1.9 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Therefore, the under the Approval Year Plus Project (Year 2011) Conditions, the proposed project would result in a less-than-significant impact related to localized CO concentrations.

The SCAQMD has developed localized significance thresholds for CO, NO_x, PM_{2.5}, and PM₁₀ emissions generated on project sites. Based on SCAQMD methodology and URBEMIS2007, on-site emissions at the project site would be generated by natural gas consumption and landscaping activities. On-site operational daily emissions associated with the proposed project, under both scenarios, are shown in **Table 4.2-5**. As shown, localized daily operational emissions for both scenarios would not exceed SCAQMD localized significance thresholds for CO, NO_x, PM_{2.5}, and PM₁₀. Therefore, the proposed project would not exceed localized operational emissions thresholds; impacts would be less than significant.

TABLE 4.2-5: LOCALIZED OPERATIONAL EMISSIONS				
	Pounds Per Day			
	NO_x	CO	PM_{2.5}	PM₁₀
APPROVAL YEAR (YEAR 2011) CONDITIONS				
Natural Gas	1	<1	0.0	0.0
Landscaping	<1	5	0.01	0.01
Approval Year (Year 2011) Localized Emissions	1	5	0.01	0.01
APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS				
Natural Gas	5	2	0.01	0.01
Landscaping	<1	8	0.03	0.03
Proposed Localized Emissions	5	10	0.04	0.04
Net Localized Emissions (Approval Year Plus Project (Year 2011))	4	5	0.03	0.03
Localized Significance Threshold	196	1,296	1.7	2.7
Exceed Threshold?	No	No	No	No
CUMULATIVE BASE (YEAR 2020) CONDITIONS				
Natural Gas	1	<1	0.0	0.0
Landscaping	<1	5	0.01	0.01
Cumulative Base (Year 2020) Localized Emissions	1	5	0.01	0.01
CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS				
Natural Gas	5	2	0.01	0.01
Landscaping	<1	8	0.03	0.03
Cumulative Plus Project (Year 2020) Localized Emissions	5	10	0.04	0.04
Net Localized Emissions (Cumulative Plus Project (Year 2020))	4	5	0.03	0.03
Localized Significance Threshold	196	1,296	1.7	2.7
Exceed Threshold?	No	No	No	No
SOURCE: TAHA, 2011.				

Mitigation Measures

Localized CO concentrations would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact AQ-3 Operation of the proposed project would generate toxic air contaminant emissions, but emissions would not exceed SCAQMD significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to toxic air contaminants.

MATES-II showed that average cancer risk in the Basin ranges from 1,100 in a million to 1,750 in a million, with an average regional risk of about 1,400 in a million. Moreover, diesel particulate matter (DPM) accounts for more than 70 percent of the cancer risk. Subsequently, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.⁸

The proposed project would develop residential, neighborhood serving retail, and creative office uses on the project site. These uses are not anticipated to generate a substantial number of daily truck trips. The primary source of potential TACs associated with project operations is diesel particulate from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). Typically, less than five heavy-duty trucks (e.g., delivery trucks) would access the project site on a daily basis, and the trucks that do visit the site would not idle on-site for extended periods of time. Based on the limited activity of these TAC sources, the proposed project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the proposed project would result in a less-than-significant impact related to mobile source TAC emissions.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). It is anticipated that the proposed project would not release substantial amounts of TACs. Therefore, the proposed project would result in a less-than-significant impact related to stationary source TAC emissions.

CARB's Air Quality and Land Use Handbook: A Community Health Perspective, April 2005 provides guidance for locating new sensitive receptors (e.g., residences) near potential sources of TAC emissions.⁹ Relevant recommendations include avoid siting new sensitive land uses within 500 feet of a freeway, 300 feet of a dry cleaning operation that uses perchloroethylene, or 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). The project site is located approximately 2,250 feet from I-10, approximately 2,250 feet from the nearest dry cleaner (Courtyard Cleaners at 2501 Colorado Avenue), and approximately 3,000 feet from the nearest gas station (Wilshire 76 at 2601 Wilshire Boulevard). The proposed project would not locate new sensitive receptors near off-site TAC sources. Therefore, the proposed project would not exceed thresholds for offsite TAC emissions. Impacts would be less than significant.

Mitigation Measures

TAC emissions impacts would be less than significant. No mitigation measures are required.

⁸SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, August 2003.

⁹California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.

Level of Impact After Mitigation

Impacts would be to be less than significant without mitigation.

Impact AQ-4 Operation of the proposed project would not generate substantial odors that would create a nuisance. Therefore, the proposed project would result in a less-than-significant impact related to odors.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project site would be developed with residential, neighborhood serving retail, and creative office uses, which are not land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors, but would be located and maintained in a manner that promotes odor control. Consequently, no adverse odor impacts are anticipated from these types of land uses. Therefore, impacts would be less than significant.

Mitigation Measures

Odor related impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact AQ-5 The proposed project would not conflict or obstruct implementation of any air quality plan. Therefore, the proposed project would result in a less-than-significant impact related to AQMP consistency.

The applicable air quality plan for the project site is the 2007 AQMP, developed by the SCAQMD and SCAG. The 2007 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Project objectives include:

- Construct the project to achieve a minimum LEED NC Certification for New Buildings and Major Renovations;
- Maximize housing opportunities near the future Expo Line station; and
- Co-locate jobs, neighborhood serving retail, office, and housing on the same site to reduce trips.

These objectives all encourage affordable residential development while minimizing criteria pollutant and greenhouse gas emissions. This is consistent with the purpose of the AQMP. In addition, the regional and localized emissions analysis demonstrated that the proposed project would not generate significant emissions according to the SCAQMD. Therefore, the proposed project would not conflict with the AQMP; impacts would be less than significant.

Mitigation Measures

Impacts related AQMP consistency would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

SCAQMD's approach to determining cumulative air quality impacts for criteria air pollutants is to first determine whether or not the proposed project would result in a significant project-level impact to regional air quality based on SCAQMD significance thresholds. If the project exceeds SCAQMD thresholds, then the lead agency needs to consider the additive effects of related projects only if the proposed project is part of an ongoing regulatory program or is contemplated in a Program EIR, and the related projects are located within an approximately one mile of the proposed project site. If there are related projects within the vicinity (one-mile radius) of the proposed project site that are part of an ongoing regulatory program or are contemplated in a Program EIR, then additive effects of the related projects should be considered. Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. As the proposed project is not part of an ongoing regulatory program, the SCAQMD recommends that project specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The proposed project would not result in significant VOC, PM_{2.5}, PM₁₀, NO_x, CO or SO_x emissions. Therefore, the proposed project would not contribute to a cumulative impact related to operational air quality.

In addition, the proposed project would not contribute to a significant cumulative impact related to localized CO hotspots. Localized CO concentrations from the proposed project and future growth were analyzed under the Cumulative Plus Project (Year 2020) Conditions. As indicated in **Table 4.2-5**, localized CO concentrations at the study intersections would not exceed CAAQS for either the one- or eight-hour periods. Cumulative impacts associated with CO hotspots would be less than significant.

With regard to cumulative impacts associated with TAC emissions, operation of the proposed project would not result in any new sources of TACs, and thus would not contribute to a cumulative impact. Furthermore, the SCAQMD has adopted regulations (e.g., Regulation XIV) that specifically address TAC emissions. Compliance with such rules on a case-by-case basis for related projects will reduce TAC emissions in the Basin. As such, cumulative TAC emissions would be less than significant.

Regarding cumulative odor impacts, the proposed project and related projects identified in Table 3-3 in Chapter 3.0 Project Description consist of primarily residential, office, post-production, retail, and restaurant uses. These land uses do not generate substantial odors. Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement best available control technology to limit potential objectionable odor impacts to a less than significant level. Therefore, cumulative odor impacts would be less than significant.

4.3 BIOLOGICAL RESOURCES

This section describes existing vegetation, landscaping, and potential biological resources within the project site and evaluates potential project-related impacts to those resources. The analysis includes an assessment of potential impacts to migratory birds and locally protected trees. This section relies upon information published in federal, State, and local documents. In addition, this section was prepared utilizing a tree inventory and memo prepared by certified arborist Cy Carlberg titled *Village Trailer Park, 2930 Colorado Avenue, Santa Monica, California*, dated September 2011, which is included in Appendix D of this EIR.

EXISTING SETTING

The project site contains 109 spaces for mobile homes. The empty mobile home lots have a concrete pad and ornamental landscape around it as shown in **Figure 4.3-1**.

Based on the aforementioned tree report, there are 107 trees on the project site, three trees that straddle the property line between the project site and property to the west, and eight trees within the City right-of-way. The trees located on the project site comprise 27 different tree species, only one of which is native to California (coast redwood). The majority of the trees are volunteer specimens (grown inadvertently on its own from seed dispersion and/or other methods), shrub plantings, or house plants that were placed outdoors years ago. These seedlings, shrubs, and house plants have developed into trees and constitute a large part of the tree canopy at the project site.

The most common tree species include jacarandas, Brazilian pepper trees, and weeping figs. As indicated in the tree report, the jacaranda trees have been topped, and thus, may be subject to limb failure due to wood decay at the location of the topping cuts. In addition, the Brazilian pepper trees are considered an invasive species. The weeping figs were likely former houseplants that were relocated to the outdoors. **Table 4.3-1**, below, shows the species of trees on the project site and **Table 4.3-2** shows the species of trees within the City right-of-way. None of the trees on the project site are considered rare or endangered.

No nesting activity was observed during the time of the tree survey. However, existing trees could be used by migratory birds during the nesting season (typically March 1st through August 30th). Migratory birds that are common to the area include the northern mockingbird (*Mimus polyglottos*), Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), and the snowy plover (*Charadrius alexandrinus*). Anecdotal information indicates that hawks and falcons forage in urban areas for avian prey species at backyard feeders and parks, but nest in native areas outside the City (such as the Santa Monica Mountains).¹

Although many of these trees are mature, none of them are listed as Landmark trees by the City of Santa Monica. A variety of ornamental shrubs and flowers are also planted on the project site. The project site does not contain any natural water features. The project site does not serve as a corridor for wildlife or fish migration.

¹City of Santa Monica Land Use and Circulation Element Final Environmental Impact Report, April 2010.



SOURCE: TAHA, 2010.

FIGURE 4.3-1

EXISTING LANDSCAPING

TABLE 4.3.1: SUMMARY OF ON-SITE TREE SPECIES		
Common Name	Scientific Name	Quantity
American arborvitae	<i>Thuja occidentalis</i>	1
Avocado	<i>Persea americana</i>	1
Bald cypress	<i>Taxodium distichum</i>	3
Blackwood acacia	<i>Acacia melanoxylon</i>	3
Brazilian pepper	<i>Schinus terebinthifolius</i>	17
Camphor tree	<i>Cinnamomum camphora</i>	1
Carrotwood	<i>Cupaniopsis anacardioides</i>	1
Coast redwood	<i>Sequoia sempervirens</i>	1
Eugenia	<i>Syzigium paniculatum</i>	7
Hollywood juniper	<i>Juniperus chinensis 'Torulosa'</i>	2
Incense cedar	<i>Libocedrus decurrens</i>	1
Indian laurel fig	<i>Ficus microcarpa</i>	2
Italian cypress	<i>Cupressus sempervirens</i>	7
Jacaranda	<i>Jacaranda mimosifolia</i>	27
Lemon tree	<i>Citrus limon</i>	2
Loquat	<i>Eriobotrya japonica</i>	1
Mexican fan palm	<i>Washingtonia robusta</i>	2
Mock orange	<i>Pittosporum tobira</i>	1
Norfolk Island pine	<i>Araucaria heterophylla</i>	1
Queen palm	<i>Syagrus romanzoffianum</i>	2
Rubber tree	<i>Ficus elastica</i>	2
Spanish dagger	<i>Yucca gloriosa</i>	1
Tupidanthus	<i>Tupidanthus calyptratus</i>	4
Umbrella tree	<i>Schefflera actinophylla</i>	1
Unkown	<i>Unknown</i>	2
Victorian box	<i>Pittosporum undulatum</i>	1
Weeping fig	<i>Ficus benjamina</i>	16
Total On-Property Trees		110
SOURCE: Cy Carlberg. (2011). <i>Village Trailer Park, 2930 Colorado Avenue, Santa Monica, California.</i>		

TABLE 4.3.2: CITY OF SANTA MONICA RIGHT-OF-WAY TREES		
Common Name	Scientific Name	Quantity
Carrotwood (located on Colorado Avenue)	<i>Cupaniopsis anacardioides</i>	4
Jacaranda (located on Stanford Street)	<i>Jacaranda mimosifolia</i>	2
She-oak (located on Stanford Street)	<i>Casuarina cunninghamiana</i>	2
Total right-of-way trees		8
SOURCE: Cy Carlberg. (2011). <i>Village Trailer Park, 2930 Colorado Avenue, Santa Monica, California.</i>		

REGULATORY FRAMEWORK

Federal

Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA) (16 USC Sections 703–711) includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds, under the authority of the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). The MBTA protects over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many common species.

State

California Fish and Game Code Sections 3500 through 3705, Migratory Bird Protection. Sections 3500 through 3705 of the CDFG Code regulate the taking of migratory birds and their nests. These codes prohibit the taking of nesting birds, their nests, eggs, or any portion thereof during the nesting season. Typically, the breeding/nesting season is from March 1st through August 30th. Depending on each year's seasonal factors, the breeding season can start earlier and/or end later.

The MBTA decrees that all migratory birds and their parts (including eggs, nests and feathers) are fully protected. Under the act, taking, killing, or possessing migratory birds is unlawful. Projects that are likely to result in the taking of birds protected under the MBTA will require the issuance of take permits from the USFWS. Activities that would require such a permit would include, but not be limited to, the destruction of migratory bird nesting habitat during the nesting season when eggs or young are likely to be present. Under the act, surveys are required to determine if nests will be disturbed and, if so, a buffer area with a specified radius around the nest would be established so that no disturbance or intrusion would be allowed until the young had fledged and left the nest. If not otherwise specified in the permit, the size of the buffer area would vary with species and local circumstances (e.g. presence of busy roads), and would be based on the professional judgment of the monitoring biologist.

Local

City of Santa Monica Municipal Code 7.40. Section 7.40 of the Santa Monica Municipal Code establishes the Santa Monica Tree Code, which requires that any tree, shrub or plant in the City's public right-of-ways be protected during the erection, repair, alteration or removal of any building, house, or structure in the City so as to prevent injury to said tree, shrub or plant.²

Tree removal within City right of ways must comply with the *City's Guide to Designing for Mandatory Tree Protection*. This document establishes specific measures that must be undertaken for construction projects to minimize damage to City trees. Specifically, during construction, Tree Protection Zones must be established around all City trees prior to the commencement of construction activities. In addition, City trees that are replaced or added must be selected from the City's currently approved Street Tree List. This list details existing dominant species and recommended replacement species determined to-date for street segments Citywide. As indicated below, the City has recently prepared an updated draft Designated Street Tree list.

The City of Santa Monica has no municipal code requirements related to the protection and/or preservation of trees on private property.

City of Santa Monica ~~Community Forest~~ Urban Forest Master Plan. In 2000, the City adopted the Community Forest Management Plan, which sets forth objectives and policies with regard to the management of the City's Community Forest. The plan's objectives including enhancing the community forest, promoting the conservation of tree resources, maintaining trees in a healthy condition, ensuring the optimum planting of trees, and educating the public.

²City of Santa Monica Municipal Code 7.40.160, prior code § 7615; amended by Ord. No. 1242CCS, adopted January 2, 1982.

The City ~~is currently drafting~~ adopted a long range Urban Forest Master Plan on December 13, 2011, which updates and expands upon the Community Forest Management Plan. The plan ~~will~~ provides long-term guidance for the preservation and enhancement of the City's urban forest. The plan ~~will~~ includes guiding principles, goals, and management strategies for addressing the ~~the~~ needs of the urban forests. As part of the Urban Forest Master Plan, the City has released a draft Designated Street Tree list, which establishes the recommended tree species for each block of the City. The City's Urban Forest Master Plan states that the best option for existing trees is for them to remain in their existing location. However, relocation of public trees may be considered as a part of new city public improvement projects. All tree relocations will be subject to review and approval by the City Council upon completion of the project's community design and commission review processes.

The City will incorporate existing healthy trees in the design of city public improvement projects wherever consistent with the project's design objectives and after a community design process where proposed tree relocations and removals are identified. Where tree removal is included as part of the proposed design, the City will provide incentives for relocation of trees that have good survival prospects. The Urban Forest Master Plan also sets out criteria that must be met for street tree removal and the process to request street tree removal including appeals and public notification.

City of Santa Monica Landmark Trees. As part of promoting the conservation of the Community Forest, trees that possess exceptional characteristics may be designated by the Landmarks Commission as a Landmark Tree. These trees are typically protected from removal unless they become diseased or pose a threat to public safety. Realizing that in some cases exceptional private trees may qualify for Landmark status, the Landmarks Commission at their discretion may bestow this designation on private trees as well.

Within the Community Forest, there are trees that have special significance due to at least one or more of the following factors may qualify for Landmark Status.

- The tree's age and association with a historic building or district gives the tree historical significance.
- The tree represents a specimen that is particularly rare in the Los Angeles basin and is of considerable size and age.
- The tree possesses unique characteristics or special horticultural significance.
- The tree is of a significant size and/or makes a significant and outstanding aesthetic impact to its setting and is an exceptional specimen in good condition and health.

These factors correlate to the Landmark Designation Criteria contained in SMMC 9.36.100. The Landmarks Commission may approve the landmark designation of a structure, improvement, natural feature or an object if it finds that it meets one or more of the following criteria:

- It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.
- It has aesthetic or artistic interest or value, or other noteworthy interest or value.
- It is identified with historic personages or with important events in local, state or national history.
- It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.
- It is a significant or a representative example of the work or product of a notable builder, designer or architect.
- It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

There are four trees in the City of Santa Monica that are designated as Landmark trees. No Landmark trees are located within the project site.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to biological resources if it would:

- 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 Game or U.S. Fish and Wildlife Service;
- 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 US Fish and Wildlife Service;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands); and/or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

IMPACTS

As discussed in the Initial Study (Appendix A of this EIR), the proposed project does not have the potential to affect sensitive, or special status species, riparian habitat, as the project site is currently developed with a mobile home park and ancillary uses. No suitable habitat exists on-site. The project also would not affect a federally protected wetland, as no wetlands exist on or near the project site. In addition, the project would not conflict with any adopted Habitat Conservation Plan, as the area is not subject to any such applicable plans. Therefore, these issues will not be addressed further.

Impact BR-1 The proposed project would remove mature trees that could potentially serve as nesting sites for migratory birds. However, Mitigation Measure BR1 would reduce impacts to less than significant.

Construction of the proposed project would require the removal of the majority of the existing trees from the site. Some of the trees that would be removed may be used for nesting by migratory birds. Migratory bird species likely to occur on the project site include raptors, such as hawks and falcons. This may conflict with State and federal laws protecting native birds and active nests, including the federal Migratory Bird Treaty Act and other similar laws in the CDFG Code. Although the loss of the existing on-site trees for potential migratory birds is not critical to the survival of these species, tree removal could possibly impact nesting sites for other bird species including some birds which are considered possible prey species for raptors. Therefore, without mitigation, the proposed project would potentially result in a significant impact related to migratory birds.

Mitigation Measures

The following mitigation measure would reduce impacts related to nesting birds.

BR1 Prior to removal, trees on the project site will be inspected for bird nests by a qualified biologist. Inspection of the trees shall occur prior to the typical breeding/nesting season (March 1st through August 30th). If nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established, within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has

failed. If no nesting is observed, trees to be removed from within the project site shall be netted to prevent birds from inhabiting the trees prior to removal and construction.

Level of Impact After Mitigation

With implementation of Mitigation Measure **BR1**, impacts related to biological resources would be reduced to less than significant.

Impact BR-2 The majority of the trees currently on the site would be removed as part of the proposed project. Some trees may be preserved on the project site and/or relocated on-site or off-site. However, these trees are not locally-protected Landmark trees. Tree removal and/or replacement within City right-of-ways would be conducted in accordance with the City's Tree Code and the *City's Guide to Designing for Mandatory Tree Protection*. Therefore, impacts would be less than significant.

As discussed above, there are 107 trees within the project site and three trees that are located on the property line between the project site and adjacent property to the west. The majority of the trees currently on the site would be removed as part of the proposed project. Some trees may be preserved on the project site and/or relocated on-site or offsite. None of the trees on-site are locally-protected Landmark trees. As discussed in the tree report, Brazilian pepper trees are considered an invasive species and the Eugenia trees are infested with a leaf sucking insect. In addition, none of the trees are native to California, with the exception of the coast redwood. The coast redwood is considered to be of medium value. Based on the arborist assessment, this tree still exhibits good vigor but will likely languish as it ages. Because its roots are intermixed with an adjacent jacaranda, the coast redwood was not considered viable for relocation.

Protection, replacement, and/or the removal of trees within the City of Santa Monica right-of-way would be conducted in accordance with the City's Tree Code. Therefore, impacts related to a local ordinance protecting biological resources (such as trees) would be less than significant.

Mitigation Measures

Impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Due to the site-specific nature of biological impacts (i.e., tree removal, wetlands, etc.), biological impacts are typically assessed on a site-specific basis, rather than on a cumulative basis. Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. As with the proposed project, related projects would be subject to the same local, regional, State and federal regulations pertaining to biological resources, including the Migratory Bird Treaty Act and the City's Tree Code. Therefore, with adherence to such regulations, the proposed project would not contribute to a cumulative impact related to biological resources.

4.4 CONSTRUCTION EFFECTS

This section analyzes the proposed project's temporary construction effects. Construction effects include air quality, noise, vibration, and traffic effects which would occur as a result of the proposed project's construction activities. Construction activities would include demolition, excavation, building construction, utilities/infrastructure improvements, paving and landscaping.

EXISTING SETTING

Air Quality

The project site is located in the South Coast Air Basin (the Basin). Air quality in the Basin is regulated by the South Coast Air Quality Management District (SCAQMD). Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The California Air Resources Board (CARB) has identified the following typical groups who are most likely to be affected by air pollution: children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors near the project site include:

- Westside Christian Fellowship (childcare center) adjacent to the east
- Multi-family residences approximately 50 feet to the east
- Single- and multi-family residences approximately 75 feet to the north
- Evergreen Community School approximately 400 feet to the west
- Santa Monica Baha'I Center approximately 500 feet to the northwest
- Little Dolphins by the Sea Preschool approximately 900 feet to the southwest
- Dreamland Preschool approximately 980 feet to the north
- Maohr Hatorah Synagogue (childcare center) approximately 1,180 feet to the north
- Lighthouse Church Preschool approximately 1,220 feet to the northwest

Refer to Section 4.2 Air Quality, for a more detailed description of the existing Air Quality setting.

Noise

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. This analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}). L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Sound measurements were taken using a SoundPro DL Sound Level Meter between 11:00 a.m. and 2:00 p.m. on September 21, 2010 to determine existing ambient daytime off-peak noise levels in the project vicinity. These readings were used to establish existing ambient noise conditions and to provide a baseline for evaluating noise impacts. As shown in **Table 4.4-1**, existing ambient sound levels range between 49.6 and 61.9 dBA L_{eq} . A 24-hour noise measurement was also taken on the project site.

TABLE 4.4-1: EXISTING NOISE LEVELS		
Noise Monitoring Location /a/	Distance from Project Site (feet)	Sound Level (dBA, L_{eq})
Between Westside Christian Fellowship and Multi-Family Residences Across Stanford Street	Adjacent	49.6
Single and Multi-Family Residences Across Colorado Avenue	Adjacent	58.1
Evergreen Community School	400	60.1
Santa Monica Baha'i Center	500	60.1
Little Dolphins by the Sea Preschool	900	54.8
Dreamland Preschool	980	61.9
Maohr Hatorah Synagogue	1,180	45.5
Lighthouse Church Preschool	1,220	55.7
/a/ Refer to Figure 4.10-2 in Section 4.10 Noise for a map of monitoring locations. SOURCE: TAHA, 2011.		

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Noise sensitive receptors near the project site include the previous listed air quality sensitive receptors.

Refer to Section 4.12 Noise, for a more detailed description of the existing Noise setting.

Traffic

Regional access to the project site is provided by the Santa Monica Freeway (I-10), the San Diego Freeway (I-405), Pacific Coast Highway, and Lincoln Boulevard (SR-1). I-10 is approximately 0.5 miles south of the project site and provides east-west access across the City of Santa Monica to the City of Los Angeles to the east. From the I-10, access to the project site is available via interchanges at Bundy Drive, Centinela Avenue, Cloverfield Boulevard, and 20th Street. I-405 is approximately two miles east of the project site and provides north-south access throughout the City of Los Angeles and connects the Westside with the San Fernando Valley to the north and South Bay area to the south. From I-405, access to the project site is available either via I-10 or via the Santa Monica Boulevard and Olympic Boulevard/Pico Boulevard ramps. The Pacific Coast Highway is approximately two miles west of the project site and provides north-south coastal access. From the Pacific Coast Highway, access to the project site is available either via I-10 or Olympic Boulevard. Lincoln Boulevard is approximately 1.5 miles west of the project site and provides north-south access across the City of Santa Monica and City of Los Angeles and terminates at the Los Angeles International Airport. From Lincoln Boulevard, access to the project site is available through arterial and collector streets such as Olympic Boulevard and Colorado Avenue.

Refer to Section 4.15, Traffic and Transportation, for a more detailed description of the existing traffic conditions.

REGULATORY FRAMEWORK

Air Quality

The Federal Clean Air Act (CAA) governs air quality in the United States. As required by the CAA, National Ambient Air Quality Standards (NAAQS) have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, the CCAA is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels. The CARB is responsible for meeting the State requirements of the CAA, administering

the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. The SCAQMD Rule Book includes air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. For example, it is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with Rule 403 reduces PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.¹

Noise and Ground-Borne Vibration

The City of Santa Monica Noise Ordinance (SMMC Chapter 4.12) prohibits any “unnecessary, excessive, or annoying noise” in the City. The SMMC (§4.12.110) restricts construction activity to between 8:00 a.m. and 6:00 p.m. Monday through Friday, 9:00 a.m. and 5:00 p.m. on Saturday, and does not allow construction activity on Sundays or major national holidays. As part of this ordinance, properties within the City are assigned a noise zone based on their corresponding zoning district. Residential districts are designated as Noise Zone I; commercial districts are designated Noise Zone II; and manufacturing or industrial districts are designated as Noise Zone III. The project site is located within a residential zone and is subject to Zone I noise standards. **Table 4.4-2** shows the allowable noise levels and corresponding times of day for each of the three identified noise zones.

TABLE 4.4-2: SMMC EXTERIOR NOISE STANDARDS			
Noise Zone	Time Interval	Allowable L _{eq}	
		15-Minute Continuous Measurement Period	5-Minute Continuous Measurement Period
I	Monday – Friday 10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	50 dBA 60 dBA	55 dBA 65 dBA
	Saturday and Sunday 10:00 p.m. – 8:00 a.m. 8:00 a.m. – 10:00 p.m.	50 dBA 60 dBA	55 dBA 65 dBA
II	All Days of the Week 10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	60 dBA 65 dBA	65 dBA 70 dBA
III	Anytime	70 dBA	70 dBA

SOURCE: City of Santa Monica Municipal Code, §4.12.060(a).

In any urban area, residents are periodically exposed to construction noise during normal working hours on weekdays and for more abbreviated periods on Saturdays (and sometimes Sundays). Per the City’s Noise Ordinance, construction activities are generally permissible only between 8:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays. During these hours, the City permits construction noise up to 20 dBA in excess of normally acceptable levels, or up to 40 dBA above normally acceptable levels for any “maximum instantaneous” noise event. Construction noise events beyond these heightened levels are only permitted between 10:00 a.m. and 3:00 p.m. on weekdays. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does

¹SCAQMD, Overview – Fugitive Dust Mitigation Measure Tables, April 2007.

not consider construction activities consistent with these timing limits to constitute significant environmental effects.

Ground-borne vibration levels that exceed 85 VdB are considered to be a human annoyance.² This is the vibration level that is considered by the Federal Transit Administration to be acceptable only if there are an infrequent number of events per day. In terms of ground-borne vibration impacts on structures, ground-borne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings.

Traffic

There are no federal, State, or local regulations applicable to construction traffic.

THRESHOLDS OF SIGNIFICANCE

Construction of the proposed project would result in significant impacts if it would:

- Have considerable construction-period impacts due to the scope, or location of construction activities.

Air Quality

The SCAQMD has developed specific CEQA significance thresholds to assess construction air quality impacts. The proposed project would have a significant construction air quality impact if:

- Daily construction emissions were to exceed SCAQMD regional and localized construction emissions thresholds for volatile organic compounds (VOC), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate 2.5 microns or less in diameter (PM_{2.5}), or particulate 10 microns or less in diameter (PM₁₀), as presented in **Table 4.4-3**;
- The proposed project would generate toxic air contaminant (TAC) emissions that generate a health risk that exceeds ten persons in one million; and/or
- The proposed project would create an odor nuisance.

TABLE 4.4-3: SCAQMD DAILY CONSTRUCTION EMISSIONS THRESHOLDS		
Criteria Pollutant	Pounds Per Day	
	Regional Emissions	Localized Emissions/a/
Volatile Organic Compounds	75	--
Nitrogen Oxides	100	196
Carbon Monoxide	550	1,296
Sulfur Oxides	150	--
Fine Particulates	55	5
Particulates	150	11
<small>/a/ Localized significance thresholds were developed for a four-acre project site and a 25-meter receptor distance. Four acres is the approximate size of the project site. Although sensitive receptors are located within 25 meters (82 feet) of the project site, 25 meters is the shortest distance between source and receptor that can be analyzed under the SCAQMD localized construction guidance. SOURCE: SCAQMD, 2011.</small>		

²Final Environmental Impact Report, City of Santa Monica Land Use and Circulation Element, April 2010.

Noise

Based on the SMMC, the proposed project would have a significant construction noise impact if:

- Construction noise levels would be 20 dBA greater than the City's noise standards, or up to 40 dBA above the City's noise standards for any "maximum instantaneous" noise event, unless these activities occur between 10:00 a.m. and 3:00 p.m. on weekdays.

The CEQA Guidelines also do not define the levels at which groundborne vibration or groundborne noise is considered excessive. For the purposes of this analysis, the proposed project would result in a significant construction vibration impact if:

- The proposed project would expose people to vibration levels that exceed 85 VdB; and/or
- The proposed project would expose extremely fragile buildings to vibration levels that exceed 95 VdB; and/or
- The proposed project would expose fragile buildings to vibration levels that exceed 100 VdB.

Traffic and Transportation

The proposed project would have a significant construction traffic impact if:

- Construction activity would interfere with the existing traffic flow, cause unsafe conditions, or would introduce truck traffic through a residential area.

IMPACTS

Impact CON-1 Daily regional construction emissions would exceed the SCAQMD significance threshold for volatile organic compounds without mitigation. However, Mitigation Measures CON1 through CON3 would reduce impacts to less than significant.

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions (PM_{2.5} and PM₁₀) would primarily result from demolition and site preparation (e.g., excavation) activities. NO_x and CO emissions would primarily result from the use of construction equipment and SO_x emissions would result from truck trips. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOC. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction emissions were calculated using the URBEMIS2007 model. URBEMIS (Urban Emissions Model) is a computer program used to estimate construction and operational emissions associated with land development projects in California. Specific construction assumptions for each phase include:

Demolition

- Duration: 3 months
- Daily Building Volume Demolished: 8,800 cubic feet
- Daily On-Road Truck Travel: 122 vehicle miles traveled (VMT)

Site Preparation

- Duration: 6 months
- Maximum Daily Acreage Disturbed: 3.85
- Maximum Depth of Excavation: ~~34~~ 26 feet³
- Exported Soil: Approximately ~~79,000~~ 146,813 cubic yards.
- Imported Soil: 0 cubic yards
- Daily On-Road Truck Travel: ~~4,278~~ 1,854 VMT

Trenching

- Duration: 3 months

Paving

- Duration: 1 month
- Acres to be Paved: 0.4

Building

- Duration: 18 months
- No Pile Driving

Coating

- Duration: 2 months

Table 4.4-4 shows the estimated daily emissions of VOC, NO_x, CO, SO_x, PM_{2.5}, and PM₁₀ associated with each construction phase. As shown, daily emissions of VOC, NO_x, CO, SO_x, PM_{2.5}, and PM₁₀ would not exceed SCAQMD regional thresholds. Daily construction emissions of VOC would exceed the SCAQMD regional thresholds due to architectural coatings. Therefore, without mitigation, the proposed project would result in a significant impact related to regional construction emissions.

³While the maximum depth of excavation is estimated to be approximately 26 feet below ground surface (bgs), the construction air quality analysis within this Draft EIR estimates a conservative depth and excavation of approximately 34 feet bgs.

TABLE 4.4-4: ESTIMATED DAILY CONSTRUCTION EMISSIONS - UNMITIGATED						
Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5} /a/	PM ₁₀ /a/
DEMOLITION						
On-Site Emissions	3	21	13	<1	2	5
Off-Site Emissions	<1	2	2	<1	<1	<1
Total Emissions	3	23	15	<1	2	5
SITE PREPARATION						
On-Site Emissions	4	27	17	<1	10	41
Off-Site Emissions	2 <u>3</u>	29 <u>36</u>	9 <u>15</u>	<1	1	1
Total Emissions	6 <u>7</u>	46 <u>63</u>	26 <u>32</u>	<1	11	42
TRENCHING						
On-Site Emissions	2	13	8	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	13	9	<1	1	1
PAVING						
On-Site Emissions	1	9	7	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	9	8	<1	1	1
BUILDING						
On-Site Emissions	2	12	10	<1	1	1
Off-Site Emissions	2	8	32	<1	<1	1
Total Emissions	4	20	42	<1	1	2
COATING						
On-Site Emissions	89	<1	<1	<1	<1	<1
Off-Site Emissions	<1	<1	2	<1	<1	<1
Total Emissions	89	<1	2	<1	<1	<1
Maximum Regional Total	89	46 <u>63</u>	42	<1	11	42
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	Yes	No	No	No	No	No
Maximum On-Site Total	--	27	17	--	10	41
Localized Significance Threshold /b/	-- /c/	196	1,296	-- /c/	5	11
Exceed Threshold?	-- /c/	No	No	-- /c/	Yes	Yes
/a/ URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.						
/b/ Assumed a four-acre project site and a 25-meter (82-foot) receptor distance.						
/c/ SCAQMD has not developed localized significance methodology for VOC or SO _x .						
SOURCE: TAHA, 2011.						

Mitigation Measures

CON1 The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter^{4 5}).

~~**CON2** The construction contractor shall utilize materials that do not require painting when such materials are available.~~

~~**CON3** The construction contractor shall use pre-painted construction materials when such materials are available.~~

^{4 5} SCAQMD, *Super-Compliant Architectural Coatings Manufacturers and Industrial Maintenance Coatings List*, <http://www.aqmd.gov/prdas/Coatings/super-compliantlist.htm>.

Level of Impact After Mitigation

Impacts related to regional air emissions of VOC were determined to be significant without mitigation. The SCAQMD has identified super-compliant architectural coatings that have a VOC standard of less than ten grams per liter. Mitigation Measure **CON1** would reduce project-related architectural coating emissions by 96 percent. ~~Mitigation Measures **CON2** and **CON3** would also reduce VOC emissions.~~ As shown in **Table 4.4-5**, Mitigation Measures **CON1** through **CON3** would reduce regional VOC emissions to below the SCAQMD threshold.

TABLE 4.4-5: ESTIMATED DAILY CONSTRUCTION EMISSIONS - MITIGATED						
Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5} /a/	PM ₁₀ /a/
DEMOLITION						
On-Site Emissions	3	21	13	<1	2	5
Off-Site Emissions	<1	2	2	<1	<1	<1
Total Emissions	3	23	15	<1	2	5
SITE PREPARATION						
On-Site Emissions	4	27	17	<1	10	41
Off-Site Emissions	2 <u>3</u>	25 <u>36</u>	40 <u>15</u>	<1	1	1
Total Emissions	6 <u>7</u>	52 <u>63</u>	27 <u>32</u>	<1	11	42
TRENCHING						
On-Site Emissions	2	13	8	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	13	9	<1	1	1
PAVING						
On-Site Emissions	1	9	7	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	9	8	<1	1	1
BUILDING						
On-Site Emissions	2	12	10	<1	1	1
Off-Site Emissions	2	8	32	<1	<1	1
Total Emissions	4	20	42	<1	1	2
COATING						
On-Site Emissions	9	<1	<1	<1	<1	<1
Off-Site Emissions	<1	<1	2	<1	<1	<1
Total Emissions	9	<1	2	<1	<1	<1
Maximum Regional Total	9	52 <u>63</u>	42	<1	11	42
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
Maximum On-Site Total	--	27	17	--	10	41
Localized Significance Threshold /b/	-- /c/	196	1,296	-- /c/	5	11
Exceed Threshold?	-- /c/	No	No	-- /c/	Yes	Yes
/a/ URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.						
/b/ Assumed a four-acre project site and a 25-meter (82-foot) receptor distance.						
/c/ SCAQMD has not developed localized significance methodology for VOC or SO _x .						
SOURCE: TAHA, 2011.						

Impact CON-2 Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied. Therefore, construction of the proposed project would result in a significant and unavoidable impact related to localized air emissions.

The localized construction emissions analysis followed guidelines published by the SCAQMD in the *Localized Significance Methodology for CEQA Evaluations (SCAQMD Localized Significance Threshold (LST) Guidance Document)*.⁵⁴ In January 2005, the SCAQMD supplemented the SCAQMD LST Guidance Document with *Sample Construction Scenarios for Projects Less than Five Acres in Size*. The LST assessment was based on a four-acre project site and an 82-foot (25-meter) receptor distance. Adjacent sensitive receptors would be located within 82 feet. However, 82 feet is the shortest distance established for the SCAQMD for use in the LST analysis.

Localized on-site emissions were calculated using similar methodology to the regional emission calculations. LSTs were developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor. LSTs for CO and NO₂ were derived by using an air quality dispersion model to back-calculate the emissions per day that would cause or contribute to a violation of any ambient air quality standard for a particular source receptor area. Construction PM₁₀ LST was derived using a dispersion model to back-calculate the emissions necessary to exceed a concentration equivalent to 50 µg/m³ over five hours, which is the SCAQMD Rule 403 control requirement.

As shown in **Table 4.4-4** above, the project's construction-related emissions of CO and NO_x would be below localized significance thresholds, and construction-related emissions of localized PM₁₀ and PM_{2.5} would be above the SCAQMD localized thresholds. Therefore, without mitigation, the proposed project would result in a significant impact related to localized air quality during construction.

Mitigation Measures

CON4CON2 Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.

CON5CON3 The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road: Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;

- Pave the surface extending at least 100 feet and at least 20 feet wide;
- Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or
- Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.

CON6CON4 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

CON7CON5 Construction activity on unpaved surfaces shall be suspended when wind speed exceed 25 miles per hour (such as instantaneous gusts).

⁵⁴ SCAQMD, *Localized Significance Methodology*, June 2003, revised July 2008.

~~CON8~~**CON6** Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).

~~CON9~~**CON7** Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.

Level of Impact After Mitigation

Mitigation Measures ~~CON4~~ ~~CON2~~ through ~~CON9~~ **CON7** would reduce localized construction-related PM₁₀ and PM_{2.5} to the greatest extent feasible. However, these mitigation measures would not reduce localized particulate emissions below the SCAQMD localized thresholds. Therefore, the proposed project would result in a significant and unavoidable impact related to localized construction emissions.

Impact CON-3 Construction activity would generate toxic air contaminant emissions (e.g., diesel particulate matter). However, sensitive receptors would not be exposed to substantial pollutant concentrations. Therefore, the proposed project would result in a less-than-significant impact related to toxic air contaminants.

The greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 33 months, the proposed project would not result in a long-term (i.e., 70 years) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant construction TAC emissions. Impacts would be less than significant.

Mitigation Measures

Construction TAC emissions would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to construction TAC emissions would be less than significant without mitigation.

Impact CON-4 Construction activity would generate odors from various activities (e.g., equipment exhaust). However, sensitive receptors would not be exposed to substantial odors. Therefore, the proposed project would result in a less-than-significant impact related to odors.

Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Therefore, the proposed project would not expose sensitive receptors to substantial odors. Impacts would be less than significant.

Mitigation Measures

Construction related odors would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to construction odors would be less than significant without mitigation.

Impact CON-5 Construction activity would intermittently generate high noise levels on and adjacent to the project site. This may affect noise sensitive uses in the vicinity and conflict with the City policies. Implementation of Mitigation Measures ~~CON10~~ CON8 through ~~CON15~~ CON13 would reduce impacts to less than significant.

Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. The increase in noise would occur during the approximate 33-month construction schedule. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities typically require the use of numerous types of noise-generating equipment. Typical noise levels from various types of equipment that may be used during construction are listed in **Table 4.4-6**. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.

TABLE 4.4-6: MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES		
Noise Source	Noise Level (dBA)	
	50 Feet /a/	100 Feet /a/
Front Loader	80	74
Trucks	89	83
Cranes (derrick)	88	82
Jackhammers	90	84
Generators	77	71
Back Hoe	84	78
Tractor	88	82
Scraper/Grader	87	81
Paver	87	81
Impact Pile Driving	101	95
Auger Drilling	77	71

/a/ Assumes a 6-dBA drop-off rate for noise generated by a "point source" and traveling over hard surfaces.
SOURCE: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

The noise levels shown in **Table 4.4-7** take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. No pile driving would be conducted during project construction. A typical piece of noisy equipment is assumed to be active for 40 percent of the eight-hour workday (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA L_{eq} at a reference distance of 50 feet.

TABLE 4.4-7: OUTDOOR CONSTRUCTION NOISE LEVELS	
Construction Phase	Noise Level At 50 Feet (dBA)
Ground Clearing	84
Grading/Excavation	89
Foundations	78
Structural	85
Finishing	89

SOURCE: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

Construction noise levels at sensitive receptors are shown in **Table 4.4-8**. Construction activity would comply with the City’s noise ordinance which construction activities are generally permissible only between 8:00 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays. The Noise Ordinance also requires that noise levels that are up to 20 dBA in excess of normally acceptable levels or up to 40 dBA above normally acceptable levels for any “maximum instantaneous” noise event only occur between 10:00 a.m. and 3:00 p.m. These standards may be exceeded during construction activity. Therefore, without mitigation, the proposed project would result in a significant impact related to construction noise.

TABLE 4.4-8: PROPOSED PROJECT CONSTRUCTION NOISE LEVELS - UNMITIGATED				
Sensitive Receptor	Distance (feet) /a/	Maximum Construction Noise Level (dBA) /b/	Existing Ambient Noise Level (dBA) /c/	New Ambient Noise Level (dBA) /d/
Westside Christian Fellowship Church	Adjacent	89.0	49.6	89.0
Multi-family residences across Stanford Street	50	89.0	49.6	89.0
Single and multi-family residences across Colorado Avenue	75	85.5	58.1	85.5
Evergreen Community School	400	70.9	60.1	71.3
Santa Monica Baha'i Center	500	69.0	60.1	69.5
Little Dolphins by the Sea Preschool	900	63.9	54.8	64.4
Dreamland Preschool	980	63.2	61.9	65.6
Maohr Hatorah Synagogue	1,180	61.5	45.5	61.6
Lighthouse Church Preschool	1,220	61.3	55.7	62.3

/a/ Distance of noise source from receptor.
/b/ Construction noise source's sound level at receptor location, with distance and building adjustment.
/c/ Pre-construction activity ambient sound level at receptor location. Existing ambient noise levels based on mid-morning measurements where the ambient levels were lower than the peak hour levels.
/d/ New sound level at receptor location during the construction period, including noise from construction activity.
 Note: Calculation worksheets are available in Appendix G.
SOURCE: TAHA, 2011.

Mitigation Measures

- CON10CON8** All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- CON11CON9** Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment).
- CON12CON10** The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators when electricity is readily available.
- CON13CON11** Construction haul truck and materials delivery traffic shall avoided residential areas whenever feasible.
- CON14CON12** Construction noise levels shall not exceed the City of Santa Monica’s noise standards except for between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.
- CON15CON13** In accordance with Santa Monica Municipal Code Section 4.12.120, the project applicant shall be required to post a sign informing all workers and subcontractors of the time restrictions for construction activities. The sign shall also include the City telephone numbers where violations can be reported and complaints associated with construction noise can be submitted.

Level of Impact After Mitigation

Mitigation Measure ~~CON10~~ ~~CON8~~ would reduce construction noise levels by 3 dBA. Although difficult to quantify, Mitigation Measures ~~CON11~~ ~~CON9~~ through ~~CON15~~ ~~CON13~~ would control construction noise levels. Sound walls are a typical construction noise mitigation measure. Sound walls have been determined to either not be feasible or not be practical for the proposed project. A sound wall only works when the line-of-site is blocked from the noise source to the receptor. The residential land uses across Colorado Boulevard are taller than one level and the second story units would look over the sound wall. Also, sound walls on the northern and eastern portions of the project site would limit access to the construction area and inhibit the construction process. **Table 4.4-9** shows mitigated construction noise levels. Mitigation measures would also ensure that construction activity comply with the City's Noise Ordinance. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does not consider construction activities consistent with these timing limits to constitute significant environmental effects. Implementation of Mitigation Measures ~~CON10~~ ~~CON8~~ through ~~CON15~~ ~~CON13~~ would reduce the impacts to less than significant.

TABLE 4.4-9: PROPOSED PROJECT CONSTRUCTION NOISE LEVELS - MITIGATED				
Sensitive Receptor	Distance (feet)/a/	Maximum Construction Noise Level (dBA)/b/	Existing Ambient Noise Level (dBA)/c/	New Ambient Noise Level (dBA)/d/
Westside Christian Fellowship Church	Adjacent	86.0	49.6	86.0
Multi-family residences across Stanford Street	50	86.0	49.6	86.0
Single and multi-family residences across Colorado Avenue	75	82.5	58.1	82.5
Evergreen Community School	400	67.9	60.1	68.3
Santa Monica Baha'i Center	500	66.0	60.1	67.0
Little Dolphins by the Sea Preschool	900	60.9	54.8	61.8
Dreamland Preschool	980	60.2	61.9	64.1
Maohr Hatorah Synagogue	1,180	58.5	45.5	58.8
Lighthouse Church Preschool	1,220	58.3	55.7	60.2

/a/ Distance of noise source from receptor.
 /b/ Construction noise source's sound level at receptor location, with distance and building adjustment.
 /c/ Pre-construction activity ambient sound level at receptor location. Existing ambient noise levels based on mid-morning measurements where the ambient levels were lower than the peak hour levels.
 /d/ New sound level at receptor location during the construction period, including noise from construction activity.
 Note: Calculation worksheets are available in Appendix G.
SOURCE: TAHA, 2011.

Impact CON-6 Construction activity would generate vibration levels that exceed the established standards. Therefore, the proposed project would result in a significant and unavoidable impact related to construction vibration.

Vibration levels were estimated based on information provided by the Federal Transit Administration.^{6 5} As shown in **Table 4.4-10**, use of heavy equipment (e.g., a large bulldozer) generates vibration levels of 87 VdB at a distance of 25 feet. The nearest sensitive receptor would typically be at least 15 feet from occasional heavy-duty equipment activity and could experience vibration levels of 94 VdB. Vibration levels at these receptors would exceed the human annoyance threshold of 87 VdB. Vibration levels would not exceed more conservative building damage threshold of 95 VdB. Based on the human annoyance threshold, the proposed project would result in a significant impact related to construction vibration.

^{6 5}Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

TABLE 4.4-10: VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT				
Equipment	Approximate VdB			
	25 Feet	50 Feet	75 Feet	100 Feet
Large Bulldozer	87	81	77	75
Loaded Trucks	86	80	76	74
Jackhammer	79	73	69	67
Small Bulldozer	58	52	48	46

SOURCE: Federal Railroad Administration, *High-Speed Ground Transportation Noise and Vibration Impact Assessment*, 1998.

Mitigation Measures

Mitigation measures to reduce vibration levels were considered. The primary means to reduce construction vibration is to limit the distance between the source and the receiver. This measure was deemed infeasible as construction activity (e.g., demolition) must occur on the property line.

Level of Impact After Mitigation

No feasible mitigation measures were identified to reduce the significant impact related to construction vibration to less than significant. Therefore, the proposed project would result in a significant and unavoidable impact related to construction vibration.

Impact CON-7 Project construction and equipment staging would temporarily increase truck traffic in the project area, which could disrupt the normal use of the sidewalk and adjacent streets, and affect parking availability. However, Mitigation Measure ~~CON16~~ CON14 would reduce the impacts to less than significant.

Project construction is anticipated to last approximately 33 months. Construction activity may affect adjacent streets, including Colorado Avenue and Stanford Street. During construction staging, the storage of construction equipment may require the use of street parking and temporary closure of a portion of Colorado Avenue and/or Stanford Street. Temporary closures would affect traffic flow and may cause traffic delays on Colorado Avenue and/or Stanford Street. Therefore, without mitigation, the proposed project would result in a significant impact related to construction activity and traffic flow.

Construction activity would require the temporary closure of the sidewalks adjacent to the site. This would disrupt pedestrian activity in the area and may generate hazards on sidewalks. Therefore, without mitigation, the proposed project would result in a significant impact related to construction activity and unsafe conditions.

Truck trips would be generated by the export of approximately 79,000 cubic yards of soil and materials delivery. These trucks would likely access the project site from Cloverfield Boulevard and Colorado Avenue. The trucks would not pass residential land uses located on Cloverfield Boulevard but would pass residential land uses located on Colorado Avenue. In addition, trucks accessing the project site may pass near residences located on Stanford Street. The proposed project would result in truck trips along roadway segments near residential land uses. Therefore, without mitigation, the proposed project would result in a significant impact related to construction activity and truck trips.

In addition to the reduction in on-street parking capacity during construction of the proposed project, construction site workers would temporarily compete with other users for parking facilities. This would temporarily reduce the available supply of public parking. Therefore, without mitigation, the proposed project would result in a significant impact related to construction traffic.

Mitigation Measures

CON16~~CON16~~**CON14** The applicant shall prepare, implement, and maintain a Construction Impact Mitigation Plan which shall be designed to:

- Prevent material traffic impacts on the surrounding roadway network;
- Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;
- Ensure safety for both those constructing the project and the surrounding community; and
- Prevent substantial truck traffic through residential neighborhoods.

The Construction Impact Mitigation Plan shall be subject to review and approval by the following City departments: Public Works; Fire; Planning and Community Development; and Police to ensure that the Plan has been designed in accordance with this mitigation measure. This review shall occur prior to commencement of any construction staging for the project. It shall, at a minimum, include the following:

Ongoing Requirements Throughout the Duration of Construction

- A detailed traffic control plan for work zones shall be maintained which includes at a minimum accurate existing and proposed: parking and travel lane configurations; warning, regulatory, guide and directional signage; and area sidewalks, bicycle lanes and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans must be reviewed and approved by the Transportation Management Division prior to commencement of construction and implemented in accordance with this approval.
- Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m., including: dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an After Hours Permit.
- Streets and equipment shall be cleaned in accordance with established Public Works requirements.
- Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on Santa Monica streets. Limited queuing may occur on the construction site itself.
- Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit.
- Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division.
- Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica.

Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction

- Advise the traveling public of impending construction activities (e.g. information signs, portable message signs, media listing/notification, implementation of an approved traffic control plan).
- Approval from the City through issuance of a Use of Public Property Permit, Excavation Permit, Sewer Permit or Oversize Load Permit, as well as any Caltrans Permits required, for any construction work requiring encroachment into public rights-of-way, detours or any other work within the public right-of-way.
- Timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Police Department, Fire Department, Environmental and Public Works Management Department, and Planning and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet.
- Coordination of construction work with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal.
- Approval by the Transportation Management Division of any haul routes involving earth, concrete or construction materials, and equipment hauling.

Level of Impact After Mitigation

Impacts related to construction traffic were determined to be significant without mitigation. Mitigation Measure ~~CON16~~ CON14 would ensure steady traffic flow near the project site, reduce unsafe conditions for pedestrians, and limit truck traffic in residential areas. Implementation of Mitigation Measure ~~CON16~~ CON14 would reduce the impacts to less than significant.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City.

As the proposed project results in a localized significant impact during construction relative to particulate matter, it is anticipated that related project development would also result in significant localized impacts. While mitigation measures would reduce air quality impacts, cumulative construction emissions would exceed SCAQMD localized significance thresholds. Therefore, the proposed project would contribute to a significant cumulative impact related to construction air quality.

Cumulative construction noise impacts are a localized impact. Construction activities for the proposed project may overlap with the construction of the two adjacent related projects to the west at 2848-2912 Colorado Avenue (Roberts Center project) and 2834 Colorado Avenue (Lionsgate project). Construction activity associated with these related projects is anticipated to include mitigation measures to ensure that construction noise would not exceed the City's Noise Ordinance standards. Implementation of these mitigation measures would ensure that cumulative noise levels are not significant. Therefore, the proposed project would not contribute to cumulative impact related to construction noise. However, the proposed project in conjunction with the two related projects would result in construction vibration which would exceed FTA vibration thresholds. Therefore, a significant and unavoidable cumulative impact related to construction vibration would occur.

Cumulative development would create temporary construction traffic impacts similar to those described for the proposed project. However, compliance with construction traffic mitigation requirements similar to those described for the proposed project on a case-by-case basis would mitigate any potential impacts from individual construction projects. Therefore, the proposed project would not contribute to cumulative impact related to construction traffic.

4.5 CULTURAL RESOURCES

This section discusses the potential impacts of the proposed project on cultural resources, particularly historical resources. The proposed project is evaluated for the potential to affect buildings and structures that are listed, or are eligible for listing, on the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or as a City of Santa Monica Landmark or Historic District. As evaluated in the Initial Study (Appendix A to this EIR), the proposed project's potential impacts on archaeological and paleontological resources would be less than significant.

EXISTING SETTING

Historic Context¹

The first Europeans to arrive in the Santa Monica area were aboard a Spanish ship in 1542 under the command of Portuguese navigator, Juan Rodriguez Cabrillo. This expedition along the California coast is responsible for the naming of several local features, including San Pedro Bay, and visited Santa Catalina Island and Santa Monica. Cabrillo is thought to have dropped anchor in Santa Monica Bay on October 9, 1542. Thereafter the area remained under Spanish control, but remained effectively unexplored until the latter portion of the 18th Century. In 1769, the Spanish sent Father Junipero Serra to Alta, California to create a chain of Missions and Mission outposts to bring Christianity to the indigenous population and create a foundation for colonization of the region. During this same year, the Franciscan Father Juan Crespi, as part of the expedition party of Gaspar de Portola, is said to have named Santa Monica. The name was inspired by the free-flowing natural springs in the area, and the story of Saint Monica weeping for her wayward son Saint Augustine. Other naming traditions cite that Santa Monica was named in the same year and during the same expedition; however, Juan Crespi is not attributed with the naming of the area, and the choice of names coincided with the discovery of the area on the May 4th celebration of Saint Monica's Day. Between 1769 and 1823, Spanish explorers and missionaries established 21 missions, four presidios, and four pueblos between San Diego and Sonoma, including the nearby Mission San Gabriel and the Mission San Fernando situated in the modern San Fernando Valley.

Mexico achieved independence from Spain in 1821, and Alta, California became the northern frontier of Mexico. Secularization of the missions took place over the next decade, and the former mission lands were transferred to families that had settled in the area. In 1828, the region was divided into three expansive land grants entitled: Rancho San Vicente y Santa Monica, Rancho Boca de Santa Monica, and Rancho La Ballona. Don Francisco Sepulveda took possession of "the place called San Vicente," which included the original town of Santa Monica. These rancho lands extended to the south from the Santa Monica Canyon to about Pico Boulevard, and from the coast to modern Westwood. The ownership of the rancho lands was then disputed, as the Reyes and Marquez families challenged the Sepulveda claim. The dispute would continue through the 1840s, and would be settled after California achieved statehood.

In May of 1846, the United States and Mexico went to war, and many decisive battles took place in California. The United States eventually prevailed, and the American victory over Mexico was formalized in February 1848 with the Treaty of Guadalupe Hidalgo. California was admitted as the thirty-first state in the Union on September 9, 1850. In 1851, the Board of Land Commissioners granted a deed to Sepulveda for the 30,000 acres known as the Rancho San Vicente y Santa Monica. The Reyes-Marquez families were then given the deed to 6,000 acres, which was known as the Boca de Santa Monica. Thereafter, Ysidro Reyes constructed the first structure in the area that would become modern Santa Monica. This adobe structure was built in 1839, and was located near Seventh Street and Adelaide Drive. The adobe was demolished in 1906.

¹City of Santa Monica, *Land Use and Circulation Element Final EIR*, April 2010.

The Boca de Santa Monica eventually became a popular summer campground in the Los Angeles area in the 1860s, and by the 1870s, portions of the Reyes-Marquez property and Sepulveda rancho were purchased by Colonel R.S. Baker. Baker was a cattleman who decided to operate a sheep ranch in the area, and in 1874 Nevada Senator John Percival Jones became his partner. Jones is regarded as the founder of Santa Monica, and with Baker, conceived the City at the terminus of the Southern California rail system. To this end, Jones and Baker organized the Los Angeles and Independence Railroad to link the interior rail system to the ocean. They secured the right-of-way and began construction of a wharf. By 1875, the men had delineated the City's physical layout and the first residential lots were sold. Within the first nine months after the City's inception, the population grew to nearly 1,000 persons. The Southern Pacific Railroad had started service to Los Angeles in the same year, and this threatened the economic feasibility of the Los Angeles and Independence Railroad, as well as hopes for Santa Monica as a port. Thereafter, the Los Angeles and Independence Railroad was acquired by the Central Pacific Railroad in 1877, and by 1879 the Southern Pacific, which by then had absorbed the Central Pacific, ordered removal of the Santa Monica wharf. During this period, the population of Santa Monica decreased from about 900 to 400 persons.

During the land boom of the 1880s, Santa Monica was reinvented as a resort community. Hotels were then constructed to support the burgeoning resort industry, and in 1886 the City of Santa Monica was incorporated. In the early 1890s, Santa Monica served as the major port of call, until San Pedro was selected as the port of Los Angeles. This decision led to a shift in City focus, where the trade and commerce of a major port-of-call was abandoned for the construction of pleasure and entertainment piers. By the 1920s, development patterns in Santa Monica had shifted to the predominantly residential and commercial uses that characterize the City today.

Historic Resources

There are three general types of designations for significant historical resources; historical properties, and districts, including federal designation in the National Register of Historic Places (National Register) for resources of importance and relevance to national heritage, State level designation in the California Register of Historical Resources (California Register), and local designation in the City of Santa Monica as Structures of Merit, Landmarks and Districts for resources of importance to local history and culture. Each of these designations employs different criteria to determine whether a resource could be determined eligible for inclusion including differentiation at the local level, as explained below.

Of the federal, State, and local designation types in Santa Monica, there are 88 historic landmarks, 4 structures of merit, and 2 historic districts. The closest historic resource is approximately one mile away from the project site. **Table 4.5-1** lists historic resources nearest to the project site. Each of these historic resources is designated only at the local level. The existing structures on the project site have no similar features to the historic resources listed in the City.

TABLE 4.5-1: HISTORIC RESOURCES NEAR THE PROJECT SITE			
Name	Address	Listed on California or National Register	Distance From Project Site (miles)
Baxter Residence /a/	2450 25 th Street	No	0.9
Santa Monica Airport Rotating Beacon Tower	Adjacent to 3223 Donald Loop	No	1.3
Eucalyptus Deanei Tree	522 24 th Street	No	1.3
Tudor Craftsman	501 24 th Street	No	1.3
California Bungalow	1414 Idaho Avenue	No	1.5
/a/ Structure of Merit SOURCE: City of Santa Monica Historic Resources Inventory.			

Two historic resources assessments were prepared for the proposed project in February 2012 to assess the project site's potential for historic significance. Specifically, a City Landmark Assessment Report was prepared by ICF international and a Historic Resource Assessment was prepared by Chattel Architecture, Planning and Preservation, Inc. On February 13, 2012, the Landmarks Commission held a public hearing to discuss the two reports and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission voted to not designate the property. The Landmarks report and associated information has been included as Appendix I of the Final EIR.

REGULATORY FRAMEWORK

Federal

Federal Antiquities Act of 1906. The Federal Antiquities Act of 1906 is the basis for all historical preservation legislation. The United States Government, acting for the people, is tasked to protect archaeological and historical sites and "any object of antiquity," and preserve them for public availability. This Act forbids disturbance of said objects of antiquity on federal lands without a permit issued by the responsible agency. It also establishes criminal sanctions for unauthorized use or destruction of antiquities.

Historic Sites Act of 1935. The Historic Sites Act of 1935 declares, "It to be national policy to preserve for public use historic sites, properties, buildings, and objects of national significance." This Act gives the National Park Service (NPS) (through the Secretary of the Interior) broad powers to execute this policy, including criminal sanctions, on both federal and non-federal lands. It also sets up an advisory board to aid the Secretary of the Interior in implementing this Act.

National Historic Preservation Act. The National Historic Preservation Act of 1966 (NHPA), as amended, sets forth national policy and procedures regarding historic properties, defined as districts, sites, buildings, structures, and objects included in or eligible for the National Register of Historic Places (National Register). Section 106 of NHPA requires federal agencies to take into account the effects of their undertakings on such properties and to allow the Advisory Council on Historic Preservation the opportunity to comment on those undertakings, following regulations issued by the Advisory Council on Historic Preservation (36 CFR 800).

Listing in the National Register assists in preservation of historic properties through: recognition that a property is of significance to the nation, the State, or the community; consideration in the planning for federal or federally-assisted projects; eligibility for federal tax benefits; consideration in the decision to issue a surface coal mining permit; and qualification for federal assistance for historic preservation, when funds are available. In addition, for projects that receive federal funding, a clearance process must be completed in accordance with Section 106 of the NHPA. Furthermore, State and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow the standards for determining the significance of properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials. The criteria are:

- A. Associated with events that have made a significant contribution to the broad patterns of our history.
- B. Associated with the lives of persons significant in our past.
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
- D. Yield, or may be likely to yield, information important in prehistory or history.

Historic integrity is the ability of a property to convey its significance and is defined as “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”

The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred;
- Design is the combination of elements that create the form, plan, space, structure, and style of a property;
- Setting is the physical environment of a historic property;
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time; and
- Association is the direct link between an important historic event or person and a historic property.

In assessing a property's integrity, the National Register criteria recognize that properties change over time. In this regard, National Register Bulletin 15 states:

“To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance.

It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.

A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.”

For properties that are considered significant under National Register Criteria A and B, National Register Bulletin 15 states:

“A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”

State

California Environmental Quality Act (CEQA). Under CEQA a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.”² This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historic resource. If so, then the second part involves

²California Public Resources Code Section 21084.1.

determining whether the project may involve a “substantial adverse change in the significance” of the resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of State CEQA Guideline Section 15064.5. The State CEQA Guidelines provide that for the purposes of CEQA compliance, the term “historical resources” shall include the following:³

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register.
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant for purposes of CEQA unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets one of the criteria for listing on the California Register (see below).
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

Section 15064.5 of the CEQA Guidelines also provides that “[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”⁴ Material impairment occurs when a project alters or demolishes in an adverse manner “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” in a state or local historic registry.⁵

California Register of Historical Places. The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”⁶ The criteria for eligibility for the California Register are based upon National Register criteria. These criteria are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California of the United States;
2. Associated with the lives of persons important to local, California or national history;
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; and
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

³State CEQA Guidelines, 14 CCR Section 15064.f(e).

⁴California Code of Regulations, Title 14, Section 15064.5(b)(1).

⁵California Code of Regulations, Title 14, Section 15064.5(b)(2)(A-C).

⁶California Public Resources Code Section 50241(e).

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register of Historic Places (Category 1 in the State Inventory of Historical Resources) and those formally Determined Eligible for listing in the National Register of Historic Places (Category 2 in the State Inventory);
- California Registered Historical Landmarks from No.0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

Other resources which may be nominated for listing in the California Register include:

- Historical resources with a significance rating of Category 3 through 5 in the State Inventory. (Categories 3 and 4 refer to potential eligibility for the National Register, while Category 5 indicates a property with local significance);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as a local landmark.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

California Public Resources Code (CPRC), Sections 5097.5, 5097.9, and 5097.98-99. Section 5097.5 of the California Public Resources Code (CPRC) defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands. This Section also prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands, and provides for criminal sanctions. In 1987, it was amended to require consultation with the California Native American Heritage Commission whenever Native American graves are found. It also established that violations for taking or possessing remains or artifacts are felonies.

CPRC Section 5097.9 establishes the California Native American Heritage Commission to make recommendations to encourage private property owners to protect and preserve sacred places in a natural state and to allow appropriate access to Native Americans for ceremonial or spiritual activities. The Commission is authorized to assist Native Americans in obtaining appropriate access to sacred places on public lands, and to aid State agencies in any negotiations with federal agencies for the protection of Native American sacred places on federally administered lands in California.

CPRC Sections 5097.98-99 require that the Governor's California Native American Heritage Commission be consulted whenever Native American graves are found. According to these Sections, it is illegal to take or possess remains or artifacts taken from Native American graves, however, it does not apply to materials taken before 1984. Violations occurring after January 1, 1988 would become felonies.

Local

City of Santa Monica Landmarks and Historic Districts. The City of Santa Monica has the ability to designate properties within the City boundaries as Landmarks to protect improvements and areas which represent the City's cultural, social, economic, political and architectural history; safeguard the City's historic, aesthetic and cultural heritage; and promote the use of landmarks and historic districts for the

education, pleasure and welfare of the people.⁷ City Landmarks are determined by the Landmarks Commission and designation is based on whether or not a property meets one or more of the following criteria:

1. It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political, or architectural history of the City.
2. It has aesthetic or artistic interest or value, or other noteworthy interest or value.
3. It is identified with historic personages or with important events in local, state, or national history.
4. It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail, or historical type valuable to such a study.
5. It is a significant or a representative example of the work or product of a notable builder, designer, or architect.
6. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community, or the City.

In addition, an historic district is defined in the Santa Monica Municipal Code, Section 9.36.100(b), as any “geographic area or a noncontiguous grouping of thematically related properties... if the City Council finds that such area meets one of the following criteria:”

1. Any of the criteria identified in items (1) through (6) above.
2. It is a noncontiguous grouping of thematically related properties or a definable area possessing a concentration of historic, scenic, or thematic sites, which contribute to each other and are unified aesthetically by plan, physical development, or architectural quality.
3. It reflects significant geographic patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.
4. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community, or the City.

City of Santa Monica Historic Preservation Element from the General Plan. The City of Santa Monica has included an Historic Preservation Element in its General Plan. Historic preservation is an optional additional element permitted under state law. The City prepared and adopted this Element to focus attention on the preservation of historic resources and devote special consideration to planning involving these resources. The purpose of the Element is to establish a long-range vision for the protection of historic resources in the City and to provide implementation strategies to achieve that vision. The General Plan is legally binding, and any new development approved by the City must be consistent with it.

The City values historic preservation because it “...enhances the quality of life in Santa Monica. It improves the quality of the built environment, encourages respect and appreciation for the community’s history and culture, maintains the character of the City, and contributes to the City’s economic Stability.”⁸

City of Santa Monica Land Use and Circulation Element from the General Plan. The Land Use and Circulation Element (LUCE) seeks to ensure that historic preservation is a fundamental community value incorporated throughout the General Plan. The LUCE policies provide Santa Monica a full array of tools

⁷From the Landmarks Commission mission statement, available at:
<http://www01.smgov.net/planning/planningcomm/landmarkscommission.html>, accessed September 14, 2010.

⁸City of Santa Monica Historic Preservation Element, September 2002, available at:
<http://www01.smgov.net/planning/planningcomm/Final%20Preservation%20Element.pdf>, accessed September 22, 2010.

that can respond to a wide range of requirements for historic preservation, preservation of historically significant attributes, and conservation of neighborhood resources. Goals and Policies to reduce impacts to historic resources from development and lack of care are included in its Historic Preservation, Neighborhood Conservation, and Urban Form chapters, which are consistent with the Historic Preservation Element. Collectively, the LUCE policies provide a menu of solutions to not only mitigate potential impacts, but also to incentivize preservation of both historic and culturally significant features. Below are the proposed LUCE policies that relate to the proposed project, organized by section:

- **Goal HP1: Preserve and protect historic resources in Santa Monica through the land use decision-making process.**
 - **Policy HP1.1** Follow policies for historic preservation contained in the Historic Preservation Element when making land use decisions.
 - **Policy HP1.3** Ensure that new development, alterations or remodeling on, or adjacent to, historic properties are sensitive to historic resources and are compatible with the surrounding historic context.
 - **Policy HP1.4** Continue to support Landmarks Commission review and public input for all structures proposed for demolition that are more than 40 years old.
 - **Policy HP1.10** Review 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.

- **Goal N23: Protect, preserve and enhance the Mid-City residential neighborhood and ensure compatible design.**
 - **Policy N23.1** Develop a program to encourage the protection of existing single family and multi-family residential properties in the Mid-City neighborhood. Options that could be explored include the following Citywide Actions:
 - Developing a Pattern Book
 - Modifying development standards
 - Modifying demolition regulations
 - Establishing a Transfer of Development Rights program for historic properties and City-identified courtyard housing

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to cultural resources if it would:

- Cause a substantial adverse change in significance of a historical resource;
- Cause a substantial adverse change in significance of an archaeological resource;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; and/or
- Disturb any human remains, including those interred outside of formal cemeteries.

IMPACTS

As discussed in the Initial Study (Appendix A of this EIR), with mitigation, the proposed project would not result in significant impacts to an archeological or paleontological resource or human remains. Therefore, these issues will not be discussed further.

Impact CR-1 Construction of the proposed project could cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5. However, the existing structures (permanent and non-permanent) are not historically significant, and therefore, loss of the existing structures will not result in significant impacts to historical resources. This impact would be less than significant.

A property may be designated a historic resource by federal, State, or local authorities. In order for a building to qualify for listing in the National Register, the California Register, or as a locally significant property in the City of Santa Monica, it must meet one or more of the respective criteria of significance as listed above. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

As part of the proposed project, the existing trailers would be moved off-site and the remaining structures would be demolished. Research in the California Index,⁹ the Santa Monica Mirror,¹⁰ and the Los Angeles Times¹¹ indicates no historically important events are known to have occurred at this site. These records also indicate that no historically significant person is associated with the project site. Therefore, the project site is not eligible for the National Register under criteria A or B, the California Register under criteria 1 or 2, and the Santa Monica City Landmarks and Districts under criteria 3.

A records search from the above sources on structures at the project site, including mobile homes, a manager's office, pool, car port, and laundry facility, yielded no indication of architectural significance for a type, period, or method of construction regarding the structures. The permanent structures are not of high artistic value and the structures themselves do not have an aesthetic that is noteworthy or of value. The remaining area of the project site is a collection of trailers that have moved onto the site over a period of several years. These also do not represent any particular style or aesthetic. Therefore, the project site is not eligible for the Nation Register under criteria C, the California Register under criteria 3, and the Santa Monica City Landmarks and Districts under criteria 2, 4, or 5.

The remaining National and California Registers criterion, D and 4 respectively, concern archeological and paleontological resources, both of which were discussed in the Initial Study (Appendix A) and do not apply to the project site. The records search from the above sources did not provide evidence that the project site would be eligible under the remaining Santa Monica City Landmarks criterion, 1 and 6. No examples of cultural, social, economic, or political history were tied to the project site, and it is not regarded as a unique location because it is located inland and away from the ocean, is on a major thoroughfare boulevard, and is surrounded by a mix of commercial, light manufacturing, and residential uses. The site does not have a singular physical characteristic, as there are mobile homes consisting of many different styles and types, from varying years of production. The project site is not an established visual feature of the neighborhood, community, or the City because a barrier of shrubbery blocks most of the view into the property and the predominant view from the entrance is of an internal circulation street with parking.

In addition to existing protections for historic resources, the LUCE establishes a rigorous regulatory framework that to preserve historic structures within the City. The LUCE provides a comprehensive range of preservation and conservation measures designed to protect the defining features that make the City unique. Specifically, Policy HP1.1 states that the City shall follow policies for historic preservation contained in the Historic Preservation Element when making land use decisions. Policy HP1.4 states that the City shall continue to support community Landmark Commission's review and public input for all structures proposed for demolition that are more than 40 years old. This demolition procedure applies to

⁹Los Angeles Public Library, *California Index*, available at: http://www.lapl.org/resources/en/california_index.html, accessed March 8, 2011.

¹⁰The Santa Monica Mirror, available at: <http://www.smmirror.com>, accessed March 8, 2011.

¹¹Los Angeles Times search, available at: <http://www.latimes.com/search/>, accessed March 8, 2011.

all properties and is not limited to Landmarks, Historic Districts, or properties on the City's Historic Resources Inventory. The Landmark Commission will review each demolition application for any structure over 40 years old.¹² This includes existing structures on the project site. Policy HP1.3 states that the City shall ensure that new development, alterations or remodeling on, or adjacent to, historic properties are sensitive to historical resources and are compatible with the surrounding historic context; and Policy HP2.1 states that the preservation of historic resources shall be considered a public benefit for a developer and will allow defined development incentives in certain areas of the City. These policies ensure that the proposed project will proceed through the appropriate processes and that no impacts to historic resources would occur.

As discussed above, none of the structures on the project site, nor any properties in the immediate vicinity are listed in the Santa Monica Historic Resources Inventory,¹³ nor designated as a Landmark or a Historic District.¹⁴ Also, the project site is not listed in the National Register¹⁵ or the California Register.¹⁶ Subsequent to circulation of the Draft EIR, an application to designate the property as a City Landmark was received by the Landmarks Commission. As part of the Landmark application process, two historic assessments that evaluated eligibility for City landmark status were prepared for the project site in February 2012. The Village Trailer Park Historic Resource Assessment was prepared by Chattel Architecture Planning and Preservation, Inc. According to this report's findings, the property is ineligible for listing locally as a Santa Monica Landmark, in the California Register of Historical Resources and in the National Register of Historic Places. Additionally, a City Landmark Assessment Report was prepared for the Village Trailer Park by ICF International. According to this report, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4). On February 13, 2012, the Landmarks Commission held a public hearing to discuss the two reports and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission voted to not designate the property. The Landmarks report and associated information is included as Appendix I of this Final EIR. Therefore, the proposed project would not cause an adverse change in a historical resource. Impacts would be less than significant.

Mitigation Measures

Historic resources impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. Impacts to historic resources are typically site-specific. As analyzed above, the proposed project would not cause an adverse change in a historical resource. Therefore, the proposed project would not contribute to cumulative impact related to cultural resources.

¹²Santa Monica Land Use and Circulation Element Final EIR, April, 2010.

¹³City of Santa Monica Historic Resources Inventory, December 2010, available at: <http://www01.smgov.net/planning/planningcomm/historicresources.html>, accessed March 17, 2011.

¹⁴City of Santa Monica Designated Landmarks and Historic Districts, available at: <http://www01.smgov.net/planning/planningcomm/designatedlandmarks.html>, accessed September 21, 2010

¹⁵National Register of Historic Places database, available at: <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>, accessed September 21, 2010.

¹⁶California Register of Historical Places database, available at: http://ohp.parks.ca.gov/listed_resources/?view=county&criteria=19, accessed March 3, 2011.

4.6 GEOLOGY AND SOILS

This section identifies the potential for geological and seismic hazards to occur on or around the project site. Issues of concern include suitability of soil for development; geologic faults; and direct and indirect seismic hazards such as fault rupture, ground shaking, expansive soils, and liquefaction.

EXISTING SETTING

Regional Geology

The City of Santa Monica lies within the northwestern portion of the Coastal Plain of the Los Angeles Basin, which is bounded to the north by the Santa Monica Mountains, Elysian Hills, and Repetto Hills; to the east Puente Hills and Santa Ana Mountains; and to the south and west by the Pacific Ocean. The topography consists of a gently southward sloping alluvial plain, rising from sea-level at the coast to approximately 375 feet above sea-level in the northeastern portion of the city. The City is underlain by a succession of sedimentary formations of Tertiary (1.6 to 65 million years ago) to Holocene (last 10,000 years) age rocks. The four rock formations that underlie the City include the oldest Tertiary Formations, the Pico Formation, San Pedro Formation, and the youngest Lakewood Formation.

The Coastal Plain of the Los Angeles Basin is sub-divided into several distinct groundwater basins, caused by geologic features such as non-water bearing bedrock, faults, and other features that impede the flow of groundwater such as folds and groundwater mounds. The City of Santa Monica is within the Santa Monica sub-basin, which is bounded by the Santa Monica Mountains to the north, the Ballona Escarpment to the south, the Inglewood Fault to the east, and the Pacific Ocean to the west. Groundwater occurs in all deposits of the sub-basin.

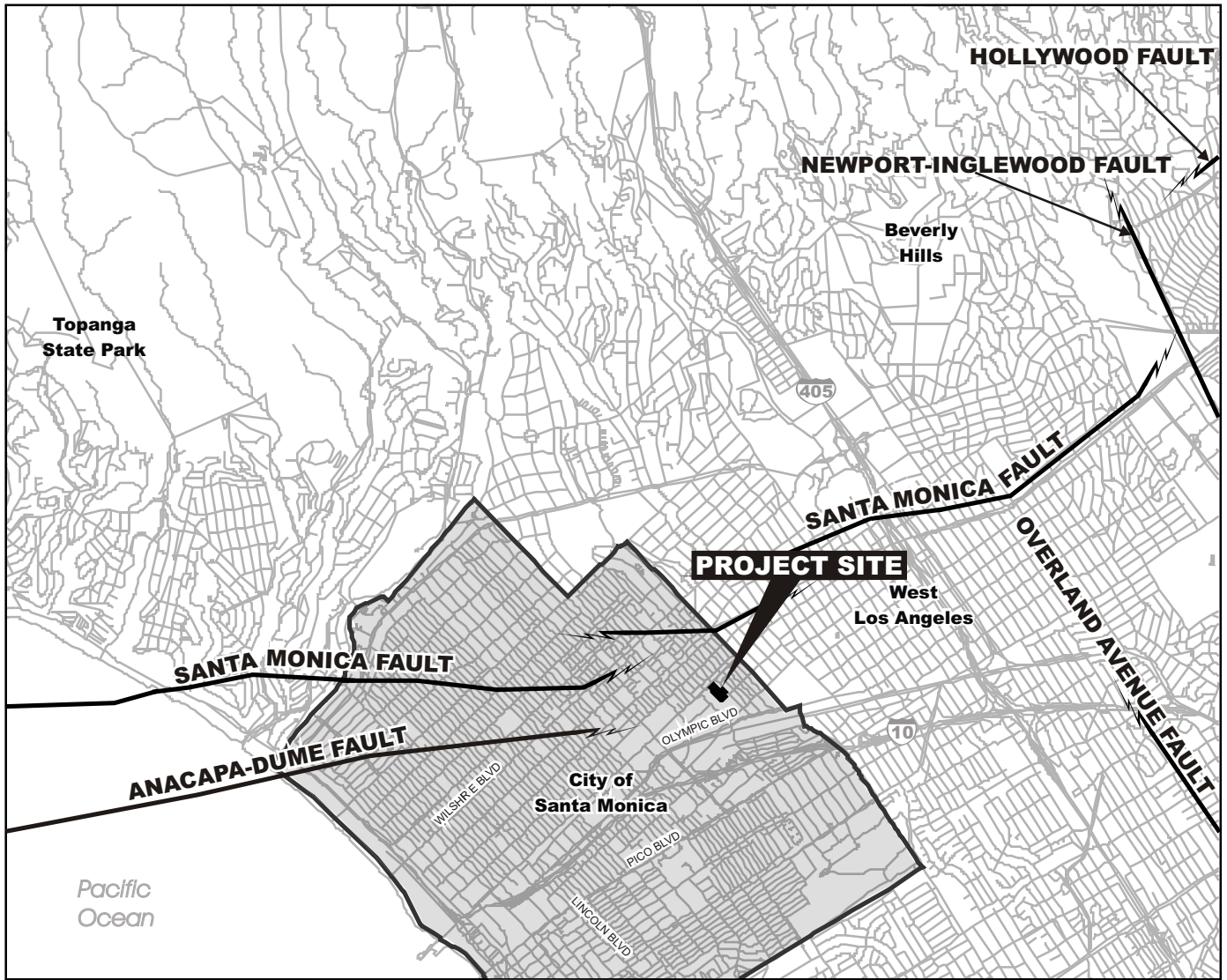
Seismic Hazards

Fault Rupture. Fault rupture is defined as surface displacement caused by an earthquake. A fault is a fracture in the Earth's crust along which rocks on one side have moved relative to rocks on the other side. Most faults are the result of repeated displacement over long periods of time.¹ Faults are characterized by the California Geological Survey as active, potentially active, or inactive, according to the last seismic activity of the fault. Active faults are faults that show evidence of surface displacement within Holocene time (i.e., the past 11,000 years). Potentially active faults are those that show evidence of surface displacement during Quaternary time (i.e., the past 1.6 million years). Inactive faults are those without recognized Holocene or Pleistocene Age activity. There are numerous faults in the Los Angeles area that are categorized as active, potentially active and inactive. The City of Santa Monica is located in a seismically active area. Major active and potentially active faults within proximity to the City of Santa Monica include the Newport-Inglewood Fault, the Santa Monica – Hollywood – Malibu Coast Fault, and the Palos Verdes Fault.² These along with other regional faults including the San Andreas, San Fernando, and Whittier Faults are capable of producing moderate to large earthquakes that could potentially affect the project site. **Figure 4.6-1** illustrates the regional faults near the project site.

The Alquist-Priolo Earthquake Fault Zoning Act regulates development near active faults to mitigate the hazard of surface fault rupture. The Act requires areas within 500 feet from a known active fault to be designated Earthquake Fault Zones and requires geologic reports for all proposed developments within 1,000 feet of the zone. It prohibits the location of most structures for human occupancy across the trace of active faults. There are no Alquist-Priolo Earthquake Fault Zones within the City of Santa Monica.

¹California Geological Survey. *Alquist-Priolo Earthquake Fault Zones*, 2007 available at: www.consrv.ca.gov, accessed August 31, 2010.

²City of Santa Monica, *General Plan Safety Element Technical Background Report*. 1995, accessed September 2, 2010.



LEGEND:

- Project Site
- City of Santa Monica
- Fault

SOURCE: TAHA, 2011.

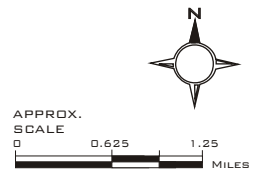


FIGURE 4.6-1
 REGIONAL FAULTS

The nearest Alquist-Priolo Earthquake Fault Zone to the project site is located approximately seven to eight miles to the east-northeast and is associated with the Newport-Inglewood Fault.³ The closest significant faults to the project site are the South Branch Santa Monica Fault, located approximately 700 feet to the south and the Newport-Inglewood Fault, located about 2.5 miles to the east.

The Safety Element of the City of Santa Monica General Plan established a "Hazard Management Zone" for the Santa Monica Fault. The Fault Management Zone encompasses areas where weak and strong geomorphic expressions of the Santa Monica Fault have been previously mapped. The City is currently treating the fault as active and requires an evaluation of surface rupture hazard for projects located within the Fault Hazard Management Zone, which extends 380 to 500 feet north of the North Branch Santa Monica Fault to 100 to 600 feet south of the South Branch Santa Monica Fault.⁴ The Technical Background Report to the Safety Element of the City of Santa Monica General Plan indicates that the project site is within the Fault Hazard Management Zone.

Ground Shaking. Ground shaking is the trembling or jerking motion of the ground during an earthquake. The most widespread damaging effects of earthquakes are caused by strong ground shaking and can vary widely across an area depending on such factors as magnitude of the earthquake, distance of the epicenter, building type, and soil conditions and geology of the area between the epicenter and the property. Greater movement can be expected in areas with poorly consolidated material, such as alluvium.⁵

As with all properties in the seismically-active Southern California region, the project area is susceptible to strong seismic ground shaking. The effect of an earthquake originating from any given fault will depend upon its distance from the project site and the size of the earthquake the fault generates. As previously mentioned, the project site is located in a seismically active area within proximity of major faults.

Liquefaction. Liquefaction is a process in which loose granular soils, saturated with water, behave like liquid during strong ground shaking. Liquefaction results in lateral spreading, ground settlement, sand boils, and soil falls. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

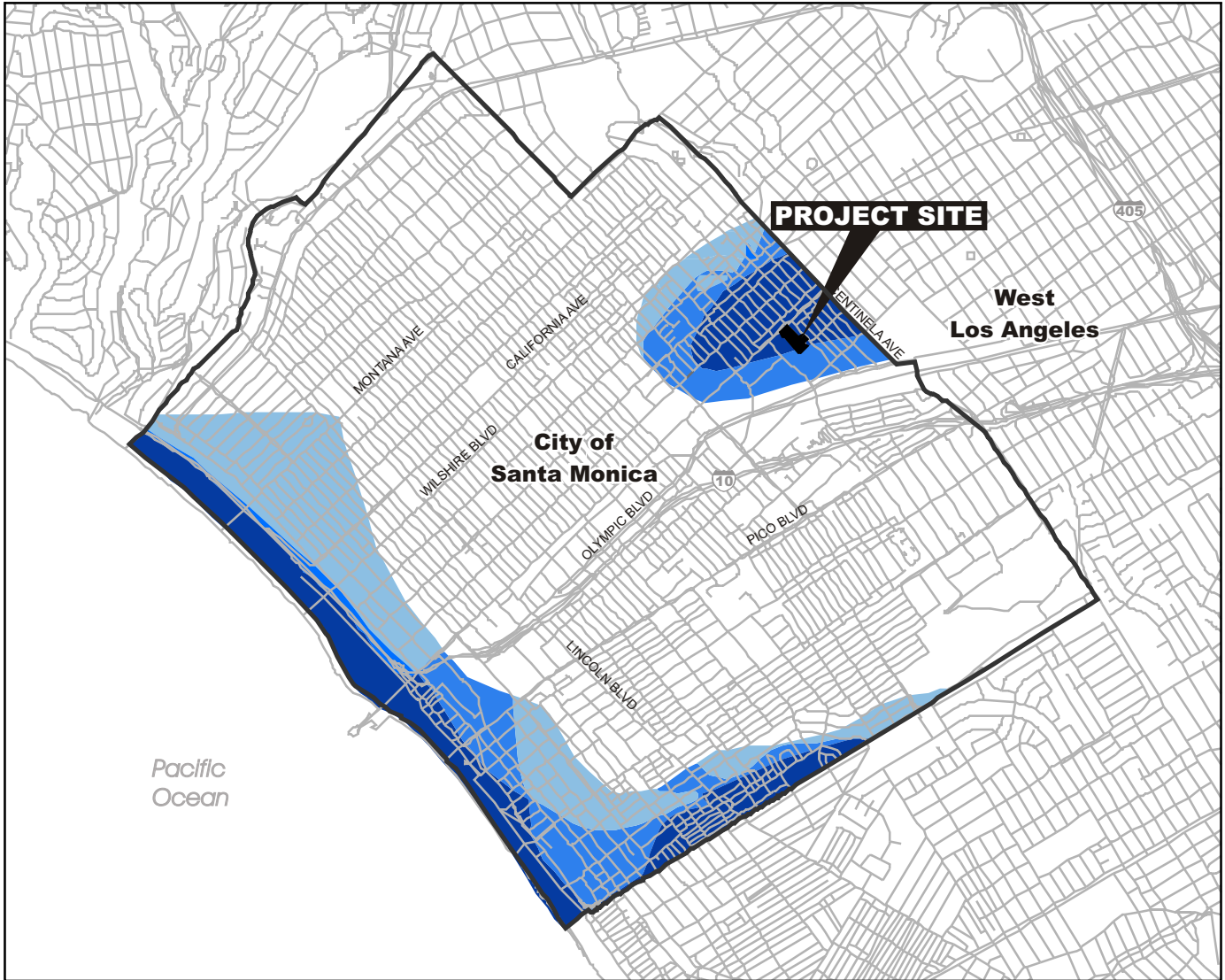
The City of Santa Monica is located in an area with varying potential for liquefaction, ranging from low to high. Quaternary alluvial fan deposits, such as those located beneath the project site, are considered to have low liquefaction susceptibility and the Seismic Hazard Evaluation of the Beverly Hills Quadrangle indicates that the project site is not located within a liquefaction hazard area.⁶ However, according to the City of Santa Monica's Geologic Hazards Map, a portion of the project site is located within an area that has "medium potential" for liquefaction, and a greater portion of the project site is located within an area that has "high potential" for liquefaction, as shown in **Figure 4.6-2**.

³City of Santa Monica. *Opportunities and Challenges Report*.2005. available at: http://www.shapethefuture2025.net/PDF/oc_report_web.pdf, accessed September 1, 2010.

⁴City of Santa Monica. *Guidelines for Geotechnical Reports City of Santa Monica Building and Safety*. March 2010. available at: <http://www01.smgov.net/planning/buildingsafety/PDF/SMGeotechGuidelines%20-%20March%202010%20final.pdf>, accessed March 30, 2011.

⁵City of Santa Monica. *Opportunities and Challenges Report*.2005. available at: http://www.shapethefuture2025.net/PDF/oc_report_web.pdf, accessed September 1, 2010.

⁶Department of Conservation – Division of Mines and Geology. 1998. *Seismic Hazard Zones Report for the Beverly Hills 7.5 Minute Quadrangle, Los Angeles County, CA.* available at: http://gmw.consrv.ca.gov/shmp/download/evalrpt/bevh_eval.pdf, accessed September 7, 2010.



LEGEND:

- Project Site
- City of Santa Monica
- High Liquefaction Potential
- Medium Liquefaction Potential
- Low Liquefaction Potential

SOURCE: TAHA, 2011.

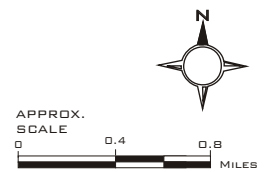


FIGURE 4.6-2

LIQUEFACTION POTENTIAL

Landslides. Landslides include a wide range of ground movement, such as rock falls, deep failure of slopes, and shallow debris flows. Landslides begin as a result of rainfall, earthquakes, volcanic activity, changes in groundwater, disturbance and change of a slope by man-made construction activities, or any combination of these factors. Landslides occur in hillside areas with unstable geological conditions or soil types that would be susceptible to failure when saturated. The project site is located in a relatively flat, developed area of Santa Monica. According to the City of Santa Monica's Geological Hazards Map, the project site is not located in a hilly area susceptible to landslides.

Soils and Geologic Materials

According to the California Geological Survey's Seismic Hazard Zone Report for the Beverly Hills 7.5 Minute Quadrangle, older alluvium soil makes up the broad high Santa Monica plain along the south flank of the Santa Monica Mountains from Beverly Hills west to Topanga Canyon and Santa Monica at the edge of the quadrangle. This material consists of alternating beds of medium dense to very dense sand, clay and silt. Gravel is abundant in many layers. The California Department of Food and Agriculture identifies three types of soils with slight variations in composition within the City of Santa Monica.⁷ These soils include Diablo Altamont Soils, Hanford Soils and Ramona Placentia Soils. The project site is underlain with Hanford soils, which are classified as sandy loams or loamy sands on alluvial fans and plains. These soils are well drained and have low potential for expansion and erosion. Specifically, the project site is located on Quaternary-age alluvial gravel, sand, silt and clay from the Santa Monica Mountains, as well as gravel and sand from stream channels.⁸

Erosion. Erosion is the removal of soils from exposed bedrock surfaces by water or wind. Erosion is intensified by an increase in slope, the narrowing of runoff channels and the removal of groundcover. Since the majority of the City of Santa Monica is paved and developed, there is a low potential for soil erosion in general. Excavation and grading activities during project construction could, however, result in soil erosion or loss of topsoil within the project site.

Expansive Soil. Expansive soils are those that swell when wetted and shrink when dried. The soil's potential to shrink and swell depends on the amount of clay in the soil, with the potential increasing as the clay content increases. Expansive soils located beneath structures can result in cracked foundations, interior and exterior wall separations, and ruptured utilities. As previously mentioned, the proposed project would be constructed in an area underlain by Hanford soils, which are well drained and considered to have a low erosion and expansion hazard potential.

REGULATORY FRAMEWORK

Federal

Uniform Building Code. The Uniform Building Code (UBC) is published by the International Conference of Building Officials and forms the basis for California's building code, as well as about half of the state building codes in the United States. It has been adopted by the California Legislature to address the specific building conditions and structural requirements for California, as well as provide guidance on foundation design and structural engineering for different soil types. The UBC defines and ranks the regions of the United States according to their seismic hazard potential. There are four types of regions defined by Seismic Zones 1 through 4, with Zone 1 having the least seismic potential and Zone 4 having the highest. The City of Santa Monica is located within Seismic Zone 4.

⁷*Ibid.*

⁸California Department of Conservation. *Seismic Hazard Zone Report for the Beverly Hills-Van Nuys (South 1/2) Quadrangle, Los Angeles County, California*. 1998. accessed September 1, 2010.

State

California Building Code. The California Building Code (CBC) Title 24 is a compilation of building standards, including seismic safety standards for new buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. Given the State's susceptibility to seismic events, the seismic standards within the CBC are among the strictest in the world. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies.

Alquist-Priolo Earthquake Fault Zoning Act. The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) provides policies and criteria to assist cities, counties, and State agencies in the development of structures for human occupancy across the trace of active faults. The Alquist-Priolo Act was enacted to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings, including historical buildings, against ground shaking. The Act requires the California Geological Survey to establish Alquist-Priolo Earthquake Fault Zones along known active faults in the state.

Seismic Hazards Mapping Act. In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the project area are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

Local

Santa Monica General Plan – Safety Element. The City of Santa Monica adopted the Safety Element of the General Plan in January, 1995 as one of seven State-required elements that must be included in the General Plan. The Safety Element includes goals and policies that address the issues of protecting the public from earthquake and landslide hazards and minimizing the economic impact of strong ground motion, liquefaction, and fault rupture on public and private property.

City of Santa Monica Building Code (Chapter 8.12 of the Santa Monica Municipal Code).

Section 8.12.020 – Adoption of California Building Code. The City of Santa Monica Building Code sets the minimum design and construction standards for construction. The "California Building Code, 2007 Edition," adopts by reference the International Building Code, 2006 Edition, as published by the California Building Standards Commission and the International Code Council including "Seismic Hazard Maps," as published by the United States Geological Survey. It was adopted with the local amendments and provisions of this Chapter, and with Chapters 8.16, 8.20 and 8.48 through 8.84 of the Santa Monica Municipal Code, and is known as the Building Code of the City of Santa Monica.⁹

⁹The City of Santa Monica. *Land Use and Circulation Element Final Environmental Impact Report*. 2010. available at: http://www.shapethefuture2025.net/PDF/eir/luce_feir_I.pdf, accessed August 30, 2010.

Section 8.12.050 – Supplemental Land Hazard Zone Regulations. The Safety Element established certain portions of the City as Seismic Hazard Zones and Geologic Hazard Zones. These areas and all accompanying information have been incorporated into the Municipal Code as Land Hazard Zones. All construction that is within a Land Hazard Zone is subject to the special design requirements necessary to affect the stated purpose of these codes. Special design requirements shall conform to the guidelines of the California Department of Conservation, Division of Mines and Geology.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to geology and soils if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:
 - 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;
 - Strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction; and/or
 - Landslides.
- Result in substantial soil erosion or the loss of topsoil;
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- 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; and/or
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

IMPACTS

As discussed in the Initial Study (Appendix A of this EIR), the proposed project would not result in impacts related to landslides as the project site is not located in a hillside area. In addition, the proposed project would be connected to the City sewer system and would not use on-site septic systems for wastewater treatment. As such, no impact related to septic tanks or alternative waste water disposal systems would occur. Therefore, these issues will not be discussed further.

The impact analysis in this section is limited to potentially significant impacts relating to seismic hazards such as ground shaking, ground failure, liquefaction, and seismically induced settlement, as well as soil hazards such as unstable soil, soil erosion, and expansive soil.

Seismicity

Impact GS-1 The project site is located in a Fault Hazard Management Zone as designated by the City. Compliance with all applicable provisions of the Santa Monica Building Code and implementation of Mitigation Measure GS1 would reduce impacts to less than significant.

The project site is not located within a State-designated Alquist-Priolo Zone. However, the project site is located within a Fault Hazard Management Zone, as identified in the Safety Element of the City of Santa Monica General Plan. The Fault Management Zone encompasses areas where weak and strong geomorphic expressions of the Santa Monica Fault have been previously mapped. Projects proposed for development within the Fault Hazard Management Zone require a qualitative evaluation discussing the

site location relative to the Santa Monica Fault, recent activity within the Santa Monica Fault Zone, relative risks and consequences of fault rupture at the project site, and measures to be taken to assess the likelihood of a fault traversing the property. This evaluation is required to be included as part of a site-specific geotechnical report that will be prepared for the proposed project by a registered geotechnical engineer. Therefore, without mitigation, the proposed project would result in a significant impact related to surface rupture.

GS1 At the time of final building plan check, a site-specific Geotechnical Report shall be submitted to the City of Santa Monica Building and Safety Division for review and approval. The Geotechnical Report shall be prepared in accordance with the City's *Guidelines for Geotechnical Reports* and at a minimum shall address: seismic hazards (fault management zone; groundshaking; liquefaction; subsidence, etc); hydrocollapse potential; and expansive soils. Information obtained from the Geotechnical Report shall be incorporated into the design and construction of the proposed project. The recommendations provided in the Geotechnical Report as well as Santa Monica Building Code requirements regarding foundation design, retaining wall design, excavations and shoring shall be fully implemented.

Impact GS-2 Seismically induced ground shaking could expose people or structures on the project site to potential substantial adverse effects. Compliance with all applicable provisions of the Santa Monica Building Code and California Geological Survey Special Publication 117 (Guidelines for Evaluating and Mitigating Seismic Hazards in California [2008]), and implementation of Mitigation Measure GS1 would reduce impacts to less than significant.

As discussed above, the project site is within an area susceptible to ground shaking. Construction of the proposed project would be required to comply with the seismic safety requirements in the Santa Monica Building Code and California Geological Survey Special Publication 117 (Guidelines for Evaluating and Mitigating Seismic Hazards in California [2008]). However, the proposed project must take into account site-specific seismic design factors and the maximum groundshaking potential to occur on the project site. The City of Santa Monica Building and Safety Department requires the approval of a detailed Geotechnical Report that specifically addresses site and building design at the time of final building plan check. The geotechnical study is required to include an evaluation of the project site relative to maximum groundshaking potential, and identify design requirements for structures and foundations to maintain structural integrity to the maximum extent under probable earthquake conditions as determined by the study. Therefore, without mitigation, the proposed project would result in a significant impact related to ground shaking.

Mitigation Measures

Mitigation Measure **GS1** would reduce impacts related to groundshaking to less than significant.

Level of Impact After Mitigation

Implementation of Mitigation Measure **GS1** would reduce impacts related to ground shaking to less than significant.

Impact GS-3 Seismic activity could produce sufficient ground shaking to result in liquefaction on-site. Compliance with the City of Santa Monica Building Code and implementation of Mitigation Measure GS1 would reduce this impact to less than significant.

According to the City of Santa Monica's Geologic Hazards map, the southwestern portion of the project site is located within an area that has "medium potential" for liquefaction, and the northeastern portion of the site is located within an area that has "high potential" for liquefaction. Soil on the project site is predominantly alluvial. The groundwater level of the Coastal subbasin of the Santa Monica Basin is

approximately 50 to 60 feet below grade, although groundwater levels at a site adjacent to the project site were found to be 42 feet below grade.¹⁰ The characteristics of the soil and groundwater table indicate that the potential for liquefaction at the project site is low. Nonetheless, a portion of the site is located in an area with a high liquefaction potential. Therefore, the proposed project could be exposed to liquefaction risks. Prior to building construction, the City of Santa Monica Building and Safety Department requires the approval of a detailed Geotechnical Report that specifically addresses site and building design at the time of final building plan check. As part of the Geotechnical Report, analysis using soil samples is required to determine the site-specific liquefaction and seismic settlement potential. The proposed project would comply with the City's established building standards and the requirements contained in the site-specific geotechnical investigation. Therefore, without mitigation, the proposed project would result in potentially significant liquefaction impacts.

Mitigation Measures

Mitigation Measure **GS1** would reduce significant impacts related to liquefaction to less than significant.

Level of Impact After Mitigation

Implementation of Mitigation Measures **GS1** would reduce impacts related to liquefaction to less than significant.

Soils and Geologic Materials

Impact GS-4 Soil erosion and sedimentation could occur during the grading and excavation phase of the proposed project due to soil transport by wind and water. Compliance with the City's Urban Runoff Pollution Ordinance requirements and implementation of Mitigation Measures GS3 through GS6 would reduce this impact to less than significant.

Construction of the project would require earthwork for construction of the subterranean parking garage and foundations. During earthwork activities, exposed and stockpiled soils on the construction site could be subject to minor erosion and conveyed via stormwater runoff into municipal storm drains. In accordance with the City's Urban Runoff Pollution Ordinance (Chapter 7.10 of the Santa Monica Municipal Code), construction projects in the City of Santa Monica must follow specific construction Best Management Practices, or BMPs. BMPs must be put into practice at the time of demolition of an existing structure, or at the start of new construction, and will remain in place until a certificate of occupancy has been issued. In accordance with the City's Urban Runoff Pollution Ordinance, the following BMPs would be implemented during construction:

- Polluted runoff (including runoff containing sediments and/or construction wastes) shall not leave the construction parcel. No wash water from any type of cement and concrete machinery or concrete mix truck shall be allowed to leave the construction parcel. Any washing of equipment in the right-of-way shall be contained and properly disposed.
- Any sediment or other materials that are tracked off the parcel by vehicles and equipment shall be removed the same day as they are tracked off the parcel. Where determined to be necessary, a temporary sediment control BMP shall be installed.
- Plastic covering shall be utilized to prevent erosion of an otherwise unprotected area, e.g., exposed or open to elements, along with treatment control BMPs to intercept and safely convey the runoff to the municipal storm system.

¹⁰City of Santa Monica Planning and Community Development Department. 2834 Colorado Avenue Creative Studio Project Draft Environmental Impact Report. 2009. accessed August 31, 2010.

- Erosion drainage controls shall be utilized depending on the extent of proposed grading and topography of the parcel to prevent runoff

All grading and excavation activities would require grading permits from the City of Santa Monica Building and Safety Department, which would be conditioned to include requirements and BMPs designed to limit the potential erosion impacts. In addition, a Storm Water Pollution Prevention Plan (SWPPP) would be implemented, which also specifies BMPs that would prevent all construction pollutants from contacting storm water and are intended to keep sediments and pollutants from being discharged off-site into receiving waters. All construction activities would be required to adhere to these standards and recommendations. Nonetheless, without mitigation, construction of the proposed project could result in significant construction impacts related to erosion.

As previously mentioned, surface improvements such as paved roads and buildings decrease the potential for soil erosion. The proposed project would involve the full development of the site, including the construction of four buildings, a subterranean parking structure and the extension of a paved road. In addition to the development of impervious surfaces, the project site is underlain with Hanford soils, which have low potential for erosion, and is located in a flat, highly urbanized area. Therefore, operational impacts would be less than significant.

Mitigation Measures

Mitigation Measures **GS2** through **GS5** would reduce significant construction related erosion impacts.

GS2 Construction and excavation activities shall adhere to the Best Management Practices (BMPs) set forth by the City of Santa Monica Urban Runoff Pollution Ordinance (Chapter 7.10 of the Santa Monica Municipal Code). Such BMPs include using plastic coverings to prevent erosion of any unprotected area, such as mounds of dirt or dumpsters, along with devices designed to intercept and safely divert runoff.

GS3 ~~Prior to the issuance of a grading permit, the contractor shall notify the City that all grading activities will be scheduled for completion before the start of the rainy season (between November and April).~~ All grading activities shall be scheduled for completion before the start of the rainy season (between November and April) to the extent feasible. If grading events do occur during the raining season, a rain event action plan shall be prepared and designed to protect all exposed portions of the site within 48 hours of any likely precipitation event forecast of 50 percent or greater probability.

GS4 ~~During the rainy season (between November and April), an~~ An erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Santa Monica Building and Safety Department to minimize potential erosion during construction. The erosion control plan shall be a condition prior to issuance of any grading permit.

GS5 Provisions shall be made for adequate surface drainage away from the areas of excavation, as well as protection of excavated areas from flooding. The grading contractor shall control surface water runoff and the transport of silt and sediment.

Level of Impact After Mitigation

With implementation of Mitigation Measures **GS2** through **GS5**, construction impacts related to erosion would be less than significant.

Impact GS-4 The project site is located on Hanford soils, which have a low potential for expansion; however, without proper site preparation or design features to provide adequate foundations, the proposed project could result in a significant impact related to expansive soils. Compliance with the City of Santa Monica Building Code and implementation of Mitigation Measure GS1 would reduce this impact to less than significant.

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. The project site is located on Hanford soils, which are well drained and considered to have low erosion and expansion potential. In addition, the City of Santa Monica Safety Element identifies the soil in the project vicinity as having a low expansion potential. As previously stated, a detailed geotechnical report would be required at the time of final building plan check. As part of the detailed Geotechnical Report, an analysis would be conducted to determine the potential for expansive soils and specific design recommendations. Therefore, without mitigation, the proposed project could result in significant impacts related to expansive soil.

Mitigation Measures

Mitigation Measure **GS1** would reduce significant impacts related to expansive soils to less than significant.

Level of Impact After Mitigation

Implementation of Mitigation Measures **GS1** would reduce impacts related to expansive soils to less than significant.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. Geologic hazards are typically site-specific, and there is little cumulative geological relationship between the proposed project and the related projects. Nevertheless, cumulative development would increase the population in the area, thus increasing the risk of exposure to seismic hazards. However, as with the proposed project, the related projects would be subject to the same local, regional, State, and federal regulations pertaining to geology and soils, including the Santa Monica Building Code, CBC and UBC requirements. The proposed project and the two nearby related projects at 2848-2912 Colorado Avenue and 2834 Colorado Avenue would involve grading and excavation for the construction of buildings and underground parking structures, which could contribute to increased erosion soil instability in the area. However, geological impacts associated with the proposed project would be mitigated to less than significant. In addition, as with the proposed project, related projects would be subject to the same local, regional, State, and federal regulations pertaining to geology and soils, including the Santa Monica Building Code, CBC and UBC requirements. Therefore, with adherence to such regulations, the proposed project would not contribute to a cumulative impact related to geology and soils.

4.7 GREENHOUSE GAS

This section provides an overview of existing greenhouse gas (GHG) conditions and evaluates the climate change impacts associated with the proposed project. Supporting data and calculations are included in Appendix C.

EXISTING SETTING

GHG emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F).

In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and water vapor. Of all the GHGs, CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. CO₂ comprised 83.3 percent of the total GHG emissions in California in 2002.¹ The other GHGs are less abundant but have higher global warming potential than CO₂. Among the other GHGs and with the exception of water vapor, CH₄ is the most abundant but has the least global warming potential. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. The CO₂e of CH₄ and N₂O represented 6.4 and 6.8 percent, respectively, of the 2002 California GHG emissions. Other high global warming potential gases represented 3.5 percent of these emissions.² In addition, there are a number of human-made pollutants, such as CO, NO_x, non-methane VOC, and SO₂, that have indirect effects on terrestrial or solar radiation absorption by influencing the formation or destruction of other climate change emissions.

REGULATORY FRAMEWORK

Global Climate Change

In response to growing scientific and political concern with global climate change, California has recently adopted a series of laws to reduce emissions of GHGs into the atmosphere. In September 2002, Assembly Bill (AB) 1493 was enacted, requiring the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. California Governor Arnold Schwarzenegger announced, on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

In response to the Executive Order, the Secretary of the California Environmental Protection Agency created the Climate Action Team (CAT), which, in March 2006, published the *Climate Action Team Report to Governor Schwarzenegger and the Legislature* (2006 CAT Report). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor’s targets are met and can be met with existing authority of the State agencies.

¹California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 11.

²*Ibid.*

Assembly Bill 32. In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the CARB to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB 32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the State.

AB 32 charges the CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, the CARB adopted three discrete early action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.³ On October 25, 2007, the CARB tripled the set of previously approved early action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing perfluorocarbons from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emission from the non-electricity sector. The CARB has determined that the total statewide aggregated greenhouse gas 1990 emissions level and 2020 emissions limit is 427 million metric tons of CO₂e. The 2020 target reductions are currently estimated to be 174 million metric tons of CO₂e.

The CARB AB 32 Scoping Plan contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by the CARB with input from the Climate Action Team and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. The measures in the Scoping Plan adopted by the Board will be developed and put in place by 2012.

The CARB has also developed the greenhouse gas mandatory reporting regulation, which required reporting beginning on January 1, 2008 pursuant to requirements of AB 32. The regulations require reporting for certain types of facilities that make up the bulk of the stationary source emissions in California. The regulation language identifies major facilities as those that generate more than 25,000 metric tons of CO₂ per year. Cement plants, oil refineries, electric generating facilities/providers, co-generation facilities, and hydrogen plants and other stationary combustion sources that emit more than 25,000 metric tons of CO₂ per year, make up 94 percent of the point source CO₂ emissions in California.

CEQA Guideline Amendments. California Senate Bill (SB) 97 required the Governor's Office of Planning and Research (OPR) to develop CEQA guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." The CEQA Guideline amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. Noteworthy revisions to the CEQA Guidelines include:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;

³California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

Senate Bill 375. California Senate Bill (SB) 375, passed September 30, 2008, provides a means for achieving AB 32 goals through regulation of cars and light trucks and ties local jurisdictions land use decisions with transportation funds. SB 375 aligns three critical policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve greenhouse gas emissions reductions targets for the transportation sector. SB 375 establishes a process for CARB to develop the GHG emissions reductions targets for each region (as opposed to individual local governments or households). CARB must take certain factors into account before setting the targets, such as considering the likely reductions that will result from actions to improve the fuel efficiency of the Statewide fleet and regulations related to the carbon content of fuels (low carbon fuels). CARB must also convene a Regional Targets Advisory Committee, which includes representation from the League of California Cities, California State Association of Counties, metropolitan planning organizations, developers, planning organizations and other stakeholder groups. Furthermore, before setting the targets for each region, CARB is required to exchange technical information with the Metropolitan Planning Organizations (MPOs) for that region and with the affected air district. SB 375 provides that the MPOs may recommend a target for its region.

SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Cities and counties that find the CEQA streamlining provisions attractive have the opportunity (but not the obligation) to align their planning decisions with the decisions of the region.

SB 375 provides more certainty for local governments and developers by framing how AB 32's reduction goal from transportation for cars and light trucks will be established. It should be noted, however, that SB 375 does not prevent the CARB from adopting additional regulations under its AB 32 authority. However, based on the degree of consensus around SB 375 and early indications from the CARB, such actions are not anticipated in the foreseeable future.⁴

CARB Guidance. The CARB has published draft guidance for setting interim GHG significance thresholds (October 24, 2008). The guidance is the first step toward developing the recommended Statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). The CARB believes that thresholds in these important sectors will advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the State.

⁴American Planning Association, California Chapter, *Analysis of SB 375*, <http://www.calapa.org/en/cms/?2841>, accessed March 30, 2009.

SCAQMD Guidance. The SCAQMD has convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies.

City of Santa Monica. Local jurisdictions, such as the City of Santa Monica, have the authority to contribute to reductions in air pollution and GHG emissions through their police power and decision-making authority.

Sustainable City Plan. The City of Santa Monica released the Santa Monica Sustainable City Plan in September 1994, with updates and revisions to the Santa Monica Sustainable City Plan adopted in February 2003, and October 2006. The Santa Monica Sustainable City Plan was initiated with the goals and strategies for City government and all sectors of the community to conserve and enhance local resources, safeguard human health and the environment, maintain a healthy and diverse economy, and improve the livability and quality of life in the City of Santa Monica. To that end, the Santa Monica Sustainable City Plan has set GHG emissions reduction targets for the City in order to address climate change impacts; these targets, if achieved, would result in greater GHG emissions reductions than those set by the State, at least in the short term. The Sustainable City Plan includes targets of reducing GHG emissions at least 30 percent below 1990 levels by 2015 for City government operations and 15 percent below 1990 levels by 2015 Citywide. The GHG emissions inventories for the City are calculated in the Santa Monica Sustainable City Plan. As shown in **Table 4.7-1**, GHG emissions for the City were 924,293 metric tons of CO₂e in 1990. In 2007, GHG emissions for the City were 941,625 metric tons of CO₂e.

TABLE 4.7-1: CITY OF SANTA MONICA GREENHOUSE GAS EMISSIONS	
Year	Metric Tons
1990	924,293
2007	941,625
SOURCE: City of Santa Monica, <i>Land Use and Circulation Element Final Environmental Impact Report</i> , April 2010.	

In order to address climate change impacts, the Santa Monica Sustainable City Plan set a Citywide target for reducing GHG emissions down to 785,649 metric tons CO₂e by 2015, which is 15 percent below 1990 levels, or a reduction of 16.6 percent below the 2007 inventory of CO₂e.

The existing Sustainable City Plan anticipated to achieve most of the reductions from increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of public transit, rideshare programs, and alternatives to driving (i.e., walking or bicycling). The following City programs and policies support or were developed to support the achievement of targeted reductions in GHG emissions listed in the Sustainable City Plan.

Land Use and Circulation Element. The City of Santa Monica Land Use and Circulation Element links new development and urban character and form with a shift in transportation to create sustainable city practices. Chapter 3.1 of the LUCE specifically addresses sustainability and climate change by providing Citywide goals and policies. The LUCE goals and policies align with State regulations and policies for GHG reductions. In addition, the LUCE is intended to achieve to the GHG reduction targets reflected in the Sustainable City Plan. The LUCE goals and policies that follow reflect the City's commitment to achieving a reduction in GHGs for new development projects. Additionally, the LUCE includes land use

and transportation goals and policies that are aimed at creating a more sustainable environment (see Section 4.10 Land Use and Section 4.15 Transportation and Traffic).

- *Policy S2.1 Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan, including, but not limited to: focusing new growth in mixed-use, transit oriented districts; focusing new growth along existing corridors and nodes; support the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City.*
- *Policy S2.3 Advance the No Net New Trips goal in the Land Use and Circulation Element with TDM projects such as expanded rideshare programs, parking management strategies, as well as development impact fees for public transit infrastructure.*
- *Policy S2.9 Consider incorporating the No Net New Trips policy into the City's CEQA environmental analysis and require mitigation of significant impacts for projects that will generate new vehicle trips.*
- *Policy S5.5 As part of future updates to the City's Green Building Ordinance, explore a requirement for shade trees on south- and west-facing sides of all new buildings to reduce building energy loads.*
- *Policy S5.6 Encourage cool roofs or green roofs on new buildings.*
- *Policy S5.7 Encourage cool paving on new plazas and parking lots.*
- *Policy S5.8 Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks*
- *Policy S6.1 Ensure sufficient water supplies for new development.*
- *Policy S6.3 Implement landscape water conservation requirements for new construction projects.*
- *Policy S6.7 Expand solid waste diversion strategies such as increased commercial recycling collection and outreach, expanded food waste collection, composting and waste to energy conversion programs.*
- *Policy LU2.5 Vehicle Trip Reduction. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.*
- *Policy LU8.1 Transportation Demand Management. Require participation in TDM programs for projects above the base to encourage walking, biking and transit and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.*
- *Policy LU8.3 Pedestrian Bicycle and Transit Connections. Ensure and transit mobility by creating facilities for comfortable walking throughout the City, a complete and safe bicycle network, and convenient and frequent transit service that will make transit an attractive option for all types of trips.*

Green Building Ordinance. In 2000, the City Council first adopted a set of green building requirements for public and private sector buildings. These requirements addressed energy efficiency and construction and demolition waste recycling. They were later expanded to include green construction materials and

landscape water conservation requirements. Since 2000 the City has required that new buildings be approximately 15 percent more efficient than state law requires, on average. The City has also adopted a policy for new municipal buildings to achieve at least a Silver rating by the US Green Building Council's Leadership in Energy and Environmental Design (LEED) rating system.

Urban Forest Management Plan. On April 7, 2009, City Council approved the establishment of an Urban Forest Task Force for a long-range urban forest master plan. The Urban Forest Task Force gathers community input and focuses on the following functions:

- Developing the long-range urban forest master plan
- Conducting community meetings to learn resident and business opinions regarding the long-term management of the community forest
- Incorporating the public's input into the long-range urban forest master plan
- Making revisions to the street tree designation list
- Advising staff throughout the plan's development to create standards for streetscape development projects
- Making recommendations for strategic goals, objectives, implementation measures, and timelines for achievement of those goals and maintenance procedures

From November 2008 through December 2009, the City of Santa Monica initiated a Sustainable Landscape Grant Program. The goals of this program include demonstrations of beautiful sustainable gardens (residential/commercial/institutional), save 5,200,000 million gallons of water each year through intelligent plant selection and advanced irrigation systems, and to bring nature back to Santa Monica while improving water quality, air quality and soil health. Santa Monica continues to implement urban forest programs, such as Tree Planting and workshops.

Solar Santa Monica Program. In the fall of 2006, the Santa Monica City Council approved a long-term energy plan. The Solar Santa Monica program provides services for residences and local business. This program will help the City achieve its energy independence goals. The City has established a goal to be energy self-sustaining by 2020.

The Solar Santa Monica Program includes resources such as a carbon calculator, do-it-yourself energy survey tool, solar potential finder, onsite audits and technical assistance, as well as providing a referral network of contractors (Specialists) that specialize in energy efficiency and other home-improvement work, and financing partners.

Construction and Material Waste Management Plan. In 1990, the Source Reduction and Recycling Element (SRRE) for Santa Monica was adopted by the City Council. Chapter 7.60, Construction and Demolition (C&D) was added to the Santa Monica Municipal Code. Municipal Code Chapter 7.60 requires a construction and material waste management plan for construction and demolition projects. The target, except in unusual circumstances, is to divert an average of at least 60 percent of all C&D Material from construction, demolition, and renovation projects; and to ensure that contractors that comply with this Chapter are not placed at a competitive disadvantage.

Projects covered by Chapter 7.60 include:

1. Private Projects: All construction and demolition projects where the total costs of which are, or are projected to be, \$50,000 or greater, or are 1,000 square feet or greater
2. City-Sponsored Projects: All City-sponsored construction, demolition and renovation Projects
3. Compliance as a Condition of Approval: Compliance with this Chapter shall be included as a condition of approval on any construction or demolition permit issued for a Covered Project

In 2008, the C&D waste diversion requirements from Chapter 7.60 were consolidated from with other green building requirements in Chapter 8.108. At that time the required diversion rate was increased to 65 percent, inert materials were excluded from this calculation, and all demolition projects were required to comply with no minimum threshold, due to the relatively higher amounts of waste generated by those projects.

Cash-Out Program. The City of Santa Monica is the first city in the nation to implement a mandatory Parking Cash-Out Program (Section 9.16.070 of the City Zoning Code). Parking Cash-Out, or AB 2109, is a State law requiring employers of fifty or more employees who lease their parking, and subsidize any part of their employee parking to offer their employees the opportunity to give up their parking space and rideshare to work instead. In return for giving up their parking space, the employer pays the employee the cost of the parking space.

Green Business Certification. The City of Santa Monica has implemented a Green Business Certification. The Santa Monica Green Business Certification Program is a collaboration between the City of Santa Monica, Chamber of Commerce, Convention & Visitors Bureau, and Sustainable Works to certify and recognize green businesses in the Santa Monica Community. Businesses under the program conserve resources, prevent pollution, protect environmental and public health, strengthen its bottom line through operating efficiencies, improves employee morale and are recognized as business leaders.

Community Gardens. The City of Santa Monica's Community Gardens provide an opportunity for people to exercise, practice sustainability, grow organic fruits, flowers and vegetables, and meet neighbors with like interests. The Community Garden includes a garden sharing registry. As a property owner, residents can share community garden space and select a listed gardener in need of space to grow. The home/property owner provides the land and the water and the gardeners do the work. Together, the crop is shared. The bounty of benefits could include homegrown vegetables, fresh herbs, fragrant flowers, and a deeper connection with the community.

Sustainable Landscape Grant. The City of Santa Monica offers a Sustainable Landscape Grant. The grant provides funding to individuals, property owners, businesses, non-governmental organizations and public agencies who are water customers in Santa Monica. The sustainable landscaping practices save water with intelligent plant selection and advanced irrigation systems, and reduction of water pollution and solid waste generation. The City estimates a savings of 5,200,000 million gallons of water each year and reduction of yard waste, such as lawn clippings, by 44,500 pounds each year.

Municipal Code 9.16.100 Transportation Management Associations. The City of Santa Monica has implemented Transportation Management Associations (TMAs) under municipal code 9.16.100. TMAs address community and worksite transportation-related problems. Transportation management associations may be formed to implement Transportation Demand Management (TDM), Transportation System Management (TSM), and/or Transportation Facility Development (TFD) strategies in employment clusters or at multi-tenant worksites.

The primary function of a TMA is to pool resources to implement solutions to commuter-related congestion problems in conjunction with the City Transportation Coordinators. The TMA must provide an annual report to the City to become recertified annually. Evaluation and results shall be discussed and used to describe the next year's planned activities.

City of Santa Monica Watershed Management Plan. In 2006, the City of Santa Monica adopted a citywide watershed management plan. The plan is intended to restore a healthier balance between the urban environment and the natural ecosystem, including the Santa Monica Bay, by reducing the pollution in urban runoff, reducing urban flooding, and increasing water conservation, recreational opportunities, open space, and wildlife and marine habitat. This plan identifies various capital drainage improvements throughout the City, including the installation of subsurface infiltration, perimeter infiltration basins, UV run-off disinfection facilities, permeable surface parking lots, and the daylighting of certain storm drains.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to greenhouse gas emissions if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The SCAQMD has not approved a GHG significance threshold for the development of non-SCAQMD projects. The significance threshold is based on the methodologies recommended by the California Air Pollution Control Officers Association (CAPCOA) *CEQA and Climate Change* white paper. CAPCOA conducted an analysis of various approaches and significance thresholds, ranging from a zero threshold (all projects are cumulatively considerable) to a high of 40,000 to 50,000 metric tons of CO₂e per year. For example, an approach assuming a zero threshold and compliance with AB 32 2020 targets would require all discretionary projects to achieve a 33 percent reduction from projected “business-as-usual” emissions to be considered less than significant. A zero threshold approach could be considered on the basis that climate change is a global phenomenon, and not controlling small source emissions would potentially neglect a major portion of the GHG inventory. However, the CEQA Guidelines also recognize that there may be a point where a project’s contribution, although above zero, would not be a considerable contribution to the cumulative impact (CEQA Guidelines, Section 15130 (a)). Therefore, a threshold of greater than zero is considered more appropriate for the analysis of GHG emissions under CEQA.

Another method would use a quantitative threshold of greater than 900 metric tons CO₂e per year based on a market capture approach that requires mitigation for greater than 90 percent of likely future discretionary development. This threshold would generally correspond to office projects of approximately 35,000 square feet, retail projects of approximately 11,000 square feet, or supermarket space of approximately 6,300 square feet. Another potential threshold would be the 10,000 metric tons standard used by the Market Advisory Committee for inclusion in a GHG Cap and Trade System in California. A 10,000 metric ton significance threshold would correspond to the GHG emissions of approximately 550 residential units, 400,000 square feet of office space, 120,000 square feet of retail, and 70,000 square feet of supermarket space. This threshold would capture roughly half of new residential or commercial development. The basic concepts for the various approaches suggested by CAPCOA are used herein to determine whether or not the proposed project’s GHG emissions are “cumulatively considerable.”

CAPCOA’s suggested quantitative thresholds are generally more applicable to development on sites at the periphery of metropolitan areas, also known as “greenfield” sites, where there would be an increase in vehicle miles traveled (VMT) and associated GHG emissions than to infill development, which would generally reduce regional VMT and associated emissions. As the City of Santa Monica is generally built out, most commercial development within the City is infill or redevelopment and would be expected to generally reduce VMT and reliance on the drive-alone automobile use as compared to further suburban growth at the periphery of the region. A reduction in vehicle use and vehicle miles traveled can result in a reduction in fuel consumption and in air pollutant emissions, including GHG emissions. Recent research indicates that infill development reduces VMT and associated air pollutant emissions, as compared to greenfield sites. For example, a 1999 simulation study conducted for the USEPA, comparing infill development to greenfield development, found that infill development results in substantially fewer VMT per capita (39 percent to 52 percent) and generates fewer emissions of most air pollutants and greenhouse gases.

For this reason, the most conservative (i.e., lowest) thresholds, suggested by CAPCOA, would not be appropriate for the proposed project given that it is located in a community that is highly urbanized. Similarly, the 900-ton threshold was also determined to be too conservative for general development in the South Coast Air Basin. Consequently, the threshold of 10,000 metric tons CO₂e is used as a quantitative benchmark for significance.

In addition, to this quantitative threshold, the proposed project's consistency with GHG plans is analyzed. Specifically, the analysis will consider the Climate Action Team (CAT) Report, which contains greenhouse gas reduction strategies that California agencies can implement. The CAT published a public review draft of Proposed Early Actions to Mitigate Climate Change in California. Most of the strategies were in the 2006 CAT Report or are similar to the 2006 CAT strategies. The 2006 CAT Report strategies that apply to the project are contained in Table 4.14-9 (Greenhouse Gas Emissions Reduction Mitigation Measures/Design Strategies). This analysis will also discuss consistency with the California Attorney General's greenhouse gas reduction measures. The California Attorney General has developed a document entitled The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level, which includes a list of mitigation measures that would serve to reduce GHG emissions. The document provides information that may be helpful to local agencies in carrying out their duties under CEQA as they relate to global warming. Included in this document are various measures that may reduce the global warming related impacts of a project. The second section of the Attorney General's mitigation document lists examples of potential greenhouse gas reduction measures in the general plan context. These measures are included both to suggest how the measures set forth in the first section could be incorporated into a general plan, as well as to identify measures that are general plan specific. This list of mitigation is periodically updated and available for public review, with the last update occurring in May 2008. Finally, the project is analyzed relative to consistency with the recently updated Land Use and Circulation Element (LUCE), which sets the vision for the City with regards to land use and transportation policies, and the Sustainable City Plan, which describes a multimodal transportation system that minimizes greenhouse gas reduction

Thus, a project's contribution to cumulative impacts to global climate change is considered cumulatively considerable if the proposed project would generate 10,000 metric tons CO₂e per year or would conflict with adopted GHG plans.

IMPACTS

Methodology

Greenhouse gas emissions were calculated for mobile sources, natural gas consumption, general electricity consumption, electricity consumption associated with the use and transport of water, and solid waste decomposition. Mobile source GHG emissions were obtained from URBEMIS2007. GHG emission factors for natural gas and electricity were obtained from the Climate Action Registry (CCAR) General Reporting Protocol (Protocol) and applied to the respective consumption rates to calculate annual GHG emissions in metric tons. The California Energy Commission has reported that the energy intensity of the water use cycle in Southern California is 12,700 kilowatt-hours per million gallons. Solid waste was estimated using generation rates provided by the California Department of Resources Recycling and Recovery. USEPA has stated that solid waste decomposition generates 3.1 metric tons of CO₂e per ton of waste.

Impact GHG-1 Operation of the proposed project would generate greenhouse gas emissions, but emissions would not exceed the established significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to GHG emissions.

Greenhouse gas emissions for the project were calculated for on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural

gas consumption, and solid waste decomposition. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. As shown in **Table 4.7-2**, the proposed project would result in ~~7,003~~ 7,008 metric tons of CO₂e per year under the Cumulative Plus Project (Year 2020) Conditions. The Approval Year Plus Project (Year 2011) Conditions would result in ~~7,143~~ 7,151 metric tons of CO₂e per year. Estimated GHG emissions would be less than the 10,000 metric tons of CO₂e per year quantitative significance threshold. Therefore, the proposed project would not exceed significance thresholds for greenhouse gas emissions. Impacts would be less than significant.

TABLE 4.7-2: GREENHOUSE GAS EMISSIONS	
Source	Carbon Dioxide Equivalent (Metric Tons per Year)
APPROVAL YEAR (YEAR 2011) CONDITIONS	
Mobile	385
General Electricity	157
Water Cycle Electricity	14
Natural Gas	263
Solid Waste Decomposition	170
Total Approval Year (Year 2011) Conditions	989
APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS	
Mobile	4,308
General Electricity	1,370
Water Cycle Electricity	108
Natural Gas	979
Solid Waste Decomposition	1,301
Total Approval Year Plus Project (Year 2011) Conditions	8,066
Total Net Operational Emissions	7,077
Construction Emissions Amortized /a/	66 74
Total Project Emissions	7,143 <u>7,151</u>
Regional Significance Threshold	10,000
Exceed Threshold?	No
CUMULATIVE BASE (YEAR 2020) CONDITIONS	
Mobile	388
General Electricity	157
Water Cycle Electricity	14
Natural Gas	263
Solid Waste Decomposition	170
Total Cumulative Base (Year 2020) Conditions)	992
CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS	
Mobile	4,168
General Electricity	1,370
Water Cycle Electricity	108
Natural Gas	979
Solid Waste Decomposition	1,301
Total Cumulative Plus Project (Year 2020) Conditions	7,926
Total Net Operational Emissions	6,934
Construction Emissions Amortized /a/	66 <u>74</u>
Total Project Emissions	7,000 <u>7,008</u>
Regional Significance Threshold	10,000
Exceed Threshold?	No
/a/ The SCAQMD recommends accounting for construction emissions by averaging them over a 30-year project lifetime.	
SOURCE: TAHA, 2011.	

Mitigation Measures

Impacts related to GHG emissions would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact GHG-2 The proposed project would be consistent with greenhouse gas reduction measures of the Climate Action Team, CAPCOA, and the Attorney General. In addition, the proposed project would be consistent with the City's Sustainable City Plan and the LUCE. Therefore, the proposed project would result in a less-than-significant impact related to applicable GHG plans, policies, or regulations.

The proposed project intends to achieve LEED certification under the USGBC. Specifically, the project intends to pursue LEED Silver Certification for New Buildings and Major Renovations. LEED Scorecards provide an initial benchmark identifying which points could potentially be incorporated into the proposed project. Refinement of specific features will be developed as the project moves further along in the design and entitlements processes and a specific LEED path is determined for the residential component. Regardless of the path determined, the proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality.

The proposed project would meet the objectives and overall intent of reducing greenhouse gases consistent with direction/measures of the California Attorney General's Office, CAPCOA, and the CAT. Project consistency with GHG reduction policies as set forth by CAT, CAPCOA, and the Attorney General are in shown in **Tables 4.7-3 through 4.7-5**. In addition, as shown in **Table 4.7-6**, the proposed project would be consistent with the City's Sustainable City Plan, the LUCE, and the Green Building Ordinance. As indicated therein, the proposed project would be consistent with GHG reduction policies. Impacts would be less than significant.

Mitigation Measures

Impacts related consistency with GHG reduction policies would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. Because project-related GHG emissions are only important in the context of cumulative emissions, the focus of the GHG analysis is on answering the question of whether incremental contributions of GHGs are a cumulatively considerable contribution to global warming effects. As shown in **Tables 4.7-3 through 4.7-5**, the proposed project would be consistent with adopted plans and policies. Therefore, the proposed project would not contribute to a cumulative impact related to greenhouse gas emissions.

TABLE 4.7-3 PROJECT CONSISTENCY WITH CLIMATE ACTION TEAM GREENHOUSE GAS EMISSION REDUCTION STRATEGIES	
Strategy	Project Consistency
CALIFORNIA AIR RESOURCES BOARD	
Vehicle Climate Change Standards: AB 1493 required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the CARB in September 2004.	Not Applicable. These are CARB enforced standards for vehicle manufacturing. Therefore, this strategy is not applicable to the project.
Diesel Anti-Idling: The CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling in July 2004.	Consistent: Current State law restricts diesel truck idling to five minutes or less. Diesel trucks making deliveries to the project site would be subject to this State-wide law. Construction vehicles would also subject to this regulation.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	Not Applicable: This strategy applies to the sale, manufacturing, and regulation of consumer products. Therefore, this strategy is not applicable to the project.
Alternative Fuels: Biodiesel Blends: CARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	Not Applicable: These are CARB strategies for regulating the use of alternative fuels and increasing heavy duty vehicle efficiency. Therefore, this strategy is not applicable to the project.
Alternative Fuels: Ethanol: Increased use of E-85 fuel.	
Heavy-Duty Vehicle Emission Reduction Measures: Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.	
Achieve 50 Percent Statewide Recycling Goal: Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills.	Consistent: The proposed project would include on-site recycling containers to support the statewide recycling goal. In addition, the proposed project would comply with Section 8.108.010 Subpart C of the Santa Monica Municipal Code, which requires that demolition and/or construction projects over 1000 square feet divert at least 65 percent of construction and demolition material from landfills. See above.
Zero Waste – High Recycling: Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	
DEPARTMENT OF FORESTRY	
Urban Forestry: A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	Consistent: The project would include the planting of new trees on the project site and along the adjacent public right of ways (e.g., Colorado Avenue and Pennsylvania Avenue extension).
DEPARTMENT OF WATER RESOURCES	
Urban Forestry: A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	Consistent: The project would include the planting of new trees on the project site and along the adjacent public right of ways (e.g., Colorado Avenue and Pennsylvania Avenue extension).

TABLE 4.7-3 PROJECT CONSISTENCY WITH CLIMATE ACTION TEAM GREENHOUSE GAS EMISSION REDUCTION STRATEGIES	
Strategy	Project Consistency
DEPARTMENT OF WATER RESOURCES	
<p>Water Use Efficiency: Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.</p> <p>Use both potable and non-potable water to maximum extent practicable; low flow appliances (i.e., toilets, dishwashers, showerheads, washing machines, etc); automatic shut off valves for sinks in restrooms; drought resistant landscaping; Place "Save Water" signs near water faucets.</p>	<p>Consistent: The proposed project intends to achieve LEED Silver certification under the USGBC. The proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, including water efficiency. As part of the LEED Silver Certification, the proposed project would be required to include low flow appliances. In addition, the proposed project's landscaping would be required to comply with the City's Water-Efficient Landscape and Irrigation Standards. Landscaping may include drought resistant plant species.</p>
ENERGY COMMISSION (CEC)	
<p>Building Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).</p>	<p>Consistent: The project will comply with the City's Green Building Ordinance, which requires that the project exceed Title 24 standards.</p>
<p>Appliance Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).</p>	<p>Not Applicable: This strategy is aimed at manufacturers and sellers of appliances. Therefore, this strategy is not applicable to the project.</p>
<p>Appliance Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).</p>	<p>Not Applicable: This strategy is aimed at manufacturers and sellers of appliances. Therefore, this strategy is not applicable to the project.</p>
<p>Fuel-Efficient Replacement Tires & Inflation Programs: State legislation established a statewide program to encourage the production and use of more efficient tires.</p>	<p>Not Applicable: This strategy is aimed at manufacturers and sellers of tires. Therefore, this strategy is not applicable to the project.</p>
<p>Municipal Utility Energy Efficiency Programs/Demand Response: Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.</p>	<p>Not Applicable: These strategies are aimed at energy companies/agencies that buy and sell energy. Therefore, this strategy is not applicable to the project.</p>
<p>Municipal Utility Renewable Portfolio Standard: California's Renewable Portfolio Standard (RPS), established in 2002, requires that all load serving entities achieve a goal of 20 percent of retail electricity sales from renewable energy sources by 2017, within certain cost constraints.</p>	
<p>Municipal Utility Combined Heat and Power: Cost effective reduction from fossil fuel consumption in the commercial and industrial sector through the application of on-site power production to meet both heat and electricity loads.</p>	
<p>Alternative Fuels: Non-Petroleum Fuels: Increasing the use of non-petroleum fuels in California's transportation sector, as recommended as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.</p>	<p>Not Applicable: These strategies are aimed at the transportation sector. Therefore, this strategy is not applicable to the project.</p>

TABLE 4.7-3 PROJECT CONSISTENCY WITH CLIMATE ACTION TEAM GREENHOUSE GAS EMISSION REDUCTION STRATEGIES	
Strategy	Project Consistency
<p>Alternative Fuels: General: The project shall include the necessary infrastructure to encourage the use of alternative fuel vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).</p>	<p>Consistent: The proposed project would be required to implement a TDM plan, which will likely include infrastructure plans to encourage the use of alternative vehicles.</p>
BUSINESS, TRANSPORTATION, AND HOUSING	
<p>Smart Land Use and Intelligent Transportation Systems (ITS): Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.</p>	<p>Consistent: The proposed project incorporates smart land use strategies as it would develop jobs and housing on a single site and would develop a dense mix of land uses near the future Bergamot Exposition Light Rail station. The proposed project also includes daily needs and services within walking distance of existing and future residential uses supporting the goal of creating compact neighborhoods.</p>
STATE AND CONSUMER SERVICE AGENCY (DEPARTMENT OF GENERAL SERVICES)	
<p>Green Buildings Initiative: Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and -leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.</p>	<p>Consistent: The proposed project intends to achieve Leadership in Energy and Environmental Design (LEED) certification under the US Green Building Council (USGBC). Specifically, the project intends to pursue LEED Silver Certification for New Buildings and Major Renovations.</p>
<p>SOURCE: TAHA, 2011.</p>	

TABLE 4.7-4: PROJECT CONSISTENCY WITH CAPCOA GREENHOUSE GAS REDUCTION MEASURES	
CAPCOA-Suggested Measure	Project Consistency
T1: Bike Parking at Multi-Unit Residential: Long term bicycle parking is provided at apartment complexes or condominiums without garages (e.g., one long-term bicycle parking space for each unit without a garage). Long term facilities shall consist of one of the following: a bike locker, a locked room with standard racks and access limited to bicyclists only, or a standard rack in a location that is staffed and/or monitored by video surveillance 24 hours per day).	Consistent: The proposed project would provide bicycle racks on the project site.
T2: Proximity to Bike Path/ Bike Lanes: Project is located within 0.5 miles of an existing/planned Class I or Class II bike lane and project design includes a network that connects the project uses to the existing offsite facility. Project design includes a designated bicycle route connecting all units, onsite bicycle parking facilities, offsite bicycle facilities, site entrances, and primary building entrances to existing Class I or Class II bike lane(s) within 0.5 miles. Bicycle route connects to all streets contiguous with project site.	Consistent: The project site would be accessible to bicyclists. Primary bicycle access to the project site would be from Stewart Street and Yale Street with the nearest east-west connectivity provided by Broadway.
T3: Minimum Parking: Provide minimum amount of parking required.	Consistent: The proposed project would include two levels of subterranean parking. The garage would provide 778 parking spaces, including 23 accessible (Americans with Disabilities Act compliant) spaces, 267 public spaces (for office and retail uses), and 511 private residential spaces, as well as bicycle lockers. Shared parking opportunities with other uses would also be explored by the applicant to minimize the amount of parking in the area.
T4: Residential Density: Employ Sufficient Density for New Residential Development to Support the Use of Public Transit. Project provides safe and convenient bicycle/pedestrian access to all transit stop(s) within 0.25 miles of project broader.	Consistent: The proposed project is located in a densely developed area. The project site would be within walking distance of the future Bergamot Station for the Exposition Light Rail. The proposed project also includes neighborhood serving retail and services within walking distance of existing and future residential uses, supporting the goal of creating compact neighborhoods.
T5: Suburban Mixed-Use: Have at least three of the following on site and/offsite within 0.25 miles: Residential Development, Retail Development, Park, Open Space, or Office.	Consistent: The proposed project includes an outdoor courtyard/ plaza area to promote walkability within the project site.
T6: Wood Burning Fireplaces/ Stoves: Project does not feature fireplaces or wood burning stoves.	Consistent: The project would not include fireplaces or wood burning stoves.
T7: Low-Water Use Appliances: Require the installation of low-water Use Appliances.	Consistent: Consistent: The proposed project would include low flow appliances to comply with LEED pre-requisites of Sustainable Sites, including water efficiency.
T8: Landscaping: Project shall use drought resistant native trees, trees with low emissions and high carbon sequestration potential.	Consistent: The proposed project's landscaping would be required to comply with the City's Water-Efficient Landscape and Irrigation Standards. Landscaping may include drought resistant plant species.
T9: LEED Certification: Promote building approach to sustainability by recognizing performance in sustainable site development, water savings, energy efficiency, materials selection, and indoor environment quality.	Consistent: The proposed project intends to achieve LEED certification under the USGBC. Specifically, the project intends to pursue LEED Silver Certification for New Buildings and Major Renovation.
T10: Energy Star Roof: Project installs Energy Star labeled roof materials, where feasible.	Consistent: The proposed project would consider the installation of Energy Star labeled roof materials.

TABLE 4.7-4: PROJECT CONSISTENCY WITH CAPCOA GREENHOUSE GAS REDUCTION MEASURES	
CAPCOA-Suggested Measure	Project Consistency
T11: Exceed Title 24: Project exceeds title 24 requirements.	Consistent: The project would comply with the City's Green Building Ordinance and LEED standards, which require that the project exceed Title 24 standards.
T12: Energy Efficient Appliance Standard: Project uses energy efficient appliances.	Consistent: The proposed project intends to achieve LEED Silver certification under the USGBC. Certification includes the use of energy efficient appliances.
T13: Green Building Materials: Project uses materials which are resource efficient and recycled, with long life cycles and manufactured in environmentally friendly way.	Consistent: The proposed project intends to achieve LEED Silver certification under the USGBC. Certification includes the use of green building materials.
SOURCE: TAHA, 2011.	

TABLE 4.7-5: PROJECT CONSISTENCY WITH SUSTAINABLE CITY PLAN AND LAND USE AND CIRCULATION ELEMENT	
Policy/Goal	Project Consistency
SUSTAINABLE CITY PLAN	
<p>Resource Conservation Goal 1</p> <ul style="list-style-type: none"> Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable, non-recyclable and non-recycled materials, water, and energy and fuels. The City should take a leadership role in encouraging sustainable procurement, extended producer responsibility and should explore innovative strategies to become a zero waste city. 	<p>Consistent - The new buildings have been designed with a goal of achieving Leadership in Energy & Environmental Design New Construction (LEED NC) Silver certification, as indicated on a preliminary draft LEED “scorecard”. The proposed project would include on-site recycling containers to support the City’s recycling goal. In addition, the proposed project would comply with Section 8.108.010 Subpart C of the Santa Monica Municipal Code, which requires that demolition and/or construction projects over 1000 square feet divert at least 65 percent of construction and demolition material from landfills.</p>
<p>Resource Conservation Goal 2</p> <ul style="list-style-type: none"> Within renewable limits, encourage the use of local, non-polluting, renewable and recycled resources (water, energy – wind, solar and geothermal – and material resources) 	<p>Consistent - The new buildings have been designed with a goal of achieving Leadership in Energy & Environmental Design New Construction (LEED NC) Silver certification, as indicated on a preliminary draft LEED “scorecard” included in the project submittals.</p>
<p>Transportation Goal 2</p> <ul style="list-style-type: none"> Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel. 	<p>Consistent - The project site is located within walking distance of the future Bergamot Station for the Exposition Light Rail. The proposed project would also include a TDM plan to encourage alternative modes of transportation.</p>
<p>Open Space and Land Use Goal 2</p> <ul style="list-style-type: none"> Implement land use and transportation planning and policies to create compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of existing and future public transit systems. 	<p>Consistent - The proposed project would develop a mix of residential, creative office, and neighborhood serving retail uses to encourage walking and bicycling. The project site is located in proximity to the future Bergamot Station for the Exposition Light Rail, and therefore would encourage the use of future public transit.</p>
LAND USE AND CIRCULATION ELEMENT (LUCE)	
<p>Policy S2.1 Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan, including, but not limited to: focusing new growth in mixed-use, transit oriented districts; focusing new growth along existing corridors and nodes; support the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City.</p>	<p>Consistent. The project site would be within walking distance of the future Bergamot Station for the Exposition Light Rail. The proposed project also includes neighborhood serving retail and services within walking distance of existing and future residential uses, supporting the goal of complete and walkable neighborhoods. Furthermore, the proposed project would implement a TDM plan, which would provide trip reduction strategies to be implemented by the applicant.</p>
<p>Policy S2.3 Advance the No Net New Trips goal in the Land Use and Circulation Element with TDM projects such as expanded rideshare programs, parking management strategies, as well as development impact fees for public transit infrastructure.</p>	<p>Consistent. The proposed project would include a TDM plan, which would provide trip reduction strategies to be implemented by the applicant. The strategies required in the TDM Plan will be determined by the City. Potential strategies of the TDM plan include a TDM coordinator, area-wide transportation management association, transit pass subsidy, ridesharing, parking cash out, unbundled parking, guaranteed ride home program, bicycle facilities (shower, racks, lockers) flexible work hours, transportation information center, wayfinding signage, and commuter club. These TDM strategies would help the City achieve the Citywide goal of No Net New Trips.</p>

TABLE 4.7-5: PROJECT CONSISTENCY WITH SUSTAINABLE CITY PLAN AND LAND USE AND CIRCULATION ELEMENT	
Policy/Goal	Project Consistency
Policy S2.9 Consider incorporating the No Net New Trips policy into the City's CEQA environmental analysis and require mitigation of significant impacts for projects that will generate new vehicle trips.	Consistent. The proposed project would include a TDM plan, which would provide trip reduction strategies to be implemented by the applicant. The TDM plan would help the City achieve the Citywide goal of No Net New trips. The project applicant would be required to implement mitigation measures for significant traffic impacts (see Section 4.15 Transportation and Traffic).
Policy S5.5 As part of future updates to the City's Green Building Ordinance, explore a requirement for shade trees on south- and west-facing sides of all new buildings to reduce building energy loads.	Consistent. The proposed project would include the planting of new trees around the project site, including along its south-facing side (Pennsylvania Avenue extension edge) and west-facing side (New Road edge).
Policy S5.6 Encourage cool roofs or green roofs on new buildings.	Consistent. During final building plan designs and/or application for LEED Silver Certification, the project applicant would consider the use of cool roofs, cool paving, and installation of electrical outlets in loading zones and on the exterior of buildings.
Policy S5.7 Encourage cool paving on new plazas and parking lots.	
Policy S5.8 Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks	
Policy S6.1 Ensure sufficient water supplies for new development.	Consistent. As indicated in Section 4.16(A) Water, the City would have adequate water supplies to serve the proposed project.
Policy S6.3 Implement landscape water conservation requirements for new construction projects.	Consistent. The proposed project's landscaping would be required to comply with the City's Water-Efficient Landscape and Irrigation Standards o
Policy S6.7 Expand solid waste diversion strategies such as increased commercial recycling collection and outreach, expanded food waste collection, composting and waste to energy conversion programs.	Consistent. The proposed project would include on-site recycling containers to encourage recycling. In addition, construction of the proposed project would occur in accordance with Section 8.108.010 Subpart C of the Santa Monica Municipal Code, which requires that demolition and/or construction projects over 1000 square feet divert at least 65 percent of construction and demolition material from landfills.
Policy LU2.5 Vehicle Trip Reduction. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.	Consistent. The proposed project would facilitate trip reduction by developing a mixed-use project, creating opportunities for people to walk to goods and services. Furthermore, the proposed project would provide for pedestrian scale ground floor retail uses and improve the existing sidewalks surrounding the project site. The proposed project would include a TDM plan, which would provide trip reduction strategies to be implemented by the applicant. The project site would also be within walking distance of the future Bergamot Station for Exposition Light Rail.

TABLE 4.7-5: PROJECT CONSISTENCY WITH SUSTAINABLE CITY PLAN AND LAND USE AND CIRCULATION ELEMENT	
Policy/Goal	Project Consistency
<p>Policy LU8.1 Transportation Demand Management. Require participation in TDM programs for projects above the base to encourage walking, biking and transit and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.</p>	<p>Consistent. The proposed project would include a TDM plan, which would provide trip reduction strategies to be implemented by the applicant. The strategies required in the TDM Plan will be determined by the City. Potential strategies of the TDM plan include a TDM coordinator, area-wide transportation management association, transit pass subsidy, ridesharing, parking cash out, unbundled parking, guaranteed ride home program, bicycle facilities (shower, racks, lockers) flexible work hours, transportation information center, wayfinding signage, and commuter club.</p>
<p>Policy LU8.3 Pedestrian Bicycle and Transit Connections. Ensure transit mobility by creating facilities for comfortable walking throughout the City, a complete and safe bicycle network, and convenient and frequent transit service that will make transit an attractive option for all types of trips.</p>	<p>Consistent. The proposed project would enhance mobility around the future Bergamot Station by developing a new Pennsylvania Avenue extension and the north-south New Road. These new streets would create additional connections and routes to transit. Furthermore, sidewalks along the project site would be improved to create a more comfortable pedestrian realm.</p>
<p>SOURCE: TAHA, 2011.</p>	

4.8 HAZARDS AND HAZARDOUS MATERIALS

This section describes the impacts associated with hazards and hazardous materials that could result from the proposed project. The analysis includes an evaluation of the potential hazards associated with construction and operation of the proposed project; the routine transport, use, disposal, and potential upset of hazardous materials; and describes other potential hazards within the area surrounding the project site.

Background

The term “hazardous material” can have varying definitions for different regulatory programs. For the purpose of this EIR, the term “hazardous materials” refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(K) defines hazardous materials as follows:¹

“Hazardous material means any material that because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.”

A waste is hazardous if it exhibits one or more of the characteristics defined below:²

- *Toxic:* Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels. (The level depends on the substances involved and is chemical-specific.) Carcinogens (substances that can cause cancer) are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- *Ignitable:* Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- *Corrosive:* Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- *Reactive:* Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, with the result that numerous industrial properties and public landfills became dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Sites are added to a National Priorities List following a hazard ranking system. The United

¹Title 22 CCR Section 66261.3, “Hazardous Waste”.

²Title 22 CCR Section 66261.20-66261.24, “Hazardous Waste”.

States Environmental Protection Agency (EPA) maintains the list of federal Superfund sites as well as a more extensive list of all sites with potential to be listed known as Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS).

Numerous smaller properties also have been designated as contaminated sites by local and regional agencies. Often these are gas station sites where leaking underground storage tanks were upgraded under a federal requirement in the late 1980s. Generally, potentially contaminated sites are referred to as “brownfields” – they are previously used, often abandoned sites that because of actual or suspected contamination are undeveloped or underused. Both the US-EPA and California Department of Toxic Substances Control (DTSC) within the California EPA maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners’ reluctance to publically label their property as potentially contaminated. In California, numerous regulatory barriers have blocked effective use of brownfields sites including uncertainty as to cleanup levels and ultimate cleanup cost. State legislation (SB 32 Escutia), adopted in 2001, establishes a locally-based program to help speed the cleanup and reuse of brownfields sites.

An underground storage tank system (UST) is a tank and any underground piping connected to the tank that has at least ten percent of its combined volume underground. Federal UST regulations apply to underground tanks and piping storing either petroleum or certain hazardous substances. When the federal UST program began, there were approximately 2.1 million regulated tanks in the U.S. Today, there are fewer USTs since many substandard UST systems have been closed. Nearly all USTs that have been closed contained petroleum. These closed sites include marketers who sold gasoline to the public (such as service stations and convenience stores) and non-marketers who used tanks solely for their own needs (such as fleet service operators and local governments.) A number of USTs installed in the past may have also been abandoned in place. EPA estimates about 25,000 tanks nationwide now hold hazardous substances covered by the UST regulations. The greatest potential hazard from a leaking UST is that the petroleum or other hazardous substance can seep into the soil and contaminate groundwater, the source of drinking water for nearly half of all Americans (although not such a high percentage in the Southern California area). A leaking UST can present other health and environmental risks, including the potential for fire and explosion. Until the mid-1980s, most USTs were made of bare steel, which is likely to corrode over time and allow UST contents to leak into the environment. Faulty installation or inadequate operating and maintenance procedures also can cause USTs to release their contents into the environment.

EXISTING SETTING

Hazardous Materials and Hazardous Sites

The project site is currently in use as a trailer park with some ancillary uses, such as office buildings and common open space. Hazardous materials used on the site are those typical of residential land uses, such as common household cleaners and pesticides. No hazardous materials are developed on-site.

Based on a review of aerial photos, topographic maps, and Sanborn fire insurance maps from Phase I Environmental Site Assessments (ESA) of adjacent properties (including the property to the west at 2834 Colorado Avenue), the project site was previously undeveloped and used for agricultural purposes before its development as a trailer park in the 1950s. Environmental records searches conducted as part of the Phase I ESAs indicate that the project site is included on any lists of hazardous materials sites.

In addition, a Phase I Environmental Site Assessment (ESA) Report was prepared for the project site by Partner Engineering and Science Inc. in February 2012 and is included in Appendix J of this Final EIR. The Phase I ESA indicates that the project site is listed on the California Hazardous Material Incident Reporting System (CHMIRS) due to an accidental release of 50 gallons of sewage overflow from a damaged private lateral line in 2008. Cleanup was reportedly conducted by the responsible party, and

based on the nature of the release reported, the project sites' listing on the database is not considered to represent a significant environmental concern. Furthermore, according to the Phase I ESA, there is no evidence of soil contamination on the project site and soil testing would not be necessary.

The area adjacent to the north of the project site is developed with a single-story church and a single-story furniture restoration company. There are low- to medium-density residences located across Colorado Avenue to the north and west; industrial uses located adjacent to the south, across Stanford Street to the north and extending further to the south and east of the project site and a Southern California Gas Company utility maintenance yard located adjacent to the southeast of the project site.

Many of the industrial uses operating in the vicinity of the project site use hazardous materials in their operations. State regulations mandate that each business using hazardous materials prepare a business plan listing the types and quantities of materials used and their associated risks. These plans are submitted to an administrative agency that, in turn, prepares an area plan based on the hazardous materials within the jurisdiction of the agency. Because the project site is located within the City of Santa Monica, the Santa Monica Fire Department (SMFD) is the administrative agency. The SMFD maintains a list of all companies using hazardous materials, an inventory of those materials, and an assessment of the risks posed by the materials at each facility. Each facility is inspected to ensure that materials are properly managed on-site.

Due to the commercial and industrial uses that this area has been subject to over many decades, releases of hazardous materials have occurred within the project area. Specifically, Southern California Gas Company (also referred to as Southern California Gas Company Santa Monica Base) is located adjacent to the south of the project site at 1701 Stewart Street and is listed on the Resource Recovery Act Small Quantity Generator (RCRA-SQG) and the Emergency Response Notification System (ERNS) site databases. According to the ERNS listing, this site reported a release of 30 gallons hydraulic fluid on December 2, 1992. The release reportedly impacted soil only, and no groundwater was affected. This site is currently listed as a fixed facility. Several other properties are located within ½ mile of the project site are listed as hazardous materials site (including Leaking Underground Storage Tank lists).³ However, based on the relative distance, the regulatory status, and/or the inferred direction of groundwater flow, these sites are not expected to represent a significant environmental concern for the proposed project.

Other Hazards

Asbestos Materials and Lead-Based Paint. Asbestos-containing materials (ACMs) were widely used in structures built between 1945 and 1978. Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Commercial/industrial structures are affected by asbestos regulations if damage occurs or if remodeling, renovation or demolition activities disturb ACMs. Lead-based paint was primarily utilized from the 1920s through 1978. Commercial/industrial structures are affected by lead-based paint regulations if the paint is in a deteriorated condition or if remodeling, renovation or demolition activities disturb lead-based paint surfaces. According to the LA County Assessor's Office, the permanent office building was built in 1950. It is likely that asbestos and lead-based paint are present in buildings constructed prior to 1978. The Phase I ESA concluded that due to the age of the buildings on-site, there is a potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. Overall, all suspect ACMs and painted surfaces were observed in good condition and do not pose a health and safety concern to the occupants of the project site at this time.

³Phase I Environmental Site Assessment, 2834 Colorado Avenue, March 2004.

Emergency Evacuation Planning

The SMFD Emergency Services Division provides primary input for, and is the chief architect of, the City's emergency and disaster preparedness plans. Other pertinent functions include continuous plan updates as well as liaison and coordination of emergency response services with other departments in the City, neighboring jurisdictions, and relief agencies. The SMFD also conducts disaster preparedness training sessions, drills, and exercises for the general public and city employees.

The City adopted the Santa Monica Emergency Response Plan in 2006, which is based on the National Incident Management System guidelines and the state Standardized Emergency Management System (SEMS) guidelines. The Plan provides guidance for the City's response to emergency situations associated with natural and manmade disasters. The Plan concentrates on management concepts and response procedures relative to large-scale disasters. Such disasters pose major threats to life, the environment, and property, and can impact the well-being of a large number of people.

REGULATORY FRAMEWORK

Hazardous materials and hazardous wastes are regulated by many State and federal laws. These include not only specific statutes governing hazardous waste, but also a variety of laws regulating air and water quality, human health and land use.

Federal

Primary federal agencies with responsibility for hazardous materials management include the EPA, Department of Labor (Federal Occupational Safety and Health Administration [OSHA]), Department of Transportation (DOT), and Nuclear Regulatory Commission (NRC). Major federal laws and issue areas include the following statutes and regulations (and regulations promulgated there under):

- Resources Conservation and Recovery Act (RCRA)
- Hazardous and Solid Waste Amendments Act (HSWA)
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Superfund Amendments and Reauthorization Act (SARA)
- Emergency Planning and Community Right-to-Know (SARA Title III)
- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety and Health Act (OSHA)
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, Executive Order 12088, *Federal Compliance with Pollution Control*, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

State

Hazardous waste in California is regulated primarily under the authority of the federal RCRA of 1976, and the California Health and Safety Code. Other California laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup and emergency planning. Primary State agencies with jurisdiction over hazardous chemical materials management are the

California Environmental Protection Agency (Cal-EPA), the DTSC, and the Regional Water Quality Control Board (RWQCB). Other state agencies involved in hazardous materials management are the Department of Industrial Relations (State OSHA implementation [Cal/OSHA]), State Office of Emergency Services (OES—California Accidental Release Prevention implementation), California Department of Fish and Game (CDFG), California Air Resources Board (CARB), California Highway Patrol (CHP), state Office of Environmental Health Hazard Assessment (OEHHA—Proposition 65 implementation), and California Integrated Waste Management Board (CIWMB). Hazardous chemical and biohazardous materials management laws in California include the following statutes (and regulations promulgated there under):

- Hazardous Waste Control Act—hazardous waste management
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)—releases of and exposure to carcinogenic chemicals
- Hazardous Substances Act
- Hazardous Waste Management Planning and Facility Siting—"Tanner Act"
- Hazardous Materials Storage and Emergency Response—including response to hazardous materials incidents
- California Medical Waste Management Act—medical and biohazardous wastes

Local

The primary local agency, known as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management is the SMFD. The Unified Program is the consolidation of six state environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by Cal-EPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are as follows:

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

As the CUPA for the City of Santa Monica, the SMFD, maintains the records regarding location and status of hazardous materials sites in the City of Santa Monica and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. In addition, the SMFD requires full business plans to be established which must include a full inventory of hazardous materials used in the facility and emergency response plans and procedures to be used in the event of a significant or threatening release of hazardous materials, as well as detailed Material Safety Data Sheets for all substances. Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous material is vital if it is disturbed during project construction.

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

- Policy 4.1: The City shall develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features by strengthening performance review and code enforcement programs.
- Policy 4.1.1: All new development shall meet minimum standards for fire safety, unless more conservative standards are defined in the City's Municipal Code. This includes:
 - Adequate road widths to accommodate emergency vehicles; and developments;
 - Enforcement of Municipal Code provisions requiring automotive fire extinguishing systems and other fire safety standards.
- Policy 4.1.2: The City shall enforce the standards and guidelines of the Uniform Building Code and Uniform Fire Code fire safety provisions and require additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate. This shall include assurance that structural and nonstructural architectural elements of the building are designed not to:
 - Impede emergency egress for fire safety manpower, equipment, and apparatus; and
 - Hinder evacuation from fire, including potential blockage of stairways or fire doors.
- Policy 5.1: The use, storage, and transportation of toxic, explosive, and other hazardous and extremely hazardous materials shall be strictly controlled to prevent unauthorized discharges.
- Policy 5.1.2: The City shall continue to manage the Hazardous Materials Disclosure Program to identify and regulate business handling types and quantities of extremely hazardous materials, or hazardous materials in greater than consumer types and quantities.
- Policy 5.1.3: The City shall continue to require annual reporting by businesses to the Environmental Programs Division of the use, storage or manufacture of hazardous or extremely hazardous materials in any quantity. The City shall continue to require annual submission or verification of business emergency plans by businesses that use, store or manufacture any hazardous or extremely hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds or 200 cubic feet. Annual fire inspections of commercial and industrial properties should include:
 - Confirming the accuracy of information provided in the business plan;
 - Identifying businesses that have complied with HMDP requirements; and
 - Identifying businesses that are not in compliance with regulations governing storage, use and/or manufacturing or hazardous materials.
- Policy 6.2: The City should regularly review and clarify emergency evacuation plans for dam failure, flood inundation, fire and hazardous materials releases, civil unrest and aircraft disasters.
- Policy 6.2.1: The City should develop a blueprint for managing evacuation plans, including allocation of buses, designating and protecting disaster routes, traffic control contingencies, and other actions.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- 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;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
- 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.

IMPACTS

As discussed in the Initial Study (Appendix A of this EIR), the proposed project would not be located on a list of hazardous materials sites, creating a significant hazard to the public or the environment. In addition, the proposed project would not be located within an airport land use plan, or in the vicinity of a private airstrip, nor is the project site located in an area prone to wildland fires. Therefore, these issues will not be discussed further.

The analysis below is limited to the potential for creating a hazard to the public through the routine use, transport or disposal of hazardous materials, or upset and accident conditions involving the release of hazardous materials. The analysis also considers the potential for the project to interfere with an emergency response plan.

HM1 The proposed project would not include uses that would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Construction of the proposed project would involve the temporary transport, use and storage of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. Some chemicals can pose physical hazards (e.g., chemical burns) or health hazards (e.g., poisoning), including potential acute or chronic illnesses. The properties and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. The extent and exposure of individuals to hazardous materials would be limited by the quantities of these materials that would be stored and used on the project site. The project-related effects of hazardous materials handling and storage would generally be limited to the immediate areas where materials would be located, because this is where exposure would be most likely. Exposure at more distant locations would require some mechanism, like wind, to transport the material to the location. The individuals most at risk would be residents, employees, or others in the immediate vicinity of the hazardous materials. The routes through which these individuals could be exposed include inhalation, ingestion, contact, and other accidents. However, all hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Hazardous materials are required to be stored in specific areas designed to prevent accidental release to the environment. California Building Code (CBC) requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Compliance with all applicable federal and State laws related to the storage of hazardous materials, as required by existing hazardous materials regulations, would be

implemented to maximize containment (through safe handling and storage practices described above) and to provide for prompt and effective cleanup if an accidental release occurs. These requirements would minimize foreseeable risks of an accident that could create a hazard to the public or environment. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, the proposed project would result in a less-than-significant construction impact related to the transport, use, or disposal of hazardous materials.

Operation of the proposed project would also involve the occasional use and storage of hazardous materials that could include limited quantities of lubricating products, paints, solvents, and custodial products (mainly cleaning supplies), pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal, and the proposed project would not generate large amounts of hazardous materials that would require routine transport, use, or disposal. Use and transport of hazardous materials would be regulated by the County of Los Angeles Department of Environmental Health and the Cal/OSHA, and all hazardous materials would be required to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Mitigation Measures

Impacts related to the transport, use, and disposal of hazardous materials would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less-than-significant without mitigation.

Impact HM2 The proposed project could potentially uncover asbestos and lead based paint during demolition of existing structures. Therefore, the proposed project could potentially 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. Implementation of Mitigation Measures HM1 and ~~HM2~~ through HM3 would reduce this impact to less than significant.

The proposed project would not expose on-site residents to substantial hazardous impacts due to surrounding industrial land uses. Specifically, industrial uses are located to the south, across Stanford Street to the north and extending further to the south and east of the project site. The Southern California Gas Company utility yard (also referred to as Southern California Gas Company Santa Monica Base) A is located adjacent to the southeast of the project site at 1701 Stewart Street. Facilities and operations such as the utility maintenance yard to the southeast of the project site, as well other industrially zoned and used properties to the south of the project site have the potential to use hazardous materials in their daily operations. However, businesses are required to comply with health and safety laws and regulations and must develop a hazardous materials business plan that includes an inventory of hazardous materials stored on-site (above specified quantities), a hazardous materials plan, and procedures to be used in the event of a significant or threatening significant release of a hazardous material. Compliance with existing regulations regarding hazardous materials would ensure impacts related to upset of hazardous materials from surrounding land uses would not occur.

Due to the commercial and industrial uses that this area has been subject to over many decades, releases of hazardous materials have occurred within the project area.⁴ The Southern California Gas Company utility yard is listed on the Resource Recovery Act Small Quantity Generator (RCRA-SQG) and the Emergency Response Notification System (ERNS) site databases. According to the ERNS listing, this site reported a release of 30 gallons hydraulic fluid on December 2, 1992. The release reportedly impacted soil only, and no groundwater was affected. This site is currently listed as a fixed facility.⁵ Based on the nature of the medium impacted (soil only) and the regulatory status, this site would not represent a significant environmental concern to the project site. In addition, the Phase I Environmental Site Assessment (Phase I ESA) prepared for the adjacent project site at 2834 Colorado Boulevard indicated that no items of environmental concern were identified on the adjacent properties, including the project site. Several properties located within ½ mile of the project site are listed as hazardous materials site.⁶ However, based on the relative distance, the regulatory status, and/or the inferred direction of groundwater flow, these sites are not expected to represent a significant environmental concern for the proposed project. Therefore, impacts relating to the accidental release of hazardous materials from soil and/or groundwater contamination at nearby surrounding land uses would be less than significant.

Construction activities would include demolition of the existing ~~one-story building-office permanent buildings~~ on the project site (~~no trailers are proposed to be demolished~~), excavation, building construction, utilities/infrastructure improvements, paving and landscaping. ~~The proposed project would include the demolition of the existing one-story office building on-site (no trailers are proposed to be demolished).~~ In addition, any trailers that have not been relocated and/or moved from the site prior to the issuance of a demolition permit for the permanent buildings would be demolished on-site. It is likely that asbestos and lead-based paint are present in buildings and trailers constructed prior to 1978. According to the Los Angeles County Assessor's Office, the office structure on-site was built in 1950. In addition, the trailers on the property were manufactured prior to 1978. Given that the project site includes a building and trailers ~~one building~~ predating 1978, it is reasonable to assume that these materials are present and could be encountered during demolition. Therefore, without mitigation, the proposed project would potentially result in significant impacts related to the accidental release of hazardous materials.

Mitigation Measures

- HM1** Prior to issuance of a demolition permit for the permanent structures on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.
- HM2** Prior to issuance of a demolition permit for the permanent structures on the project site, lead-based paint testing shall be conducted for existing ~~permanent~~ structures and trailers to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.
- HM3** An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

⁴The direction of groundwater in the project vicinity is inferred to flow toward the southeast based on the topographic map interpretation.

⁵Phase I Environmental Site Assessment, 2834 Colorado Boulevard, prepared by Asbestos, Environment, and Safety, dated March 4, 2004.

⁶Phase I Environmental Site Assessment, 2834 Colorado Boulevard, prepared by Asbestos, Environment, and Safety, dated March 4, 2004.

Level of Impact After Mitigation

With implementation of Mitigation Measures **HM1** and ~~**HM2**~~ through **HM3**, impacts related to the routine transport, use, disposal or upset involving the release of hazardous materials would be reduced to less than significant.

Impact HM3 The proposed project would be located within 0.25 miles of existing schools. However, the uses on the site would not create a hazard to the public. Therefore, impacts would be less than significant.

There are five pre-schools within 0.25 miles of the project site as shown in **Table 4.8-1**.

TABLE 4.8-1: SCHOOL SITES WITHIN 0.25 MILES OF THE PROJECT SITE		
School	Address	Distance (miles)
PRE-SCHOOLS		
Evergreen Community School	2800 Colorado Avenue	0.20
Dreamland Pre-School	1641 Centinela Avenue	0.25
Lighthouse Church Preschool	1424 Yale Street	0.25
Little Dolphins by the Sea	1812 Stanford Street	0.25
Maohr Hatorah Synagogue	1537 Franklin Street	0.23
SOURCE: TAHA, 2011.		

As mentioned above, construction and operation of the proposed project could handle and/or store potentially hazardous materials; however, hazardous materials would be used in limited quantities.

Construction of the proposed project would involve the temporary transport, use and storage of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. Construction activities would also involve the utilization of typical diesel-powered trucks and equipment, which result in diesel emissions that have been determined to be health hazards. These impacts are discussed comprehensively in Section 4.2 Air Quality. Compliance with all applicable local, State, and federal laws, and regulations, as described in the regulatory framework, regulate, control, or respond to hazardous waste, transport, disposal, or clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors.

Operation of the proposed project would also involve the occasional use and storage of hazardous materials that could include limited quantities of lubricating products, paints, solvents, and custodial products (mainly cleaning supplies), pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. The proposed project would not generate large amounts of hazardous materials that would pose a significant risk to nearby receptors. Therefore, the proposed project would result in a less-than-significant impact related to the exposure of hazardous materials within 0.25 miles of existing schools.

Mitigation Measures

Impacts related to hazardous materials near existing schools would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact HM4 Construction of the proposed project within existing street right-of-ways could potentially impact the use of the adjacent streets during an emergency response or evacuation. However, with mitigation, construction-related impacts on emergency response would be less than significant. Operation of the proposed project would introduce new traffic patterns into the area. However, these new patterns would not conflict with emergency response and evacuation planning. Therefore, impacts would be less than significant.

Construction of the proposed project may require street and sidewalk improvements and the potential construction of water, wastewater, and other underground utility lines in the adjacent street right-of-way (e.g., along Colorado Boulevard, Pennsylvania Avenue). Although short-term, the project's construction activities within the right-of-way could potentially impact the use of the adjacent streets during an emergency response or evacuation. Therefore, without mitigation, the proposed project would result in a significant impact related to circulation and accessibility of emergency response vehicles.

The proposed project would include a new circulation pattern. The site plan presented in Figure 3-6 in Chapter 3.0 Project Description was designed on the premise that the property directly to the west (2848-2912 Colorado Avenue) would also be developed and that a two-lane road would be shared between the properties. Under this scenario, site access would be provided through an extension of Pennsylvania Avenue. Traffic would enter the site from Stanford Street and immediately turn right to enter the subterranean parking. Traffic could also access the site from Colorado Avenue on the north via New Road, which travels along the west boundary of the project site. New Road would provide two-way access to the at-grade public parking stalls in front of Building B. An alternative site plan, shown in Figure 3-13 in Chapter 3.0 Project Description, has been prepared to accommodate traffic flow in a scenario where the neighboring property is either not developed at the same time or not developed. Under the alternative scenario, traffic would flow one way through the site and on New Road.

Development of the proposed project would result in a two-lane road shared between the properties and the extension of Pennsylvania Avenue between Stanford Street and Stewart Street. However, this would not interrupt the traffic flow of the designated evacuation routes along Santa Monica Boulevard and Olympic Boulevard.⁷ In fact, the addition of roads to being to create a City grid, similar to the surrounding neighborhood, could actually aid emergency vehicle response times by providing additional means of access through and around the property. Further, the proposed project will incorporate applicable, access emergency requirements of the SMFD, which are further addressed during the building plan check review process. Therefore, the proposed project would result in a less-than-significant impact related to circulation and accessibility of emergency response vehicles.

Mitigation Measures

Mitigation Measure ~~CON16~~ CON14 in Section 4.4 Construction Effects would address construction-related impacts on emergency access/evacuation.

Level of Impact After Mitigation

With implementation of Mitigation Measure ~~CON16~~ CON14 impacts related to emergency access/evacuation would be less than significant.

⁷Los Angeles County Department of Public Works. Disaster Routes. City of Santa Monica. Available at <http://dpw.lacounty.gov/dsg/disasterroutes/map/santa%20monica.pdf>, accessed September 23, 2010.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The proposed project combined with related projects would result in the increased use, transport, or storage of hazardous materials. However, these kinds of materials are not substantially different than what typically occurs in the City and region. Development of the proposed project in combination with the related projects has the potential to increase the risks associated with the use and potential accidental release of hazardous materials within the vicinity of the project site to some degree. With respect to related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of these properties. Further, related projects are required to follow local, State, and federal regulations regarding hazardous materials, which would further reduce impacts associated with related projects. It is expected that all hazardous materials would be used, stored, and disposed of in accordance with regulations and handled in compliance with applicable standards and regulations. Any risks associated with these materials would be adequately reduced to a less than significant level. In addition, as discussed above, the proposed project with mitigation would not generate, use, or emit any hazardous materials that would have the potential to result in upset environmental conditions. Therefore, the proposed project would not contribute to a cumulative impact related to hazards and hazardous materials.

4.9 HYDROLOGY AND WATER QUALITY

This section provides an overview of hydrology and water quality conditions on the project site and surrounding area, and includes an analysis of potential impacts related to groundwater and surface water hydrology (drainage) as a result of the implementation of the proposed project.

EXISTING SETTING

Hydrology

Groundwater

A groundwater basin is a groundwater reservoir comprised of an overlying land surface and the underlying aquifers that contain water stored in the reservoir. Groundwater basins are separated from adjacent basins by geologic features such as nonwater-bearing rock, faults, or other geological structures or topographical features which impede groundwater movement. Aquifers are an underground layer of water-bearing rock, permeable rock, or unconsolidated materials (e.g., gravel, sand, silt, clay, etc) from which groundwater can be extracted. Groundwater basins are recharged naturally by precipitation percolating through the soil to underlying aquifers. Groundwater basins can also be recharged artificially with imported or reclaimed water. Artificial recharge is used to offset declining groundwater levels and provide storage for use in times of drought.

The Santa Monica Groundwater Basin is located in the northwestern section of the Coastal Plain of Los Angeles County. Groundwater flow within the Coastal Plain is restricted by geologic structures, such as faults, that denote the edges of basins within the Plain. The Coastal Plain consists of two major groundwater basins that are divided along a northwest-southeast axis by the Newport-Inglewood Fault Zone: the West Basin and the Main Coastal Basin. The West Basin is further divided into two sub-basins by the Ballona Gap, a stream-cut erosional gap filled by fluvial deposits. The sub-basin north of the Ballona Gap, known as the Santa Monica Basin, is further divided by faults into the Arcadia, Olympic, Coastal (South Santa Monica), Charnock, and Crestal sub-basins. The Santa Monica Basin is also vertically segmented into multiple aquifers separated by zones of low-permeability sediment (silts and clays). Due to the natural replenishment of the Basin, there are no spreading basins in the Santa Monica Basin, and the City does not currently provide additional groundwater recharge into the Basin.

Groundwater is extracted from ten wells in three subbasins: the Arcadia Subbasin, the Olympic Subbasin, and the Charnock Subbasin.¹

The Arcadia Subbasin currently has two active groundwater wells which have a combined rated capacity of 500 gallons per minute (gpm).² Each groundwater well can pump 250 gpm, however, due to their proximity to one another the pumps cannot be run simultaneously. For a period of time, groundwater pumped from the Arcadia Subbasin was treated by a Shallow Aquifer and Vadose Remediation System (SAVRS) and a Lower Aquifer Remediation System (LARS) due to a Methyltert-butyl ether (MTBE) plume found in the groundwater. The traces of MTBE were eliminated by both SAVRS and the LARS and both systems ceased operation. In 2009, the Arcadia Subbasin wells produced approximately 344 acre-feet of water.^{3,4}

¹City of Santa Monica, *2010 Urban Water Management Plan*, July 2011.

²*Ibid.*

³An acre foot of water is equivalent to 325,851 gallons of water.

⁴City of Santa Monica Public Works Department Water Resources Division, Susan Lowell, P.E, e-mail correspondence, dated September 8, 2010.

The Olympic Subbasin currently has three active groundwater wells, Santa Monica #1, #3, and #4, that have a combined rated capacity of 2,800 gpm.⁵ The Santa Monica #4 well is located south of the project site (on Olympic Boulevard near Stanford Street). Groundwater pumped from the Olympic Subbasin contains trichloroethylene (TCE), a degreasing agent. This groundwater is treated at the Arcadia Water Treatment Plant, where the TCE is removed by mechanical surface aeration. During the 2009/2010 water year, the Olympic Subbasin wells produced approximately 2,350 acre-feet of water.⁶

The Charnock Subbasin currently has five groundwater wells that have a combined capacity of 9,000 gpm.⁷ The combined capacity of the Charnock Well Field groundwater wells exceeds the perennial safe yield from the Charnock Subbasin that is estimated to be 8,200 acre-feet per year or 5,500 gpm.⁸ MTBE was detected in the groundwater extracted from the Charnock Well Field in 1995. This resulted in the closure of Charnock Well Field groundwater pumping operations until recently. In February 2011, the City opened the Santa Monica Water Treatment Plant, which utilizes a granular active carbon (GAC) filtration system to treat groundwater containing concentrations of MTBE within the Charnock Well Field. The plant has a capacity of 3,000 gpm. The City plans to pump a volume of groundwater less than the estimated safe yield of the Charnock Subbasin.⁹

The primary sources of groundwater recharge into the Santa Monica Groundwater Basin are direct infiltration from precipitation in the basin and subsurface inflows from the Santa Monica Mountains, the upper unconfined aquifer from the east, and the upper unconfined and lower San Pedro formation from the south. Water is discharged from the basin via surface runoff, envirotranspiration, and subsurface outflow to the south. Until 1995, the City had historically used over 10,000 acre-feet per year (AFY) of groundwater from local wells.¹⁰

Prior to 1995, Santa Monica received as much as 70 percent of its water supply from local groundwater aquifers. However, with the 1995 discovery of MTBE, the City began to import more water. In addition, there are two other general areas of groundwater quality concern in the City: salinity and volatile organic compounds (VOC). The degradation of groundwater quality from saltwater intrusion and the introduction of VOCs and MTBE, limits the ability to use groundwater resources in both the Charnock and Coastal Subbasins.

Groundwater in the project area site is estimated to be on the order of 42 to 42.5 feet below ground surface (bgs). According to the Seismic Hazard Evaluation of the Beverly Hills Quadrangle (De Lisle, 1998), the historic high groundwater level for the property to the west of the project site was on the order of 35 bgs.¹¹

Stormwater and Drainage

The majority of the City is within the Santa Monica Bay Watershed, while a very small southeast portion of the City is within the Ballona Creek Watershed¹² (**Figure 4.9-1**). The City further divides the Santa Monica Bay Watershed into 13 sub-watershed basins (**Figure 4.9-2**). The sub-watershed basins are not

⁵City of Santa Monica, *2010 Urban Water Management Plan*, July 2011.

⁶City of Santa Monica Public Works Department Water Resources Division, Susan Lowell, P.E, e-mail correspondence, dated September 8, 2010.

⁷City of Santa Monica, *2010 Urban Water Management Plan*, July 2011.

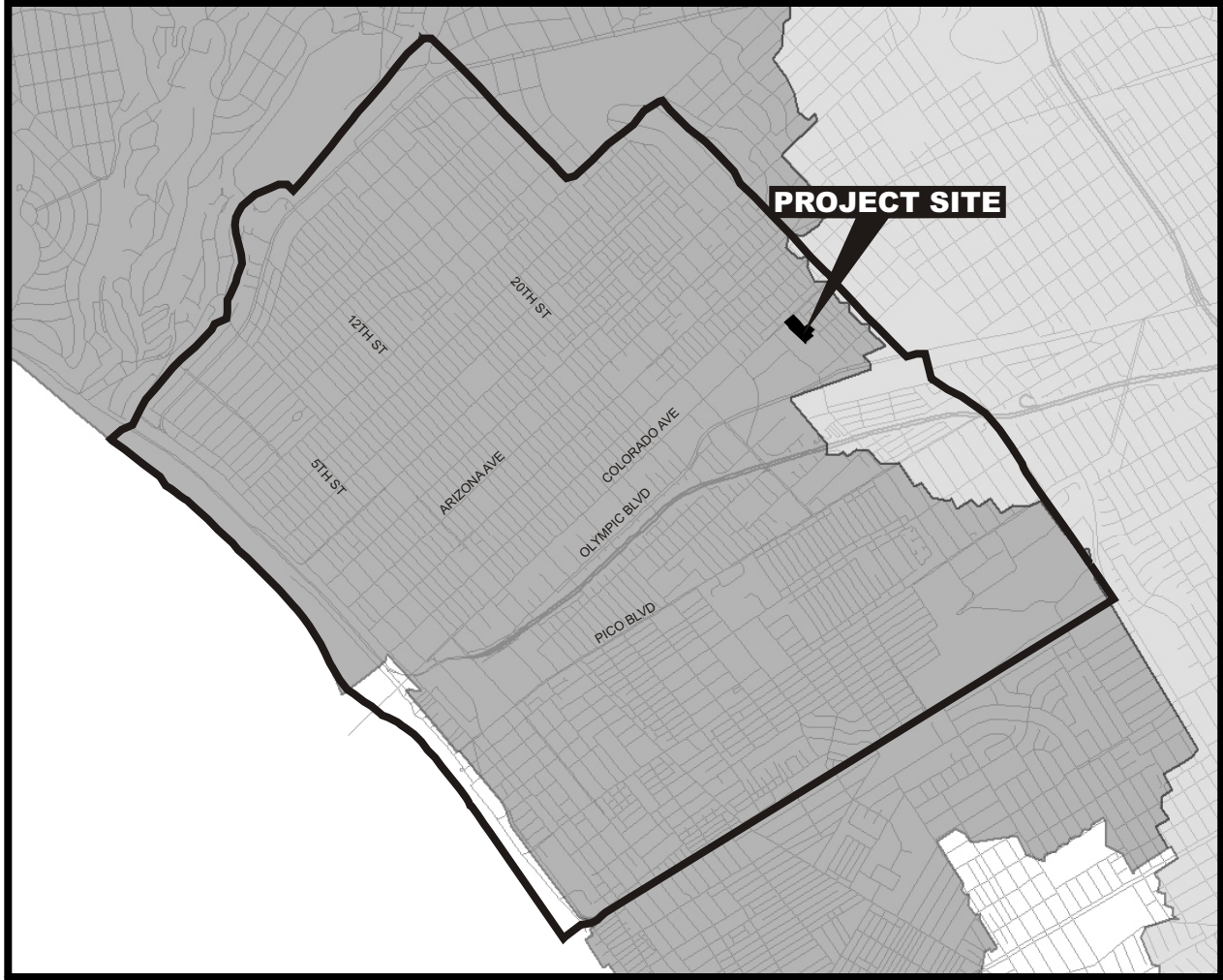
⁸City of Santa Monica, *Water Supply Assessment for the Proposed Land Use and Circulation Element*, January 2010.

⁹*Ibid.*





¹⁰City of Santa Monica, *2010 Urban Water Management Plan*, July 2011.

¹¹City of Santa Monica, Final Environmental Impact Report for 2834 Colorado Avenue Creative Studio Project, Geotechnical Report, June 2011.

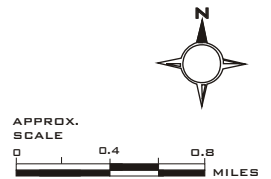
¹²The Ballona Creek Watershed is managed by the Los Angeles Department of Public Works.

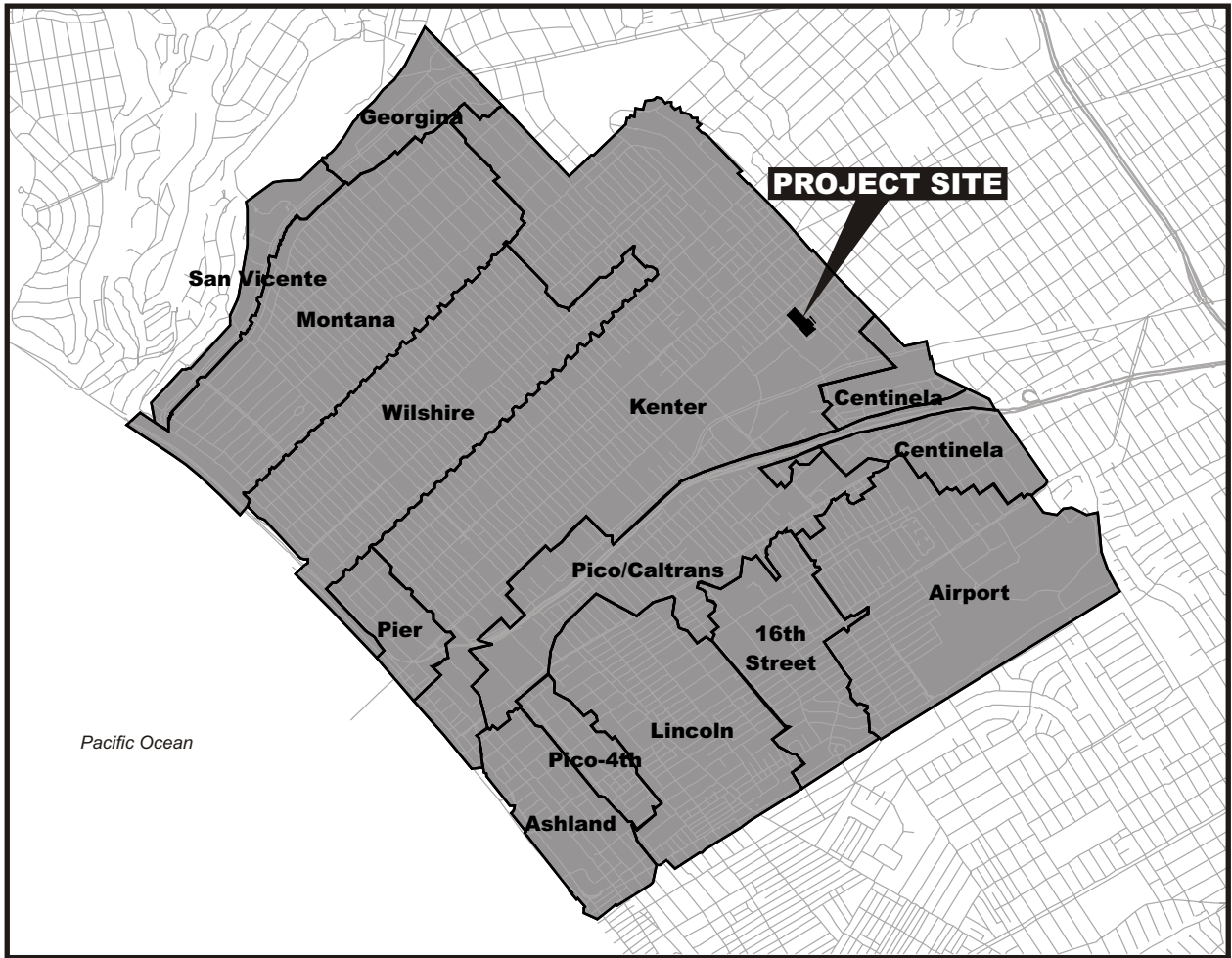


LEGEND:




-  City of Santa Monica
-  City of Santa Monica
-  Santa Monica Bay Watershed
-  Ballona Creek Watershed

SOURCE: TAHA, 2011.





LEGEND:

-  Santa Monica Bay Sub-Watershed Basins
-  City of Santa Monica
-  Santa Monica Bay Sub-Watershed Basins

SOURCE: TAHA, 2011.

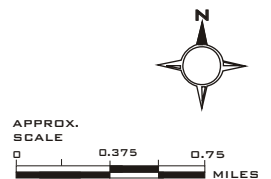


FIGURE 4.9-2

characterized by topography, but by a network of storm drains. Storm drains in each of the sub-watershed basins collect and convey City stormwater runoff directly into the Los Angeles County Flood Control District (LACFCD) stormdrain facilities that drain into the Santa Monica Bay and/or (for dry weather runoff only) the Santa Monica Urban Runoff Recycling Facility (SMURRF). The LACFCD constructs and manages major storm drains and open flood control channels, while the City of Santa Monica Public Works Department (PWD) constructs and manages local tributary drains and catch basins.

The SMURRF is located at 1623 Appian Way, adjacent to the Santa Monica Pier. Dry runoff from the Pico-Kenter and the Pier stormdrains are treated at the SMURRF year-round. The SMURRF utilizes coarse and fine screen, dissolved air flotation, microfiltration, and ultraviolet radiation to treat dry runoff. The SMURRF has the capacity to treat, clean, and reuse up to 500,000 gallons per day (gpd) of dry runoff. Dry runoff treated at the SMURRF is used in City parks, medians, the Woodlawn Cemetery, and dual-plumbed buildings. Dual-plumbed buildings currently using recycled water include the City's Public Safety Facility and the RAND Corporation building.

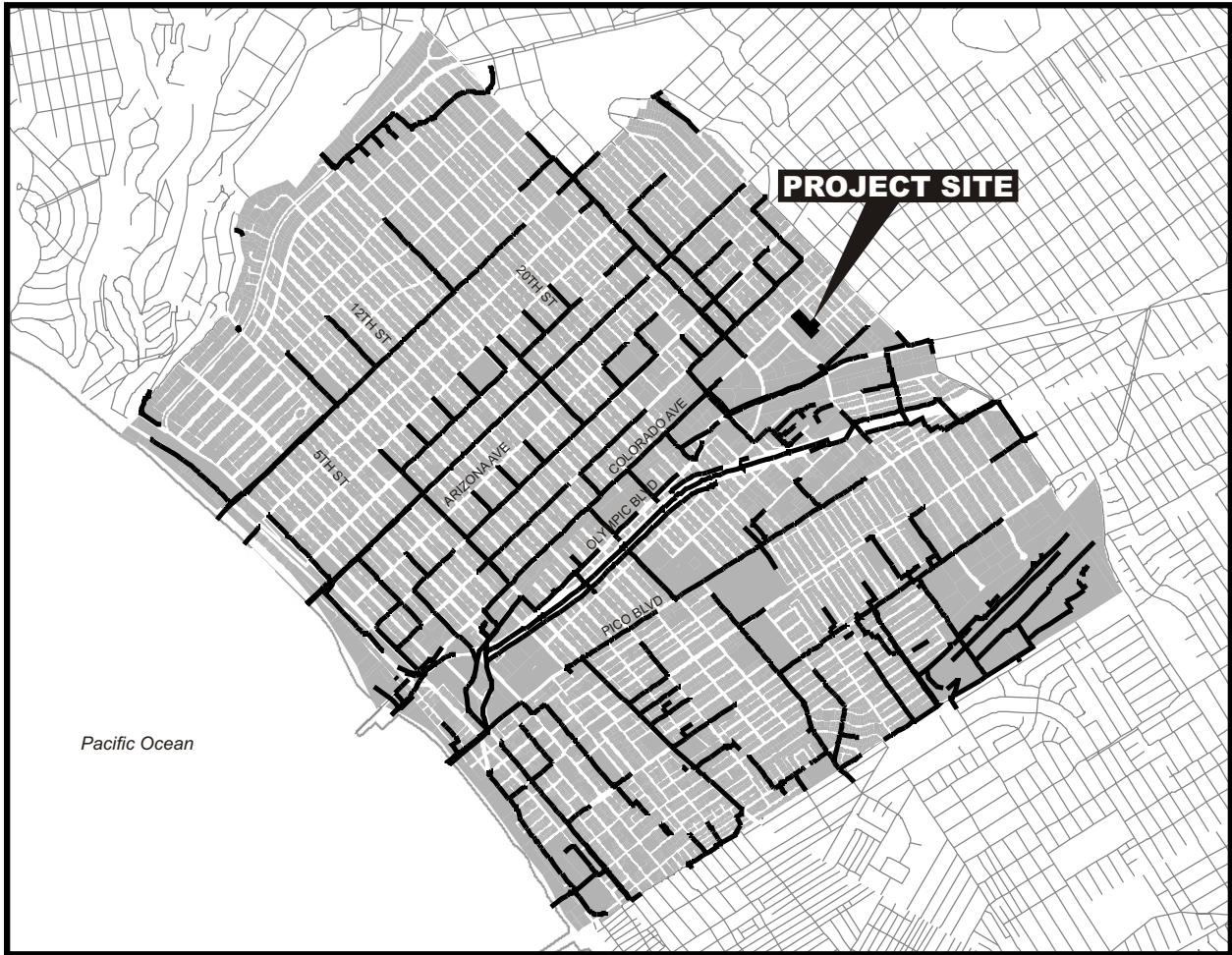
Based on a review of the City's 2006 *Watershed Master Plan*, the project site is located within the Kenter sub-watershed basin. The Kenter sub-watershed basin is approximately 2.2 square miles in size and contains approximately 3.4 miles of City storm drains. City stormwater runoff in the Kenter watershed basin is collected by City catchbasins and conveyed by City storm drains into the LACFCD-maintained Pico-Kenter storm drain. Stormwater runoff from the Pico-Kenter storm drain is then conveyed directly to the Santa Monica Bay. Dry weather runoff from the Pico-Kenter storm drain is directed to the SMURRF for treatment. While storm drainage facilities are designed to carry 100-year flood conditions, the Pico-Kenter stormdrain has been identified as deficient, and incapable of accommodating the runoff from a 50-year storm.¹³

The project site is located in a relatively flat and highly urbanized area of Santa Monica. The majority of the project site contains impervious surfaces such as asphalt roadways and concrete pads used to support trailers within the project site. Portions of the project site include small plots of pervious surfaces (e.g., gardens, lawns) for each trailer pad. Existing on-site structures were constructed in the 1950s, and it is likely that the existing on-site stormwater drainage facilities were constructed during the same year. Fully paved streets, curbs, gutters, sidewalks, or storm channels abut the project site on all sides.

The existing surface stormwater system is comprised of shallow concrete troughs that convey stormwater runoff flows in a south by southwest direction to the rear southwest corner of the property. There is a small concrete stormwater channel that runs along the southern border of the project site, as well as the two adjacent properties to the west of the project site. Surface water runoff from the project site is carried westward in this concrete stormdrain channel to the Stewart Street gutter drainage system and catch basins. The Stewart Street system is maintained by the City, and was designed and constructed in accordance with the Los Angeles County Hydrology Manual to convey a volume of water equivalent to a 25-year frequency design storm. From here, stormwater flows south, where it is ultimately conveyed to the Nebraska Avenue Drainage System, a major drainage system within the City. Stormwater collected by this system is conveyed to the Pico-Kenter storm drain at Cloverfield Boulevard and Colorado Avenue. From here, the Pico-Kenter storm drain extends down Colorado Boulevard to 6th Street where it cuts southwesterly towards the Santa Monica Bay outfall at the end of Pico Boulevard.¹⁴ **Figure 4.9-3** shows the stormdrain system for the City.

¹³Final EIR City of Santa Monica Land Use and Circulation Element, April 2010.

¹⁴City of Santa Monica Civil Engineering, Rick Valte, Watershed Program Manager, e-mail correspondence, dated September 1, 2010.



LEGEND:

- Project Site
- City of Santa Monica
- Storm Drains

SOURCE: TAHA, 2011.

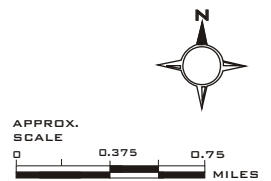


FIGURE 4.9-3

Stormwater drainage from the project site is managed by the City of Santa Monica Public Works Department (PWD) and the LACFCD. The LACFCD constructs and manages major storm drains and open flood control channels, while the PWD constructs local tributary drains and catch basins. The LACFCD and PWD design their storm drain infrastructure to handle 50-year flood storm events.¹⁵

Water Quality

Several factors may affect surface water quality, including, but not limited to: the types of land uses in a given area, hydrological conditions, meteorological conditions, geological conditions, and soil types. Activities associated with the different types of land uses may affect surface water quality, for example, when an office building generates exterior pollutants that can be washed away by surface water runoff, or when a surface parking lot that has deposits of oil, gasoline, and other pollutants that may affect the quality of surface water runoff. Similarly, meteorological conditions can influence the quantity and concentration of pollutants that are washed away through the frequency and intensity of storm events. In addition, geological conditions such as types of soils, and the presence of geological features may affect infiltration and runoff velocity. Surface water runoff has less potential to carry sediments and pollutants when runoff is slow (i.e., sheet flow over a relatively flat surface versus sheet flow down a slope) and infiltrates the soil.

In receiving waters, excess sediments can cause high turbidity, which can affect biological organisms (i.e., plant and animal life in oceans, lakes, ponds, rivers, etc.). In urban areas, non-sediment pollutants, (such as zinc, copper, and lead), which can cause toxic effects in high concentrations, are most commonly associated with surface water runoff.

Pursuant to the requirements of the federal Clean Water Act (CWA), the State Water Resources Control Board (SWRCB) adopts a list of impaired water bodies (the 303(d) list) for the State of California identifying water quality impairments including trash, metals, pathogens, and organic pesticides. The list was most recently updated in 2006 and adopted in 2007.¹⁶ Ballona Creek and the Santa Monica Bay are among the SWRCB-listed impaired waterways. Ballona Creek is listed for cadmium in sediment, cyanide, and silver from point sources, nonpoint sources, and unknown sources. The Ballona Creek Estuary is listed as impaired for shellfish harvesting due to point and nonpoint sources. The SWRCB has recorded high levels of dissolved solids, hydrogen sulfide, iron, manganese, and volatile organic compounds in the watershed. During wet weather, measurements of copper, lead, zinc, and silver have regularly exceeded values set in the California Toxics Rule. These elevated contaminate levels restrict the beneficial uses of the watershed.¹⁷ The Santa Monica Bay is listed for DDT, debris, fish consumption advisory, PCBs, and sediment toxicity due to point sources and nonpoint sources. Historic discharges of DDT and PCBs have accumulated in sediments in the Bay and have caused contamination of some marine species. Popular swimming beaches often have posted warnings resulting from high pathogen levels that are typically found near storm drain outlets. Additionally, several tons of trash washes from city streets into the Bay during rain storms, littering beaches and harming marine life.¹⁸

In addition, a Water Quality Control Plan (Basin Plan) for the Los Angeles Region has been developed by the Los Angeles Regional Water Quality Control Board (LARWQCB), which outlines conservation and enhancement of water resources and establishes beneficial uses for inland surface waters, tidal prisms, harbors, and groundwater basins.

¹⁵City of Los Angeles Department of City Planning website for Los Angeles General Plan Framework, Chapter 9, available at: <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>, accessed September 15, 2010.

¹⁶2006 CWA Section 303(d) list of water quality limited segments requiring TMDLs, available at: http://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/303dlists2006/epa/r4_06_303d_reqtmlds.pdf, accessed April 4, 2011.

¹⁷Final EIR City of Santa Monica Land Use and Circulation Element, April 2010.

¹⁸City of Santa Monica, Planning and Community Development Department, *Opportunities and Challenges*, July 2005.

REGULATORY FRAMEWORK

Federal

Federal Water Pollution Control Act (Clean Water Act, or CWA).

The CWA was first enacted in 1948 to (1) restore and maintain the chemical, physical, and biological integrity of the Nation's waters by preventing point and nonpoint pollution sources, (2) provide assistance to publicly owned treatment works for the improvement of wastewater treatment, and (3) maintain the integrity of wetlands. In 1972, the CWA was amended to provide that the discharge of pollutants to waters of the United States from any point (such as discharge from an industrial facility) or nonpoint (surface and farmland water runoff) source is unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In November 1990, the USEPA published final regulations that established the NPDES permit application requirements for specified categories of industries. The NPDES permit system was established in the CWA to regulate discharges from point source (a municipal or industrial discharge at a specific location or pipe) and certain types of nonpoint sources. As defined in the federal regulations, nonpoint sources are generally exempt from federal NPDES permit program requirements. Nonpoint pollution sources are diffuse and originate over a wide area rather than from a definable point. Nonpoint pollution often enters receiving water in the form of surface runoff and is not conveyed by way of pipelines or discrete conveyances. Urban stormwater runoff and construction site runoff, however, are nonpoint sources regulated under the NPDES permit program because they discharge to receiving waters at discrete locations in a confined conveyance system. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that the USEPA must consider in setting effluent limits for priority pollutants. For point source discharges, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. For nonpoint source discharges (e.g., municipal stormwater and construction runoff), the NPDES program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of (1) characterizing receiving water quality, (2) identifying harmful constituents, (3) targeting potential sources of pollutants, and (4) implementing a Comprehensive Stormwater Management Program. State implementation of the NPDES program as it relates to the proposed project is discussed below under State and Regional regulations. Federal regulations allow two permitting options for stormwater discharges (individual permits and general permits). The State Water Resource Control Board (SWRCB) has elected to adopt one statewide general permit for construction activity at this time. The General Construction Activities Stormwater Permit (GCASP) applies to all stormwater discharges associated with construction activity, except for those on tribal lands, those in the Lake Tahoe Hydrologic Unit, and those performed by the California Department of Transportation (Caltrans). Currently, the GCASP requires all dischargers where construction activity disturbs one acre or more to conduct the following:

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States; or
- Perform inspections of all BMPs.

The CWA also directs states to establish water quality standards for all “waters of the United States” and to review and update such standards on a triennial basis. Section 319 mandates specific actions for the control of pollution from nonpoint sources. The USEPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, such as the

NPDES Program, to the SWRCB and the Regional Water Quality Control Board (RWQCB). Section 303(c)(2)(b) of the CWA requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based upon biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. Water quality standards applicable to the proposed project are listed in the California RWQCB's Basin Plan.

Section 303(d) of the CWA bridges the technology-based and water quality-based approaches for managing water quality. Section 303(d) requires that states make a list of waters that are not attaining standards after the technology-based limits are put in place. For waters on this list (and where the USEPA administrator deems they are appropriate), the states are to develop Total Maximum Daily Loads (TMDL). TMDLs are established at the level necessary to implement applicable water quality standards. A TMDL must account for all sources of pollutants that cause the water to be listed. Federal regulations require that TMDLs, at a minimum, account for contributions from point sources and nonpoint sources. Specific TMDLs applicable to the proposed project are listed under Regional regulations.

State

Responsibility for the protection of water quality in California rests with the SWRCB and nine RWQCBs. The SWRCB establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. In cases where the Basin Plan does not contain a standard for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document, California Toxics Rule) or from USEPA water quality criteria developed under Section 304(a) of the CWA. Numeric criteria are required by the CWA for many priority toxic pollutants. To fill in the gap between the water quality control plans and CWA requirements, on May 18, 2000, the USEPA promulgated the California Toxics Rule based on the Administrator's determination that numeric criteria are necessary in the State of California to protect human health and the environment. These federal criteria are numeric water quality criteria for priority toxic pollutants and other provisions for water quality standards legally applicable in the State of California for inland surface waters, enclosed bays, and estuaries for all purposes and programs under the CWA.

Section 401 of the CWA requires water quality certification from the SWRCB or from a RWQCB when the project requires a CWA Section 404 permit. Section 404 of the CWA requires a permit from the U.S. Army Corps of Engineers to discharge dredged or fill material into waters of the United States.

Porter-Cologne Water Quality Control Act. The Porter-Cologne Water Quality Control Act establishes the SWRCB and each RWQCB as the principal State agencies for coordinating and controlling water quality in California. Specifically, the Porter-Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the state (including both surface and groundwaters) and directs the RWQCBs to develop regional Basin Plans. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative.

Regional

Basin Plan for the California Regional Water Quality Control Board, Los Angeles Region (Basin Plan). The proposed project is within the jurisdiction of the Los Angeles RWQCB.¹⁹ The Los Angeles RWQCB provides permits that affect surface waters and groundwater. Under Section 303(d) of the CWA, the Los Angeles RWQCB is also responsible for protecting surface waters and groundwater from both point and nonpoint sources of pollution within the project site and for establishing water quality standards and objectives in its Basin Plan that protect the beneficial uses of various waters. The State has developed TMDLs, which is a calculation of the maximum amount of a pollutant that a waterbody can have and still meet Water Quality Objectives (WQOs) established in the Basin Plan,²⁰ in order to protect the valuable uses of its waters.

NPDES General Construction Activity Stormwater Permit (GCASP). The SWRCB regulates stormwater discharges associated with construction activity under the NPDES GCASP (Order No. 2009-009-DWQ as amended by 2010-0014-DWQ).²¹ Construction activities subject to the NPDES GCASP include clearing, grading, and disturbances to the ground, such as stockpiling or excavation, that result in soil disturbances of at least one acre of total land area. This Order requires that, prior to beginning any construction activities, the permit applicant must obtain coverage under the GCASP by preparing and submitting a Notice of Intent (NOI) and appropriate fee to the SWRCB. Additionally, coverage would not occur until an adequate Stormwater Pollution Prevention Plan (SWPPP) has been prepared. A separate NOI shall be submitted to the SWRCB for each construction site.

The SWPPP, which specifies BMPs that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters, has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater, as well as non-stormwater discharges. The SWPPP must include BMPs that address source control, and, if necessary, must also include BMPs that address specific pollutant control. The SWPPP includes a description of (1) the site, (2) erosion and sediment controls, (3) means of waste disposal, (4) implementation of approved local plans, (5) control of post-construction sediment and erosion control measures and maintenance responsibilities, and (6) non-stormwater management controls. Dischargers are also required to inspect their construction sites before and after storms to identify stormwater discharge associated with construction activity and to identify and implement controls where necessary.

BMPs are intended to diminish impacts to the Maximum Extent Practicable (MEP), which is a standard developed by Congress to allow regulators the flexibility needed to shape programs to the site-specific nature of municipal stormwater discharges. Reducing impacts to the MEP generally relies on BMPs that emphasize pollution prevention and source control, with additional structural controls as needed.

¹⁹California State Water Resources Control Board map, available at:
http://www.waterboards.ca.gov/waterboards_map.shtml, accessed September 9, 2010.

²⁰LARWQCB Basin Plan, Chapter 3, *Water Quality Objectives*, available at:
http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml, accessed September 9, 2010.

²¹Construction General Permit 2009-0009-DWQ (Effective July 1, 2010), available at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml, accessed September 9, 2010.

Local

County of Los Angeles Hydrology Manual. Drainage and flood control of the project site is regulated by the PWD and the LACFCD. The County has jurisdiction over regional drainage facilities. The Los Angeles County Department of Public Works' Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event.²² Areas with sump conditions are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event. The County also limits the allowable discharge into existing stormdrain facilities and enforces all new developments that discharge directly into the County's stormdrain system. Any proposed drainage improvements of County owned stormdrain facilities such as catch basins and stormdrain lines requires the approval/review from the County Flood Control District department.

Santa Monica Municipal Code. Chapter 7.10, *Urban Runoff Pollution Control*, of the Santa Monica Municipal Code mandates requirements to reduce urban runoff pollution for any new developments.²³ An Urban Runoff Mitigation Plan must be submitted to the Department of Public Works at the time of submittal of an application for a new project. The Urban Runoff Mitigation Plan shall demonstrate that an applicant will either (1) store and use for non-potable purposes, infiltrate, or treat and release the project generated runoff produced by a 0.75 inch storm event through incorporation of design elements, or (2) alternatively, pay an Urban Runoff Reduction Fee.

The Urban Runoff Mitigation Plan identifies design elements to be included in the project that would infiltrate or treat project-generated runoff. The design elements must meet one or more of the following goals:

- 1) *Maximize permeable areas to allow for more percolation of runoff into the ground;*
- 2) *Maximize the amount of runoff directed to permeable areas and/or maximize stormwater storage for reuse or infiltration; or*
- 3) *Remove pollutants through installation of treatment control BMPs.*

Examples of design elements that could be incorporated into the project to achieve these goals include, but are not limited to: biofilters, swales and green strips; orienting roof runoff to permeable areas; grading the site to divert runoff to permeable areas; and using cisterns or other retention structures to capture runoff for reuse. The Urban Runoff Mitigation Plan must also include steps for ongoing maintenance of BMPs throughout the life of the project.

City of Santa Monica Watershed Management Plan. In 2006, the City of Santa Monica adopted a citywide watershed management plan. The plan is intended to restore a healthier balance between the urban environment and the natural ecosystem, including the Santa Monica Bay, by reducing the pollution in urban runoff, reducing urban flooding, and increasing water conservation, recreational opportunities, open space, and wildlife and marine habitat. This plan identifies various capital drainage improvements throughout the City, including the installation of subsurface infiltration, perimeter infiltration basins, UV run-off disinfection facilities, permeable surface parking lots, and the daylighting of certain storm drains.

²²Los Angeles County Department of Public Works, *Hydrology Manual* (January 2006) website, available at: http://ladpw.org/wrd/Publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf, accessed September 15, 2010.

²³Santa Monica Municipal Code, available at: <http://www.qcode.us/codes/santamonica/>, accessed September 9, 2010.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted);
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- 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;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood plain structures which would impede or redirect flood flows; and/or
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

IMPACTS

As discussed in the Initial Study (Appendix A to this EIR), the proposed project does not have the potential to violate water quality standards or waste discharge requirement, cause substantial erosion or siltation on- or off-site, cause flooding on- or off-site, cause substantial polluted runoff, place housing or structures within a 100-year flood plain that would impede or redirect flood flows, or expose people or structures to significant risk involving flooding. Therefore, these issues will not be discussed further.

The impacts analysis that follows is limited to potential depletion of groundwater supplies and/or interference with groundwater recharging areas, and a potential increase in stormwater runoff that would exceed capacity of existing or planned stormwater drainage systems associated with the proposed project.

Impact HW-1 The proposed project may require temporary and/or permanent dewatering. Therefore, groundwater impacts would be potentially significant. Implementation of Mitigation Measure HW1 would reduce impacts to less than significant.

The proposed project would increase residential and commercial/office uses on-site and, therefore, would increase water usage over existing conditions. Potable water would be supplied by the Santa Monica Water Resources Division, which draws its local water supplies from groundwater and imported supplies from the Metropolitan Water District of Southern California. In the past few years, the City received much of its water from imported sources due to the closure of the groundwater wells in Charnock Well Field. However, with the recent opening of the Santa Monica Water Treatment Plant to treat water from the Charnock Well Field, the City plans to be operating all of its groundwater wells and, therefore, will receive most of its water from local supplies.²⁴ Table 4.16.1-3 in Section 4.16.1 Utilities and Service

²⁴2005 Urban Water Management Plan, City of Santa Monica, <http://www.scag.ca.gov/rcp/pdf/uwmp/LosAngeles/CityofSantaMonica2005UWMP.pdf>, accessed September 27, 2010.

Systems of this EIR estimates that the proposed project would result in a net water usage increase of 51,598 gallons per day over existing conditions. This represents a less than one percent increase of the total water supply for the City.²⁵ Therefore, the proposed project would not substantially deplete groundwater supplies.

The project site is located in an urbanized portion of the City and is generally impervious. Therefore, it does not offer opportunities for groundwater recharge. The addition of the proposed project would represent a negligible increase in the overall permeability of the site because the lot coverage, and, therefore, permeability, will remain nearly identical. Although the proposed project would be built to LEED standards and would include green and sustainable design elements, the overall effect on groundwater recharge would be minimal. However, implementation of the proposed project would bring the project site to be in compliance with Chapter 7.10, *Urban Runoff Pollution Control*, of the Santa Monica Municipal Code. This chapter mandates the implementation of urban runoff pollution control measures to ensure that the proposed project would contain project-generated runoff on-site during a 0.75-inch storm event. As a result, the proposed project would not substantially impact groundwater recharging capabilities.

According to the Seismic Hazard Evaluation of the Beverly Hills Quadrangle (De Lisle, 1998), the historic high groundwater level for the property to the west of the project site was on the order of 35 bgs. The floor of the proposed subterranean parking would be approximately 22 feet bgs. Excavation further below the ground surface for foundation and other related work could potentially encounter groundwater. Therefore, the proposed project may require temporary (construction) and/or permanent dewatering of groundwater on the project site. The City's groundwater aquifer (used for drinking water) is deep below the surface; therefore, dewatering for the proposed project would not affect the City's groundwater drinking supplies. However, temporary and/or permanent dewatering could have impacts related to groundwater quality. Therefore, impacts related to groundwater could be potentially significant without mitigation.

Mitigation Measures

HW1 If temporary and/or permanent dewatering on the project site is required, the Applicant shall obtain a dewatering permit from the City of Santa Monica Water Resources Protection Program prior to the issuance of a grading permit. Soil and groundwater testing to a minimum depth of 50 feet shall be conducted to the satisfaction of the Water Resources Protection Program staff. If contaminated groundwater is discovered on-site, treatment and discharge of the contaminated groundwater shall be conducted in compliance with applicable regulatory requirements including the Los Angeles Regional Water Quality Control Board standards.

Level of Impact After Mitigation

With implementation of Mitigation Measure **HW1**, impacts related to groundwater would be reduced to less than significant.

²⁵See Section 4.14 Utilities and Service Systems of this EIR for more details.

Impact HW-2 Implementation of the proposed project could increase stormwater runoff from the site to the local stormdrain system. However, this increase would not require the expansion or construction of new major storm drain infrastructure. This impact would be less than significant.

The project site is currently developed as a trailer park, with approximately 91 percent of the site covered by impervious surfaces. In comparison, the proposed project would develop the site with a mixed-use residential and office complex which would result in impervious surfaces covering approximately 89 percent of the site. Therefore, the overall difference in impervious surface and associated stormwater runoff from the site would not substantially change. Based on the Rational Method Approach for stormwater runoff calculation from the Los Angeles County Hydrology Manual, it is estimated that the proposed project would reduce stormwater flow leaving the project site by approximately two percent as compared to the current condition (see Appendix E). Although the calculation predicts a reduction in stormwater runoff, the percentage is negligible, but it concludes that stormwater runoff will be equal to, or less-than, the runoff from the existing land use.

In addition, implementation of the proposed project would bring the project site in compliance with Chapter 7.10, *Urban Runoff Pollution Control*, of the Santa Monica Municipal Code. This chapter mandates urban runoff requirements for new developments and would ensure that the proposed project would include engineering design measures that could contain project-generated runoff on-site during a 0.75 inch storm event. Design elements to be included in the project that would infiltrate or treat project-generated runoff may include biofilters, swales, and green strips; orienting roof runoff to permeable areas; grading the site to divert runoff to permeable areas; and using cisterns or other retention structures to capture runoff for reuse. If such design measures are infeasible for a site, an urban runoff reduction fee may be paid by the applicant.

The proposed project would include minor connections to the existing stormdrain infrastructure. The proposed project would not increase impervious surfaces and would be subject to the stormwater runoff regulations and requirements cited above to ensure that the existing stormdrain infrastructure would not be adversely affected. Therefore, the proposed project would not result in the need for new or expanded major stormdrain infrastructure; impacts would be less than significant.

Mitigation Measures

Stormwater drainage impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The proposed project, combined with related projects, could potentially increase the amount of impervious surface area within the City. Cumulative development has the potential to reduce surface water quality during construction, and could increase stormwater runoff and decrease groundwater infiltration due to increased imperviousness. Compliance with requirements, including development of a SWPPP for construction on sites greater than acre, and adherence to the City of Santa Monica's Urban Runoff Pollution Control Ordinance for construction and operation of new developments, would be expected to mitigate these potential cumulative impacts by requiring on-site detention, treatment, or other best management practices for controlling urban runoff. Therefore, cumulative impact related to hydrology and water quality would be less than significant.

4.10 LAND USE AND PLANNING

This section discusses the proposed project to determine whether it would be consistent with City and/or regional land use plans and policies, and analyzes potential conflicts between existing and proposed land uses in and around the project site.

EXISTING SETTING

The City of Santa Monica is 8.3 square miles and is located in west Los Angeles County, approximately 20 miles west of Downtown Los Angeles. The City is bounded on the north, south, and east by the City of Los Angeles and on the west by the Pacific Ocean. Surrounding communities in the City of Los Angeles include Pacific Palisades, Brentwood, Sawtelle, Mar Vista, and Venice. Santa Monica contains a range of land uses which include:

- A traditional downtown with retail, office, entertainment, and mixed-use residential uses
- An active industrial spine that runs parallel to the Santa Monica Freeway (I-10)
- Multiple commercial corridors
- Civic uses that include parks, schools, hospitals, colleges, and places of worship
- Established residential neighborhoods—with a diverse range of housing types and densities

The predominant land use in the City is residential, which comprises approximately 63 percent of the City's total land area (34 percent single-family and 29 percent multi-family).¹ Commercial uses occupy approximately nine percent of land, mixed-uses account for approximately ten percent of land, open space and institutional uses each occupy approximately eight percent of land, and industrial uses occupy approximately two percent of land area. The City has very little vacant land remaining for development. **Table 4.10-1** shows the existing land use distribution for the City of Santa Monica.

The project site is located in the north central portion of the City and is developed as the existing Village Trailer Park, south of Colorado Avenue and west of Stanford Street. The existing mobile homes and the office building on-site are one-story and existing development in the project vicinity generally ranges from two to five stories in height. **Figure 4.10-1** shows the views of the project site and **Figure 4.10-2** shows the views of surrounding land uses types.

Land uses in the vicinity of the project site include a mix of industrial, commercial, office and residential uses. The majority of the uses along the south side of Colorado Boulevard are light industrial, commercial and/or creative office, while many of the uses on the north side of Colorado Boulevard are one and two-story residential uses. A one-story (approximately 15 feet tall) storefront church, the Westside Christian Fellowship, is located immediately to the east of the project site. Along Stanford Street to the east of the site, is surface parking and additional industrial uses. Residential structures, both single- and multi-family, are interspersed with industrial structures located along Colorado Avenue, as well as along Stewart Street. In general, the multi-family residences along Colorado Avenue are two-stories in height with minimal setbacks (approximately five feet). The single-family residential buildings are one-story with slightly greater setbacks from the street. There are two schools located approximately 500 feet to the south of the project site, a preschool, and a satellite Santa Monica College facility specializing in entertainment and technology. **Figure 4.10-3** shows the existing land uses surrounding the project site. The future site of the Bergamot Station for the Exposition Light Rail Line, scheduled to open in 2015, is also located approximately 0.25 miles to the south of the project site at Olympic Boulevard and 26th Street.

¹City of Santa Monica, *GIS Land Use Distribution*, July 2010.

TABLE 4.10-1: CITY OF SANTA MONICA LAND USE TYPES AND ZONING			
Land Use	Corresponding Zones	Net Acres	Percent Area
RESIDENTIAL		3,274	63.3
Single-Family	R1, OP-1	1,747	33.8
Low-Density	R-2, R2-B, R2-R,R-MH, OP, OP-2	1,150	22.3
Medium-Density	R3, R3-R, OP-3	186	3.6
High-Density	R4, OP-4	192	3.7
COMMERCIAL		484	9.4
Downtown Core	C3, C3-C, CC	148	2.9
Neighborhood	C2, CM, N	100	1.9
General	C4	55	1.1
Health Care/Mixed-Use	CP-3, CP-5	51	1.0
Office	C5	130	2.5
MIXED-USE		498	9.6
Mixed-Use Boulevard	C6	298	4.7
Mixed-Use Creative	LMSD	108	1.1
Oceanfront	BSCD, BP	33	0.3
Bergamot Transit Village	LMSD	59	0.6
INDUSTRIAL		80	1.6
Industrial Conservation	M1	80	1.6
OPEN SPACE		419	8.1
Parks and Open Space	DP	419	8.1
INSTITUTIONAL		399	7.7
Institutional/Public Lands	PL	399	7.7
Total		5,165	100.0
SOURCE: City of Santa Monica GIS Data, 2010.			

REGULATORY FRAMEWORK

Regional

SCAG Regional Comprehensive Plan, Regional Transportation Plan, and Growth Vision Report. Southern California Association of Governments (SCAG) is the regional planning agency with responsibility for reviewing the consistency of local plans, projects, and programs with regional plans. It is a federally-designated metropolitan organization for six southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth-management, hazardous waste management and air quality.



View of Village Trailer Park entrance along Colorado Avenue.



View of existing trailer homes.



View of existing trailer homes.



View of the office on the project site.

SOURCE: TAHA, 2010.



View of the Westside Christian Fellowship Church to the north of the project site.



View of industrial use to the north of the project site.

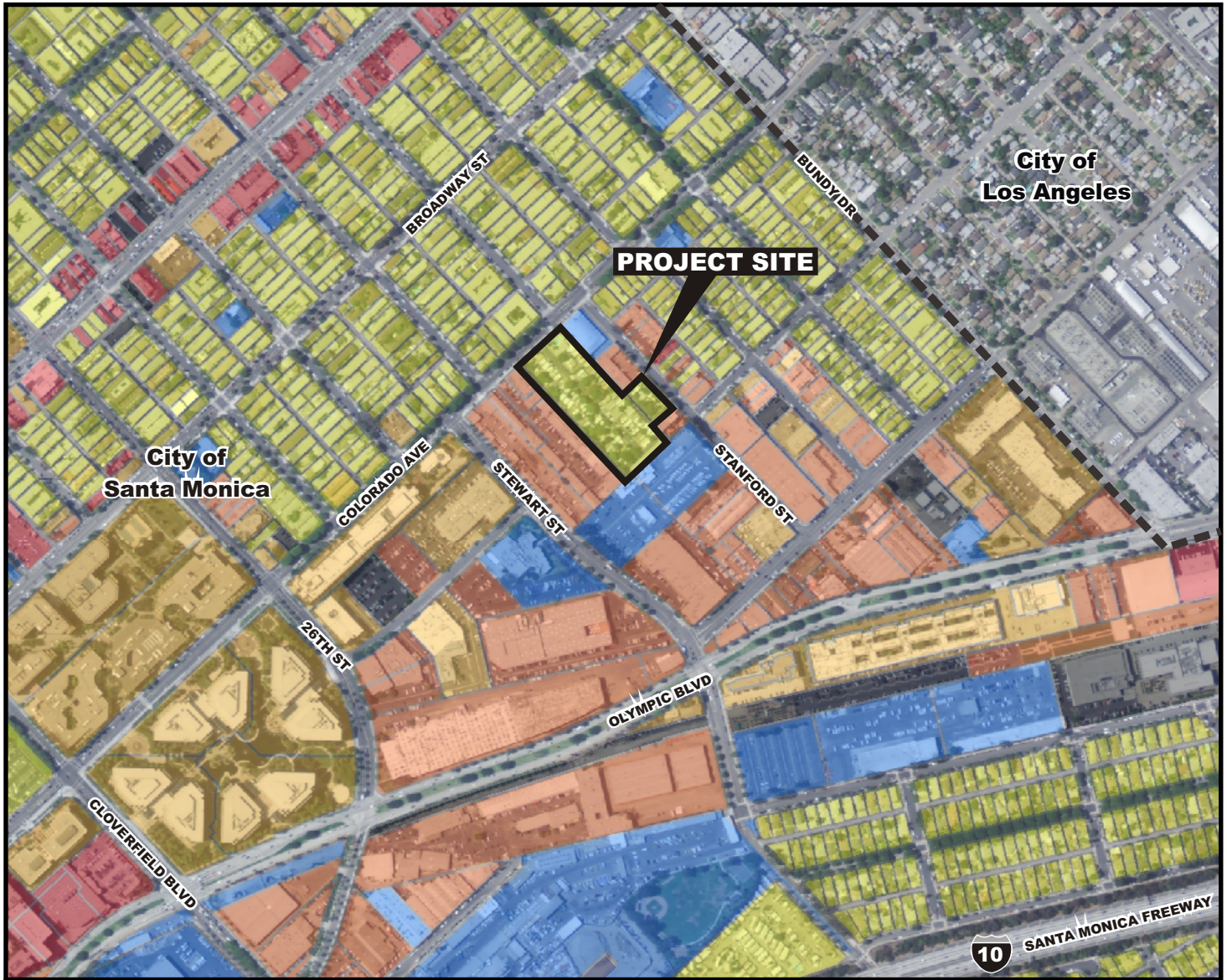


View of multi-family residences to the west of the project site.










View of industrial use adjacent to the south of the project site.

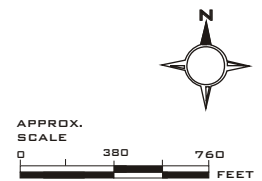
SOURCE: TAHA, 2010.



LEGEND:

- | | | | |
|--|----------------------|---|--------------------------|
|  | Project Site |  | Office |
|  | City of Santa Monica |  | Industrial |
|  | Residential |  | Government/Institutional |
|  | Commercial/Retail |  | Vacant/Parking |

SOURCE: County of Los Angeles, 2010.



Regional Comprehensive Plan. The Regional Comprehensive Plan (RCP) is an advisory document that describes the region's economic, social, and environmental future and addresses the region's challenges. It defines solutions to interrelated housing, traffic, water, air quality and other regional challenges and is intended to provide a framework for decision making by local governments regarding growth and development. The RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The core chapters in the RCP include Land Use and Housing, Open Space and Habitat, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness and Economy.

Regional Transportation Plan. SCAG is mandated by the federal government to prepare the Regional Transportation Plan (RTP) every four years. The RTP was most recently updated in May 2008. The RTP provides a framework for the future development of the regional transportation system through the year 2035 and addresses all modes of transportation within the region. The RTP policies are incorporated into the RCP. At the regional level, the goals, objectives, and policies in the RCP and RTP are used for measuring consistency with the adopted plan.² SCAG is currently in the process of preparing the updated 2012 RTP.

Growth Vision Report. SCAG has collaborated with interdependent sub-regions, counties, cities, communities and neighborhoods in a process referred to by SCAG as Southern California Compass, which resulted in the development of a shared Growth Vision Report for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The shared regional vision sought to address issues such as congestion and housing availability, which may threaten the regions' livability. Principles established by the Growth Vision Subcommittee are intended to promote and maximize regional mobility, livability, prosperity and sustainability.³ Decisions regarding growth, land use, transportation and economic development should support and be guided by these principles.

Compass Blueprint 2% Strategy. The Compass Blueprint 2% Strategy is a guideline for the implementation of the key principles set forth in the SCAG Growth Vision Report. It proposes increasing mobility, livability, prosperity and sustainability by making changes to current land use and transportation trends within two percent of the land area of the SCAG Region. Areas within this two percent are referred to as 2% Strategy Opportunity Areas, and are made up primarily of Metro centers, city centers, rail transit stops, bus rapid transit corridors, airports ports and industrial centers, and priority residential in-fill areas. The project area is located within a Compass Blueprint 2% Strategy Area. Planning efforts and resources within 2% Strategy Areas are intended to contribute to the greatest progress towards achieving/satisfying the goals of the Growth Vision.⁴

Local

Santa Monica General Plan

The Santa Monica General Plan, adopted in 1984, contains the seven State required elements including land use, circulation, housing, open space, noise, conservation, and safety. In addition, the City has adopted a historic preservation element. The General Plan has not been comprehensively revised in recent years, although there have been periodic amendments to the majority of the elements, including the Land Use and Circulation Element (LUCE) in 2010, Noise Element in 1992, the Open Space Element in 2001, the Historic Preservation Element in 2002, and the Housing Element in 2008.

²SCAG, 2008 *Regional Transportation Plan*, available at <http://www.scag.ca.gov/rtp2008/index.htm>, accessed November 2010.

³SCAG, 2004 *Growth Vision Report*, available at <http://www.compassblueprint.org/files/scag-growthvision2004.pdf>, accessed November 2010.

⁴Compass Blueprint, *2% Strategy*; available at: <http://www.compassblueprint.org/about/strategy>, accessed March 2011

Santa Monica Land Use and Circulation Element. The City of Santa Monica LUCE was adopted on July 6, 2010 and incorporates the community's most fundamental values into the land use and transportation policies to preserve and enhance the City of Santa Monica.⁵ The LUCE directs change to occur in selected areas of the City that are served by transit, including the future Exposition Light Rail line, and provides guidance for enhancing the residential neighborhoods, increasing open space, reducing congestion, and preserving historic resources. It employs the necessary tools to meet State and local greenhouse gas emission goals, as well as a reduction in vehicle miles traveled. The LUCE provides a number of goals and policies that are based on the following key principles:

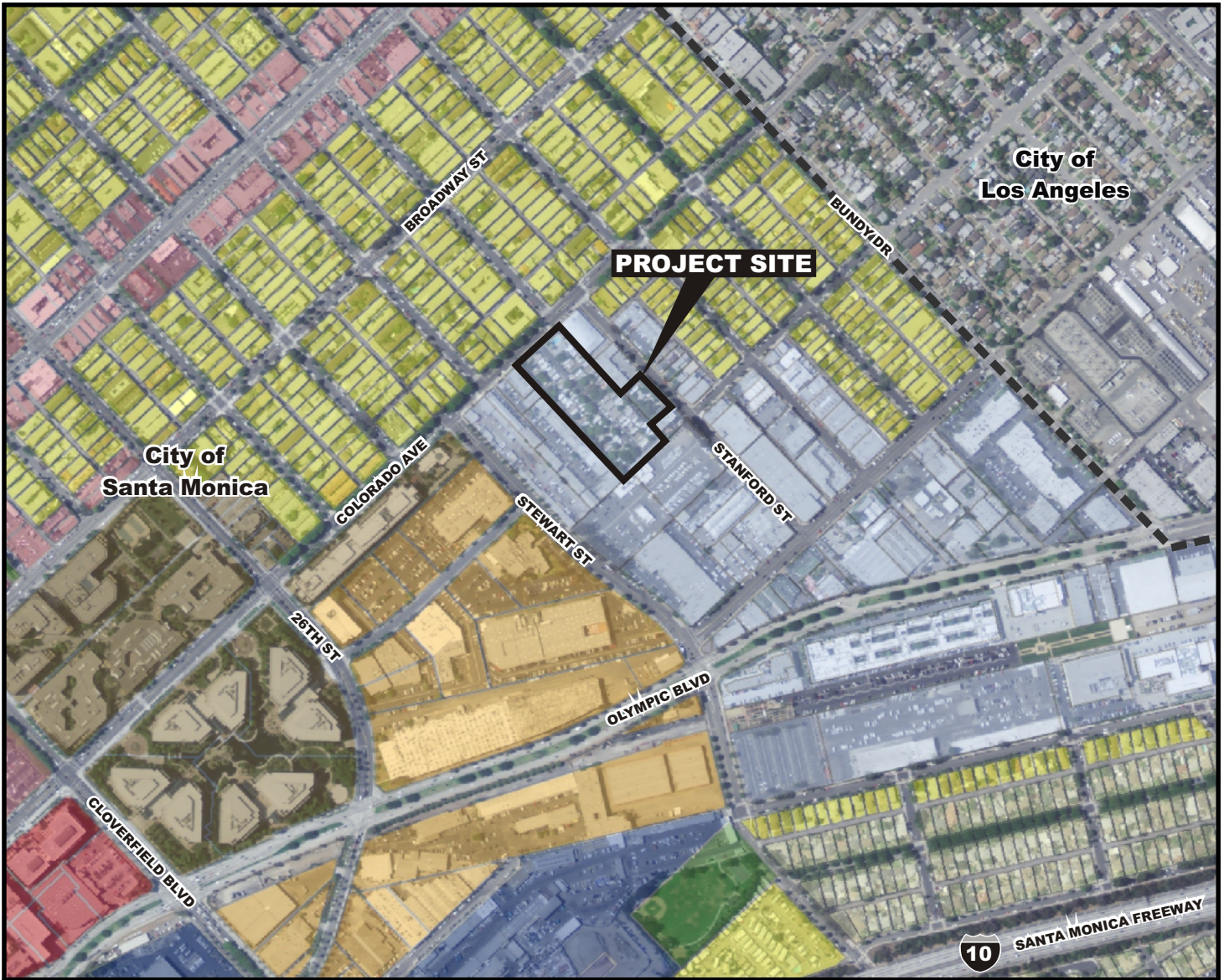
- Preserve and enhance neighborhoods;
- Preserve historic resources;
- Reduce and manage traffic by coordinating land use with transit corridors;
- Create complete neighborhoods: housing, jobs, shopping, and services within walking distance;
- Require new development to provide community benefits;
- Increase open space and housing choice;
- Placemaking through quality urban design; and
- Environmental and fiscal sustainability.

The goals and policies of the LUCE that are relevant to the proposed project are presented in Table 4.10-3. The LUCE establishes a 3-tier approach for determining allowable height and floor area ratio (FAR) for new development in the City. Each land use designation (with the exception of the Downtown Core which does not utilize a tier approach) includes a base by-right tier (Tier 1) and two discretionary tiers (Tiers 2 and 3). Projects requesting a height above the base height (Tier 2 and 3 projects) are subject to discretionary review and must provide community benefits. The LUCE identifies five priority categories of community benefits: Trip Reduction and Traffic Management; Affordable and Workforce Housing; Community Physical Improvements; Social and Cultural Facilities; and Historic Preservation.

Figure 4.10-4 shows the LUCE land use designations for the project site and surrounding area. The project site currently has a LUCE land use designation of "Mixed-Use Creative" which encourages the combination of studio-related uses (such as film and music production) with affordable, workforce and market rate housing and ground floor, active, local-serving retail. The Mixed-Use Creative land use designation was designed to encourage the retention and expansion of the creative arts and entertainment-related jobs in the City. This designation provides the opportunity to balance creative arts jobs with a variety of housing for all income ranges and neighborhood-serving retail and services. These uses would take advantage of the future Bergamot Exposition Light Rail Station by bringing jobs and housing closer to high-frequency transit service.

The Mixed Use Creative land use designation establishes a target of 50 percent residential to 50 percent nonresidential uses with not more than a 5 percent deviation in either direction. This target ratio applies to the entire Mixed Use Creative District as a whole, and not for individual projects. In addition, the Mixed-Use Creative designation sets a Tier 1 base height of 32 feet (2 stories) or if affordable housing is provided on-site, 36 feet (3 stories). The base FAR is 1.5. Subject to a discretionary review process, Tier 2 projects in this land use designation may be permitted to be developed to a maximum allowable height of 47 feet and FAR of 2.0 with the provision of community benefits and Tier 3 projects may be developed to a maximum height of 57 feet and FAR of 2.5 with additional community benefits. As further discussed below, the proposed project is a Tier 3 project that requires the processing of a Development Agreement.

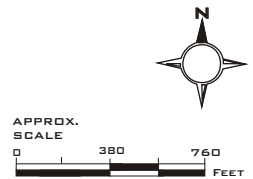
⁵City of Santa Monica, *2010 Land Use and Circulation Element*, available at <http://www.shapethefuture2025.net>, accessed November 2010.



LEGEND:

- | | | |
|-----------------------|-------------------------|-------------------------|
| Project Site | Mixed Use Boulevard | Office Campus |
| City of Santa Monica | Transit Village | Designated Parks |
| Single-Family Housing | Mixed Use Creative | Industrial Conservation |
| Low Density Housing | Mixed Use Boulevard Low | |

SOURCE: LUCE, 2011.



Bergamot Area Plan

No adopted specific plans or area plans are in effect that would apply to the project site. However, the City of Santa Monica is currently in the process of preparing a Bergamot Area Plan, which would address area-wide issues such as land use, circulation, publicly accessible open space, urban form and scale, parking, community benefits, area-wide infrastructure, and coordinated implementation. The Bergamot Area Plan would be consistent with the LUCE.

Santa Monica Interim Ordinance for LUCE Implementation. The LUCE was adopted in July 2010, however, amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals and standards have not yet been adopted, and currently there are certain areas of conflict between the LUCE and the existing Zoning Ordinance. A primary implementation action of the LUCE is the comprehensive Zoning Ordinance update, which would establish specific zoning districts, detailed uses, transportation and parking standards, and development standards consistent with the LUCE goals and policies. Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2345 on January 25, 2011 establishing interim development procedures. The Interim Ordinance presents interim zoning regulations and provides an alternate process by which development is reviewed and approved to ensure consistency with the implementation of the LUCE.⁶ Specifically, the Interim Ordinance mandates that Tier 2 and Tier 3 development projects as well as Downtown projects over 32 feet in height be subject to a Development Agreement. On April 26, 2011, the City Council approved an extension of the Interim Ordinance to a sunset date of October 26, 2012.

Santa Monica Housing Element. The City of Santa Monica Housing Element was adopted on November 11, 2008 and seeks to provide future housing within a context of livability and urban design that is compatible with the community's desire to promote a more sustainable and diverse community. The Housing Element is intended to work in tandem with the LUCE to provide the City an opportunity to examine and coordinate the issues of community growth, land use, housing, transportation, and community design. Because the City can satisfy State housing requirements through the building permit process, the Housing Element takes a comprehensive approach to achieve the following policy goals:

- Housing conservation and improvement
- Housing production
- Housing Assistance
- Balance housing with other City goals
- Assure equal housing opportunities

Santa Monica Zoning Ordinance

The City of Santa Monica Zoning Ordinance is contained within Article 9 of the Santa Monica Municipal Code (SMMC). The Zoning Ordinance serves as the primary implementation tool of the General Plan. The General Plan is a policy document that sets forth direction for development decisions and the Zoning Ordinance is a regulatory ordinance that establishes specific standards for the use and development of all properties in the City. The Ordinance regulates development intensity using a variety of methods, such as setting limits on building setbacks, yard landscaping standards, and building heights. The Zoning Ordinance also indicates which land uses are permitted in the various zones.

⁶City of Santa Monica, *Ordinance Number (City Council Series) An Ordinance of the City Council of the City of Santa Monica Establishing Interim Development Procedures Pending Implementation of the LUCE*; January 2011, available at: <http://www01.smgov.net/cityclerk/council/agendas/2011/20110125/s2011012507-B-1.htm>, accessed March 2011

The project site has a zoning designation of Residential Mobile Home Park District (R-MH). According to Section 9.04.08.06.010 of the SMMC, permitted uses within the R-MH zone include, but are not limited to, mobile homes and small family day care homes. The R-MH zone also allows large family day care homes with a performance standards permit as well as child day care centers with a conditional use permit. The R-MH zone does not establish maximum height and floor area ratio (FAR) but requires that a Development Review permit be processed for any new development within the zone. The project includes land uses that are not consistent with the very limited types of uses in the R-MH zone; however, the proposed Development Agreement (DA) establishes that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. **Figure 4.10-5** shows the zoning designations for the project site and surrounding area.

Santa Monica Affordable Housing Production Program (AHPP). Chapter 9.56 of the Zoning Ordinance establishes an affordable housing production program that requires developers of market rate multi-family developments to contribute to affordable housing production and thereby help the City meet its affordable housing targets. The purpose of the AHPP is based upon the City's long-standing commitment to economic diversity; the serious need for affordable housing as reflected in local, State, and federal housing regulations and policies; the demand for affordable housing created by market rate development; the depletion of potential affordable housing sites by market-rate development; and the impact that the lack of affordable housing production has on the health, safety, and welfare of the City's residents including its impacts on traffic, transit and related air quality impacts, and the demands placed on the regional transportation infrastructure. Housing projects in non-residential zones have the option of satisfying their affordable housing obligation by either paying a fee or constructing affordable units either on the project site or off-site.

THRESHOLDS OF SIGNIFICANCE

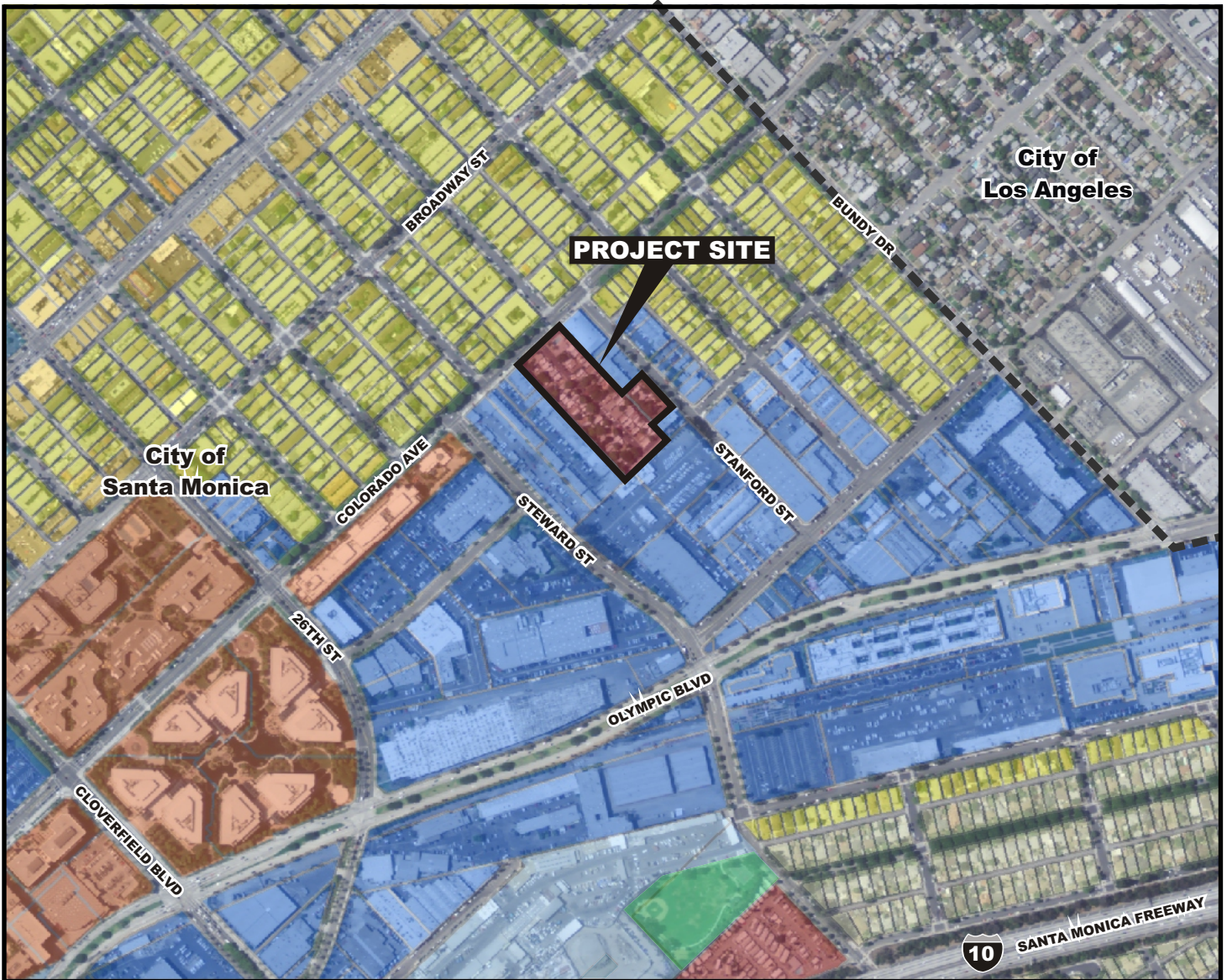
In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to land use if it would:

- Physically divide an established community;
- Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; and/or
- Conflict with any applicable habitat conservation plan or natural community conservation plan.











IMPACTS

Impact LU-1 The proposed project would be constructed in an area with a mix of residential and light industrial and residential uses but would not divide an established community or physically alter access to any of the surrounding established communities. Therefore, impacts would be less than significant.

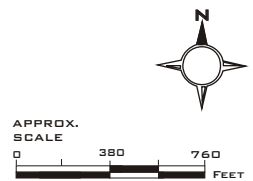
The existing Village Trailer Park is a distinct land use as it is one of two trailer/mobile home parks within the City of Santa Monica. The project site is located within the industrial core of Santa Monica, which extends from the I-10 freeway on the south to Colorado Avenue on the north. This area was developed as light industrial uses in part due to proximity to the Exposition railroad right-of-way that bisects the center of the area. I-10 and Colorado Avenue are the defining north and south physical boundaries to this area. The surrounding land uses consist primarily of light-industrial uses and begin to transition to residential uses to the north across Colorado Avenue. The proposed project would replace the existing trailer park with a mix of land uses including residential, neighborhood serving retail, and creative office uses. This mix of uses is consistent with the LUCE vision for the Mixed Use Creative land use designation and would be compatible with the existing residential and light industrial uses.



LEGEND:

- | | |
|--|--|
|  Project Site |  C4 - Highway Commercial |
|  City of Santa Monica |  C5 - Special Office Commercial |
|  R1 - Single-Family Residential |  M1 - Industrial Conservation |
|  R2 - Low Density Multiple Residential |  LMSD - Light Manufacturing Studio District |
|  RMH - Residential Mobile Home Park |  DP - Designated Parks |

SOURCE: City of Santa Monica, 2011.



The proposed project also includes the fairshare extension of Pennsylvania Avenue through its project site. Development of the Pennsylvania Avenue extension by the proposed project and the two adjacent properties to the west (2848-2912 Colorado Avenue and 2834 Colorado Avenue) would provide a continuous east-west connection between Stanford and Stewart Street. This new connection coupled with a new north-south road that would provide access from Colorado Avenue to the Pennsylvania Avenue extension fulfills LUCE goals and policies for the Mixed Use Creative District that aim to establish a neighborhood-scale street grid that would improve the pedestrian, bicycle, and vehicular connectivity of surrounding land uses and would not divide any existing communities.

The addition of residential uses combined with neighborhood serving retail and creative office uses within 0.5 miles of the future Bergamot Expo Light Rail station would help to create a balanced and transit oriented community. Although the project includes an increased number of residential, creative office, and neighborhood serving retail uses, it would not introduce any new uses to the area that do not already exist currently. Therefore, the proposed project would result in a less-than-significant impact to the division of an established community.

Mitigation Measures

Impacts related to division of an established community were found to be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

As indicated previously, impacts related to division of an established community would be less than significant and no mitigation measures are required.

Impact LU-2 The proposed project would be consistent with regional and local plans and policies. Impacts would be reduced to less than significant.

Table 4.10-2 summarizes the proposed project’s consistency with the applicable regional plans and policies.

TABLE 4.10-2: PROPOSED PROJECT CONSISTENCY WITH REGIONAL PLANS	
Applicable Goal/Objective/Policy	Proposed Project Consistency
REGIONAL COMPREHENSIVE PLAN	
Goal 1. Improve the Standard of Living	
Objective 1. Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities	Yes - The proposed project involves a mixed-use development with multi-family residential units in an urbanized area served by existing infrastructure and facilities.
Goal 2. Maintain Quality of Life	
Objective 1. Encourage local jurisdictions plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment	Yes - The proposed project is an infill redevelopment project that would be accessible to the future Bergamot Exposition Light Rail station.
Objective 2. Support and encourage settlement patterns which contain a range of urban densities	Yes – The LUCE provides for development of various urban densities. In conformance with the LUCE, the proposed project would range from four to five stories and would be in an area with a range of urban densities including low scale single-family, medium scale multi-family residences, as well as other office/commercial uses of a similar height/scale.

TABLE 4.10-2: PROPOSED PROJECT CONSISTENCY WITH REGIONAL PLANS	
Applicable Goal/Objective/Policy	Proposed Project Consistency
Goal 3. Provide Social, Political, Cultural Equity	
Objective 1. Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment	Yes - The proposed project would increase the overall supply of housing stock within the community, providing a mix of rent control, affordable, and market rate housing.
Objective 2. Develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, child care, social services, recreational facilities, law enforcement, and fire protection	Yes - The proposed project would provide additional employment opportunities, goods and services within the community while maintaining access to existing goods, services and infrastructure located in close proximity to the project site.
REGIONAL TRANSPORTATION PLAN	
Policy/Strategy 1. Identify strategic opportunity areas for infill development of aging and underutilized areas and increased investment in order to accommodate future growth	Yes - The proposed project involves the redevelopment of an existing mobile home park within an area that has been identified as a strategic opportunity area due to its access to existing and future public transit.
Policy/Strategy 2. Create mixed-use districts or “complete communities” in strategic growth areas through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity	Yes - The proposed project would create a mixed-use development, including a variety of residential, neighborhood serving retail and creative office uses, in an area designated as Mixed Use Creative and in close proximity to adjacent residential and other uses.
Policy/Strategy 3. Focus housing and employment growth in transit-accessible locations	Yes - The proposed project would develop new residential, neighborhood serving retail, and creative office uses which would provide housing and employment opportunities near the future Bergamot Exposition Light Rail station.
Policy/Strategy 4. Increase multi-family and infill housing in central locations to appeal to the needs and lifestyles of the population	Yes - The proposed project provides multi-family and infill housing in an area that contains a mix of uses and is located in an area that is transit accessible.
Policy/Strategy 5. Focus growth in centers and corridors to make the most efficient use of developed land and minimize encroachment on public open space and natural habitat	Yes - The mixed-use development is an infill project that is in close proximity to the future Exposition Light Rail line and would not encroach on existing open space or natural habitat.
GROWTH VISION REPORT	
Goal 1. Focusing growth in existing and emerging centers and along major transportation corridors	Yes - The project would be located near the future Exposition Light Rail line and in an emerging opportunity area.
Goal 2. Creating significant areas of mixed-use development and walkable communities	Yes - The proposed project would provide a mix of residential, retail and creative office uses on a single site. This mix of uses as well as the design of the project would support the creation of a walkable community.
Goal 3. Targeting growth around existing and planned transit stations	Yes - The proposed project is located in close proximity to the future Bergamot Exposition Light Rail station.

TABLE 4.10-2: PROPOSED PROJECT CONSISTENCY WITH REGIONAL PLANS	
Applicable Goal/Objective/Policy	Proposed Project Consistency
<p>Compass Blueprint 2% Strategy. Increasing mobility, livability, prosperity and sustainability by making changes to current land use and transportation trends within two percent of the land area of the SCAG Region.</p>	<p>The proposed project would increase mobility by locating new employment and residential uses near the future Bergamot Exposition Light Rail station. The proposed project also includes daily needs and services within walking distance of existing and future residential uses supporting the goal of creating compact neighborhoods. In addition, the proposed project would provide a range of housing types to accommodate a wide variety of income levels. The proposed project is located within a 2% Strategy Opportunity Area and would be consistent with the applicable policies of the Compass Blueprint 2% Strategy.</p>
<p>SOURCE: TAHA, 2011.</p>	

Regional Comprehensive Plan. The proposed project is an infill development that would increase the City’s housing stock, increase the amount of available housing for the community, provide additional employment opportunities and neighborhood goods and services, take advantage of existing infrastructure and is located within a 0.5 miles of a future light rail station. Therefore, the proposed project would be consistent with all of the applicable policies of the RCP.

Regional Transportation Plan. The proposed project site has been identified in the RTP as an area with opportunity for increased residential development. The project would create opportunities for more housing and accommodate future growth and improve the quality of life with the addition of creative industry jobs, and the provision of neighborhood-serving goods and services. The proposed project would create a mixed-use community in close proximity to the future site of the Bergamot Exposition Light Rail station, which will support the goal of reducing vehicle trips. Therefore, the proposed project would be consistent with all of the applicable policies of the RTP.

Growth Vision Report. The proposed project would accommodate a mix of residential, retail, and creative office uses. The additional land uses would increase the City’s housing stock, create additional housing, and provide neighborhood services and jobs to create a sustainable community along a designated transit corridor. The proposed project has been developed with regard to the principles set forth in the Growth Vision Report. Therefore, the proposed project is consistent with the applicable policies of the plan. The proposed project is also consistent with the Compass Blueprint 2% Strategy, which is a guideline for the implementation of the Growth Vision Report.

Table 4.10-3 summarizes the proposed project’s consistency with applicable local plans and policies that address land use.

TABLE 4.10-3: PROPOSED PROJECT CONSISTENCY WITH LOCAL PLANS AND POLICIES	
Applicable Goal/Objective/Policy	Proposed Project Consistency
CITY OF SANTA MONICA GENERAL PLAN	
Land Use and Circulation Element	
LU 2.2 Transit Villages-Capitalize on the Exposition Light Rail stations to create vital new complete sustainable neighborhoods with transit as a focal element, green connections and pathways, a variety of housing types and jobs, enhanced creative arts and institutions, and local-serving retail and services	Yes - The proposed project involves developing a creative mixed-use district near the future Bergamot Station for the Exposition Light Rail Line.
LU 2.6 Active Spaces-Focus new development in defined districts to create active spaces that can support diverse local serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections	Yes - The proposed project would be in the Mixed-Use Creative land use designation which supports arts and entertainment companies. In addition, the proposed project would involve the development of neighborhood serving retail and a variety of service uses within walking distance of other surrounding land uses. A key feature of the project is the provision of two new streets that will serve to introduce a neighborhood-scale grid conducive to pedestrian and bicycle accessibility.
LU 3.3 Focus on Local-Serving Uses-Emphasize uses which address local-serving needs and daily resources necessary to reduce vehicle trips and vehicle miles traveled	Yes - Neighborhood serving retail would be provided on-site to the residents of the proposed project, as well as the community.
LU 4.1 Active Centers-Creat active neighborhood districts that cluster services, goods, and cultural and recreational uses within walking distance of residences to create a focus for community activity and an active environment that can sustain local uses	Yes - The proposed project would contribute to the existing neighborhood by developing a variety of goods, services, uses and open space within walking distance to residences.
LU 4.2 Uses to Meet Daily Needs-Encourage uses that meet daily needs such as grocery stores, local-serving restaurants and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips	Yes - The proposed project includes the development of a mix of neighborhood-serving retail, offices, and residential uses on the project site. These uses would be within walking distance of each other, and thus, would reduce the frequency and distance travelled of vehicle trips.
LU 4.3 Mixed-Use Associated with Transit-Encourage mixed-use development close to transit to provide housing opportunities for the community, support local businesses, and reduce reliance on automobiles	Yes - The proposed project will create a mixed-use community within walking distance of the future Bergamot Exposition Light Rail station. The project reduces automobile reliance by providing housing opportunities for the community in close proximity to local-serving businesses.
LU 5.1 Encourage Desired Uses at Stations-Encourage a range of housing options, including affordable and workforce housing, around the Expo Light Rail stations with a balanced mix of local-serving retail, services and employment	Yes - The proposed project would provide a range of housing options including affordable housing, rent-controlled apartments, and market rate housing. These housing opportunities will be within an area with neighborhood serving retail and employment and within close proximity to the future Bergamot Exposition Light Rail station.
LU 10.2 Benefits Tied to Community Values-Require new development that requests height above the base to provide measurable benefits to foster complete communities and support the goals of the LUCE, including vehicle trips and GHG emissions, maintaining diversity, and promoting affordable and workforce housing	Yes - The proposed project is requesting a height of 57 feet (which is above the base height of 32 feet) and is required to provide community benefits including affordable housing, new vehicle, bicycle, and pedestrian connections, and ground floor open space. These community benefits include implementation of a TDM program to reduce vehicle trips and GHG emissions by and creating a mixed-use walkable community near a transit station. The variety and range of housing opportunities will accommodate residents of different income levels.

TABLE 4.10-3: PROPOSED PROJECT CONSISTENCY WITH LOCAL PLANS AND POLICIES	
LU 10.3 Affordable and Workforce Housing-Focus on additional affordable and workforce housing with an emphasis on employment centers close to transit facilities	Yes - The proposed project would provide new affordable housing options near creative arts employment within walking distance of the future Bergamot Exposition Light Rail station.
LU 11.2 Expand Housing Opportunities-Expand housing opportunities by identifying and designating specific infill areas along transit-rich boulevards and in the districts, including near Expo Light Rail stations and at transit hubs. In these areas, new residential is desired to create complete neighborhoods and support sustainability goals	Yes - The proposed project is an infill development that includes a variety of available housing opportunities, in a Mixed-Use Creative District that is in close proximity to the Bergamot Exposition Light Rail station.
LU 15.2 Respect Existing Residential Scale-New commercial or mixed-use buildings adjacent to residential districts shall be contained within a prescribed building envelope designed to maintain access to light and air and to preserve the residential character	Yes - The proposed project incorporates setbacks and building stepbacks on the upper floors to create a transition between the project's maximum height of 57 feet and the lower-scale character on 1-3 story residential neighborhood to the north.
LU 15.4 Open and Inviting Development-Encourage new development to be open and inviting with visual and physical permeability, connections to existing street and pedestrian network, and connections to the neighborhoods and broader community	Yes - The proposed project would provide a new road to connect Pennsylvania Avenue and Colorado Avenue which will improve traffic circulation and pedestrian access, while opening the area up to the surrounding community.
LU 15.7 Street Level Pedestrian-Oriented Design-Buildings in the mixed-use and commercial areas should generally be located at the back of the sidewalk or property line (street front) and include active commercial uses at the ground floor. Where a residential use occupies the ground floor, it shall be set back from the property line, be located one-half level above the street, or incorporate design features to provide privacy for the unit. Front doors, porches and stoops are encouraged as part of orienting the residential units to the street	Yes – The project proposes ground floor, neighborhood-serving uses on Colorado Avenue. Where residential uses are on the ground floor, the plans can be revised to incorporate pedestrian-oriented features such as porches, stoops, and front doors.
B 10.7 Ensure that mixed-use developments have active ground floor uses that face Colorado Avenue with predominantly residential located on the upper floors. In the activity centers and Mixed Use Creative designation, creative arts uses may also be located on upper floors.	Yes - The ground-floor uses that face Colorado Avenue will contain retail/commercial uses.
B 12.1 Integrate the new Mixed-Use Creative District with the neighborhood north of Colorado Avenue by locating local-serving retail and residential uses along the avenue and stepping the mass of the buildings down to provide effective transitions to the adjacent, lower-scale residential area	Yes - The proposed project will add neighborhood serving retail and residential uses along Colorado Avenue, and project design will ensure that the new buildings within the project area will be scaled down on the perimeter of the project site to allow for compatibility with the adjacent uses.
D 24.13 Retain the Village Trailer Park to the extent feasible, and permit recycling to other uses that are consistent with the MUCD and in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks.	Yes – This policy recognizes that the project site is a mobilehome park and that the park owner may close the park. The Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks.

TABLE 4.10-3: PROPOSED PROJECT CONSISTENCY WITH LOCAL PLANS AND POLICIES	
D 24.14 Explore means to sustain Village Trailer Park's economic viability by incorporating it into a larger multi-property master plan, if feasible, or by the transfer of development rights that have as a goal, preserving existing housing as an integral part of a new mixed-use project.	Yes – An alternative to retain the Village Trailer Park on the project site was explored but ultimately was deemed infeasible due to the following: (1) a TDR program does not yet exist to implement such a transfer of development rights and therefore is totally dependent on the cooperation of individual property owners to participate in common ownership; (2) adjacent property owners did not express an interest in participating in a transfer of development rights or in forming a single ownership entity; and (3) the maximum height and floor area ratio (FAR) established in the LUCE cannot be exceeded and therefore, the LUCE cannot accommodate the amount of development rights that would be transferred from the Village Trailer Park property to the adjacent two properties.
E 2.3 Target new uses in the Bergamot Transit Village and Mixed-Use Creative Commercial areas for the following types of businesses: <ul style="list-style-type: none"> • Creative arts industries • Production and post-production • Advanced research and development activities • Emerging technologies requiring “incubator” space • Uses that create a high percentage of potential jobs for Santa Monica residents • Businesses that support residents and existing businesses located in Santa Monica 	Yes - Creative-office space will support a variety of business types and the additional neighborhood serving retail will provide employment opportunities for Santa Monica residents.
E 3.1 Support creative industries such as film and music production and post-production facilities in the major business districts including the Industrial Conservation and Mixed-Use Creative Districts	Yes - The proposed project would include creative office space in the Mixed-Use Creative District that will accommodate entertainment companies such as film and music production and post-production facilities.
H 1.6 Encourage the production of affordable housing along the boulevards and in the districts by requiring a percentage of affordable housing as a pre-condition for consideration of height above the base	Yes - The proposed project includes 109 apartment units that would be subject to Santa Monica's rent-control ordinance; 52 of which would be deed restricted as affordable housing.
H 3.1 Locate new housing opportunities near transit and within walking distance of local retail and services	Yes - The proposed project would involve locating additional residential units within walking distance to local retail and the Bergamot Transit Village.
Housing Element	
Policy 1.1 Provide adequate sites for all types of housing, particularly in locations near transit and services that promote walkability	Yes - The housing units associated with the proposed project would be within 0.5 miles of the future Bergamot Exposition Light Rail station, and would include studio, 1-bedroom, 2-bedroom and loft apartments.
Policy 1.2 Encourage and provide incentives for the development of housing in nonresidential zones and transit-oriented development	Yes - The proposed project is an example of transit-oriented development, with a variety of uses and residential units in close proximity to one another and to the Bergamot Transit Village.
Goal 3.b: Protection of Mobile Home Park Tenants Continue to assist tenants at the Mountain View Mobile Home Park and protect the existing tenants at the Village Trailer Park-In the event that closure of the Village Trailer Park is approved, provide assistance options for residents such as relocation to the proposed on-site rent controlled apartment buildings or condominiums, coach purchase and replacement programs or relocation to the City's Mountain View mobile home park	Yes - The Development Agreement will include a relocation plan for existing Village Trailer Park residents.

TABLE 4.10-3: PROPOSED PROJECT CONSISTENCY WITH LOCAL PLANS AND POLICIES	
SANTA MONICA MUNICIPAL CODE	
Zoning Ordinance	Yes -The project site has a zoning designation of Residential Mobile Home Park District (R-MH). As previously stated, the project includes land uses that are not consistent with the very limited types of uses in the R-MH zone; however, with the Development Agreement (DA), the proposed project needs to only be consistent with the General Plan and therefore, may establish the development standards and type and mix of allowable land uses.
Affordable Housing Program	Yes - The proposed project would provide 52 affordable housing units and must comply with the requirements of the Affordable Housing Production Program.
SOURCE: TAHA, 2011.	

Santa Monica Land Use and Circulation Element. As encouraged by the LUCE, the proposed project would contribute to the creation of a sustainable neighborhood by adding a variety of housing types, including affordable housing, providing creative arts jobs, and providing neighborhood-serving retail and services. The site’s close proximity to the future Bergamot Exposition Light Rail station would also support the goal of reducing vehicle trips. Therefore, the proposed project would be consistent with all of the applicable policies of the LUCE listed in **Table 4.10-3**, above.

In addition to land use and circulation policies, the LUCE also provides the standards for development intensity for each land use district. The proposed project is located within the Mixed-Use Creative District. The Mixed-Use Creative District allows local-serving retail, service commercial, and creative arts uses. Creative office, affordable housing, workforce, and market-rate residential uses are allowed, with a target residential to nonresidential ratio of 50:50 that can deviate up to five percent in either direction.⁷ This target ratio applies to the entire Mixed Use Creative District as a whole, and not for individual projects. The site plan for the proposed project contains active retail and commercial uses on the ground floor, which is consistent with the development standards of the LUCE. The LUCE development standards establish a Tier 1 base floor area ratio (FAR) of 1.5 and a maximum height of 32 feet.⁸ Compliance with the Affordable Housing Production Program enables the development to receive a three foot height bonus. However, as discussed above, Tier 3 projects that provide a number of the five community benefits described in the LUCE may request an average height up to 57 feet and a FAR of 2.5 subject to a discretionary review process. The proposed project is considered a Tier 3 project as it contains four buildings ranging in maximum height from 51 to 57 feet and a FAR of 2.38:1. As indicated in Chapter 3.0 Project Description, the Development Agreement is required as part of the proposed project. As required by the LUCE, the proposed Development Agreement would provide community benefits. Therefore, the proposed project would be consistent with the LUCE.

Santa Monica Housing Element. The proposed project would increase the City’s available housing stock by developing 166 apartments and 227 condominiums. Of the 166 apartment units, 52 would be deed restricted as affordable housing. These housing units would be located within 0.25 mile of the future Bergamot Expo Light Rail station. These features of the proposed project are consistent with the first two policies of the Housing Element listed in **Table 4.10-3**. The remaining policy would require that the project applicant provide relocation assistance to the existing residents of Village Trailer Park. These options include, but are not limited to relocation back to the site in the newly constructed affordable housing units or to the Mountain View Mobile Home Park or the rent controlled apartment units to be

⁷City of Santa Monica, *Land Use and Circulation Element*, July 2010.

⁸*Ibid.*

developed by the project. The Development Agreement will include a ~~tenant impact report and~~ plan for relocation of existing Village Trailer Park residents, including provisions related to the dedication of units for the existing residents. Therefore, the proposed project would be consistent with the Housing Element.

Santa Monica Zoning Code. The project site has a zoning designation of Residential Mobile Home Park District (R-MH). According to Section 9.04.08.06.010 of the Santa Monica Municipal Code (SMMC), permitted uses within the R-MH zone include, but are not limited to, mobile homes and small family day care homes. All of the uses in the proposed project, including multi-family housing, retail uses, and office uses, are not consistent with the R-MH zone. However, as previously stated, amendments to the City's Zoning Ordinance that reflect the 2010 LUCE's policies, goals and standards have not yet been adopted. The proposed project would be implemented through a Development Agreement which requires that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site.

Santa Monica Affordable Housing Program. The proposed project is subject to the provisions of the Affordable Housing Production program contained in Chapter 9.56 of the City of Santa Monica Planning and Zoning Code. For multi-family developments in non multi-family districts, the project applicant shall construct, on-site, at least (1) ten percent of the total units of the proposed project for very low-income households or (2) 20 percent of the total units of the project for low-income households or (3) 100 percent of the total units of the project for moderate income households.^[1] The Affordable Housing Production Program also allows the housing requirement to be met by satisfying additional options which include, providing equivalent off-site affordable housing, fee payment, or the granting of land. The detailed provisions for satisfying these requirements are located in Section 9.56 of the Santa Monica Planning and Zoning Code.

A Development Agreement between the City and the developer will require that the proposed project satisfy the provisions of the Affordable Housing Production Program. The obligation may be satisfied by providing unit on-site or as an alternative, provide equivalent off-site affordable housing, fee payment, or the granting of land as stated in Section 9.56 of the Santa Monica Planning and Zoning Code.

The proposed project would include 52 apartment units that would be deed restricted as affordable housing units. Based on the stipulations provided above for the Development Agreement, the proposed project would satisfy the requirements of the Affordable Housing Program. As discussed above, the proposed project would be subject to a Development Agreement to ensure consistency with the LUCE. Therefore, the proposed project would not conflict with land use plans or regulations; impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

As indicated in Table 3-3 in Chapter 3.0 Project Description, there are a number of related projects in the vicinity of the proposed project site. There are two adjacent creative office projects that have been proposed to the west of the project site: 2834 Colorado Avenue and 2848-2912 Colorado Avenue. The

^[1]City of Santa Monica, *Affordable Housing Production Program*, accessed November, 2010.

related project at 2834 Colorado Avenue was approved recently in July 2011 and the related project at 2848-2912 Colorado Avenue is in the planning phase. These additional projects include residential and commercial land uses that would also be compatible with the proposed project and would be consistent with the Mixed Use Creative designation in the General plan. Furthermore, development of the proposed project and these two related projects would create a full extension of Pennsylvania Avenue between Stewart Street and Stanford Street. The new Pennsylvania Avenue extension would create a new connection to the existing street and pedestrian network, and a new connection to the surrounding neighborhoods and broader community.

Cumulative growth in housing and development would alter the composition of existing land uses in the area. However, because of its proximity to the future Bergamot Exposition Light Rail station, this area has been targeted to accommodate future growth and development. This change in land use is consistent with the City's goals and policies for future development of the area. Furthermore, related projects would be required to be consistent with the General Plan and may be required to undergo Development Agreement and/or Development Review Processing and other discretionary land use actions. General Plan consistency of each related project would be considered on a case-by-case basis. Therefore, the proposed project would not contribute to a cumulative impact related to land use.

4.11 NEIGHBORHOOD EFFECTS

Neighborhood effects refer to the impacts of the proposed project that might affect the quality of life of the residents in adjacent neighborhoods. Quality of life represents a composite impression, and is usually expressed in terms of overall environment, combining ambient noise levels, air quality, traffic congestion, and visual characteristics of a given area. This section summarizes the operational and construction impacts of the proposed project on the surrounding neighborhood as a whole rather than as individual residences. Impacts associated with individual residences are fully analyzed within the appropriate section of each chapter of this EIR.

EXISTING SETTING

The project site is located on the existing Village Trailer Park, which is south of Colorado Avenue and west of Stanford Street, in the north central portion of the City of Santa Monica, within the Mixed-Use Creative District adjacent to the Bergamot Transit Village. The Mixed-Use Creative land use designation was designed to work in unison with the Bergamot Transit Village to encourage the retention and expansion of the creative arts and entertainment-related jobs in the City, while balancing arts jobs with a variety of housing, neighborhood-serving retail and services.

As described in Section 4.10 Land Use and Planning, land uses in the vicinity of the project site include a mix of industrial, commercial, and office uses, as well as interspersed residential uses. The existing buildings on-site are one story and existing development in the project vicinity generally ranges from two to five stories in height. The majority of the uses along the south side of Colorado Boulevard are commercial and/or office, while many of the uses on the north side of Colorado Boulevard are one-and two-story residential uses. To the east of the site there is a one-story storefront church, surface parking, and industrial uses, and single- and multi-family residential structures are interspersed with industrial uses along Colorado Avenue and Stewart Street. There are two schools located approximately 500 feet to the south of the project site, a preschool, and a satellite Santa Monica College facility specializing in entertainment and technology.

REGULATORY FRAMEWORK

Local

Santa Monica General Plan

The Santa Monica General Plan, adopted in 1984, contains the seven State required elements including land use, circulation, housing, open space, noise, conservation, and safety. In addition, the City has adopted a historic preservation element. The elements of the General Plan ~~has~~ have not been ~~comprehensively~~ comprehensively concurrently revised in recent years, although there have been periodic amendments to the majority of the elements, including the Land Use and Circulation Element (LUCE) in 2010, Noise Element in 1992, the Open Space Element in 2001, the Historic Preservation Element in 2002, and the Housing Element in 2008.

Santa Monica Land Use and Circulation Element. The City of Santa Monica LUCE was adopted on July 6, 2010 and incorporates the community's fundamental values into land use and transportation policies aimed to preserve and enhance the City of Santa Monica. The LUCE encourages citizen and neighborhood participation in the City planning process to ensure realization of the established goals and includes a comprehensive program of incentives and restraints designed to conserve the high quality of life in Santa Monica's residential neighborhoods. A key component is the Neighborhood Conservation

program, which outlines a variety of techniques that seek to reduce development pressure, while conserving and/or enhancing the character-defining attributes of individual neighborhoods.

THRESHOLDS OF SIGNIFICANCE

The proposed project would have a significant impact related to neighborhood effects if it would:

- Have considerable effects on the project neighborhood.

IMPACTS

Section 4.1 Aesthetics

Impact AE-1 Project structures would cast shadows onto adjacent properties. However, the shadows would not be cast upon shadow-sensitive uses for durations that exceed those identified in City thresholds. Impacts would be less than significant.

As discussed in Section 4.1 Aesthetics, the longest shadows cast by the proposed project would occur during the Winter Solstice from late October to early April. During winter mornings, shadows would be cast northward onto residences across Colorado Avenue. However, shadows from trees (approximately 12 feet in height) lining Colorado Avenue currently shade the residential uses north of the project site. Project generated shadows would not shade any shadow sensitive uses that are not currently shaded by adjacent trees on Colorado Avenue. Shadows would shorten and move eastward during the day. The duration of the shadow effect on shadow sensitive land uses would not exceed a period of four hours between 9:00 a.m. and 3:00 p.m. between early April and late October and three hours between 9:00 a.m. and 3:00 p.m. between late October and early April. Therefore, impacts to surrounding neighborhoods from shadow effects would be less than significant.

Section 4.2 Air Quality

Impact AQ-1 Operation of the proposed project would generate daily air pollutant emissions, but emissions would not exceed SCAQMD regional significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to regional operational emissions.

As discussed in Section 4.2 Air Quality, long-term project emissions would be generated by mobile sources and area sources, such as natural gas combustion. Traffic generated by the proposed project would be the predominate source of long-term project emissions. As shown in Section 4.15 Transportation and Traffic, the proposed project would generate 2,375 net daily vehicle trips under the Approval Year Plus Project (Year 2011) conditions and 2,278 net new daily vehicle trips under the Cumulative Plus Project (Year 2020) conditions.¹ Regional operational emissions would not exceed SCAQMD regional operational significance thresholds. Therefore, operational regional air quality impacts would be less than significant.

Impact AQ-2 The proposed project would generate off- and on-site localized emissions. Localized emissions would be below significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to localized concentrations.

The State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. The USEPA CAL3QHC micro-scale dispersion model was used to calculate the

¹Fehr & Peers Transportation Consultants, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

CO concentrations and takes into account the nearest sensitive residential receptors. Under the Cumulative Plus Project (Year 2020) scenario, the one-hour proposed project CO concentration at the Centinela Avenue (West)/Olympic Boulevard intersection would be 1.0 ppm at worst-case sidewalk receptors. The eight-hour CO concentration would be 1.0 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Under the Approval Year Plus Project (Year 2011), the one-hour CO concentration at the Centinela Avenue (West)/Olympic Boulevard intersection would be 3 ppm at worst-case sidewalk receptors. The eight-hour CO concentration would be 1.9 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Therefore, localized CO impacts would be less than significant.

Impact AQ-3 Operation of the proposed project would generate toxic air contaminant emissions, but emissions would not exceed SCAQMD significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to toxic air contaminants.

The proposed project would develop residential, neighborhood serving retail, and creative office uses on the project site. These uses are not anticipated to generate a substantial number of daily truck trips. The primary source of potential TACs associated with project operations is diesel particulate from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). Typically, less than five heavy-duty trucks (e.g., delivery trucks) would access the project site on a daily basis, and the trucks that do visit the site would not idle on-site for extended periods of time. Based on the limited activity of these TAC sources, the proposed project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the proposed project would not exceed mobile source TAC emissions threshold; impacts would be less than significant.

Impact AQ-4 Operation of the proposed project not would generate substantial odors that would create a nuisance. Therefore, the proposed project would result in a less-than-significant impact related to odors.

The project site would be developed with residential, neighborhood serving retail, and creative office uses, which are not land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors, but would be located and maintained in a manner that promotes odor control. Consequently, no adverse odor impacts are anticipated from these types of land uses. Therefore, impacts would be less than significant.

Section 4.4 Construction Effects

Impact CON-1 Daily regional construction emissions would exceed the SCAQMD significance threshold for volatile organic compounds without mitigation. However, Mitigation Measures CON1 through CON3 would reduce impacts to less than significant.

As discussed in Section 4.4 Construction Effects, construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions (PM_{2.5} and PM₁₀) would primarily result from demolition and site preparation (e.g., excavation) activities. NO_x and CO emissions would primarily result from the use of construction equipment and SO_x emissions would result from truck trips. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOC. Daily construction emissions of VOC would exceed the SCAQMD regional thresholds due to architectural coatings, and the proposed project would result in a significant impact related to regional construction emissions. Impacts

related to regional air emissions of VOC were determined to be significant without mitigation. However, implementation of Mitigation Measures ~~CON1 through CON3~~ would reduce construction-related regional air quality impacts to less than significant.

Impact CON-2 Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied. Therefore, construction of the proposed project would result in a significant and unavoidable impact related to localized air emissions.

The localized construction emissions analysis followed guidelines published by the SCAQMD in the *Localized Significance Methodology for CEQA Evaluations (SCAQMD Localized Significance Threshold (LST) Guidance Document)*.² In January 2005, the SCAQMD supplemented the SCAQMD *LST Guidance Document* with *Sample Construction Scenarios for Projects Less than Five Acres in Size*. The LST assessment was based on a four-acre project site and an 82-foot (25-meter) receptor distance. Adjacent sensitive receptors would be located within 82 feet.

The project's construction-related emissions of CO and NO_x would be below significance thresholds, but construction-related emissions of localized PM₁₀ and PM_{2.5} would be above the SCAQMD localized thresholds. Therefore, without mitigation, the proposed project would result in a significant impact related to localized air quality. Mitigation Measures ~~CON4-CON3~~ through ~~CON9-CON7~~ would reduce localized construction-related PM₁₀ and PM_{2.5} to the greatest extent feasible. However, these mitigation measures would not reduce localized particulate emissions below the SCAQMD localized thresholds. Therefore, the proposed project would result in a significant and unavoidable impact related to localized air quality during construction.

Impact CON-5 Construction activity would intermittently generate high noise levels on and adjacent to the project site. This may affect noise sensitive uses in the vicinity and conflict with the City policies. Implementation of ~~CON10 CON12~~ through ~~CON15 CON13~~ would reduce the impacts to less than significant.

The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. A typical piece of noisy equipment is assumed to be active for 40 percent of the eight-hour workday (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA L_{eq} at a reference distance of 50 feet. Construction noise levels would exceed the 80-dBA construction noise threshold (Noise Zone I standard of 60 dBA L_{eq} plus 20 dBA) at multiple sensitive receptors. Impacts related to construction noise were determined to be significant without mitigation. The significant increase in ambient noise levels would be short-term and would be dependent on equipment location and construction activity. Noise levels would decrease as equipment moves away from receptors towards the center of the project site and as structures are constructed that would block the line-of-site from construction activity to the receptors. Mitigation Measure ~~CON10 CON12~~ would reduce construction noise levels by 3 dBA. Although difficult to quantify, Mitigation Measures ~~CON14 CON13~~ through ~~CON15 CON13~~ would control construction noise levels. Sound walls are a typical construction noise mitigation measure. Sound walls have been determined to either not be feasible or not be practical for the proposed project. A sound wall only works when the line-of-site is blocked from the noise source to the receptor. The residential land uses across Colorado Boulevard are taller than one level and the second story units would look over the sound wall. Also, sound walls on the northern and eastern portions of the project site would limit access to the construction area and inhibit the construction process. Table 4.4-8 shows mitigated construction noise levels. Mitigation measures would also ensure that construction activity comply with the City's Noise Ordinance. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does not consider construction

²SCAQMD, *Localized Significance Methodology*, June 2003, revised July 2008.

activities consistent with these timing limits to constitute significant environmental effects. Implementation of Mitigation Measures ~~CON10~~ CON12 through ~~CON15~~ CON13 would reduce the impacts to less than significant.

Section 4.12 Noise

Impact N-1 The proposed project would increase traffic and associated roadway noise levels in the project area. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to mobile noise.

As discussed in Section 4.12 Noise, under the Cumulative Plus Project (Year 2020), the proposed project would generate 2,375 net new daily trips, including an increase of 158 trips in the weekday morning peak hour and an increase of 181 trips in the weekday evening peak hour. The greatest project-related noise increase would be 0.2 dBA L_{eq} along Stewart Street between Olympic Boulevard and Pennsylvania Avenue. This would not exceed the 5-dBA operational mobile source significance threshold. Under Approval Year Plus Project (Year 2011) conditions, the greatest project-related noise increase would be 2.1 dBA L_{eq} . This would not exceed the most conservative roadway noise threshold of 1.5-dBA. This would not exceed the 5-dBA operational mobile source significance threshold. Therefore, the proposed project would not exceed the 5-dBA significance threshold for mobile noise; impacts would be less than significant.

Impact N-2 The proposed project would generate stationary noise from mechanical equipment, truck loading, parking activity, and recreational activity. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to stationary noise.

Mechanical Equipment

Sources of mechanical noise include air handlers, exhaust fans, and pool equipment. Operation of mechanical equipment is not anticipated to increase ambient noise levels by 5 dBA or more. Therefore, the proposed project would result in a less-than-significant impact related to mechanical equipment.

Truck Loading

The proposed project would include loading docks for delivery trucks. Loading docks would be located within the project site off the New Road along the western boundary from the project site (away from existing sensitive receptors). Noise levels from medium-duty trucks accessing the project site would range from 71 to 79 dBA L_{eq} at 50 feet.³ The proposed project would typically generate less than five truck trips per day. These truck trips would be intermittent and would generate short-term noise sources. Truck activity would typically occur during daytime hours and the intermittent noise level increase is not considered to be significant. However, potential nighttime truck activity would increase ambient noise levels at nearby sensitive receptors by more than 5 dBA and would be a substantial annoyance to nearby residential land uses. In addition, based on the distance of the sensitive residential uses on Stewart Street and Colorado Avenue from the loading docks (more than 25 feet), noise attenuation would occur. Furthermore, the proposed project's on-site buildings would serve as a noise barrier to further reduce noise impacts. Therefore, the proposed project would result in a less than significant impact related to truck loading noise.

³California Department of Transportation, *Technical Noise Supplement*, November 2009.

Parking Activity

The majority of parking would be accommodated by a 778-stall, two-level subterranean garage. Subterranean parking noise would be inaudible at sensitive receptors. Parking activity would not increase ambient noise levels. Therefore, the proposed project would result in a less-than-significant impact related to subterranean parking activity.

Recreational Activity

The proposed project would include a rooftop pool and courtyards areas. The pool area would be enclosed on all sides and would not be in the direct line-of-site of any sensitive receptors. In addition, the pool would not include amplified noise. It was assumed that the pool area would generate a noise level of 73 dBA at ten feet. The Western Christian Fellowship would be the closest sensitive receptor to the project site. Pool noise would increase noise levels at this receptor by less than 2 dBA. This increase would not be audible and would be less than the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to pool activity. The courtyards would be central to the project site and screened from view of sensitive receptors. The courtyards would not include amplified noise or other unusually loud sources of noise. Courtyard noise would be inaudible at nearby sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact related to courtyard activity.

Impact N-3 The proposed project would include residential land uses. Existing ambient noise levels are compatible with City guidelines for residential land uses. Therefore, the proposed project would result in a less-than-significant impact related to noise/land use compatibility.

The City of Santa Monica has developed a Noise Element for the General Plan to manage noise exposure within the City. The General Plan Noise Element includes goals for locating new land uses in acceptable noise environments. For example, residential land uses are generally not compatible with the noise environment adjacent to a freeway. Residential land uses within the City are clearly compatible with ambient noise levels less than 60 dBA CNEL. A 24-hour noise measurement taken on the project site indicated that the ambient CNEL is 55.4 dBA. This noise level is less than the clearly compatible 60 dBA CNEL for residential land uses. Therefore, the proposed project would not generate noise that would be incompatible with surrounding land uses. Impacts would be less than significant.

Impact N-4 The proposed project would generate vibration as a result of trucks accessing the project site. This vibration would not be perceptible to sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact related to vibration.

The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, project-related traffic vibration levels would not be perceptible by sensitive receptors. Therefore, the proposed project would not result in perceptible groundbourne vibration. Impacts would be less than significant.

Section 4.15 Transportation and Traffic

Impact T-3 The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) conditions. No feasible mitigation measures are available to reduce project impacts. Therefore, ~~without mitigation~~, the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.

The City of Santa Monica has developed criteria to evaluate potential traffic impacts related to neighborhood traffic. The City's significance criteria to evaluate these impacts are listed in Table 4.15-11 in Section 4.15 Traffic and Transportation. The Approval Plus Project (Year 2011) neighborhood traffic impact analysis is presented in Table 4.15-24. The analysis indicates that average daily traffic increase attributable to the proposed project ranges from 0.4 to 32.3 percent at the 15 studied street segments. Based on this analysis, the following six segments would exceed the thresholds of significance:

- Yale Avenue, north of Colorado Avenue
- Stanford Street, north of Pennsylvania Avenue
- Stanford Street, south of Pennsylvania
- Pennsylvania Avenue, East of Stanford Street
- Nebraska Avenue, west of Stanford Street
- Nebraska Avenue, east of Stanford Street

The neighborhood traffic impact analysis, under the Cumulative Plus Project (Year 2020), is presented in Table 4.15-25. The analysis indicates that average daily traffic increase attributable to the proposed project ranges from 0.4 to 34.9 percent at the 15 studied street segments. Based on this analysis, the following five segments would exceed the thresholds of significance:

- Yale Avenue, north of Colorado Avenue
- Stanford Street, south of Pennsylvania Avenue
- Pennsylvania Avenue, east of Stanford Street
- Nebraska Avenue, west of Stanford Street
- Nebraska Avenue, east of Stanford Street

Therefore, without mitigation, the proposed project would result in a significant impact related to neighborhood traffic.

Mitigation Measures

Mitigation measures to reduce the significant impact related to neighborhood traffic were considered. However, as discussed in the traffic study, none of these measures were deemed feasible.

Level of Impact After Mitigation

Aesthetics, air quality, construction, and noise impacts to neighborhoods would be less than significant with mitigation. Traffic impacts to neighborhoods would be significant and unavoidable.

CUMULATIVE IMPACTS

Cumulative development of buildings of greater height would generally increase shadowing throughout the City. The shadow effects of individual buildings would need to be addressed on a case-by-case basis since shadowing is dependent upon building height, massing, and location, as well as the immediately surrounding uses. Based on a review of Table 3-3 in Chapter 3.0 Project Description, there are two related projects immediately to the west of the project site at 2848-2912 Colorado Avenue (Roberts Center project) and 2834 Colorado Avenue (Lionsgate project). Similar to the proposed project, both related projects would be subject to the LUCE's maximum Tier 3 height of 57 feet in the Mixed Use Creative District. As a result, shadows cast by these related projects would be similar to the proposed project. As previously discussed, the residential uses to the north across Colorado Avenue are already shaded by street trees on Colorado Avenue. Therefore, shadows from the proposed project and related projects would not shade sensitive uses (that are not currently shaded) for longer than four hours during the winter. Cumulative shadow impacts would be less than significant.

As the proposed project results in a localized significant impact during construction relative to particulate matter, it is anticipated that related project development in the project area (particularly at 2834 Colorado Avenue and 2848-2912 Colorado Avenue) would also result in significant localized impacts within the neighborhood. While mitigation measures would reduce air quality impacts, cumulative construction emissions would exceed SCAQMD localized significance thresholds. Therefore, the proposed project would contribute to a cumulative impact related to construction air quality in the project neighborhood.

Cumulative construction noise impacts are a localized impact. Construction of the proposed project may overlap with the two related projects in the neighborhood; however, construction activity associated with these projects would include mitigation measures to ensure that construction noise would not exceed City standards. Implementation of these mitigation measures would ensure that cumulative noise levels are not significant and the proposed project would not contribute to a cumulative impact related to construction noise in the project neighborhood.

The cumulative growth in housing and development associated with the proposed project and related projects in the neighborhood would lead to an increased level of traffic in the project vicinity, thereby resulting in potential traffic impacts to neighborhood street segments. No feasible mitigation measures were identified to reduce the significant impact related to neighborhood traffic to less than significant. Therefore, the proposed project would contribute to a cumulative impact related to neighborhood traffic.

4.12 NOISE

This section provides an overview of noise and vibration levels and evaluates operational noise and vibration impacts associated with the proposed project. Construction-related noise and vibration impacts are analyzed in Section 4.4 Construction Effects.

Noise Characteristics and Effects

Characteristics of Sound. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The “A-weighted scale,” abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. **Figure 4.12-1** provides examples of A-weighted noise levels from common sounds.

Noise Definitions. This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL), Equivalent Noise Level (L_{eq}), and Day-Night Noise Level (L_{dn}).

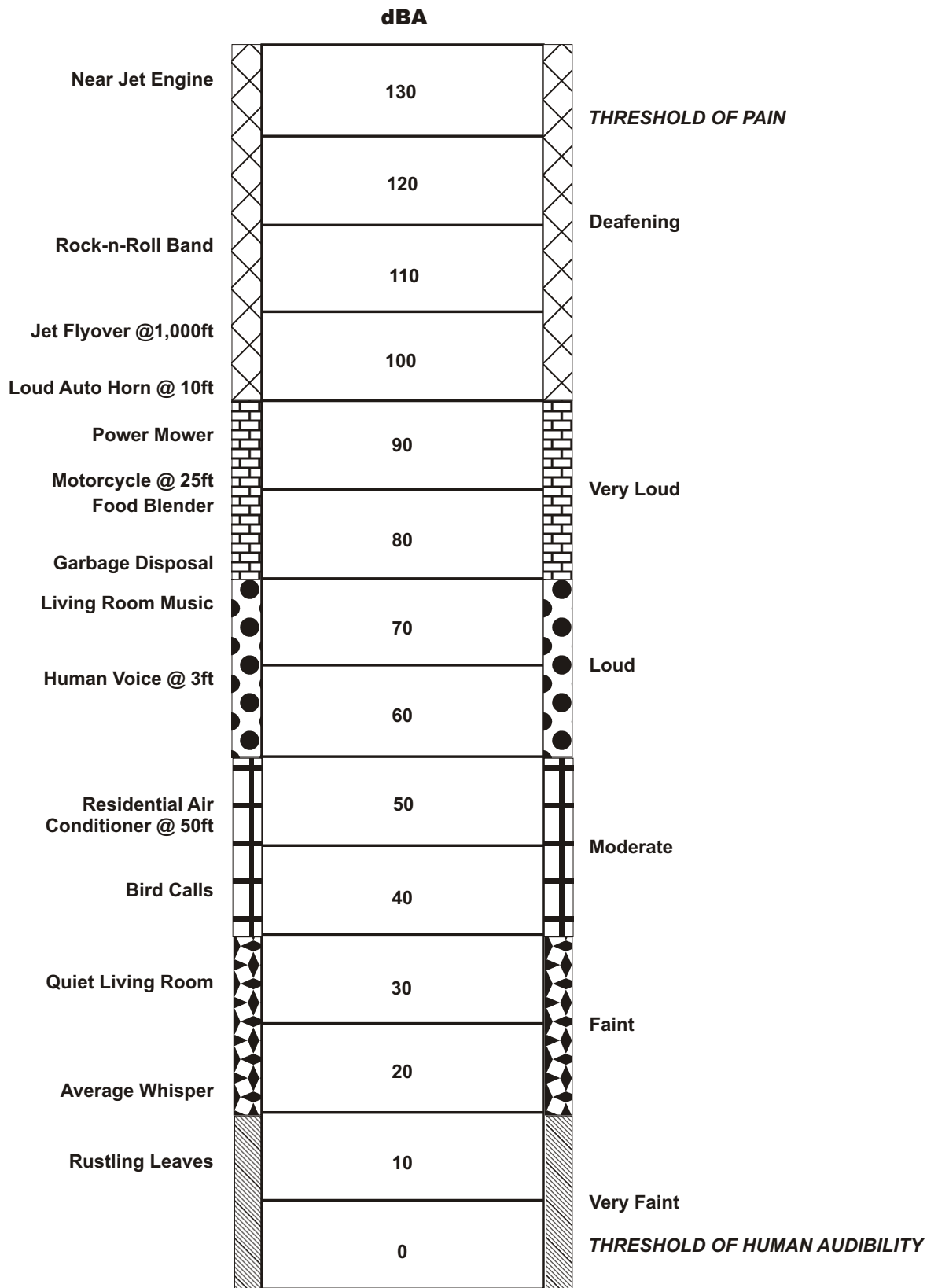
Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Day-Night Noise Level. L_{dn} is a 24-hour L_{eq} with an adjustment to reflect the greater sensitivity of most people to nighttime noise. The adjustment is a 10-dBA penalty for all sound that occurs in the nighttime hours of 10:00 p.m. to 7:00 a.m. The effect of the penalty is that in the calculation of L_{dn} , any event that occurs during the nighttime hours is equivalent to 10 of the same event during the daytime hours.

Effects of Noise. Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment range from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes. Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness and would cause a community response.



SOURCE: Cowan, James P., *Handbook of Environmental Acoustics*.

FIGURE 4.12-1

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.8 dBA over soft surfaces for each doubling of the distance.

Generally, noise is most audible when traveling by direct line-of-sight.¹ Barriers, such as walls, berms, or buildings, that break the line-of-sight between the source and the receiver greatly reduce noise levels from the source since sound can only reach the receiver by bending over the top of the barrier. Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Vibration Characteristics and Effects

Characteristics of Vibration. Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

Vibration Definitions. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.

Effects of Vibration. High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of ground-borne vibration can damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes).

Perceptible Vibration Changes. In contrast to noise, ground-borne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans which is around 65 RMS.² Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

¹Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.

²Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

REGULATORY FRAMEWORK

City of Santa Monica Noise Element for the General Plan

The City of Santa Monica has developed a Noise Element for the General Plan to manage noise exposure within the City. The General Plan Noise Element provides a description of existing and projected future noise levels, and incorporates comprehensive goals, policies, and implementing actions. The Noise Element also includes a Land Use/Noise Compatibility Matrix, shown in **Table 4.12-1**, which identifies the compatibility of different land uses with a range of noise levels. For example, residential uses are considered clearly compatible with noise environments less than 60 dBA CNEL. With mitigation, residential uses are considered compatible with noise environments between 60-70 dBA CNEL.

TABLE 4.12-1: LAND USE/NOISE COMPATIBILITY								
Proposed Land Use Categories		Compatible Land Use Zones (in CNEL)						
Categories	Uses	<55	55-60	60-65	65-70	70-75	75-80	>80
Residential	Single Family, Duplex, Multiple Family	A	A	B	B	C	D	D
Residential	Mobile Home	A	A	B	C	C	D	D
Commercial <i>Regional, District</i>	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D
Commercial <i>Regional, Village District, Special</i>	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	A	B	B	C
Commercial Industrial Institution	Office Building, Research and Development, Professional Offices	A	A	A	B	B	C	D
Commercial <i>Recreation</i> Institutional <i>Civic Center</i>	Amphitheater, Concert Hall, Auditorium, Meeting Hall	B	B	C	C	D	D	D
Commercial <i>Recreation</i>	Children's Amusement Park, Miniature Golf Course, Sports Club	A	A	A	B	B	D	D
Commercial <i>General, Special, Industrial, Institutional</i>	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Institutional <i>General</i>	Hospital, Church, Library, Schools' Classroom, Day Care	A	A	B	C	C	D	D
Open Space	Parks	A	A	A	B	C	D	D
Open Space	Golf Course, Cemeteries, Nature Centers Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
Agriculture	Agriculture	A	A	A	A	A	A	A

ZONE A - Clearly Compatible: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
 ZONE B - Compatible with Mitigation: New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems on air conditioning, will normally suffice. Note that residential uses are prohibited with Airport CNE L greater than 65.
 ZONE C - Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the designed.
 ZONE D - Clearly Incompatible: New construction or development should generally not be undertaken.
SOURCE: City of Santa Monica General Plan Noise Element.

City of Santa Monica Noise Ordinance

The City of Santa Monica Noise Ordinance (SMMC Chapter 4.12) prohibits any “unnecessary, excessive, or annoying noise” in the City. The SMMC does not control traffic noise on public streets, but applies to all noise sources located on private property including traffic noise. As part of this ordinance, properties within the City are assigned a noise zone based on their corresponding zoning district. Residential districts are designated as Noise Zone I; commercial districts are designated Noise Zone II; and manufacturing or industrial districts are designated as Noise Zone III. The project site is located within a residential zone and is subject to Zone I noise standards. The SMMC also limits the amount of noise generated by uses during normal operation that may affect the surrounding areas. **Table 4.12-2** shows the allowable noise levels and corresponding times of day for each of the three identified noise zones. If the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard. The standards plus 20 dB (i.e., 65 dBA for 7:00 a.m. to 10:00 p.m. for Zone II) apply to maximum instantaneous noises occurring for any period of time.

TABLE 4.12-2: SMMC EXTERIOR NOISE STANDARDS			
Noise Zone	Time Interval	Allowable L_{eq}	
		15-Minute Continuous Measurement Period	5-Minute Continuous Measurement Period
I	Monday – Friday 10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	50 dBA 60 dBA	55 dBA 65 dBA
	Saturday and Sunday 10:00 p.m. – 8:00 a.m. 8:00 a.m. – 10:00 p.m.	50 dBA 60 dBA	55 dBA 65 dBA
II	All Days of the Week 10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	60 dBA 65 dBA	65 dBA 70 dBA
III	Anytime	70 dBA	70 dBA

SOURCE: City of Santa Monica Municipal Code, §4.12.060(a).

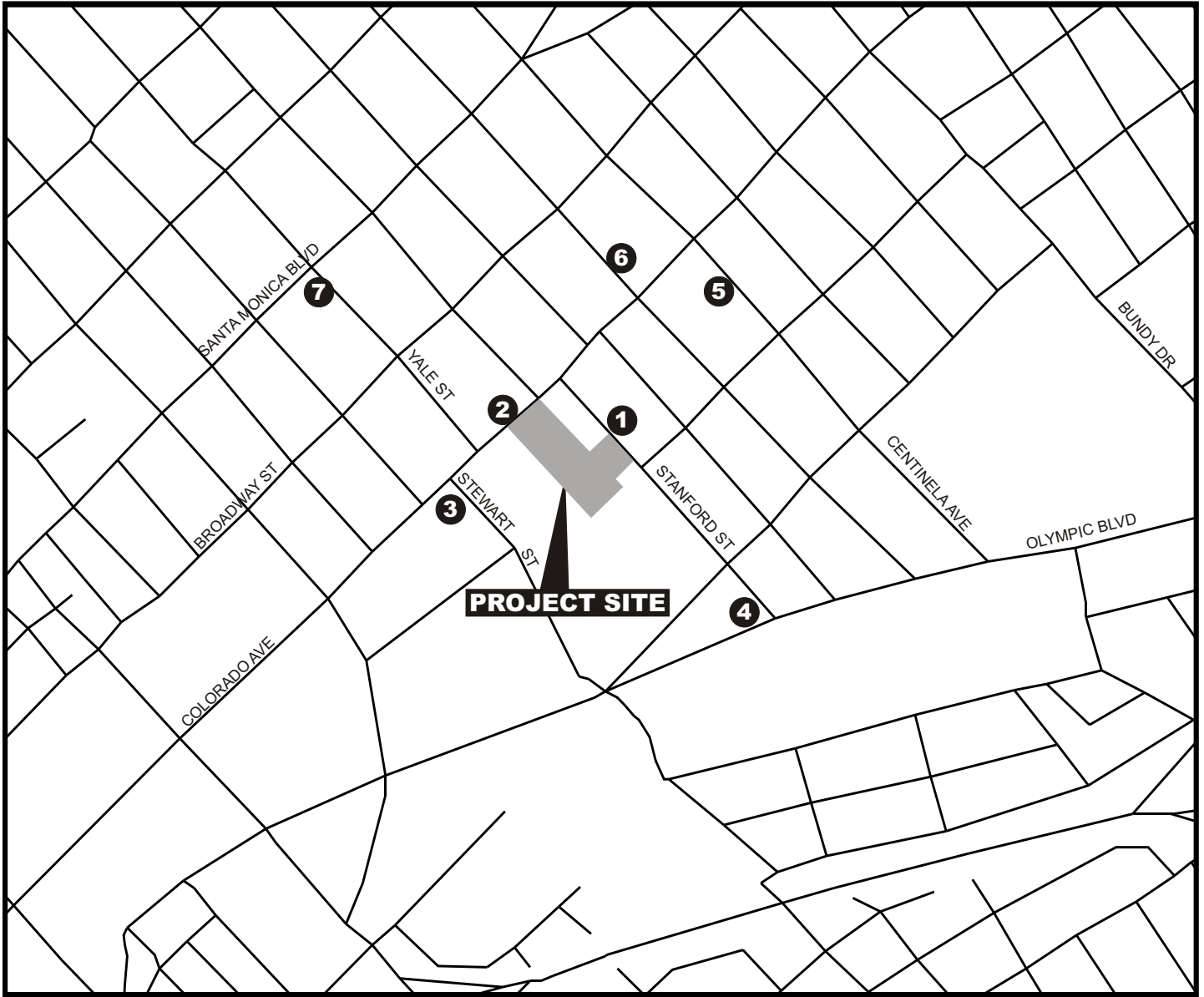
Vibration

The Federal Transit Administration (FTA) includes information on ground-borne vibration. The FTA considers groundborne vibration level of 85 VdB to be acceptable only if there are an infrequent number of events per day.

EXISTING SETTING

Noise Levels

Sound measurements were taken using a SoundPro DL Sound Level Meter between 11:00 a.m. and 2:00 p.m. on September 21, 2010 to determine existing ambient daytime off-peak noise levels in the project vicinity. These readings were used to establish existing ambient noise conditions and to provide a baseline for evaluating operational noise impacts. Noise monitoring locations are shown in **Figure 4.12-2**. As shown in **Table 4.12-3**, existing ambient sound levels range between 49.6 and 61.9 dBA L_{eq} . A 24-hour noise measurement was also taken on the project site. The existing project site noise level was measured as 55.4 dBA CNEL.



LEGEND:

 Project Site

 Noise Monitoring Locations

- | | |
|---------------------------------------|--------------------------------|
| 1. Multi-Family Residences | 5. Dreamland Preschool |
| 2. Single and Multi-Family Residences | 6. Maohr Hatorah Synagogue |
| 3. Evergreen Community School | 7. Lighthouse Church Preschool |
| 4. Little Dolphins by the Sea | |



SOURCE: TAHA, 2011.

FIGURE 4.12-2

NOISE MONITORING LOCATIONS

TABLE 4.12-3: EXISTING NOISE LEVELS			
Key to Figure 4-2	Noise Monitoring Location	Distance from Project Site (feet)	Sound Level (dBA, L_{eq})
1	Multi-family residences across Stanford Street	Adjacent	49.6
2	Single- and multi-family residences across Colorado Avenue	Adjacent	58.1
3	Evergreen Community School	400	60.1
4	Little Dolphins by the Sea Preschool	900	54.8
5	Dreamland Preschool	980	61.9
6	Maohr Hatorah Synagogue	1,180	45.5
7	Lighthouse Church Preschool	1,220	55.7

SOURCE: TAHA, 2011.

Vehicular traffic is the predominant noise source in the project vicinity. Using existing traffic volumes provided by the project traffic consultant, the $CNEL L_{dn}$ was calculated for various roadway segments near the project site using the Traffic Noise Model Look-Up Program. Existing peak hour noise levels are shown in **Table 4.12-4**. Mobile noise levels in the project area range from ~~55.1~~ 54.1 to ~~75.2~~ 74.2 dBA $CNEL L_{dn}$.

TABLE 4.12-4: EXISTING MOBILE SOURCE NOISE LEVELS	
Roadway Segment	Estimated L_{dn} (dBA)
Stewart Street from Olympic Boulevard to Pennsylvania Avenue	67.6
Stewart Street from Pennsylvania Avenue to Colorado Avenue	67.3
Colorado Avenue from Stewart Street to 26 th Street	68.8
Colorado Avenue from Yale Avenue to Stanford Street	67.2
Colorado Avenue from Stanford Street (North) to Stanford Street (South)	67.6
Stanford Street south of Colorado Avenue	54.1
Yale Avenue from Santa Monica Boulevard to Ohio Avenue	63.2
Colorado Avenue from Stanford Street to Centinela Avenue	67.8
Centinela Avenue from Idaho Avenue to Pennsylvania Avenue	68.3
Olympic Boulevard east of Stewart Street	74.2

SOURCE: TAHA, 2011.

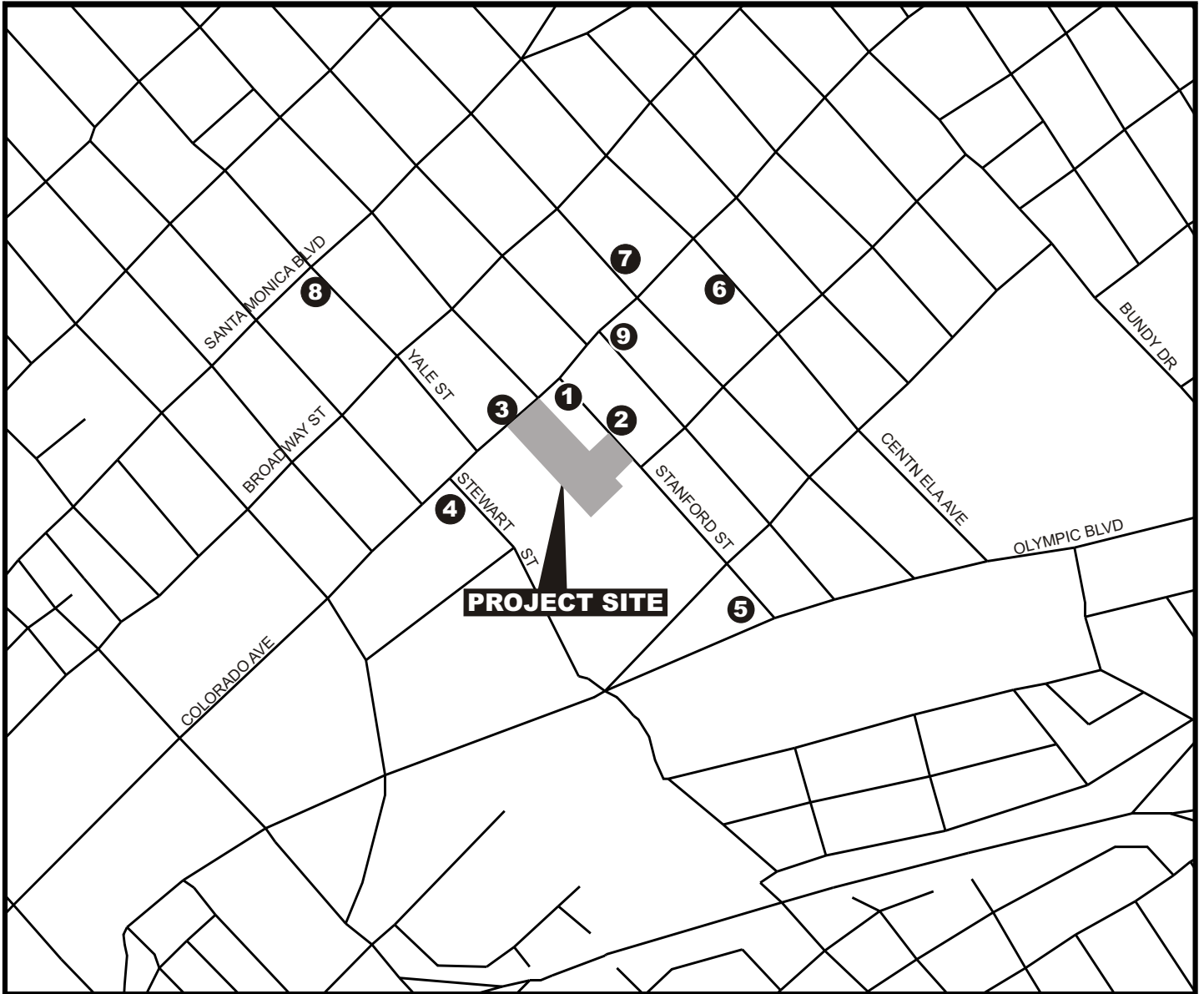
Vibration

There are no stationary sources of vibration located near the project site. Heavy-duty trucks can generate ground-borne vibrations that vary depending on vehicle type and weight, and pavement conditions. However, vibration levels from adjacent roadways are not typically perceptible at the project site.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. As shown in **Figure 4.12-3**, sensitive receptors near the project site include:

- Westside Christian Fellowship (childcare center) adjacent to the east
- Multi-family residences approximately 50 feet to the east
- Single- and multi-family residences approximately 75 feet to the north
- Evergreen Community School approximately 400 feet to the west
- Santa Monica Baha'i Center approximately 500 feet to the east
- Little Dolphins by the Sea Preschool approximately 900 feet to the southwest
- Dreamland Preschool approximately 980 feet to the north
- Maohr Hatorah Synagogue (childcare center) approximately 1,180 feet to the north
- Lighthouse Church Preschool approximately 1,220 feet to the northwest



LEGEND:

 Project Site

 Sensitive Receptor Locations

- | | |
|---------------------------------------|--------------------------------|
| 1. Westside Christian Fellowship | 6. Dreamland Preschool |
| 2. Multi-Family Residences | 7. Maohr Hatorah Synagouge |
| 3. Single and Multi-Family Residences | 8. Lighthouse Church Preschool |
| 4. Evergreen Community School | 9. Santa Monica Baha'i Center |
| 5. Little Dolphins by the Sea | |

SOURCE: TAHA, 2011.

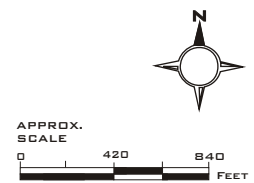


FIGURE 4.12-3

NOISE SENSITIVE RECEPTOR LOCATIONS

The above sensitive receptors represent the nearest noise sensitive receptors with the potential to be impacted by the proposed project. Additional sensitive receptors are located further from the project site in the surrounding community within 0.25 miles of the project site and would be less impacted by the proposed project than the above sensitive receptors.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to operational noise if it would:

- Expose persons to or generate noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels; and/or
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

The CEQA Guidelines do not define the levels at which temporary and permanent increases in ambient noise are considered substantial. Studies have shown that a change of at least 5 dBA is typically a noticeable increase and would likely evoke a community reaction. However, as the existing level of ambient noise increases, the allowable level of project generated noise increases, but the total amount that community noise exposure is allowed to increase is reduced. This accounts for the unexpected result that a project noise exposure which is less than the existing noise exposure can still cause impact. Therefore, for the purposes of this analysis, a significant operational noise impact would result if:

- Roadway noise levels increase by 5 dBA or more when the ambient noise level is less than 60 dBA L_{dn} , 3 dBA or more when the ambient noise level is between 60 and 65 dBA L_{dn} , or 1.5 dBA or more when the ambient noise level is greater than 65 dBA L_{dn} ; and/or
- The proposed project causes non-roadway related noise levels measured at the property line of the affected uses to increase by 5 dBA or more; and/or
- The proposed project locates land uses in a noise environment that is not compatible with the noise levels shown in **Table 4.12-1**, above.

For the purposes of this analysis, the proposed project would result in a significant operational vibration impact if:

- The proposed project would expose people to vibration levels that exceed 85 VdB.

IMPACTS

Methodology

Mobile source noise levels were calculated based on information provided in the traffic study prepared by Fehr & Peers and using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5 Look-Up Program. The FHWA TNM Version 2.5 Look-Up Tables provide a reference of pre-calculated FHWA TNM results for simple highway geometries. The calculations are for an infinitely long, straight roadway over flat ground, with a receiver set at a height of five feet (1.5 meters) above the ground. If desired, an infinitely long straight barrier may also be included in the calculations. The model only predicts L_{eq} noise levels. These noise levels were adjusted to L_{dn} based on guidance in the California Department of Transportation *Technical Noise Supplement* (November 2009). Peak hour traffic was assumed to be ten percent of average daily traffic with a 90/10 day/night traffic split.

Stationary source noise levels were calculated based on available technical data. Vibration levels were estimated based on information provided by the FTA.³

Impact N-1 The proposed project would increase traffic and associated roadway noise levels in the project area. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to mobile noise.

As indicated in Section 4.14 Transportation and Traffic, under the Cumulative Plus Project (Year 2020) Conditions the proposed project would generate 2,278 net new trips per day. Morning peak hour trips would increase by 144 and evening peak hour trips would increase by 170. **Table 4.12-5** shows peak hour mobile source noise levels along the analyzed roadway segments with and without the project in the future year of 2020. The greatest project-related noise increase would be 0.1 dBA L_{eq} . This would not exceed the most conservative roadway noise threshold of 1.5-dBA. Therefore, under Cumulative Plus Project (Year 2020) Conditions, the proposed project would not exceed the 5-dBA significance threshold for mobile noise. Mobile noise impacts would be less than significant.

TABLE 4.12-5: OPERATIONAL MOBILE SOURCE NOISE LEVELS – CUMULATIVE PLUS PROJECT(YER 2020) CONDITIONS			
Roadway Segment	Estimated dBA, L_{dn}		
	No Project	Project	Project Impact
Stewart Street from Olympic Boulevard to Pennsylvania Avenue	69.5	69.6	0.1
Stewart Street from Pennsylvania Avenue to Colorado Avenue	68.9	68.9	0.0
Colorado Avenue from Stewart Street to 26 th Street	70.9	71.0	0.1
Colorado Avenue from Yale Avenue to Stanford Street	69.0	69.0	0.0
Colorado Avenue from Stanford Street to Stanford Street	69.4	69.4	0.0
Stanford Street south of Colorado Avenue	56.0	56.1	0.1
Yale Avenue from Santa Monica Boulevard to Ohio Avenue	64.7	64.5	(0.2)
Colorado Avenue from Stanford Street to Centinela Avenue	69.7	69.7	0.0
Centinela Avenue from Idaho Avenue to Pennsylvania Avenue	70.0	70.1	0.1
Olympic Boulevard east of Stewart Street	76.4	74.5	0.1

SOURCE: TAHA, 2011.

Table 4.12-6 shows peak hour Approval Year Plus Project (Year 2011) Conditions and Approval Year Plus Project (Year 2011) mobile source noise levels. The greatest project-related noise increase would be 2.1 dBA L_{eq} . This would not exceed the most conservative roadway noise threshold of 1.5-dBA. Therefore, under Approval Year Plus Project (Year 2011) Conditions, the proposed project would not exceed the 5-dBA significance threshold for mobile noise. Mobile noise impacts would be less than significant.

Mitigation Measures

Mobile noise impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to mobile noise would be less than significant without mitigation.

³Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

TABLE 4.12-6: OPERATIONAL MOBILE SOURCE NOISE LEVELS – APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS			
Roadway Segment	Estimated dBA, L_{dn}		
	Approval Year (Year 2011) Conditions	Approval Year Plus Project (Year 2011) Conditions	Project Impact
Stewart Street from Olympic Boulevard to Pennsylvania Avenue	69.3	69.4	0.1
Stewart Street from Pennsylvania Avenue to Colorado Avenue	68.9	69.0	0.1
Colorado Avenue from Stewart Street to 26 th Street	71.0	71.1	0.1
Colorado Avenue from Yale Avenue to Stanford Street	69.2	69.4	0.2
Colorado Avenue from Stanford Street to Stanford Street	69.6	69.7	0.1
Stanford Street south of Colorado Avenue	56.1	58.2	2.1
Yale Avenue from Santa Monica Boulevard to Ohio Avenue	64.7	64.8	0.1
Colorado Avenue from Stanford Street to Centinela Avenue	69.8	69.9	0.1
Centinela Avenue from Idaho Avenue to Pennsylvania Avenue	69.9	70.0	0.1
Olympic Boulevard east of Stewart Street	76.3	76.3	0.0

SOURCE: TAHA, 2011.

Impact N-2 The proposed project would generate stationary noise from mechanical equipment, truck loading, parking activity, and recreational activity. These noise levels would not exceed the 5-dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to stationary noise.

Mechanical Equipment

Sources of mechanical noise include air handlers, exhaust fans, and pool equipment. Mechanical equipment rooms would be located on the ground floor of the structures. These rooms would be in the interior of the proposed structure and equipment would be completely enclosed. Exterior mechanical equipment would also be designed so as to be located within an enclosure. In addition, mechanical equipment would be screened from view as necessary to comply with provisions of the Santa Monica Municipal Code for on-site stationary sources. Operation of mechanical equipment is not anticipated to increase ambient noise levels by 5 dBA or more. Therefore, the proposed project would result in a less-than-significant impact related to mechanical equipment.

Truck Loading

The proposed project would include loading docks for delivery trucks. Loading docks would be located within the project site off the New Road along the western boundary from the project site (away from existing sensitive receptors). Noise levels from medium-duty trucks accessing the project site would range from 71 to 79 dBA L_{eq} at 50 feet.⁴ Back-up safety alarms would generate a single event noise level of approximately 79 dBA at 50 feet.⁵ The proposed project would typically generate less than five truck trips per day. These truck trips would be intermittent and would generate short-term noise sources. Truck activity would typically occur during daytime hours and the intermittent noise level increase is not considered to be significant. In addition, based on the distance of the sensitive residential uses on Stewart Street and Colorado Avenue from the loading docks (more than 25 feet), noise attenuation would occur. Furthermore, the proposed project's on-site buildings would serve as a noise barrier to further reduce noise levels. Therefore, the proposed project would result in a less than significant impact related to truck loading noise.

⁴California Department of Transportation, *Technical Noise Supplement*, November 2009.

⁵The back-up safety alarm noise level was based on regulations set forth by the Occupational Safety and Health Administration.

Parking Activity

The majority of parking would be accommodated by a 778-stall, two-level subterranean garage. Since all parking on the project site would be enclosed within the proposed subterranean parking structure, parking noise would be inaudible at nearby sensitive receptors. Parking activity would not increase ambient noise levels. Therefore, the proposed project would result in a less-than-significant impact related to subterranean parking activity.

An additional 26 on-street public parking spaces would be provided along New Road on the western boundary of the site and along Pennsylvania Avenue. Automobile parking activity typically generates a noise level of approximately 58.1 dBA L_{eq} at 50 feet (e.g., tire noise, engine noise, and door slams).⁶ This parking area is typical to residential and commercial mixed-use developments. It is also important to note the project site currently supports 96 surface parking spaces. The proposed project would have 70 fewer surface parking spaces and at-grade parking would generate less noise under the proposed project than with existing conditions. Therefore, the proposed project would result in a less-than-significant impact related to parking activity.

Recreational Activity

The proposed project would include a rooftop pool and courtyards areas. The pool area would be enclosed on all sides and would not be in the direct line-of-site of any sensitive receptors. In addition, the pool would not include amplified noise. It was assumed that the pool area would generate a noise level of 73 dBA at ten feet. The Western Christian Fellowship would be the closest sensitive receptor to the project site. Pool noise would increase noise levels at this receptor by less than 2 dBA. This increase would not be audible and would be less than the 5 dBA significance threshold. Therefore, the proposed project would result in a less-than-significant impact related to pool activity.

The courtyards would be central to the project site and, therefore, noise would be attenuated by the surrounding project buildings. The courtyards would not include amplified noise or other unusually loud sources of noise. Courtyard noise would be inaudible at nearby sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact related to courtyard activity.

Mitigation Measures

Stationary noise impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact N-3 The proposed project would include residential land uses. Existing ambient noise levels are compatible with City guidelines for residential land uses. Therefore, the proposed project would result in a less-than-significant impact related to noise/land use compatibility.

The City of Santa Monica has developed a Noise Element for the General Plan to manage noise exposure within the City. The General Plan Noise Element includes goals for locating new land uses in acceptable noise environments. For example, residential land uses are generally not compatible with the noise environment adjacent to a freeway. The City's land use/noise compatibility matrix is shown in **Table 4.12-1**, above. Residential land uses within the City are clearly compatible with ambient noise levels less than 60 dBA CNEL. A 24-hour noise measurement taken on the project site indicated that the ambient CNEL is 55.4 dBA. This noise level is less than the clearly compatible 60 dBA CNEL listed in

⁶The reference parking noise level is based on a series of noise measurements completed 50 feet from vehicles accessing a multi-level parking structure.

Table 4.12-1 for residential land uses. Therefore, the proposed project would not generate noise that would be incompatible with surrounding land uses. Impacts would be less than significant.

Mitigation Measures

Noise/land use compatibility impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact N-4 **The proposed project would generate vibration as a result of trucks accessing in the project site. This vibration would not be perceptible to sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact related to vibration.**

The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, project-related traffic vibration levels would be less than 85 VdB and would not be perceptible by sensitive receptors. Therefore, the proposed project would not result in perceptible groundbourne vibration. Impacts would be less than significant.

Mitigation Measures

Groundborne vibration impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

The traffic analysis provided in Section 4.15 Transportation and Traffic incorporates cumulative traffic from future growth and related projects. Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. Since the mobile noise impacts are analyzed based on the traffic analysis, the Cumulative Plus Project (Year 2020) Conditions noise impacts described in this report already reflect cumulative impacts.

Table 4.12-7 present the cumulative increase in future traffic noise levels at intersections. The maximum cumulative roadway noise increase would be 2.0 dBA L_{eq} and would occur along Stanford Street south of Colorado Avenue. The significance threshold for this street segment is 5 dBA because the existing noise level is less than 60 dBA L_{dn} . Cumulative noise levels would not exceed the significance thresholds. Therefore, cumulative impacts related to mobile source noise would be less than significant.

TABLE 4.12-7: CUMULATIVE OPERATIONAL MOBILE SOURCE NOISE LEVELS			
Roadway Segment	Estimated dBA, L_{dn}		
	Existing	Project	Cumulative Impact
Stewart Street from Olympic Boulevard to Pennsylvania Avenue	67.6	68.0	0.4
Stewart Street from Pennsylvania Avenue to Colorado Avenue	67.3	67.5	0.2
Colorado Avenue from Stewart Street to 26 th Street	68.3	68.9	0.1
Colorado Avenue from Yale Avenue to Stanford Street	67.2	67.3	0.1
Colorado Avenue from Stanford Street to Stanford Street	67.6	67.7	0.1
Stanford Street south of Colorado Avenue	54.1	56.1	2.0
Yale Avenue from Santa Monica Boulevard to Ohio Avenue	63.2	63.2	0.0
Colorado Avenue from Stanford Street to Centinela Avenue	67.8	67.9	0.1
Centinela Avenue from Idaho Avenue to Pennsylvania Avenue	68.3	68.4	0.1
Olympic Boulevard east of Stewart Street	74.2	74.5	0.3

SOURCE: TAHA, 2011.

The nearest related projects to the project site are located to the west at 2848-2912 Colorado Avenue and 2834 Colorado Avenue. Similar to the proposed project, the 2848-2912 Colorado Avenue and 2834 Colorado Avenue related projects would include stationary mechanical noise sources (e.g., air handlers and exhaust fans). Mechanical equipment is expected to be screened from view as necessary to comply with provisions of the Santa Monica Municipal Code for on-site stationary sources. Cumulative mechanical equipment is not anticipated to increase ambient noise levels by 5 dBA or more. Therefore, the proposed project would not contribute to a cumulative impact related to stationary source noise.

The predominant vibration source near the project site is heavy trucks traveling on the local roadways. Neither the proposed project nor related projects would substantially increase heavy-duty vehicle traffic near the project site and would not cause a substantial increase in heavy-duty trucks on local roadways. The proposed project would not contribute to a cumulative vibration impact.

4.13 POPULATION AND HOUSING

This section discusses the effect that the proposed project would have on local and regional population and housing. Specifically, this section addresses the population and housing growth and displacement that would be caused by the proposed project. These impacts are evaluated in terms of projections provided by the Southern California Association of Governments (SCAG). Additional housing and population estimates are derived from the 2010 United States Census and from the City of Santa Monica Land Use and Circulation Element.

EXISTING SETTING

SCAG is the federally-designated Metropolitan Planning Organization (MPO) for six counties in Southern California (Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial). SCAG's mission is to develop long-range regional plans and strategies that provide for efficient movement of people, goods, and information; enhance economic growth and international trade; and improve the quality of life for the Southern California region. SCAG also develops forecasts for population, housing, and employment for the region.

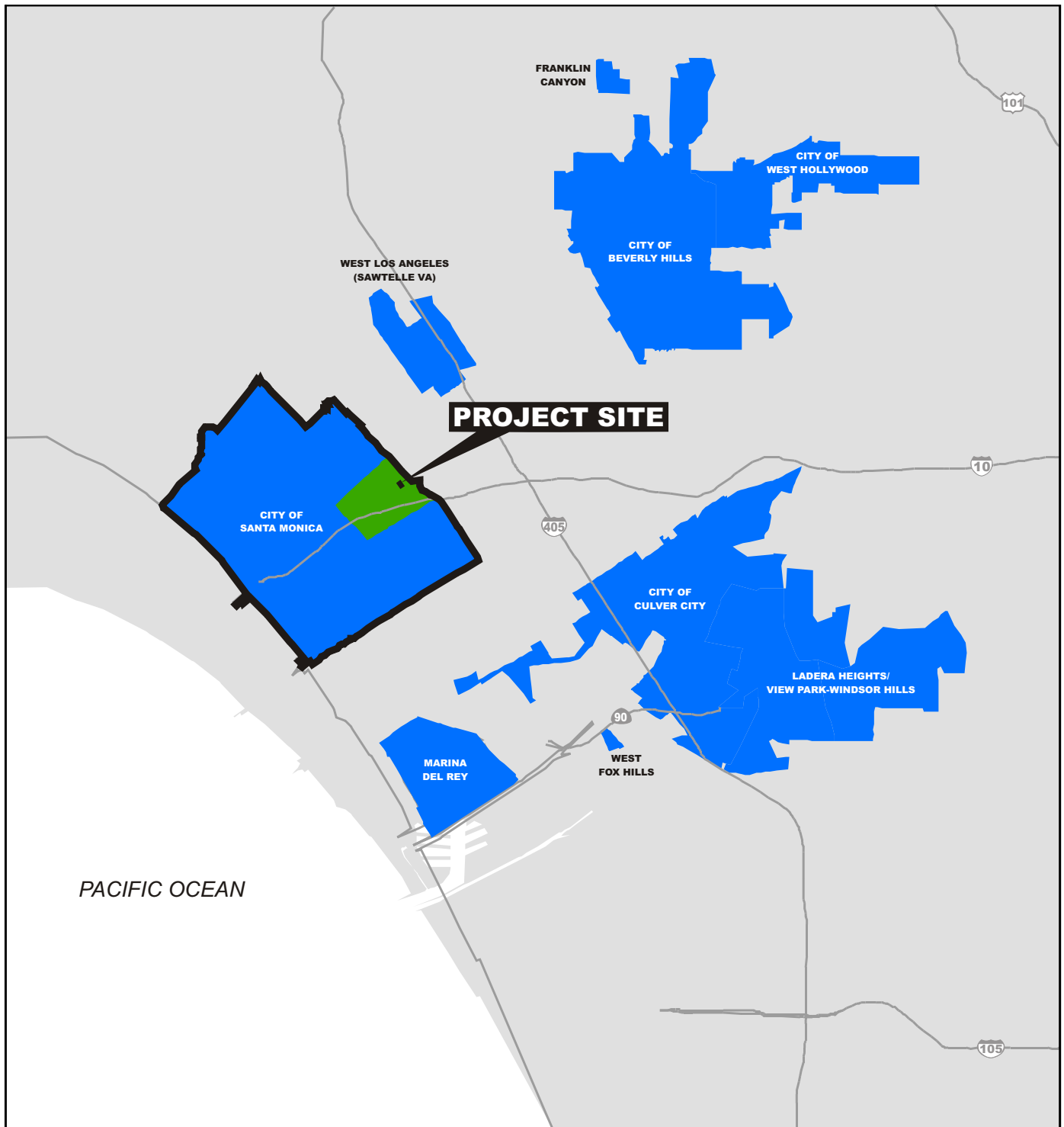
SCAG divides its planning area into 14 subregions. The 3.85-acre project site is located within the City of Santa Monica, which is part of the Westside Cities Council of Governments (WCCOG) Subregion, which also contains the Cities of Beverly Hills, Culver City, and West Hollywood, plus portions of the City of Los Angeles and unincorporated areas of County of Los Angeles.

The project site is located within Census tract 7018.01, which is bounded by Pico Boulevard on the south, 20th Street on the west, Colorado Avenue on the north, and Centinela Avenue on the east.

Population

As shown in **Table 4.13-1**, the population on the existing site is approximately 51 persons and the Census tract in which the project site is located has approximately 5,870 persons. The City of Santa Monica has a population of approximately 89,736 persons, the WCCOG Subregion has a population of approximately 238,850 persons, and the County of Los Angeles has a population of approximately 9.8 million persons. Currently, the population at the project site is less than one percent of the total Census tract 7018.01 population and of the City of Santa Monica population. The annual population growth rate for the project site Census tract is 0.41 percent, and for the City of Santa Monica it is 0.63 percent. The annual population growth rates for these two geographic regions are lower than the annual population growth rates for either the WCCOG Subregion (0.62 percent) or the County of Los Angeles (1.15 percent).

The population density (number of persons per square mile) of the existing site is approximately 8,500 persons per square mile and the project site Census tract has a population density of 7,993 persons per square mile (**Table 4.13-1**). These population densities are lower than those of the City of Santa Monica and the WCCOG (10,812 and 11,182 persons per square mile, respectively), which are some of the highest in the County. By comparison, the population density of the County of Los Angeles is 2,455 persons per square mile.



- LEGEND:
- Project Site
 - City of Santa Monica
 - Project Site Census Tract 7018.01
 - Westside Cities Council of Governments (WCCOG)
 - County of Los Angeles

SOURCE: ESRI and TAHA, 2011.

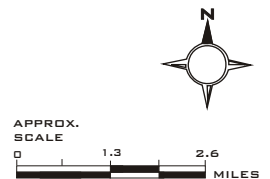


TABLE 4.13-1: EXISTING POPULATION CHARACTERISTICS			
Area	2010 Population	Annual Growth Rate (%)	Density (persons/sq.mi.) /a/
County of Los Angeles	9,818,605	0.30% /b/	2,455
WCCOG Subregion /c/	238,847	0.62% /d/	11,182
City of Santa Monica	89,736	0.63% /e/	10,812
Census Tract 7018.01 /f/	5,867	0.41%/g/	7,993
Project Site	51	N/A	8,500

/a/ For determining population density, the following areas were used:
 County of Los Angeles: Approximately 4,000 square miles.
 WCCOG Subregion: Approximately 21.36 square miles.
 City of Santa Monica: Approximately 8.3 square miles.
 Census tract 7018.01: Approximately 0.734 square miles.
 Project Site: Approximately 0.006 square miles.

/b/ Annual Growth Rate was determined by comparing US Census population data from 2000 (9,519,330 persons) and 2010.

/c/ From SCAG 2008 RTP Growth Projections Data

/d/ Annual Growth Rate was determined by comparing SCAG 2008 RTP population data from 2005 (233,894 persons) and 2010.

/e/ Annual Growth Rate was determined by comparing US Census population data from 2000 (84,084 persons) and 2010.

/f/ From 2010 U.S. Census Redistricting Data (Public Law 94-171) Summary File.

/g/ Annual Growth Rate was determined by comparing US Census population data from 2000 (5,624 persons) and 2010.

SOURCE: Southern California Association of Governments, *Regional Transportation Plan*, 2008; 2000 and 2010 U.S. Census; and TAHA, 2011.

Housing

The median house price in the City of Santa Monica is \$925,000, much higher than the City of Los Angeles (\$450,000) and nearby Culver City (\$499,000).¹ This dramatic increase in home value is largely attributed to location, the amenities the City offers, and the limited amount of developable space. In order to ensure fairness and affordability in housing, rent-control is a common practice used to preserve affordable housing in the City. Section 9.04.02.030.025 of the Santa Monica Municipal Code defines Affordable Housing as “Housing in which one hundred percent of the dwelling units are deed-restricted or restricted by an agreement approved by the City for occupancy by low or moderate income households. Such projects may also include non-residential uses, as long as such uses do not exceed thirty-three percent of the floor area of the total project.”

The 3.85-acre project site is developed with 109 trailer home lots. The site has been in use as a trailer park since the 1950s. All of the 109 spaces are rent-controlled housing. Although there are 109 spaces at the project site, approximately 76 of them are currently occupied by trailers

The housing at the project site comprises approximately three percent of the total Census tract 7018.01 housing stock and less than one percent of the City of Santa Monica housing stock. The annual housing growth rate for Census tract 7018.01 is 1.5 percent, and for the City of Santa Monica is 0.6 percent. The annual population growth rate for these two geographic regions is higher than the annual population growth rate for either the WCCOG Subregion (0.31 percent) or the County of Los Angeles (0.51 percent).

As shown in **Table 4.13-2**, the project site Census tract has a housing density of approximately 3,400 housing units per square mile, and the City of Santa Monica and the WCCOG have housing densities of 6,134 and 5,439 housing units per square mile, respectively.

The household size for renter-occupied housing in the City of Santa Monica is 1.71 persons per household, which is slightly lower than Census Tract 7018.01 (1.99 persons per household). Comparatively, the County of Los Angeles and the WCCOG have larger household sizes of 2.81 and 2.06 respectively.

¹Movoto Real Estate website, <http://www.movoto.com/statistics/ca.htm>, accessed on October 19, 2010.

TABLE 4.13-2: EXISTING HOUSING CHARACTERISTICS				
Area	2010 Units	Annual Housing Growth Rate (%)	Density (housing units/sq.mi.)/a/	Household Size (Renter-Occupied Units)
County of Los Angeles	3,445,076	0.51% /b/	861	2.81
WCCOG Subregion /c/	116,181	0.31% /d/	5,439	2.06
City of Santa Monica	50,912	0.6% /e/	6,134	1.71
Census Tract 7018.01 /f/	2,935	1.5% /g/	3,998	1.99
Project Site	76	N/A	640	N/A

/a/ For determining population density, the following areas were used:
 County of Los Angeles: Approximately 4,000 square miles.
 WCCOG Subregion: Approximately 21.36 square miles.
 City of Santa Monica: Approximately 8.3 square miles.
 Census tract 7018.01: Approximately 0.734 square miles.
 Project Site: Approximately 0.006 square miles.
 /b/ Annual Growth Rate was determined by comparing US Census housing data from 2000 (3,270,909 units) and 2010.
 /c/ From SCAG 2008 RTP Growth Projections Data
 /d/ Annual Growth Rate was determined by comparing SCAG 2008 RTP housing data from 2005 (114,421 units) and 2010.
 /e/ Annual Growth Rate was determined by comparing US Census housing data from 2000 (47,863 units) and 2010.
 /f/ From 2010 U.S. Census Redistricting Data (Public Law 94-171) Summary File.
 /g/ Annual Growth Rate was determined by comparing US Census housing data from 2000 (2,495 units) and 2010.
SOURCE: Southern California Association of Governments, *Regional Transportation Plan*, 2008; 2000 and 2010 U.S. Census; and TAHA, 2011.

REGULATORY FRAMEWORK

The following is a discussion of the relevant plans that contain goals and objectives pertaining to population and housing.

Regional

SCAG 2008 Regional Transportation Plan. SCAG addresses the future of Southern California through the year 2035 in its Regional Comprehensive Plan (RCP), which was provided as a tool for local jurisdictions in planning and evaluating growth. As part of the SCAG RCP, SCAG has adopted the 2008 Regional Transportation Plan (RTP). This plan focuses on improving the balance between region-wide land uses and the current and future transportation system. SCAG also prepared the Growth Forecast Report for the RTP. SCAG’s RTP growth forecasts for population, housing, and employment are based on 2000 Census data. Based on those projections, the City’s population is anticipated to be 91,689 persons in 2020 and 92,120 person in 2030. SCAG’s goals encourage land use and growth patterns that complement transportation investments. These goals include:

- Provide adequate and affordable housing for the growing population. Production of new housing units will provide an economic stimulus to the region through direct investment and new jobs.
- Promote improved jobs-housing balance throughout the region. Locating new housing near jobs, new employment centers near housing, and both housing and jobs near transit and other transportation corridors will shorten commutes and allow commuting options other than single occupancy vehicles.
- Reduce regional vehicle miles traveled (VMT), resulting in reduced traffic congestion and delay and reduced air quality impacts. Reduced VMT will also lead to significant infrastructure cost savings.
- Improve social equity and environmental justice through revitalization of older suburban and inner-city locations, promotion of economic development in urban core areas and enhancement of local property and sales tax revenues.

SCAG is currently preparing the 2012 RTP which would include updated forecasts based on the 2010 U.S. Census. In addition, the City of Santa Monica is working with SCAG to align SCAG’s conservative numbers to the City’s population and housing estimates provided in the 2010 Land Use and Circulation Element.

Regional Housing Needs Assessment (RHNA). The RHNA is a key tool for SCAG and its member governments to plan for this growth. The RHNA quantifies the need for housing within each jurisdiction between 2006 and 2014. Communities then plan, consider, and decide how they will address this need

through the process of completing the Housing Elements of their General Plans. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment. The RHNA is produced periodically by SCAG, as mandated by State law, to coincide with the region's schedule for preparing Housing Elements. It consists of two measurements of housing need: (a) existing need; and (b) future need.

The existing need assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding.

The future need for housing is determined primarily by the forecasted growth in households in a community, based on historical growth patterns, job creation, household formation rates, and other factors to estimate how many households will be added to each community over the projection period. The housing need for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition, and encourage acceptable levels of housing upkeep and repair. The RHNA also accounts for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors household growth, vacancy need and replacement need form the "construction need" assigned to each community. The City of Santa Monica was assigned a RHNA of 662 housing units for the 2006 to 2014 planning period.

Finally, the RHNA considers how each jurisdiction might grow in ways that will decrease the concentration of low income households in certain communities. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution.

Local

City of Santa Monica General Plan, Land Use and Circulation Element (LUCE, 2010). The City of Santa Monica is largely urbanized with limited vacant land area. The proposed LUCE focuses on how limited population and employment changes and emphasis on trip reduction strategies can be strategically managed to preserve the distinguishing and valued qualities of the City, support a thriving economy that benefits the City's residents' quality of life, and to achieve a sustainable and integrated system of land use and transportation in the City of Santa Monica consistent with the requirements of recent state legislation. Of primary importance, the proposed LUCE conserves the existing pattern of uses and establishes policies for the protection and long-term conservation of established residential neighborhoods. The land use changes that would be allowed under the proposed LUCE would be focused in areas around planned transit stations along future Exposition light rail line, and at nodes along primary commercial and transit corridors in the City. The proposed LUCE protects the City's residential neighborhoods through a variety of means, and shifts development pressure from those neighborhoods to the City's commercial corridors. The following LUCE policies apply to this project:

***Policy D24.1** Capitalize on the Expo Light Rail station at Bergamot to create a mixed-use neighborhood with a diverse mix of creative arts facilities and residential types as well as local serving uses to establish a 170 hours per day 7 days per week neighborhood.*

***Policy D24.4** Encourage appropriate uses including existing job-rich uses, new arts-related industries, neighborhood-serving retail and services, and affordable, workforce and market-rate housing.*

***Policy D24.13** Retain the Village Trailer Park to the extent feasible, and permit recycling to other uses that are consistent with the Mixed Use Creative District and in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks.*

Policy D24.14 *Explore means to sustain Village Trailer Park's economic viability by incorporating it into a larger multi-property master plan, if feasible, or by the transfer of development rights that have as a goal, preserving existing housing as an integral part of a new-mixed use project.*

Policy LU2.4 Affordable and Workforce Housing. *Create diverse housing options along the transit corridors and in the activity centers, replacing some commercial potential with additional affordable and workforce housing, and encouraging affordable workforce housing near the transit stations.*

Policy LU3.1 Reduce Regional-Serving Commercial Uses. *Reduce regional office and commercial uses and encourage smaller floor plate office uses, housing and local-serving retail and services.*

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

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

Policy LU10.3 Affordable and Workforce Housing. *Focus on additional affordable and workforce housing with an emphasis on employment centers close to transit facilities.*

Policy LU11.1 Neighborhood Housing. *Continue to support healthy, diverse neighborhoods that provide a range of housing choices to meet the needs of their residents.*

Policy LU11.2 Expand Housing Opportunities. *Expand housing opportunities by identifying and designating specific infill areas along transit-rich boulevards and in the districts, including near Expo Light Rail stations and at transit hubs. In these areas, new residential is desired to create complete neighborhoods and support sustainability goals.*

Policy LU11.3 Housing Incentives. *Provide incentives to build and increase the amount of affordable and workforce housing and to conserve character-defining multi-family housing.*

Policy LU11.4 Housing and Employment. *Encourage programs for employer-assisted housing (housing accessible to Santa Monica workers) and other efforts to reduce vehicle miles traveled.*

Policy LU11.6 Affordable Housing Incentives. *Encourage projects providing exclusively very low-, low-, and moderate-income housing through incentives such as a streamlined permit process, flexible development and parking standards, density bonuses, and financial assistance.*

City of Santa Monica General Plan, Housing Element (2008). The Housing Element of the General Plan consists of an identification and analysis of the existing and projected housing needs of all economic segments of the City of Santa Monica. Policies of the Housing Element include the provision of an adequate and affordable supply of housing and the goal of encouraging the location of housing, jobs, and services in mutual proximity. These policies include:

Policy 1.1: *Provide adequate sites for all types of housing, particularly in locations near transit and services that promote walkability.*

Policy 1.2: *Encourage and provide incentives for the development of housing in non-residential zones and transit-oriented development.*

Policy 1.4: *Maintain development standards that promote the development of special needs housing, such as affordable senior, accessible, or family housing, while protecting quality of life goals.*

Policy 2.1: Encourage innovative municipal and private sector programs to promote the financing and development of housing for very low-, low-, and moderate-income persons and facilitate housing for the City's workforce that earn above-moderate income levels but are unable to afford housing in the community.

Policy 2.2: Cooperate and assist with for-profit and nonprofit housing providers develop housing for extremely low-, very low-, low-, and moderate-income households, and housing for the City's workforce that earn above-moderate income.

Policy 2.3: Support the enactment of federal, State, and local legislation to provide funding and incentives for the preservation and development of housing affordable to very low-, low-, and moderate-income households.

Policy 2.4: Ensure the continued availability and affordability of housing for very low-, low-, and moderate-income households.

Policy 2.7: Explore the development of housing affordable to the city's workforce, including possibilities for rental, ownership, and employer-provided transitional housing.

Policy 2.8: Consider the facilitation of housing in targeted areas as part of the Land Use and Circulation Element Update. These potential new housing areas include the City's major corridors and locations near transit stations.

Policy 3.1: Ameliorate the effects of the Costa-Hawkins vacancy de-control regulation on the affordable housing stock.

Policy 3.2: Encourage the preservation of affordable rental housing.

Policy 3.3: Continue to protect rental housing by limiting the conversion of rental units to ownership units.

Policy 3.4: Encourage the replacement of multi-family housing that is demolished.

Policy 5.1: Support rental assistance programs for very low- and low-income households; support mortgage assistance programs for low- and moderate-income households.

Policy 5.2: Provide information and assistance to very low- and low-income households and households with special needs to help them locate appropriate housing.

Since the 1995 Costa-Hawkins Bill (allowing vacancy de-controlling of rent-controlled units) and the 1986 Ellis Act (allowing property owners to permanently remove units from the rental housing market by meeting certain conditions) were passed, the City of Santa Monica has lost over 17,000 rent-controlled units.² Consequently, there is a need for affordable housing in the City.

City of Santa Monica Rent Control Law

The existing units on the project site are subject to the Rent Control Law.

The City's Rent Control Law (Article XVII of the City charter) was adopted in 1979 to alleviate housing shortage by establishing a Rent Control Board empowered to regulate rentals in the City of Santa Monica so that rents will not be increased unreasonably and so that landlords will receive no more than a fair return.

²City of Santa Monica, *City of Santa Monica Land Use and Circulation Element*, Chapter 3.3, Page 3.3-7, 2010.
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The City's Rent Control Law provides that any landlord who desires to remove a controlled rental unit from the rental housing market by demolition, conversion or other means is required to obtain a permit from the Rent Control Board prior to such removal from the rental housing market in accordance with rules and regulations promulgated by the Board. In order to approve such a permit pursuant to Charter Section 1803(t)(i), the Board is required to make a finding that the landlord cannot make a fair return by retaining the controlled rental unit.

In addition, under Charter Section 1083(t)(ii), the Board may approve such a permit:

- (i) If the Board finds that the controlled rental unit is uninhabitable and is incapable of being made habitable in an economically feasible manner, or
- (ii) If the permit is being sought so that the property may be developed with multifamily dwelling units and the permit applicant agrees as a condition of approval, that the units will not be exempt from the provisions of this Article pursuant to Section 1801(c) and that at least fifteen (15) percent of the controlled rental units to be built on the site will be at rents affordable by persons of low income.

In addition, the Rent Control Charter Amendment provides that the Housing Element of the General Plan of the City of Santa Monica shall at all times contain a provision that neither the City Council nor any City agency shall approve an application for tentative subdivision map or tentative parcel map for a converted unit until and unless the applicant first obtains a removal permit as required by this Section. This subsection shall not apply to any tentative subdivision map or tentative parcel map approved in accordance with Article XX relating to tenant ownership rights.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to population and housing if it would:

- Induce substantial 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);
- Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere; and/or
- Displace substantial numbers of people necessitating the construction of replacement housing elsewhere.

It should also be noted that the focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the physical environment. Accordingly, CEQA Guidelines Section 15064(e), economic and social impacts of a project are not to be treated as "significant" impacts on the physical environment, as defined. To the extent that there is a direct or indirect causal connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is "significant." Population and housing displacement impacts are relevant CEQA issues to the extent that displacement would result in physical changes to the environment, (i.e., necessitate the construction of replacement housing elsewhere).

IMPACTS

Impact PH-1 The proposed project would directly increase population area by providing 393 new housing units. The new units would potentially result in a population of 672 residents in the City of Santa Monica. Project growth would not exceed population and housing growth projections. Therefore, this impact would be less than significant.

The proposed project includes the development of 166 apartment units and 227 condominium units, replacing the existing 109 rent-controlled mobile home spaces.³ Based on the City of Santa Monica average household size (1.71 persons per household), the proposed project's 393 new housing units would potentially generate a population of 672 persons. The worst-case scenario would assume that all 672 additional future residents currently reside outside the City of Santa Monica and would relocate to the City. However, it is likely that at least some of the future residents would be existing City residents. Furthermore, as part of the relocation plan in the Development Agreement, some of the proposed project's housing units would be available for existing Village Trailer Park residents. Therefore, the projected 672 residents presented is extremely conservative.

The 2010 Census estimates that the City of Santa Monica has a current population of 89,736 residents. Therefore, the proposed project's 672 residents represents less than 0.1 percent of the City's current population, which is not substantial.

As discussed above, SCAG's RTP includes population estimates for cities and counties in the region. However, as these numbers are used for regional planning purposes, many cities choose to supplement these data. The City of Santa Monica has recently adopted the updated Land Use and Circulation Element (LUCE) of its General Plan, which projects housing and population growth in the City to 2030. The LUCE population and housing unit projections intend to supplement SCAG growth projections, which are particularly low for this City. Therefore, 2020 population and housing numbers for the City of Santa Monica are based on the LUCE. The City of Santa Monica is currently working with SCAG on the 2012 RTP so that SCAG's housing and population growth projection numbers are aligned with the City of Santa Monica's Land Use and Circulation Element. For the County of Los Angeles and the WCCOG Subregion, the SCAG 2020 projections are used (**Table 4.13-3**).

TABLE 4.13-3: POPULATION AND HOUSING GROWTH						
Area	Existing (2010)	Projection	Projected Growth	% Growth	Proposed Project	% of Projected Growth
POPULATION (PERSONS)						
County of Los Angeles	9,818,605	11,329,829 /a/	1,511,224	15.4%	672	<1%
WCCOG Subregion	238,847	244,878 /a/	6,031	2.5%	672	11.14%
City of Santa Monica	89,736	100,579 /b/	10,843	12%	672	6.2%
HOUSING (UNITS)						
County of Los Angeles	3,445,076	3,666,631 /a/	221,555	6.4%	393	<1%
WCCOG Subregion	116,181	119,207 /a/	3,026	2.6%	393	13%
City of Santa Monica	50,912	52,385 /b/	1,473	3%	393	27%
Note: In general, SCAG growth projections become less accurate for smaller geographies. In the case of the City of Santa Monica, the 2008 RTP underestimated the 2010 housing projections by almost 5,000 units. As the 2010 U.S. Census figures are being used for the existing settings, it is not a useful analysis to compare it with a lower number, as this would indicate a projected loss of units, which would not be correct. The City of Santa Monica recently adopted the updated LUCE which provides population and housing projections which are more in line with observed growth in the City. The growth projection available in the LUCE EIR is for the year 2030. The 2020 housing figure was calculated using an interpolation of the 2010 Census existing figure and the 2030 LUCE projection. For population estimates, the persons-per-household figure of 1.92 was used as presented in the LUCE Final EIR. /a/ Projections are from 2008 SCAG RTP for year 2020. /b/ Projections are from the 2010 LUCE EIR for year 2020. SOURCE: Southern California Association of Governments, <i>Regional Transportation Plan</i> , 2008; City of Santa Monica, <i>Land Use and Circulation Element Final Environmental Impact Report</i> , April 2010; and TAHA, 2011.						

The population and housing growth due to the proposed project would comprise less than one percent of the County of Los Angeles 2020 SCAG population and housing growth projections, and approximately 11 and 13 percent of the WCCOG Subregion 2020 SCAG population and housing growth projections, respectively. The project's 393 housing units would not exceed the 2020 LUCE population and housing growth projections for the City of Santa Monica, comprising approximately 6.2 percent of the projected

³Of the 109 existing mobile home spaces, only 76 have a dwelling unit on it. However, for a conservative impact analysis for population growth, population for the proposed project was estimated without taking credit for the existing residents.
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population growth and 27 percent of the projected housing growth (**Table 4.13-3**). Therefore, the proposed project would not result in a population increase that exceeds City estimates. Impacts would be less than significant.

Mitigation Measures

Population impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact PH-2 The proposed project would displace all 109 mobile home spaces at the project site. However, these rent-controlled housing units would be replaced, on a one-for-one basis in the new development so no net loss of rent controlled housing occurs. The proposed project would include a mix of rent-control, affordable, and market rate housing units on the project site, resulting in a net increase in housing. Therefore, no net loss of housing is anticipated, and this impact would be less than significant.

As part of the implementation of the proposed project, all of the 109 mobile home spaces would be displaced. The proposed project includes the development of 166 apartment units (of which 109 would be rent-controlled, 52 would be deed restricted as affordable housing, and 57 would be market rate) and 227 market rate condominiums.

According to the Santa Monica City Charter Article 1803(t)(ii) (“Rent Control Law”), a removal permit from the Rent Control Board is required for removal of the rent-controlled mobile home spaces, and as such permit will require a one-for-one replacement of affordable, rent-controlled units. The proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Of these, at least 15 percent (or 16 units) must be at rents affordable by persons of low income. The proposed project would include 52 units that would be deed restricted as affordable housing. The proposed project would result in a net increase in housing. Therefore, the proposed project would not displace substantial number of housing; impacts would be less than significant.

Mitigation Measures

Housing displacement impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact PH-3 The proposed project would displace existing residents living on the project site. The proposed project would require approval of a relocation plan for existing residents. Residents would be given the option to relocate to the new affordable units constructed as part of the proposed project. If the resident does not want to relocate to one of these affordable housing units, they would be assisted in their relocation efforts. Therefore, this impact would be less than significant.

As part of the implementation of the proposed project, the existing 76 mobile homes would be displaced. Therefore, existing Village Trailer Park residents would need to be relocated. The Development Agreement between the City and the developer will ~~include~~ be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be

developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Upon implementation of the relocation provisions of the Development Agreement, population displacement impacts would be less than significant.

Mitigation Measures

Population displacement impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The analysis presented previously (see Table 4.13-3) compares the proposed project's population to forecasted cumulative population and housing growth between 2010-2020 in the City of Santa Monica, the County of Los Angeles, and the WCCOG Subregion. As determined previously, the proposed project's population would not exceed population and housing forecasts in 2020. Therefore, cumulative population and housing growth impacts would be less than significant.

Relative to the displacement of housing and people, similar to the project, future related projects occurring on development sites with existing housing would be required to address displacement on a case-by-case basis. Therefore, the proposed project would not contribute to a cumulative impact on displacement of housing and population.

4.14 PUBLIC SERVICES AND RECREATION

This section of the EIR addresses the impacts that implementation of the proposed project could have on public services, including fire and paramedic services, police protection services, public schools, parks and recreation, and public libraries.

EXISTING SETTING

Fire Protection and Paramedic Services

The City of Santa Monica Fire Department (SMFD) provides fire protection and paramedic services to the City.

The SMFD receives and provides additional fire protection and paramedic service support to the City of Los Angeles Fire Department (LAFD) and other fire departments within Los Angeles County that have agreed to participate in the State Civil Defense Master Mutual Aid Agreement. The SMFD has an automatic-aid agreement with the LAFD. Under the automatic-aid agreement between the SMFD and the LAFD, fire protection and paramedic units would be dispatched to a pre-defined area. Also, LAFD would assist the SMFD by responding to large-scale emergencies when specific fire equipment is required. In addition, the City is participant to the State's California Disaster and Civil Defense Master Mutual Aid Agreement. The City is within Area A of the Mutual Aid Region I and obtains or provides mutual aid through the Region I, Area A coordinator.¹

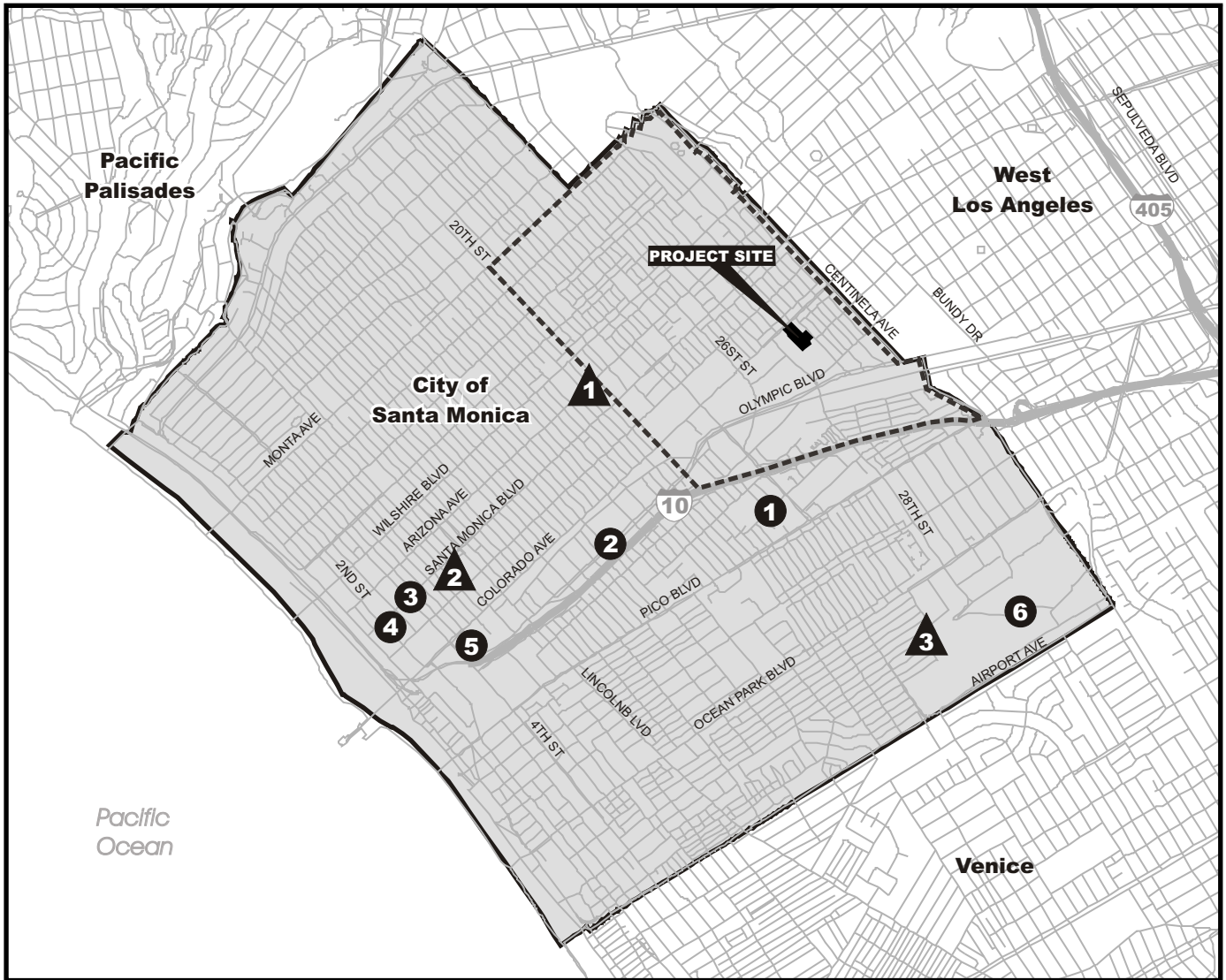
The project site is served by Fire Stations 3, 1, and 5 of the SMFD and is not within any of the pre-defined areas indicated in the automatic-aid agreement between SMFD and LAFD.² **Table 4.14-1** lists the address, staffing assignments, equipment, and response route distance of the SMFD fire stations that serve the project site. **Figure 4.14-1** shows the locations of the fire stations serving the project site

TABLE 4.14-1: FIRE STATIONS SERVING PROJECT SITE				
Fire Station	Address	Equipment	Staffing /a/	Distance (miles) from Site
Station 3	1302 19 th Street	Engine Company 3 Engine Company 4	2 Fire Captains 2 Fire Engineers 5 Firefighters	0.9
Station 1	1444 7 th Street	Engine Company 1 Engine Company 6 Truck 1 Rescue/Utility 1	1 Battalion Chief 3 Fire Captains 3 Fire Engineers 1 Tiller 6 Firefighters	1.4
Station 5	2450 Ashland Avenue	Engine Company 5 Aircraft Rescue 5	1 Fire Captain 1 Fire Engineer 2 Firefighters	1.4


/a/ At least two members of each engine company are Paramedics.
SOURCE: City of Santa Monica Fire Department, Walter Shirk, Division Chief Support Services, Written Correspondence, December 20, 2010.

¹Region I of the Mutual Aid Regions is comprised of Los Angeles, Orange, San Luis Obispo, Santa Barbara, and Ventura Counties. Region A is Los Angeles County.

²City of Santa Monica Fire Department, Walter Shirk, Division Chief Support Services, Written Correspondence, December 20, 2010.



LEGEND:

- | | | | | | |
|--|----------------|---|-------------------------------|---|--------------------------|
|  | Project Site |  | City of Santa Monica |  | SMPD Beat A-6 Boundaries |
|  | Fire Stations |  | Police Facilities | | |
| 1. | Fire Station 3 | 1. | Pico Neighborhood Sub-station | | |
| 2. | Fire Station 1 | 2. | Police Activities League | | |
| 3. | Fire Station 5 | 3. | Harbor Office | | |
| | | 4. | Downtown Sub-station | | |
| | | 5. | SMPD Headquarters | | |
| | | 6. | Airport Security Office | | |

SOURCE: TAHA, 2011.

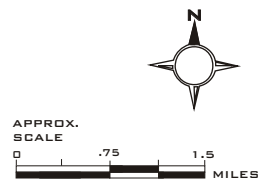


FIGURE 4.14-1

FIRE STATIONS AND POLICE FACILITIES

Fire Station 3 is located at 1302 19th Street, is approximately 0.9 miles southwest from the project site, and is the primary responding fire station to the project site. Fire Station 3 has two engine companies and a hazardous materials apparatus. Engine Company 3 and 4, of Fire Station 3, are the primary and secondary responding apparatuses to the project site and have a service area of 1.997 and 0.758 square miles, respectively. The most direct response route from Fire Station 3 to the project site is 1.2 miles. During 2010, Fire Station 3 responded to a total of 3,754 calls, of which 40 were related to structural fire emergencies and 3,715 were related to other emergency calls.³

Fire Station 1 is located at 1444 7th Street, is approximately two miles southwest from the project site, and is the secondary responding fire station to the project site. Fire Station 1 has two engine companies, one fire truck, and a rescue/utility truck. Engine Company 1 and 6 are the third and fourth responding apparatuses to the project site and have a service area of 0.758 and 1.124 square miles, respectively. The most direct response route from Fire Station 1 to the project site is 1.9 miles. During 2010, Fire Station 1 responded to a total of 4,356 calls, of which 38 were related to structural fires and 4,318 were related to other emergency calls.⁴

Fire Station 5 is located at 2450 Ashland Avenue, is approximately one mile southwest from the project site, and is the third responding fire station to the project site. Fire Station 5 has one engine company and one aircraft rescue. Engine Company 5 is the sixth response apparatus to the project site and has a service area of 1.838 square miles. The most direct response route from Fire Station 5 to the project site is 1.7 miles. During 2010 Fire Station 5 received a total of 1,294 calls, of which 14 were related to structural fires and 1,280 were related to other emergency calls.⁵

Police Protection Services

The City of Santa Monica Police Department (SMPD) provides police protection services to the City. In addition, the SMPD receives and provides police protection services to the Los Angeles County Sheriff's Department and the City of Los Angeles Police Department through mutual aid agreements.

The SMPD is staffed by 214 sworn officers and 233 civilian personnel.⁶ The City does not use an officer-to-resident service ratio to determine department-wide staffing because there are external and internal factors that would make such a standard inaccurate. External and internal factors include, but are not limited to, visitors to the City, the large non-residential work force, tourist seasons, and the homeless population. SMPD deployment of its officers is based upon its patrol plan which entails assigning an officer for every square mile of the City 24 hours a day, seven days a week. In addition, the SMPD deploys its Crime Impact Team to high crime areas based on the latest crime statistical data. Furthermore, the SMPD Neighborhood Resource Officer Program assigns a dedicated police officer to each beat, or patrol area. This three-prong approach to police officer deployment ensures that there is adequate police service throughout the City and the patrol area of the project site.⁷

The SMPD headquarters is located at 333 Olympic Drive in the City of Santa Monica. Equipment is maintained at the headquarters location. In addition, SMPD operates two substations: one in Downtown at 1433 2nd Street and the other at 350 Santa Monica Pier.

SMPD patrol of the City is organized into eight beats. Each beat is staffed by a Neighborhood Resource Officer and a Crime Prevention Coordinator. The project site is within the patrol area of Beat A-6, which has four officers assigned for patrol. There is adequate level of police service within Beat A-6. Beat A-6

³City of Santa Monica Fire Department, Walter Shirk, Division Chief Support Services, Written Correspondence, December 20, 2010.

⁴*Ibid.*

⁵*Ibid.*

⁶Santa Monica Police Department, *2010 Year in Review*, 2011.

⁷Santa Monica Police Department, Chief of Police Timothy J. Jackman, written correspondence, dated September 28, 2010.

shares the same boundaries as SMPD reporting district 6A.⁸ **Table 4.14-2** lists the number of Part I crime offenses that have occurred within the City and Beat A-6 during the year beginning on August 1, 2009 and ending on July 31, 2010. **Figure 4.14-1**, above, shows the locations of the SMPD facilities throughout the City.

TABLE 4.14-2: CRIME STATISTICS WITHIN CITY OF SANTA MONICA AND PATROL BEAT A-6									
Geography	Murder	Rape	Robbery	Aggravated Assault	Burglary	Larceny-theft	Grand Theft Auto	Arson	Total
Santa Monica	2	9	159	163	406	2,466	163	27	3,395
Beat A-6	0	1	23	17	74	327	20	16	478

SOURCE: City of Santa Monica Police Department, Kevin McGowan, Assistant to the Chief of Police, e-mail correspondence, dated October 1, 2010.

Over the past year, there were 3,395 reported Part I crime offenses within the City. The crime rate within the City was approximately 37 Part 1 crime offenses per 1,000 persons.⁹ Of the 3,395 City-wide Part I crime offenses, there were 2 murder, 9 rape, 159 robbery, 163 aggravated assault, 406 burglary, 2,466 larceny-theft, 163 grand theft auto, and 27 arson offenses.

Over the past year, there were 478 reported Part I crime offenses and 1,230 emergency calls within Beat A-6. The crime rate within Beat A-6 was approximately 31 crime offenses per 1,000 persons, which is below the City-wide crime rate.¹⁰ Of the 478 Part I crime offenses within Beat A-6, there was 1 rape, 159 robberies, 17 aggravated assaults, 406 burglaries, 327 larceny-thefts, 20 grand theft autos, and 16 arson offenses.

Public Schools

The Santa Monica-Malibu Unified School District (SMMUSD) provides public K-12 education to the Cities of Santa Monica and Malibu. SMMUSD operates 11 elementary schools, 4 middle schools, 3 high schools, an off-campus learning center, a child development school, and an adult education center. During the 2011/2012 school year, the SMMUSD had an enrollment of 11,562 students.¹¹

The project site is served by the SMMUSD McKinley Elementary School, Lincoln Middle School, and Santa Monica High School. **Table 4.14-3** lists the address, current enrollment, enrollment capacity, and seating shortage of the schools serving the project site. It also shows that all schools serving the project site are currently experiencing a seating shortage. The location of each public school serving the project site is shown in **Figure 4.14-2**.

TABLE 4.14-3: SCHOOLS SERVING THE PROJECT SITE				
School	Location	Current Enrollment (students)	Enrollment Capacity (seats)	Seating Overage/(Shortage)
ELEMENTARY SCHOOL				
McKinley	2401 Santa Monica Boulevard	422	414	(8)
MIDDLE SCHOOL				
Lincoln	1501 California Avenue	1,118	1,037	(81)
HIGH SCHOOL				
Santa Monica	601 Pico Boulevard	3,015	2,926	(89)

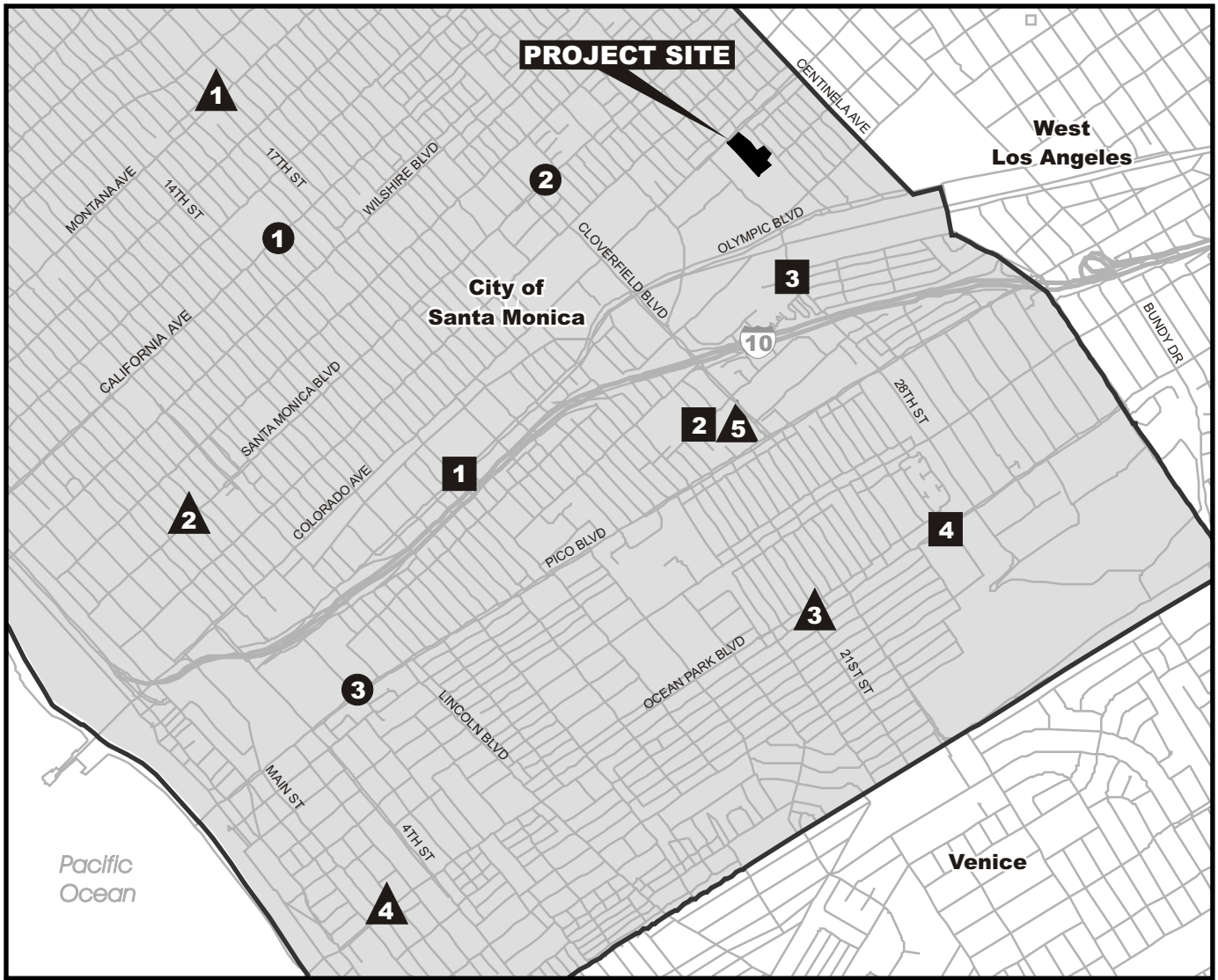
SOURCE: Santa Monica-Malibu Unified School District, *School Facility Fee Study*, June 9, 1997.; Santa Monica-Malibu Unified School District, Chief Financial Officer Janece L. Maez, written correspondence, September 2010. ; City of Santa Monica, *Land Use and Circulation Element Final Environmental Impact Report*, April 2010.

⁸Santa Monica Police Department, Chief of Police Timothy J. Jackman, written correspondence, dated September 28, 2010

⁹The Crime rate is calculated with the following equation: [total crimes/total population] x 1,000 persons.

¹⁰The population within Beat A-6 is 15,580 persons and was determined by reviewing the population statistics from the 2000 US Census for the following Census Block Groups: 060377012021, 060377016011, 060377016012, 060377016013, 060377016014, 060377016021, 060377016022, 060377016023, 060377017011, 060377017012, 060377017013, 060377018011, 060377018012, and 060377018015.

¹¹Santa Monica-Malibu Unified School District, *School Facility Fee Study*, June 9, 1997.



LEGEND:

Project Site

City of Santa Monica

Public School

Public Library

Public Park

- 1. Lincoln Middle School
- 2. McKinley Elementary School
- 3. Santa Monica High School

- 1. Montana Avenue Branch Library
- 2. Main Branch Library
- 3. Fairview Branch Library
- 4. Ocean Park Branch Library
- 5. Pico Branch Library (Opening Fall 2012)

- 1. Memorial Park
- 2. Virginia Park
- 3. Stewart Park
- 4. Clover Park

SOURCE: TAHA, 2011.

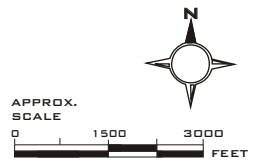


FIGURE 4.14-2

Parks and Recreation

The City's Cultural and Community Services Department (CCSD) operates park and recreation facilities that serve City residents. Currently, the CCSD operates 26 City park and recreation facilities.¹² The City's 26 park and recreation facilities provide 122 acres of park and recreation space to City resident, which is considered an adequate level of service.¹³ The City parks and recreation facilities are intended to serve all residents of the City and, therefore, do not have a service radius or specific residential population to be served. Furthermore, the CCSD does not employ a park acreage-to-resident service ratio/standard to determine the level of service of parks to City residents.

The nearest City park and recreation facilities to the project site are the Clover, Memorial, Stewart, and Virginia Parks. **Table 4.14-4** lists the address, size, and distance from the project site of the nearest park and recreation facilities to the project site. **Figure 4.14-2**, above, shows the locations of the four closest City parks.

TABLE 4.14-4: PARKS SERVING THE PROJECT SITE			
Park	Address	Size(acres)	Distance from Project Site(miles)
Clover Park	2600 Ocean Park Boulevard	17.9	1.10
Memorial Park	1401 Olympic Boulevard	10.4	1.03
Stewart Park	Stewart St and Delaware Avenue	3.8	0.31
Virginia Park	2200 Virginia Avenue	9.5	0.67

SOURCE: City of Santa Monica Cultural and Community Services Department, *Santa Monica Parks*, Available at: <http://www01.smgov.net/parks/parklist.htm>, Date Accessed December 14, 2010, and TAHA, 2011.

Public Libraries

The City of Santa Monica Public Library (SMPL) provides library services and materials to City residents. The SMPL operates four branch libraries throughout the City. The City branch libraries are intended to serve all City residents and, therefore, do not have a service radius or specific residential population to be served. In addition, the SMPL does not have a service ratio or standard for its libraries. The SMPL provides library services and materials in response to community demand. The SMPL only calculates per capita costs, which is \$188 for the fiscal year 2010/2011.^{14,15} **Table 4.14-5** lists the address, facility size, library material volume, staffing, and distance from the project site of the four branch libraries. **Figure 4.14-2**, above, shows the location of each SMPL branch library.

TABLE 4.14-5: CITY OF SANTA MONICA PUBLIC LIBRARIES					
Library	Address	Facility Size (sq ft)	Number of Library Materials	Staff Size /a/	Distance from Project Site (miles)
Main Branch	601 Santa Monica Boulevard	104,000	308,000	88	1.74
Montana Avenue Branch	1704 Montana Avenue	7,517	45,000	6	1.39
Fairview Branch	2101 Ocean Park Boulevard	7,735	50,000	7	1.26
Ocean Park Branch	2601 Main Street	8,435	28,000	6	2.23

/a/ Staff size is in full-time equivalents.
SOURCE: City of Santa Monica Public Library, Claudia Fishler, Assistant City Librarian, e-mail correspondence, September 7, 2010.

¹²City of Santa Monica, *Comprehensive Parks List*, Available at: <http://www01.smgov.net/parks/parklist.htm>, Date Accessed: September 13, 2010.

¹³City of Santa Monica Cultural and Community Services Department, Julie Silliman, Senior Administrative Analyst, telephone conversation, dated September 8, 2010.

¹⁴The SMPL 2010/2011 Fiscal Year Budget is \$10,950,760 and the 2010 population figure used to calculate per capita costs is 92,703 persons.

¹⁵City of Los Angeles Public Library, Claudia Fishler, Assistant City Librarian, e-mail correspondence, September 7, 2010.

The nearest SMPL facilities to the project site are the Fairview and Montana Branch Libraries. The Fairview Branch Library is located at 2101 Ocean Park Boulevard, approximately 1.26 miles south of the project site. It is a 7,735-square-foot facility that contains 50,000 library materials and has a staff of seven full-time employees. The Montana Avenue Branch Library is located at 1704 Montana Avenue, approximately 1.38 miles west of the project site, and is a 7,517-square foot facility containing 45,000 library materials and a staff of six full-time employees.

The SMPL is currently planning and designing a new library facility, the Pico Branch Library. The Pico Branch Library would be built on a portion of a City-owned property, located at 2200 Virginia Avenue, in Virginia Avenue Park. Construction of the library is anticipated to begin in the Fall 2011. It is expected to be open to the public in Winter 2013 and will be an 8,300 square-foot facility projected to have 35,000 library materials. Staffing at the Pico Branch Library is expected to be a minimum of seven full-time employees.¹⁶

REGULATORY FRAMEWORK

State

California Fire Code. Title 24, Part 9 of the California Code of Regulations (CCR) is the California Fire Code. It sets forth regulations regarding building standards, fire protection, notification systems, devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. The 2007 California Fire Code is the incorporation of the 2006 International Fire Code of the International Code Council with necessary California amendments. The proposed project would be subject to applicable regulations of the California Fire Code.

California Government Code Section 65995. California Government Code Section 65995 is found in Title 7, Chapter 4.9 of the California Government Code. It authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. Senate Bill 50 (SB 50) amended Government Code Section 65995 in 1998. Under the provisions of SB 50, schools can collect fees to offset costs associated with increasing school capacity as a result of development. The proposed project would be subject to applicable fees determined by the SMMUSD and in compliance with California Government Code Section 65995.

California Government Code Section 66477. California Government Code Section 66477 was established by the passage of the Quimby Act in 1975. It authorizes cities and counties to pass ordinances to require developers to set aside land, donate land, provide conservation easements, or pay fees for park improvements. The City of Santa Monica does not have a Quimby Act ordinance; however, as discussed below, the Santa Monica Municipal Code does establish requirements relating to the payment of Parks and Recreation Facilities tax.

Local

City of Santa Monica Municipal Code Chapter 8.40. The City of Santa Monica Municipal Code (SMMC) Chapter 8.40 is the City's Fire Code. The City adopted the State Fire Code as its fire code and amended provisions to include requirements of the International Fire Code for occupancies that are not subject to the State Fire Code. The proposed project would be subject to building regulations and requirements of the City's Fire Code.

City of Santa Monica Municipal Code Chapter 8.44. The SMMC Chapter 8.44 is the City's Fire and Life Safety Prevention Requirements. The purpose of the Chapter 8.44 is to promote public safety and welfare by reducing the cumulative impact of certain individual construction and building projects that each have the potential to increase the demand for rescue and fire suppression resources of the City.

¹⁶City of Los Angeles Public Library, Claudia Fishler, Assistant City Librarian, e-mail correspondence, September 7, 2010.

Chapter 8.44 requires new and certain existing buildings to have approved automatic fire extinguishing and detection systems, standpipes, fire resistive doors, and/or other features. The City requirements for the aforementioned design requirements are intended to significantly reduce the potential demand for simultaneous incidents on emergency resources. The proposed project would be subject to the regulations of Chapter 8.44.

City of Santa Monica Municipal Code Chapter 6.80. The SMMC Chapter 6.80 is the Unit Dwelling Tax. SMMC Chapter 6.80 created a Park and Recreation Facilities Fund which would keep receipts of the Unit Dwelling Tax. Tax revenue collected pursuant to SMMC Chapter 6.80 would be used to acquire, improve, expand, public park, playground, and/or recreation facilities within the City. The Park and Recreation Facilities Fund and Unit Dwelling Tax were created to address the increased demand for park and recreation facilities that is associated with the City's increasing residential population. The proposed project would be subject to the tax requirements of SMMC Chapter 6.80.

City of Santa Monica Municipal Code Section 9.04.10.12. The SMMC Section 9.04.10.12 are the City's project mitigation measures, which include the Office Mitigation Fee.¹⁷ The project mitigation measures are intended to satisfy the project mitigation measures of the City's Land Use and Circulation Element. The City's project mitigation measures are applicable to general office development in the City that is in excess of 15,000 square feet of new construction or 10,000 square feet of additions to existing development. A developer may satisfy the City's project mitigation measures, in accordance with SMMC Section 9.04.10.12, by paying an in-lieu fee and/or provide low- and moderate-income housing and/or developing new park space on or off the project site. In-lieu fees received from a developer is deposited in the City Housing and Park Mitigation Funds. The proposed project would be subject to the requirements of SMMC Chapter 6.80.

City of Santa Monica Open Space Element. The Open Space Element of the City of Santa Monica General Plan identifies specific objectives and policies focused on establishing a long-range vision for the future development of parks and open spaces. It is directed toward developing and maintaining a diversified and balanced system of high-quality, publically accessible open space areas and recreational facilities throughout the City. Policies in the Open Space Element include, but are not limited to, transforming surface parking lots, expanding the open space role through shared use of certain facilities, encouraging open space and recreational use of alleys and street ends, and utilizing streets to form open space. The proposed project would be subject to the applicable objectives and policies of the Santa Monica Open Space Element.

City of Santa Monica Land Use and Circulation Element. The City of Santa Monica Land Use and Circulation Element (LUCE) was adopted on July 6, 2010 and incorporates the community's most fundamental values into the land use and transportation policies to preserve and enhance the City of Santa Monica¹⁸ The LUCE identifies goals related to parks and recreation, along with policies aimed toward achieving each goal. The following goals are identified in the LUCE:

- Increase the amount of open space in the City and improve the quality and character of existing open space areas ensuring access for all residents;
- Expand the amount, quality, diversity, and inter-connectivity of parks, open spaces, and recreational facilities throughout the city; and
- Develop a comprehensive system of pedestrian-friendly, green streets and recreational pathways.

¹⁷City of Santa Monica, *Office Mitigation Fee – Housing & Redevelopment*, Available at: http://www01.smgov.net/housing/Office_Mitigation_Fee.htm, Accessed on February 28, 2011.

¹⁸City of Santa Monica, *2010 Land Use and Circulation Element*, available at <http://www.shapethefuture2025.net>, accessed November 2010.

The proposed project would be subject to the applicable policies relating to parks and recreation identified in the LUCE.

THRESHOLD OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to public services and recreation if it would:

- Cause 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:
 - Fire protection
 - Police protection
 - Schools
 - Parks
 - Libraries
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and/or
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

IMPACTS

Buildout of the proposed project includes the construction of 166 apartments, 227 condominium units, and 117,044 square feet of commercial/retail space. The proposed project would result in a residential population and employment growth of 672 persons and 228 employees/jobs, respectively. In addition, the proposed project would dedicate land for the Pennsylvania Street roadway extension and the New Road.

Impact PS-2 The proposed project would incrementally increase demand on the SMPD. However, the increase would not significantly affect services ratios, response times, or other performance objectives and would not require the construction of new police facilities. Impacts would be less than significant.

The increased residential and employment activity within the project site is anticipated to incrementally increase the demand of fire protection and paramedic services of the SMFD. The demand for fire protection and paramedic services by the proposed project could require the SMFD to increase staffing and/or equipment at the fire stations serving the project site. However, the proposed project is not anticipated to require the SMFD to expand existing facilities, or construct new facilities to maintain its level of service (i.e., response times). This is because of the relative proximity of the project site to Fire Station 3 (less than one mile).

In addition, the proposed project would separate the block that contains the project site by dedicating land for the Pennsylvania Street roadway extension and New Road. The new roadways would increase the SMFD access options to the project site and be constructed in accordance with the City and State Fire Codes to accommodate all SMFD fire apparatus. Furthermore, the SMFD would review site and building plans as well as the structures prior to issuance of Certificate of Occupancy in order to ensure that the required fire protection safety features, including building sprinklers and emergency access, are implemented.

The City of Santa Monica also allocates funding to the SMFD during the annual budget process, the amount of which is based on cumulative development and the changing needs of the City. Through this process, funding for additional staffing or equipment needs would be addressed as the needs arise.

Therefore, the proposed project would not require new or expanded fire protection facilities; impacts would be less than significant.

Mitigation Measures

As described above, the developer is required to incorporate applicable Fire Code standards into final site and building plans. The SMFD would review plans and inspect construction of the project. No mitigation beyond these standard requirements is necessary.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact PS-2 The proposed project would incrementally increase demand on the SMPD. However, the increase would not significantly affect services ratios, response times, or other performance objectives and would not require the construction of new police facilities. Impacts would be less than significant.

The increased residential and employment activity within the project site is anticipated to incrementally increase the demand on police protection services and emergency calls for service placed to the SMPD. The proposed project is an infill development in an urban area where service is already established. The proposed project would construct the Pennsylvania Street roadway extension and New Road. These new roadways would improve SMPD emergency access to the project site by providing additional options to access the project site.

The proposed project would involve an increase in the density on-site (through more housing units) and the land use (by providing commercial and office space), which has the potential to incrementally increase the number of police service calls to the site. The SMPD's level of service is determined by the patrol plan, the Crime Impact Team's response to the crime rate within an area of the City, and permanent staffing within each patrol beat. If additional police service is needed for increased volume of emergency calls related to the proposed project, the SMPD would respond by deploying additional officers from other beats throughout the City. Deployment of officers from other patrol beats to respond to calls for service to the proposed project would reduce response times. To maintain adequate service, as measured by response times, the SMPD is anticipated to deploy additional officers. However, the proposed project is not anticipated to require the SMPD to construct new facilities, or to expand existing police facilities within the City to maintain its service (e.g., officer deployment City-wide).

In addition, as required during the Development Agreement and project approval process, the applicant would be required to consult with the SMPD regarding crime prevention features appropriate for the design of the proposed project and subsequently, would be required to submit plot plans for review and comment. The plans would be required to incorporate design guidelines relative to security and semi-public and private spaces which may include, but not be limited to, access control to buildings, secured parking facilities, wall/fences with key systems, well-illuminated public and semi-public and private spaces, which may include access control to buildings, secured parking facilities, walls/fences with key systems, well-illuminated public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provisions of security guard patrol if needed. The applicant 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 SMPD. Any additional design features identified by the SMPD will be incorporated into the proposed project's final design and to the satisfaction of SMPD, prior to issuance of a Certificate of Occupancy for the project.

Funding for additional staffing and equipment is allocated to the SMPD through the City's budget process and is not directly tied to individual development projects. The proposed project and other additional

growth in the City will help increase funding, which could be allocated to the SMPD to maintain adequate levels of service. Therefore, the proposed project would not result in the need for new or expanded police protection services; impacts would be less than significant.

Mitigation Measures

The proposed project would have less-than-significant-impacts related to police protection services.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact PS-3 The proposed project would be expected to generate additional school-age students. However, with payment of required school impact fees, impacts would be reduced to less than significant.

The proposed project includes the development of residential and commercial uses that would be expected to result in an increase in school-age children in the SMMUSD. **Table 4.14-6** shows the number of students that would be generated by the proposed project. As shown, the proposed project would potentially generate a total of 68 students that would consist of 33 elementary school students, 15 middle school students, and 20 high school students. Students generated by commercial uses would be negligible.

TABLE 4.14-6: ESTIMATED STUDENT GENERATION OF THE PROPOSED PROJECT					
Use	Quantity	Students Generated			
		Elementary School /a/	Middle School /a/	High School /a/	Total Students
Multi-family Housing	393 dwelling units	33	15	20	68
<small>/a/ The residential SMMUSD student generation rate for elementary schools (K-5) is 0.083 students per dwelling unit, the residential SMMUSD student generation rate for middle schools (6-8) is .038 students per dwelling unit, and the residential SMMUSD student generation rate for high schools (9-12) is .051 students per dwelling unit. SOURCE: Santa Monica-Malibu Unified School District, <i>School Facility Fee Study</i>, June 9, 1997.</small>					

McKinley Elementary School currently exceeds its enrollment capacity by eight students. The proposed project could increase enrollment at McKinley Elementary School by 33 students and could result in the elementary school exceeding its capacity by 41 students.

Lincoln Middle School currently exceeds its enrollment capacity by 81 students. The proposed project could increase enrollment at Lincoln Middle School by 15 students and could result in the middle school exceeding its capacity by 96 students.

Santa Monica High School currently exceeds its enrollment capacity by 89 students. The proposed project could increase enrollment at Santa Monica High School by 20 students and could result in the high school exceeding its capacity by 109 students.

However, the proposed project’s impacts on schools would be mitigated by the proposed project’s compliance with California Government Code 65995. Developers of the proposed project are expected to comply with this code and pay the school facility fees, as determined by the SMMUSD, prior to construction. Per Section 65996 of the California Government Code, compliance with Section 65995 is “deemed to provide full and complete school facilities mitigation” and, for the purposes of CEQA, would therefore reduce impacts on the schools serving the project site. Therefore, the proposed project would not require construction of new school facilities; impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required. The applicable required State mandated school impact fees would be collected at the time of building permit issuance. No mitigation beyond this standard requirement is needed.

Level of Impact After Mitigation

The payment of applicable required State mandated school impact fees is considered full mitigation for the proposed project's impacts under CEQA. Following payment of these fees, impacts to schools would be less than significant.

Impact PS-4 The proposed project would incrementally increase demand on local parks. However, this demand would not exceed the capacity of local parks. Therefore, impacts would be less than significant.

The increased residential population and day-time workers associated with the proposed project are anticipated to increase the demand for City park and recreation facilities. The CCSD has determined that the existing City parks could accommodate the additional residents and employees created by the proposed project. Also, the proposed project would provide additional open space opportunities, in the form of residential and public court yards, to residents and day-time workers. Thus, increased use of existing park and recreation facilities associated with the proposed project is not anticipated to accelerate the physical deterioration of existing City park and recreation facilities. The proposed project would not require the construction of new park and recreation facilities, or the expansion of existing ones.¹⁹ Therefore, the proposed project would result in a less-than-significant impact related to parks.

Mitigation Measures

Impacts related to parks and recreation would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to parks and recreation would be less than significant.

Impact PS-5 The proposed project would incrementally increase the demand for public libraries. However, the increase would not result in the construction for new or expanded facilities. Therefore, impacts would be less than significant.

The increased residential population at the project site is anticipated to increase the demand of library services of the SMPL. SMPL library services are provided in response to community demand. Therefore, the population increase represented by the proposed project (672 persons) would not be substantial relative to the existing City population of 89,736. Further, construction of new, or expansion of existing library facilities in the City is not singularly connected to increased library service demand attributed to individual or groups of development projects. City funding, such as bond measures, redevelopment agency funding, and/or general fund monies would fund and initiate the planning, design, and construction of new, or expansion of existing, library facilities. Consequently, the SMPL is not anticipated to construct new facilities or expand existing library facilities to accommodate the proposed project. Therefore, the proposed project would not require new public libraries; impacts would be less than significant.

¹⁹City of Santa Monica Community and Cultural Services Department, Julie Silliman, Senior Administrative Analyst, e-mail correspondence, September 13, 2010.

Mitigation Measures

Library impacts would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to public libraries would be less than significant without mitigation.

CUMULATIVE IMPACTS

Projected population and employment growth in the City would result in the addition of new residents and workers to the City of Santa Monica. Based on a cumulative development as projected in the LUCE (Section 4.13 Population and Housing), population in Santa Monica would increase by 10,843 persons. The cumulative rise in population attributable to the proposed project and related projects would increase the demand for fire and police protection services. Compliance with building and site development standards as well as review required by the SMFD and SMFD for new residential development would mitigate cumulative development impacts to fire and police protection services to less-than-significant levels.

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. Cumulative development in the City would increase enrollment in the SMMUSD. As previously noted, the three SMMUSD schools serving the project site are operating over student capacity. However, as related projects are approved, they would be required to pay the full statutory fee allowed by the provisions of SB 50. With the payment of these fees, cumulatively impacts on school would be less than significant.

Related projects in the City of Santa Monica generally consist of residential and commercial uses and do not include large recreational facilities, although it is expected that most of the related projects would include some open spaces such as courtyards, paseos, or urban plazas. Buildout of the proposed project would result in an increase in residents and, as a result, would increase the demand on open space and recreational facilities within the City. Chapter 6.80 of the SMMC includes a Unit Dwelling Tax and a Park and Recreation Facilities Fund, which were created to address the increased demand for park and recreation facilities associated with the City's increasing residential population. The proposed project and related projects would be subject to the SMMC as well as the goals and policies set forth in the City's General Plan, which would ensure that the proposed project's demand for parks and recreation facilities are met. Therefore, cumulatively impacts related to recreational facilities would be less than significant.

As previously mentioned, the City branch libraries are intended to serve all City residents and, therefore, do not have a service radius or specific residential population to be served. Library services are provided in response to community demand. The residential increase associated with the proposed project, as well as other residential development associated with related projects could increase the demand for public library facilities. However, as the demand for libraries increases, library services are anticipated to increase. Therefore, cumulative impacts related to library services would be less than significant.

4.15 TRANSPORTATION AND TRAFFIC

This section provides an overview of transportation and traffic and evaluates the operational traffic impacts associated with the proposed project. Topics addressed include intersection impacts, neighborhood street segment impacts, site access and circulation, and the Congestion Management Plan (CMP). This section was prepared utilizing the *Draft Traffic Study for the Village Trailer Park* prepared for the proposed project by Fehr & Peers. The traffic study is included in its entirety in Appendix F to this EIR.

EXISTING SETTING

Existing Regional Roadway System

Regional access to the project site is provided by the Santa Monica Freeway (I-10), the San Diego Freeway (I-405), Pacific Coast Highway, and Lincoln Boulevard (SR-1). I-10 is approximately 0.5 miles south of the project site and provides east-west access across the City of Santa Monica to the City of Los Angeles to the east. From the I-10, access to the project site is available via interchanges at Bundy Drive, Centinela Avenue, Cloverfield Boulevard, and 20th Street. I-405 is approximately two miles east of the project site and provides north-south access throughout the City of Los Angeles and connects the Westside with the San Fernando Valley to the north and South Bay area to the south. From I-405, access to the project site is available either via I-10 or via the Santa Monica Boulevard and Olympic Boulevard/Pico Boulevard ramps. The Pacific Coast Highway is approximately two miles west of the project site and provides north-south coastal access. From the Pacific Coast Highway, access to the project site is available either via I-10 or Olympic Boulevard. Lincoln Boulevard is approximately 1.5 miles west of the project site and provides north-south access across the City of Santa Monica and City of Los Angeles and terminates at the Los Angeles International Airport. From Lincoln Boulevard, access to the project site is available through arterial and collector streets such as Olympic Boulevard and Colorado Avenue.

Existing Local Street System

The streets surrounding the proposed project are described below based on their designations in the City of Santa Monica Land Use and Circulation Element (LUCE):¹

- **Boulevards** – Boulevards are regional transportation corridors with continuous mixed used and commercial land uses. Boulevards in the study area include Wilshire Boulevard, Santa Monica Boulevard and Pico Boulevard.
- **Avenue: Major** – These streets serve regional automobile trips and provide access for all modes of transportation. They are designed to discourage regional auto traffic from using Secondary or Minor Avenues. Examples of these Major Avenues include Centinela Avenue (south of Olympic Boulevard), Cloverfield Boulevard (between Santa Monica Boulevard and Pico Boulevard) and 26th Street (between Broadway and Cloverfield Boulevard).
- **Avenue: Secondary** – These streets distribute auto trips onto Minor Avenues and Neighborhood Streets, often serving regional bicycle trips. Examples of Secondary Avenues in the project area include Centinela Avenue (between Wilshire Boulevard and Olympic Boulevard), Broadway (west of 26th Street), Colorado Avenue, Ocean Park Boulevard (between 20th Street and 25th Street), 23rd Street and Cloverfield Boulevard (between Pico Boulevard and Ocean Park Boulevard) and 20th Street (between Wilshire Boulevard and Pico Boulevard).

¹Prior to the recent 2010 of the updated LUCE, the City of Santa Monica's Circulation Element classified streets in the City as either arterial, collector, or local streets. The 2010 LUCE has adopted a different typology for streets in the City (e.g., Boulevards, Avenues, Neighborhood Streets, etc.), but the City's significance criteria have not yet been revised to reflect the updated street classifications.

- Avenue: Minor – These are street that connect Neighborhood Streets with other avenues. Examples of Minor Avenues include Arizona Avenue (between Lincoln Boulevard and 23rd Street), Broadway (east of 26th Street), Nebraska Avenue, Stewart Street/28th Street (north of Ocean Park Boulevard) and 20th Street (between Pico Boulevard and Ocean Park Boulevard).
- Neighborhood Street – These streets primarily serve abutting buildings. Examples of Neighborhood Streets include Princeton Street, Harvard Street, Stanford Street, Yale Street, Berkeley Street, Franklin Street and Pennsylvania Avenue (east of Stewart Street).

Existing Traffic Conditions

An analysis of existing traffic conductions was conducted for the following 56 study intersections within the vicinity of the project site.

1. 20th Street/Wilshire Boulevard
2. 20th Street/Santa Monica Boulevard
3. 20th Street/Colorado Avenue
4. 20th Street/Olympic Boulevard
5. 20th Street/I-10 Westbound On-Ramp
6. 20th Street/I-10 Eastbound Off-Ramp
7. 23rd Street/Pico Boulevard
8. 23rd Street/Ocean Park Boulevard
9. Cloverfield/Santa Monica Boulevards
10. Cloverfield Boulevard/Broadway
11. Cloverfield Boulevard/Colorado Avenue
12. Cloverfield/Olympic Boulevards
13. Cloverfield Boulevard/I-10 Westbound Off-Ramp
14. Cloverfield Boulevard/I-10 Eastbound On-Ramp
15. Cloverfield/Pico Boulevards
16. Cloverfield/Ocean Park Boulevards
17. 26th Street/Wilshire Boulevard
18. 26th Street/Santa Monica Boulevard
19. 26th Street/Broadway
20. 26th Street/Colorado Avenue
21. 26th Street/Olympic Boulevard
22. Yale Street/Wilshire Boulevard
23. Yale Street/Santa Monica Boulevard
24. Yale Street/Broadway
25. Yale Street/Colorado Avenue
26. Stewart Street/Colorado Avenue
27. Stewart Street/Pennsylvania Avenue
28. Stewart Street/Olympic Boulevard
29. Stewart/28th Streets
30. 28th Street/Ocean Park Boulevard
31. Stanford Street (west)/Colorado Avenue
32. Stanford Street (east)/Colorado Avenue
33. Centinela Avenue (east)/Wilshire Boulevard
34. Centinela Avenue/Santa Monica Boulevard
35. Centinela Avenue/Broadway/Ohio Avenue
36. Centinela/Colorado/Idaho Avenues
37. Centinela Avenue/Pennsylvania/Iowa Avenues
38. Centinela/Nebraska Avenues

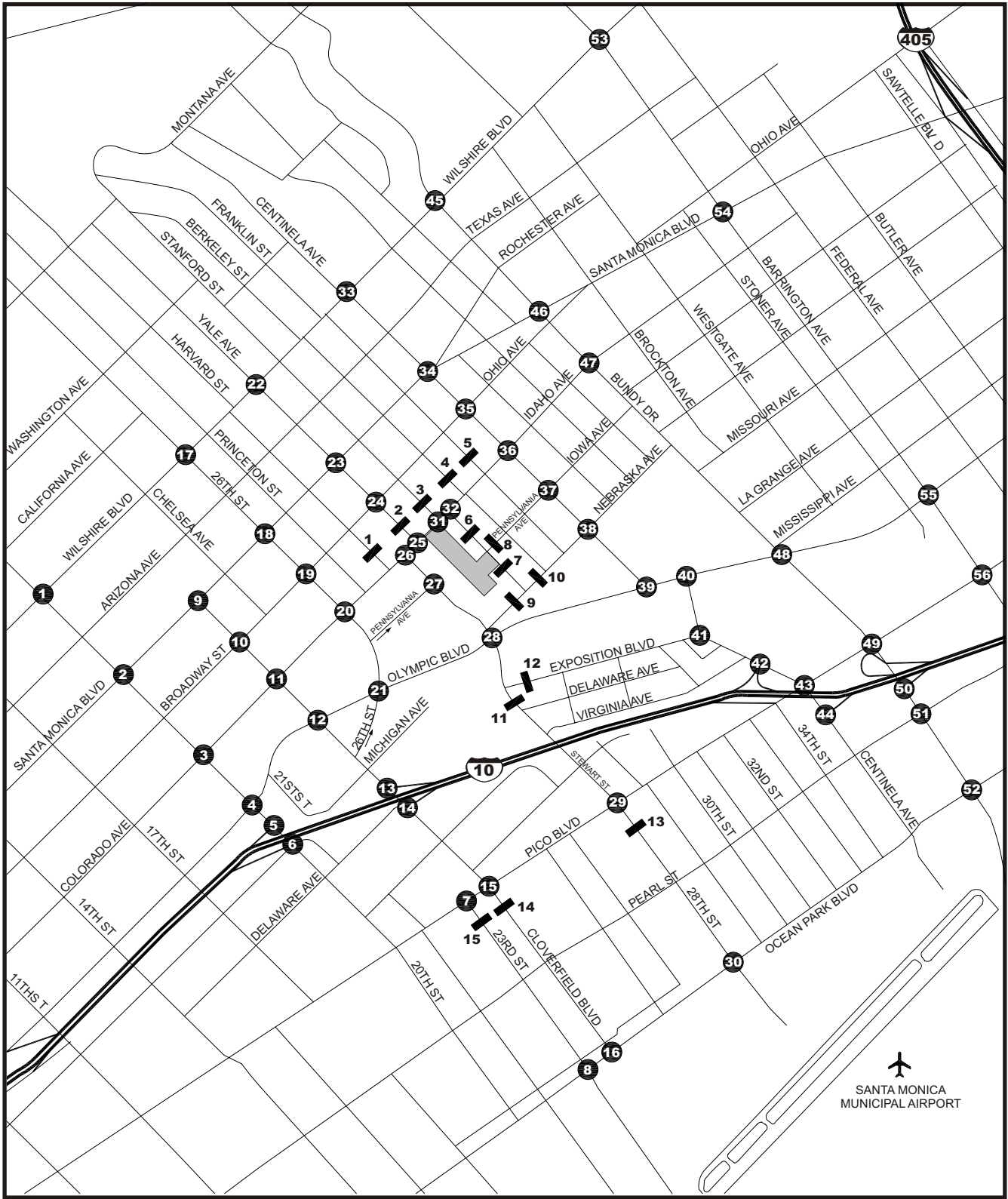
39. Centinela Avenue (west)/Olympic Boulevard
40. Centinela Avenue (east)/Olympic Boulevard
41. Centinela Avenue/Exposition Boulevard
42. Centinela Avenue/I-10 Westbound Ramps
43. Centinela Avenue/Pico Boulevard
44. Centinela Avenue/I-10 Westbound Ramps
45. Bundy Drive/Wilshire Boulevard
46. Bundy Drive/Santa Monica Boulevard
47. Bundy Drive/Idaho Avenue
48. Bundy Drive/Olympic Boulevard
49. Bundy Drive/Pico Boulevard
50. Bundy Drive/I-10 Eastbound ramps
51. Bundy Drive/Pearl Street
52. Bundy Drive/Ocean Park Boulevard
53. Barrington Avenue/Wilshire Boulevard
54. Barrington Avenue/Santa Monica Boulevard
55. Barrington Avenue/Olympic Boulevard
56. Barrington Avenue/Pico Boulevard

Of the 56 intersections, 48 are controlled by traffic signals. The location of the 56 study intersections is shown in **Figure 4.15-1**. The traffic control type of the eight unsignalized intersections is listed in **Table 4.15-1**.

TABLE 4.15-1: UNSIGNALIZED STUDY INTERSECTIONS	
ALL-WAY STOP-CONTROLLED INTERSECTION	
Yale Ave./Broadway	
TWO-WAY STOP-CONTROLLED ON MINOR APPROACHES WITH NO CONTROLS FOR MAJOR APPROACHES	
Yale Ave./Colorado Ave.	
Stewart St./Pennsylvania Ave.	
Stanford St. (west)/Colorado Ave.	
Stanford St. (east)/Colorado Ave.	
Centinela Ave./Exposition Ave.	
Centinela Ave./Pennsylvania Ave./Iowa Ave.	
UNCONTROLLED (NORTHBOUND LEFT-TURNING TRAFFIC MUST YIELD TO ONCOMING SOUTHBOUND TRAFFIC)	
20 th St./I-10 Westbound On-Ramp	
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i> , October 2011.	

The 56 study intersections evaluated in this section are either under the jurisdiction of the City of Santa Monica (32 intersections), under shared jurisdiction between the City of Santa Monica and City of Los Angeles (12 intersections), or under the jurisdiction of the City of Los Angeles (12 intersections). **Table 4.15-2** indicates the study intersections and jurisdictions they operate under.

TABLE 4.15-2: STUDY INTERSECTION JURISDICTIONS		
Intersections	Number of Intersections	Jurisdiction
Intersections 1-32	32	City of Santa Monica
Intersections 33-44	12	City of Santa Monica and City of Los Angeles
Intersections 45-56	12	City of Los Angeles
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i> , October 2011.		



LEGEND:

- Project Site
- Analyzed Intersection
- Analyzed Street Segment

SOURCE: Fehr & Peers, 2010.

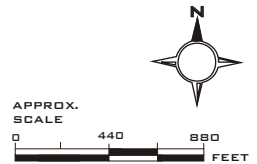


FIGURE 4.15-1
STUDY INTERSECTIONS

Existing Traffic Volumes

Traffic volume data for both the weekday morning (7:30 to 9:30 a.m.) and afternoon (5:00 to 7:00 p.m.) peak periods (collected in fall 2007) was obtained from the City of Santa Monica’s TRAFFIX database for 37 of the 56 study intersections. For the remaining 19 study intersections, new traffic volume data was collected in 2008, 2009, or 2010. See the Traffic Study in Appendix F for figures of the existing traffic volumes at the 56 intersections.

Existing Level of Service

The adopted methodology of the City of Santa Monica for intersection analysis is the “Operational Analysis” method from *Highway Capacity Manual* (HCM) (Transportation Research Board, 2000). The HCM method was employed to perform signalized intersection level of service (LOS) analysis at all signalized study intersections, including those partially or wholly under the jurisdiction of the City of Los Angeles.

The City of Los Angeles Department of Transportation (LADOT) uses a different methodology, the Critical Movement Analysis (CMA) method (Transportation Research Board, 1980), for signalized intersection capacity analysis. The signalized intersections under a shared jurisdiction between the City of Santa Monica and the City of Los Angeles and those intersections wholly under the jurisdiction of the City of Los Angeles have been analyzed using the CMA methodology.

The City of Santa Monica’s TRAFFIX database was used to develop the LOS for the HCM and CMA methodology. LOS categories range from excellent, nearly free-flow traffic at LOS A to overloaded, stop-and-go traffic conditions at LOS F. **Tables 4.15-3 through 4.15-5** provide the LOS definitions for signalized intersections using the HCM technology, signalized intersections using the CMA methodology, and stop-controlled intersections using the HCM methodology, respectively. The LOS definitions, ranges of delay, and ranges of volume-to-capacity (V/C) ratio represent average conditions for all vehicles at an intersection across an entire hour. Delays longer than the average conditions are experienced by motorists in certain movements and/or during peak times within the peak hour.

TABLE 4.15-3: LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS 2000 HCM OPERATIONAL METHODOLOGY		
Level of Service	Average Stopped Delay per vehicle (seconds)	Definition
A	≤10	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	> 10 and ≤ 20	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 20 and ≤ 35	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 35 and ≤ 55	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	> 55 and ≤ 80	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 80	FAILURE. Backups from nearby locations on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

SOURCE: Transportation Board, *Highway Capacity Manual*, 2000.

TABLE 4.15-4: LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS CMA METHODOLOGY		
Level of Service	Volume/Capacity Ratio	Definition
A	0.00 – 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	> 0.600 and ≤ 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 0.700 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 0.800 – 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	> 0.900 – 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.00	FAILURE. Backups from nearby locations on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

SOURCE: Transportation Board, *Transportation Research Circular No. 212, Interim Materials on Highway Capacity*, 1980.

TABLE 4.15-5: LEVEL OF SERVICE DEFINITIONS FOR STOP-CONTROLLED INTERSECTIONS		
Level of Service	Average Control Delay (seconds/vehicle)	
A	≤10.0	
B	> 10.0 and ≤ 15.0	
C	> 15.0 and ≤ 25.0	
D	> 25.0 and ≤ 35.0	
E	> 35.0 and ≤ 50.0	
F	> 50	

SOURCE: Transportation Board, *Highway Capacity Manual*, 2000.

Prior to the recent 2010 of the updated LUCE, the City of Santa Monica’s Circulation Element classified streets in the City as either arterial, collector, or local streets. The City of Santa Monica has designated LOS D as the minimum desirable LOS at arterial intersections and LOS C as the minimum desirable LOS at collector street intersections. The 2010 LUCE has adopted a different typology for streets in the City (e.g., Boulevards, Avenues, Neighborhood Streets, etc.), but the criteria have not yet been revised to reflect the updated street classifications.

The City of Los Angeles has designated LOS D as the minimum acceptable level of service. The minimum desirable LOS allows for substantial queuing and delays at intersections during peak periods. At intersections operating at an undesirable LOS, delays and queuing are greater than what is considered acceptable.

All signalized intersections in the City of Santa Monica were analyzed using the City of Santa Monica’s preferred methodology (i.e., the HCM Methodology). In addition, intersections under a shared jurisdiction between the City of Santa Monica and City of Los Angeles, or wholly under the jurisdiction of the City of Los Angeles were analyzed using the City of Los Angeles’ preferred methodology (i.e., the CMA methodology).

City of Santa Monica – HCM Methodology

The results of the LOS analysis of existing weekday morning and afternoon peak hour conditions at study intersections using the HCM methodology are summarized in **Table 4.15-6**. The following intersections were determined to operate at an unacceptable LOS during AM and/or PM peak hours under existing conditions:

8. 23rd Street/Ocean Park Boulevard (LOS F during AM and PM peak hours)

TABLE 4.15-6: EXISTING INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY						
No.	Intersection	Class /a/	PEAK HOUR	EXISTING		
				V/C	Delay /b/	LOS
1	20th St./ Wilshire Blvd.	A	AM	1.374	34	C
		A	PM	1.380	38	D
2	20th St./ Santa Monica Blvd.	A	AM	1.070	24	C
		A	PM	0.975	20	B
3	20th St./ Colorado Ave.	A	AM	0.763	14	B
		A	PM	0.757	14	B
4	20th St./ Olympic Blvd.	A	AM	1.009	54	D
		A	PM	0.800	36	D
5	20th St./ I-10 WB On-Ramp /d/ [worst approach only] [worst approach only]	C	AM	n/a	1	A
		C	PM	n/a	1	A
			AM	n/a	9	A
			PM	n/a	13	B
6	20th St./ I-10 EB Off-Ramp	C	AM	0.652	14	B
		C	PM	0.850	18	B
7	23rd St./ Pico Blvd.	A	AM	0.912	19	B
		A	PM	0.860	13	B
8	23rd St./ Ocean Park Blvd.	A	AM	1.063	-- /c/	F
		A	PM	1.071	-- /c/	F
9	Cloverfield Blvd./ Santa Monica Blvd.	A	AM	1.123	68	E
		A	PM	0.948	29	C
10	Cloverfield Blvd./ Broadway	A	AM	0.517	11	B
		A	PM	0.578	12	B
11	Cloverfield Blvd./ Colorado Ave.	A	AM	0.732	35	C
		A	PM	0.671	37	D
12	Cloverfield Blvd./ Olympic Blvd.	A	AM	0.838	42	D
		A	PM	0.878	46	D
13	Cloverfield Blvd./ I-10 WB Off-Ramp	A	AM	1.411	-- /c/	F
		A	PM	0.939	22	C
14	Cloverfield Blvd./ I-10 EB On-Ramp	A	AM	1.028	31	C
		A	PM	1.500	-- /c/	F
15	Cloverfield Blvd./ Pico Blvd.	A	AM	0.655	25	C
		A	PM	0.715	26	C
16	Cloverfield Blvd./ Ocean Park Blvd.	A	AM	0.968	-- /c/	F
		A	PM	0.885	51	D
17	26th St./ Wilshire Blvd.	A	AM	0.850	28	C
		A	PM	1.066	55	D
18	26th St./ Santa Monica Blvd.	A	AM	0.992	24	C
		A	PM	0.981	31	C
19	26th St./ Broadway	A	AM	0.688	12	B
		A	PM	0.700	14	B
20	26th St./ Colorado Ave.	A	AM	0.790	18	B
		A	PM	0.803	20	B
21	26th St./ Olympic Blvd.	A	AM	0.691	31	C
		A	PM	0.859	37	D
22	Yale St./ Wilshire Blvd.	A	AM	0.818	14	B
		A	PM	0.936	28	C
23	Yale St./ Santa Monica Blvd.	A	AM	0.645	10	A
		A	PM	0.798	17	B
24	Yale St./ Broadway /e/	C	AM	0.789	19	C
		C	PM	1.083	49	E

TABLE 4.15-6: EXISTING INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY						
No.	Intersection	Class /a/	PEAK HOUR	EXISTING		
				V/C	Delay /b/	LOS
25	Yale St./ Colorado Ave. /f/	C	AM	n/a	2	A
		C	PM	n/a	2	A
	[worst approach only] [worst approach only]		AM PM	n/a n/a	19 26	C D
26	Stewart St. & Colorado Ave.	C	AM	0.781	32	C
		C	PM	0.870	21	C
27	Stewart St./ Pennsylvania Ave. /f/	C	AM	n/a	1	A
		C	PM	n/a	3	A
	[worst approach only] [worst approach only]		AM PM	n/a n/a	10 11	A B
28	Stewart St. & Olympic Blvd.	A	AM	0.845	30	C
		A	PM	1.279	61	E
29	Stewart St./28th St./ Pico Blvd.	A	AM	0.904	25	C
		A	PM	0.901	23	C
30	28th St./ Ocean Park Blvd.	A	AM	0.730	17	B
		A	PM	0.720	21	C
31	Stanford St. (west)/ Colorado Ave. /f/	C	AM	n/a	1	A
		C	PM	n/a	1	A
	[worst approach only] [worst approach only]		AM PM	n/a n/a	19 16	C C
32	Stanford St. (east)/ Colorado Ave. /f/	C	AM	n/a	1	A
		C	PM	n/a	1	A
	[worst approach only] worst approach only]		AM PM	n/a n/a	20 39	C E
33	Centinela Ave. (east)/ Wilshire Blvd.	A	AM	0.599	6	A
		A	PM	0.626	8	A
34	Centinela Ave./ Santa Monica Blvd.	A	AM	1.035	38	D
		A	PM	0.972	33	C
35	Centinela Ave./ Broadway/Ohio Ave.	A	AM	0.701	13	B
		A	PM	1.325	-- /c/	F
36	Centinela Ave./ Colorado Ave./Idaho Ave.	A	AM	0.747	15	B
		A	PM	1.076	43	D
37	Centinela Ave./Pennsylvania Ave./Iowa Ave. /f/	A	AM	n/a	2	A
		A	PM	n/a	2	A
	[worst approach only] [worst approach only]		AM PM	n/a n/a	20 33	C D
38	Centinela Ave./ Nebraska Ave.	A	AM	0.440	5	A
		A	PM	0.507	8	A
39	Centinela Ave. (west)/ Olympic Blvd.	A	AM	0.686	9	A
		A	PM	0.849	15	B
40	Centinela Ave. (east)/ Olympic Blvd.	A	AM	0.871	16	B
		A	PM	0.706	15	B
41	Centinela Ave./ Exposition Blvd. /f/	A	AM	n/a	1	A
		A	PM	n/a	3	A
	[worst approach only] [worst approach only]		AM PM	n/a n/a	27 29	D D
42	Centinela Ave./ I-10 WB Ramps	A	AM	1.785	-- /c/	F
		A	PM	1.527	-- /c/	F
43	Centinela Ave./ Pico Blvd.	A	AM	0.721	14	B
		A	PM	0.761	14	B
44	Centinela Ave./ I-10 EB On-Ramp	A	AM	0.562	10	A
		A	PM	0.555	7	A
45	Bundy Dr./ Wilshire Blvd.	A	AM	0.780	32	C
		A	PM	0.743	30	C
46	Bundy Dr./ Santa Monica Blvd.	A	AM	0.500	21	C
		A	PM	0.605	22	C

TABLE 4.15-6: EXISTING INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY

No.	Intersection	Class /a/	PEAK HOUR	EXISTING		
				V/C	Delay /b/	LOS
47	Bundy Dr./ Idaho Ave.	A	AM	0.609	9	A
		A	PM	0.701	13	B
48	Bundy Dr./ Olympic Blvd. /g/	A	AM	0.929	47	D
		A	PM	1.022	58	E
49	Bundy Dr./ Pico Blvd. /g	A	AM	0.791	19	C
		A	PM	1.388	--/c/	F
50	Bundy Dr./ I-10 EB On-Ramp /g	A	AM	1.531	-- /c/	F
		A	PM	0.869	16	B
51	Bundy Dr./ Pearl St.	A	AM	0.622	6	A
		A	PM	0.737	16	B
52	Bundy Dr./ Ocean Park Blvd.	A	AM	0.962	24	C
		A	PM	1.279	61	E
53	Barrington Ave./ Wilshire Blvd.	A	AM	0.744	23	C
		A	PM	0.933	25	C
54	Barrington Ave./ Santa Monica Blvd.	A	AM	0.614	13	B
		A	PM	0.583	13	B
55	Barrington Ave./ Olympic Blvd. /g/	A	AM	0.816	27	C
		A	PM	1.253	-- /c/	F
56	Barrington Ave./ Pico Blvd.	A	AM	0.832	20	B
		A	PM	0.872	23	C

/a/ Class A is an arterial intersection. Class C is a collector intersection.
 /b/ Average stopped delay per vehicle, in seconds.
 /c/ Indicates oversaturated conditions. Delay cannot be calculated.
 /d/ Northbound left turn is yield-controlled. All other movements (northbound through, southbound through/right) are uncontrolled.
 /e/ Intersection is a four-way stop.
 /f/ Intersection controlled by stop signs on the minor approaches.
 /g/ Intersection saturation flow was adjusted based on empirical peak information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

- 9. Cloverfield/Santa Monica Boulevards (LOS E during AM peak hour)
- 13. Cloverfield Boulevard/I-10 Westbound Off-Ramp (LOS F during AM peak hour)
- 14. Cloverfield Boulevard/I-10 Eastbound On-Ramp (LOS F during PM peak hour)
- 16. Cloverfield/Ocean Park Boulevards (LOS F during AM peak hour)
- 24. Yale Street/Broadway (LOS E during PM peak hour)
- 28. Stewart Street/Olympic Boulevard (LOS E during PM peak hour)
- 32. Stanford Street (east)/Colorado Avenue (LOS E during PM peak hour)
- 35. Centinela Avenue/Broadway/Ohio Avenue (LOS F in the PM peak hour)
- 36. Centinela/Colorado/Idaho Avenues (LOS D during the PM peak hour)
- 41. Centinela Avenue/Exposition Boulevard (LOS D during the AM peak hour and PM peak hour)
- 42. Centinela Avenue/I-10 Westbound Ramps (LOS F during AM and PM peak hours)
- 48. Bundy Drive/Olympic Boulevard (LOS E during the PM peak hour)
- 49. Bundy Drive/Pico Boulevard (LOS F during the PM peak hour)
- 50. Bundy Drive/I-10 Eastbound Ramps (LOS F during AM peak hour)
- 55. Barrington Avenue/Olympic Boulevard (LOS F during the PM peak hour)

City of Los Angeles – CMA Methodology

The results of the LOS analysis of existing weekday morning and afternoon peak hour conditions at study intersections using the CMA methodology are summarized in **Table 4.15-7**. The following intersections were determined to operate at an unacceptable LOS during AM and/or PM peak hours under existing conditions:

- 34. Centinela Avenue/Santa Monica Boulevard (LOS E during AM and PM peak hours)
- 35. Centinela Avenue/Broadway/Ohio Avenue (LOS E during PM peak hour)

TABLE 4.15-7: EXISTING INTERSECTION LEVELS OF SERVICE CITY OF LOS ANGELES ANALYSIS METHODOLOGY - CMA					
No.	Intersection	Class /a/	EXISTING		
			V/C /b/	Delay /c/	LOS
33	Centinela Ave. (east)/ Wilshire Blvd.	A	0.561	n/a	A
		A	0.595	n/a	A
34	Centinela Ave./ Santa Monica Blvd.	A	0.942	n/a	E
		A	0.906	n/a	E
35	Centinela Ave./ Broadway/Ohio Ave.	A	0.607	n/a	B
		A	0.967	n/a	E
36	Centinela Ave./ Colorado Ave. /Idaho Ave.	A	0.832	n/a	D
		A	1.233	n/a	F
37	Centinela Ave./ Pennsylvania Ave./Iowa Ave. /d/	A	n/a	n/a	n/a
		A	n/a	n/a	n/a
38	Centinela Ave./ Nebraska Ave.	A	0.440	n/a	A
		A	0.562	n/a	A
39	Centinela Ave. (west)/ Olympic Blvd.	A	0.657	n/a	B
		A	0.909	n/a	E
40	Centinela Ave. (east)/ Olympic Blvd.	A	0.767	n/a	C
		A	0.677	n/a	B
41	Centinela Ave./ Exposition Blvd. /d/	A	n/a	n/a	n/a
		A	n/a	n/a	n/a
42	Centinela Ave./ I-10 WB Ramps	A	1.659	n/a	F
		A	1.522	n/a	F
43	Centinela Ave./ Pico Blvd.	A	0.730	n/a	C
		A	0.835	n/a	D
44	Centinela Ave./ I-10 EB On-Ramp	A	0.535	n/a	A
		A	0.527	n/a	A
45	Bundy Dr./ Wilshire Blvd.	A	0.794	n/a	C
		A	0.752	n/a	C
46	Bundy Dr./ Santa Monica Blvd.	A	0.563	n/a	A
		A	0.659	n/a	B
47	Bundy Dr./ Idaho Ave.	A	0.646	n/a	B
		A	0.763	n/a	C
48	Bundy Dr./ Olympic Blvd. /e/	A	1.012	n/a	F
		A	1.127	n/a	F
49	Bundy Dr./ Pico Blvd.	A	0.824	n/a	D
		A	1.615	n/a	F
50	Bundy Dr./ I-10 EB On-Ramp /e/	A	1.657	n/a	F
		A	0.922	n/a	E
51	Bundy Dr./ Pearl St.	A	0.544	n/a	A
		A	0.724	n/a	C
52	Bundy Dr./ Ocean Park Blvd.	A	0.975	n/a	E
		A	1.356	n/a	F
53	Barrington Ave./ Wilshire Blvd.	A	0.655	n/a	B
		A	0.694	n/a	B
54	Barrington Ave./ Santa Monica Blvd.	A	0.705	n/a	C
		A	0.618	n/a	B
55	Barrington Ave./ Olympic Blvd.	A	0.845	n/a	D
		A	1.591	n/a	F
56	Barrington Ave./ Pico Blvd.	A	0.765	n/a	C
		A	0.890	n/a	D

/a/ Class A is an arterial intersection. Class C is a collector intersection.
/b/ V/C ratio includes reduction for intersections operating with ATSC capability.
/c/ Average stopped delay per vehicle, in seconds.
/d/ Intersection controlled by stop signs on minor approaches. This intersection was not analyzed since the City of Los Angeles does not have criteria for minor approach stop-controlled intersections.
/e/ Intersection saturation flow was adjusted based on empirical peak hour information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

- 36. Centinela/Colorado/Idaho Avenues (LOS F during PM peak hour)
- 39. Centinela Avenue (west)/Olympic Boulevard (LOS E during PM peak hour)
- 42. Centinela Avenue/I-10 Westbound Ramps (LOS F during AM and PM peak hours)
- 48. Bundy Drive/Olympic Boulevard (LOS F during AM and PM peak hours)
- 49. Bundy Drive/Pico Boulevard (LOS F during PM peak hour)
- 50. Bundy Drive/I-10 Eastbound On-Ramp (LOS F during AM peak hour and LOS E during AM peak hour)
- 52. Bundy Drive/Ocean Park Boulevard (LOS E during AM peak hour and LOS F during the PM peak hour)
- 55. Barrington Avenue/Olympic Boulevard (LOS F during the PM peak hour)

Neighborhood Street Segments

The average daily traffic volume (ADT) was obtained for 15 study street segments within the vicinity of the project site. The locations of the 15 study street segments are listed below and shown in **Figure 4.15-1**, above. The existing average daily traffic volumes for the 15 study street segments are shown in **Table 4.15-8**.

TABLE 4.15-8: EXISTING NEIGHBORHOOD STREET SEGMENT AVERAGE DAILY TRIP VOLUMES				
Segment Number	Location	City	Street Classification	Existing ADT
1	Harvard St., north of Colorado Ave.	Santa Monica	Local	1,053
2	Yale Ave., north of Colorado Ave.	Santa Monica	Local	2,893
3	Stanford St., north of Colorado Ave.	Santa Monica	Local	803
4	Berkeley St., north of Colorado Ave.	Santa Monica	Local	1,715
5	Franklin St., north of Colorado Ave.	Santa Monica	Local	667
6	Stanford St., north of Pennsylvania Ave.	Santa Monica	Local	1,227
7	Stanford St., south of Pennsylvania Ave.	Santa Monica	Local	1,107
8	Pennsylvania Ave. east of Stanford St.	Santa Monica	Local	633
9	Nebraska Ave., west of Stanford St.	Santa Monica	Local	4,017
10	Nebraska Ave., east of Stanford St.	Santa Monica	Local	3,260
11	Stewart St., south of Exposition Blvd.	Santa Monica	Collector	9,150
12	Exposition Blvd., east of Stewart St.	Santa Monica	Local	1,838
13	Stewart St., south of Pico Blvd.	Santa Monica	Collector	6,429
14	Cloverfield Blvd., south of Pico Blvd.	Santa Monica	Collector	8,414
15	23 rd St., south of Pico Blvd	Santa Monica	Collector	8,377

SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

- 1. Harvard Street north of Colorado Avenue
- 2. Yale Street north of Colorado Avenue
- 3. Stanford Street north of Colorado Avenue
- 4. Berkeley Street north of Colorado Avenue
- 5. Franklin Street north of Colorado Avenue
- 6. Stanford Street north of Pennsylvania Avenue
- 7. Stanford Street south of Pennsylvania Avenue
- 8. Pennsylvania Avenue east of Stanford Street
- 9. Nebraska Avenue west of Stanford Street
- 10. Nebraska Avenue east of Stanford Street
- 11. 28th Street south of Exposition Boulevard (collector street)
- 12. Exposition Boulevard east of Stewart Street
- 13. Stewart Street south of Pico Boulevard (collector street)
- 14. Cloverfield Boulevard, south of Pico Boulevard (collector street)
- 15. 23rd Street south of Pico Boulevard (collector street)

Existing Public Transit Service

The study area is served by public transit provided by the City of Santa Monica's Big Blue Bus and Metro. While the project site is accessible by public transportation, there are no bus stops adjacent to the project site. The closest stops are approximately 0.25 miles away, which is about a five-minute walk. When transfer opportunities are considered, the project site is accessible from most of Santa Monica and the Los Angeles metropolitan area. The seven bus routes with stops within a 0.5-mile walking distance of the project site are:

- **Big Blue Bus Line 1 (Santa Monica Boulevard)** – Line 1 runs from the Windward Street/Main Street intersection through downtown Santa Monica to the University of California, Los Angeles (UCLA). Line 1 provides service on Santa Monica Boulevard in the study area north of the project site. Service headways of about ten minutes are provided during weekday peak periods and about 15 minutes during weekday off-peak periods and on weekends. The stop nearest to the project site is at the Yale Avenue and Santa Monica Boulevard intersection.
- **Big Blue Bus Line 5 (Olympic Boulevard-Century City)** – Line 5 runs from downtown Santa Monica to Century City and the Rimpau Transit Center via Colorado Avenue, Olympic Boulevard, and Pico Boulevard. In the study area, Line 5 operates on Colorado Avenue, 26th Street, and Olympic Boulevard. Service headways of about 20 minutes are provided during weekday peak periods and about 30 minutes during weekday off-peak periods and on weekends. The stop nearest to the project site is at the 26th Street and Colorado Avenue intersection.
- **Big Blue Bus Line 6 (SMC Commuter)** – Line 6 runs from the Santa Monica College Main Campus to the Santa Monica College Bundy/Airport Campuses and the City of Los Angeles' Palms neighborhood. In the study area, Line 6 operates eastbound along Pico Boulevard and westbound along Ocean Park Boulevard. Service headways of about 20 minutes are provided during the weekday morning peak periods, and service is not available on weekends or holidays. The stop nearest the project site is at Pico Boulevard and Bundy Drive.
- **Big Blue Bus Line 10 (Santa Monica Freeway Express)** – Line 10 runs from the Ocean Park Boulevard/Main Street intersection through downtown Santa Monica to downtown Los Angeles. In the study area, Line 10 operates on Santa Monica Boulevard west of Bundy Drive and on Bundy Drive between Santa Monica Boulevard and the I-10. Service headways of about 15 minutes are provided during weekday peak periods and about 30 minutes during weekday off-peak periods and on weekends. The stop nearest the project site is at Yale Avenue and Santa Monica Boulevard intersection.
- **Big Blue Bus Line 11 (Campus Connector)** – Line 11 runs along Santa Monica Boulevard between Santa Monica College and the UCLA Hilgard Terminal. In the study area, Line 11 operates along Santa Monica Boulevard and 20th Street. Service headways are about one hour in the morning peak period, and service is not available on weekends or holidays. The stop nearest the project site is at Yale Street and Santa Monica Boulevard.
- **Mini Blue Sunset Ride** – Sunset Ride is a community circulator that provides access to Santa Monica College's dispersed campuses in the central and eastern portions of the City. In the study area, the Sunset Ride operates on Colorado Avenue and Stewart Street (clockwise direction only). Service headways of about 15 to 20 minutes are provided during the weekday, and no service is provided on weekends. The stop nearest the project site is at Stewart Street & Colorado Avenue.

- **Metro Bus Line 4 and Rapid Line 704** – Line 4 and Rapid Line 704 run from downtown Santa Monica to downtown Los Angeles via Santa Monica and Sunset Boulevards. Line 4 provides local service, while Line 704 provides limited-stop service on Santa Monica Boulevard in the study area. Service headways of about 10 minutes are provided during weekday peak periods and about 15 minutes during weekday off-peak periods and on weekends. Line 4 stops at the Yale Avenue and Santa Monica Boulevard intersection, and Line 704 stops at the 26th Street and Santa Monica Boulevard intersection.

Existing Bicycle and Pedestrian Facilities

Bicycle Facilities

The study area has an extensive bicycle and pedestrian network. Existing facilities in the project study area are identified below.

Class II Bicycle Lanes

Class II bicycle facilities are marked bicycle lanes. These facilities are located on-street but have pavement markings separating the lane from vehicular traffic. On roadways with parking, the bicycle lane will be located between the parking lane and the outermost travel lane. The following roadway segments within the project study area have Class II bicycle facilities:

- Arizona Avenue – There are Class II bicycle facilities between Lincoln Boulevard and 26th Street.
- Broadway – There are Class II bicycle facilities between Lincoln Boulevard and Centinela Avenue.

Class III Bicycle Routes

Like Class II facilities, Class III bicycle routes are located on-street. There are no pavement markings but there may be signage indicating the bicycle route and instructing motorists to share the road. The following roadway segments within the project study area have Class III bicycle facilities:

- Arizona Avenue/Texas Avenue – There are Class III bicycle facilities between 26th Street and Westgate Avenue.
- 28th Street/Stewart Street – There are Class III bicycle facilities between Ocean Park Boulevard and Colorado Avenue.
- Yale Street – There are Class III bicycle facilities between Colorado Avenue and Montana Avenue.

Pedestrian Facilities

Sidewalks are typically present on both sides of the street throughout the project study area with the exception of Olympic Boulevard, which has no sidewalk along the north side between 26th Street and Centinela Avenue. Signalized intersections throughout the study area have marked crosswalks and pedestrian signals. Pedestrian walk time is either automatic at the intersection or actuated by pedestrians by push-button. Pedestrian treatments at unsignalized intersections vary between standard crosswalks, high-visibility crosswalks, and no crosswalks. Additionally, there are pedestrian-actuated in-pavement flashers and overhead pedestrian signals at some crossings along arterial roadways in the project study area.

REGULATORY FRAMEWORK

State and Regional

Regional Transportation Plan

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality.

On May 8, 2008, the Regional Council of SCAG adopted the 2008 Regional Transportation Plan (RTP): Making the Connections. The 2008 RTP strives to provide a regional investment framework to address the region's transportation and related challenges, and looks to strategies that preserve and enhance the existing transportation system and integrate land use into transportation planning. The RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic, and commercial limitations.

Based on the most recent RTP, the SCAG region is expected to grow from 17 million people to nearly 23 million by 2030. To prepare for this future growth, SCAG has developed the Compass Blueprint regional planning process. The Compass Blueprint outlines four key principles guiding regional growth:

- Mobility—Getting where we want to go
- Livability—Creating positive communities
- Prosperity—Long-term health for the region
- Sustainability—Promoting efficient use of natural resources

To realize these principles, SCAG encourages the following policies:

- Focusing growth in existing and emerging centers and along major transportation corridors
- Creating significant areas of mixed-use development and walkable communities
- Targeting growth around existing and planned transit stations
- Preserving existing open space and stable residential areas

Congestion Management Plan

To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, the Congestion Management Plan (CMP) was enacted by Proposition 111. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. The Los Angeles County Metropolitan Transportation Authority (Metro), the local CMP agency, has established a Countywide approach to implement the statutory requirements of the CMP. The countywide approach includes designating a highway network that includes all State highways and principal arterials within the County and monitoring the network's LOS standards.

The CMP traffic impact analysis guidelines require analyses of all CMP arterial monitoring intersections where a project could add a total of 50 or more trips during either the AM or PM peak hours of adjacent street traffic. Additionally, all CMP mainline freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours must be analyzed. The nearest CMP arterial

monitoring intersections to the project site are at the Santa Monica Boulevard/Bundy Drive, Santa Monica Boulevard/Cloverfield Boulevard, and Wilshire Boulevard/26th Street intersections. These three intersections are study intersections for the proposed project. The closest CMP mainline freeway monitoring locations are at I-10 freeway at Lincoln Boulevard, I-10 east of Overland Avenue, and I-405 north of Venice Boulevard.

Local

Santa Monica Land Use and Circulation Element (LUCE) provides a framework to integrate land use and transportation to reduce vehicle trips, encourage walking, bicycling and transit use, and create active pedestrian-oriented neighborhoods. The LUCE establishes the goal of achieving no net new evening peak period vehicle trips generated within Santa Monica. Vehicle trip reduction is a primary strategy to achieve this goal. The LUCE proposes the creation of a comprehensive multimodal transportation system that builds on the City's investment in transit and the opportunity offered by the coming of the Metro Exposition Light Rail Transit (LRT) line. The LUCE identifies local strategies that manage trips, with aggressive requirements for trip reduction, transit enhancements, pedestrian and bike improvements, and shared parking. Transportation Demand Measures (TDM) programs that reduce automobile travel demand and incentivize alternative modes such as carpool, vanpools, and shuttles, walking, bicycling, and shared parking are all encouraged. The transportation-related goals contained in the LUCE are presented below.

- Goal LU2: Integrate Land Use and Transportation for Greenhouse Gas (GHG) Emission Reduction—Integrate land use and transportation, carefully focusing new development on transit-rich boulevards and in the districts, to create sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use and improving community quality of life.
- Goal LU4: Complete Sustainable Communities—Create complete neighborhoods that exemplify sustainable living practices with open spaces, green connections, diverse housing, local employment, and local-serving businesses that meet the daily needs of nearby residents and reduce vehicle trips and greenhouse gas.
- Goal LU5: Expo Light Rail Line—Cluster housing, employment, local-serving retail, and services around the Expo Light Rail line to reduce vehicle trips, create complete communities, and support transit.
- Goal LU8: Reduction of Vehicle Trips/Management of Congestion – Establish a complete transportation network that support integrated land use. Ensure that transportation supports human activity and access to land uses through a diverse multimodal transportation system that incentivizes walking, biking and transit and reduces the need for vehicle trips.
- Goal T1: Design and manage Santa Monica's streets to support comprehensive public health and safety.
- Goal T2: Santa Monica's streets should be well maintained.
- Goal T3: Ensure that Santa Monica's streets are pleasant for all users.
- Goal T4: Support local and regional air quality, sustainability and GHG emissions reduction goals through the management of Santa Monica's streets.
- Goal T5: Establish performance measures and design guidelines for the City's transportation system that reflect the LUCE priorities.
- Goal T6: Enable everyone to walk comfortably everywhere in Santa Monica.

- Goal T7: Ensure that walking is safe for everyone, everywhere in Santa Monica.
- Goal T8: Provide a beautiful and attractive pedestrian environment throughout the City.
- Goal T9: Create a complete network of high quality bicycle facilities, with the aim of increasing the number of people who use bicycles for everyday transportation.
- Goal T10: Ensure that the bicycle network is attractive to cyclists of all ages and experience levels.
- Goal T11: Create a safe, comfortable cycling environment in the City through facility design and public education.
- Goal T12: Expand high quality regional rapid transit, including rail service, to improve connections between Santa Monica and the region.
- Goal T13: Increase transit ridership for all types of trips.
- Goal T14: Ensure the financial stability of transit providers.
- Goal T15: Manage local and regional congestion affecting Santa Monica.
- Goal T16: Provide a safe environment for all road users.
- Goal T17: Create a street network that is accessible to all modes of transportation.
- Goal T18: Encourage a more sustainable transportation system.
- Goal T19: Create an integrated transportation and land use program that seeks to limit total peak period vehicle trips with a Santa Monica origin or destination to 2009 levels.
- Goal T20: Manage the transportation system to prioritize flexibility, cost effectiveness and accountability.
- Goal T21: Use all available tools to make the most effective possible use of the transportation system.
- Goal T22: Provide adequate parking availability for residents on residential streets at all times of day.
- Goal T23: Encourage new projects to improve residents' opportunities to find parking.
- Goal T24: Provide adequate parking availability for commuters, visitors, and shoppers throughout the day.
- Goal T25: Design parking to meet applicable urban design goals and minimize negative impacts on pedestrians, bicyclists, and transit users.
- Goal T26: Use parking policies to achieve housing affordability, congestion management and air quality goals.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the proposed project would have a significant impact on transportation and traffic if it would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not

limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;

- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; and/or
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Intersection Analysis

City of Santa Monica Criteria

The City of Santa Monica has established specific CEQA criteria for assessing whether project-related traffic increases would result in significant impacts on intersection operating conditions. The significance criteria, summarized in **Table 4.15-9**, accounts for the classifications of the streets at the intersection (e.g., arterial, collector, or local street) and the operating conditions of the intersection during the approval year (Year 2011) plus project and cumulative (Year 2020) plus project traffic conditions. Functional street classifications are from the City's previous Circulation Element. The 2010 LUCE has adopted a different typology for streets, but the significant criteria has not yet been revised.

TABLE 4.15-9: CITY OF SANTA MONICA SIGNIFICANT IMPACT CRITERIA ARTERIAL AND COLLECTOR INTERSECTIONS		
Base Scenario		Plus Project Scenario
Level of Service	Intersection Type	Significant Impact If:
A, B, or C	Collector Street Intersection	Average vehicle delay is \geq 15 seconds or LOS becomes D, E, or F
	Arterial Street Intersection	Average vehicle delay is \geq 15 seconds or LOS becomes E or F
D	Collector Street Intersection	Any net increase in average seconds of delay per vehicle
	Arterial Street Intersection	Average vehicle delay is \geq 15 seconds or LOS becomes E or F
E	Collector or Arterial Intersection	Any net increase in average seconds of delay per vehicle
F	Collector or Arterial Intersection	HCM V/C ratio net increase is \geq 0.005

SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

The potential significance of a project's impact is measured by either the change in average vehicular delay or by a change in the intersection operating conditions to unacceptable conditions. If the projected LOS is F, however, significance is defined in terms of a change in V/C ratio (as calculated by the HCM operational method), since the average vehicular delay cannot be calculated using the HCM operational method if the intersection exhibits oversaturated traffic conditions.

Based on **Table 4.15-9**, a project would not be considered to have a significant impact at an intersection if, for example, it is on an arterial street operating at LOS D with the addition of project traffic and the incremental change in the average vehicle delay is less than 15 seconds. If the intersection is operating at LOS E after the addition of project traffic and the average vehicle delay increases by any amount, however, this would be considered a significant project impact. All impacts on intersections projected to operate at LOS F are based on the V/C ratio, with project-related increases of 0.005 or greater is considered significant.

The City of Santa Monica significance criteria does not define criteria to determine a significant impact for uncontrolled intersections where the side street is stop-controlled. For the purposes of impact analysis, uncontrolled intersections where the side street is stop-controlled are evaluated by the criteria outlined in **Table 4.15-9** for signalized intersections.

City of Los Angeles Criteria

LADOT has also established threshold criteria that determine if a project has a significant traffic impact at a specific intersection. LADOT significance thresholds are used to evaluate all study intersections that are wholly or partially under the jurisdiction of the City of Los Angeles. The LADOT significance criteria are summarized in **Table 4.15-10**.

TABLE 4.15-10: CITY OF LOS ANGELES SIGNIFICANT IMPACT CRITERIA		
Intersection Condition with Project Traffic		Project-Related Increase in V/C Ratio
Level of Service	V/C Ratio	
C	0.701 – 0.800	Equal or greater than 0.40
D	0.801 – 0.900	Equal to or greater than 0.020
E,F	> 0.901	Equal to or greater than 0.010 Any net increase in average seconds of delay per vehicle
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i> , October 2011.		

Neighborhood Street Segments

The City of Santa Monica has developed criteria to evaluate potential traffic impacts related to neighborhood street segments. The City’s significance criteria to evaluate potential traffic impacts upon a street segment are listed in **Table 4.15-11**. The significance criteria are based on the existing ADT volumes and the projected level of increase in ADT that can be attributed to a project.

TABLE 4.15-11: CITY OF SANTA MONICA SIGNIFICANCE IMPACT CRITERIA – COLLECTOR, FEEDER, AND LOCAL STREETS	
COLLECTOR STREETS	
A transportation impact is significant if the Base ADT is:	Greater than 13,500 and there is a net increase of one trip or more in ADT due to project-related traffic
	Greater than 7,500 but less than 13,500 and the project-related traffic increases the ADT by 12.5% or the ADT becomes 13,500 or more
	Less than 7,500 and the project related traffic increases the ADT by 25%
FEEDER STREETS	
A transportation impact is significant if the Base ADT is:	Greater than 6,750 and there is a net increase of one trip or more in ADT due to project-related traffic
	Greater than 3,750 but less than 6,750 and the project related traffic increases the ADT by 12.5% or the ADT becomes 6,750 or more
	Less than 3,750 and the project related traffic increases the ADT by 25%
LOCAL STREETS	
A transportation impact is significant if the Base ADT is:	Greater than 2,250 and there is a net increase of one trip or more in ADT due to project-related traffic
	Greater than 1,250 but less than 2,250 and the project-related traffic increases the ADT by 12.5% or the ADT becomes 2,250 or more
	Less than 1,250 and the project-related traffic increases the ADT by 25%.
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i> , October 2011.	

METHODOLOGY

The traffic impact analysis is based on an assessment of the following scenarios:

- Approval Year (Year 2011) Conditions – This scenario forecasted the traffic conditions expected at the proposed project approval year in 2011 and provides the baseline by which approval year project impacts were evaluated.
- Approval Year Plus Project (Year 2011) Conditions – This analysis identified the potential direct impacts of the proposed project on existing traffic operating conditions by adding the project-generated traffic to the existing traffic forecasts.
- Cumulative Base (Year 2020) Conditions – This scenario projected the future traffic growth and intersection operating conditions that could be expected from regional growth and known “related projects” in the vicinity of the project site by year 2020. This scenario provides the cumulative “baseline” conditions by which project impacts were evaluated.
- Cumulative Plus Project (Year 2020) Conditions – This analysis identified the potential incremental impacts of the proposed project on future traffic operating conditions by adding the traffic expected to be generated by the project to the cumulative base traffic forecasts. The City of Santa Monica’s Travel Demand Forecasting Model (TDFM) was used to project year 2020 cumulative traffic volumes.

Approval Year (Year 2011) Conditions

Section 15125 of the State CEQA Guidelines directs that:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation [“NOP”] is published, or if no notice of preparation is published at the time environmental analysis is commenced, from both a local and regional perspective. These environmental settings will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant [emphasis added].” (14 Cal. Code Reg. 15125 (a)).

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

For this EIR, the NOP year for existing conditions (2010) is generally used as the baseline environmental setting for analyzing most of the project’s impact areas in this EIR. However, for the analysis of traffic impacts, this EIR uses the project’s approval year of 2011 as the ‘baseline’ environmental setting. The purpose of establishing the project’s approval year as the ‘baseline’ for the analysis for traffic impacts is

that it is a more accurate representation of traffic conditions that change over the time period that the EIR is being prepared. Therefore, an ambient growth rate of 0.8% has been applied to account for increased traffic volume from related projects that have received their Certificates of Occupancy between the NOP date and project’s anticipated approval year and for forecasted traffic growth as substantiated by Southern California Association of Governments (SCAG) projections, LA County Congestion Management Plan (CMP) subarea projections, and the City’s actual historical traffic volume patterns. The decision in *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 125-126, supports this alternative use of baseline traffic levels: “For instance, where the issue involves an impact on traffic levels, the EIR might necessarily take into account the normal increase in traffic over time. Since the environmental review process can take a number of years, traffic levels as of the time the project is approved may be a more accurate representation of the existing baseline against which to measure the impact of the project.” Because an environmental baseline that differs from the date of the NOP is reasonable and results in a more accurate environmental analysis of traffic impacts, this EIR uses the estimated time of project approval (2011) as the baseline for analyzing traffic impacts.

The traffic forecasted for Approval Year (Year 2011) Conditions (shown below in **Table 4.15-12**) uses 2007 intersection turning movement counts obtained from the City of Santa Monica’s TRAFFIX database that are adjusted to reflect Approval Year (Year 2011) Conditions.

TABLE 4.15-12: APPROVAL YEAR (YEAR 2011) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY						
No.	Intersection	Class /a/	PEAK HOUR	APPROVAL YEAR BASE		
				V/C	Delay /b/	LOS
1	20th St./ Wilshire Blvd.	A	AM	1.467	34	D
			PM	1.296	38	D
2	20th St./ Santa Monica Blvd.	A	AM	1.117	26	C
			PM	1.077	22	C
3	20th St./ Colorado Ave.	A	AM	0.797	14	B
			PM	0.798	14	B
4	20th St./ Olympic Blvd.	A	AM	1.025	57	E
			PM	0.827	37	D
5	20th St./ I-10 WB On-Ramp /d/ [worst approach only] [worst approach only]	C	AM	n/a	1	A
			PM	n/a	1	A
			AM	n/a	9	A
			PM	n/a	13	B
6	20th St./ I-10 EB Off-Ramp	C	AM	0.658	14	B
			PM	0.862	19	B
7	23rd St./ Pico Blvd.	A	AM	0.942	21	C
			PM	0.878	13	B
8	23rd St./ Ocean Park Blvd.	A	AM	1.380	-- /c/	F
			PM	1.256	-- /c/	F
9	Cloverfield Blvd./ Santa Monica Blvd.	A	AM	1.144	74	E
			PM	0.971	32	C
10	Cloverfield Blvd./ Broadway	A	AM	0.539	11	B
			PM	0.610	12	B
11	Cloverfield Blvd./ Colorado Ave.	A	AM	0.749	36	D
			PM	0.690	38	D
12	Cloverfield Blvd./ Olympic Blvd.	A	AM	0.779	39	D
			PM	0.889	45	D
13	Cloverfield Blvd./ I-10 WB Off-Ramp	A	AM	1.434	-- /c/	F
			PM	0.962	24	C
14	Cloverfield Blvd./ I-10 EB On-Ramp	A	AM	1.046	35	C
			PM	1.525	-- /c/	F

TABLE 4.15-12: APPROVAL YEAR (YEAR 2011) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY						
No.	Intersection	Class /a/	PEAK HOUR	APPROVAL YEAR BASE		
				V/C	Delay /b/	LOS
15	Cloverfield Blvd./ Pico Blvd.	A	AM	0.669	25	C
		A	PM	0.751	27	C
16	Cloverfield Blvd./ Ocean Park Blvd.	A	AM	1.030	-- /c/	F
		A	PM	0.994	-- /c/	F
17	26th St./ Wilshire Blvd.	A	AM	0.876	28	C
		A	PM	1.090	60	E
18	26th St./ Santa Monica Blvd.	A	AM	1.053	25	C
		A	PM	1.034	39	D
19	26th St./ Broadway	A	AM	0.718	13	B
		A	PM	0.725	14	B
20	26th St./ Colorado Ave.	A	AM	0.816	20	B
		A	PM	0.872	22	C
21	26th St./ Olympic Blvd.	A	AM	0.785	35	C
		A	PM	0.936	44	D
22	Yale St./ Wilshire Blvd.	A	AM	0.835	14	B
		A	PM	1.018	29	C
23	Yale St./ Santa Monica Blvd.	A	AM	0.656	10	A
		A	PM	0.813	17	B
24	Yale St./ Broadway /e/	C	AM	0.832	21	C
		C	PM	1.170	64	F
25	Yale St./ Colorado Ave. /f/	C	AM	n/a	2	A
		C	PM	n/a	3	A
			AM	n/a	20	B
			PM	n/a	28	C
26	Stewart St. & Colorado Ave.	C	AM	0.801	36	D
		C	PM	0.892	22	C
27	Stewart St./ Pennsylvania Ave. /f/	C	AM	n/a	1	A
		C	PM	n/a	3	A
			AM	n/a	10	A
			PM	n/a	11	B
28	Stewart St. & Olympic Blvd.	A	AM	0.987	48	D
		A	PM	1.803	-- /c/	F
29	Stewart St./28th St./ Pico Blvd.	A	AM	1.051	31	C
		A	PM	0.981	26	C
30	28th St./ Ocean Park Blvd.	A	AM	0.740	17	B
		A	PM	0.727	21	C
31	Stanford St. (west)/ Colorado Ave. /f/	C	AM	n/a	1	A
		C	PM	n/a	0	A
			AM	n/a	19	B
			PM	n/a	17	B
32	Stanford St. (east)/ Colorado Ave. /f/	C	AM	n/a	1	A
		C	PM	n/a	1	A
			AM	n/a	21	C
			PM	n/a	44	D
33	Centinela Ave. (east)/ Wilshire Blvd.	A	AM	0.613	6	A
		A	PM	0.640	8	A
34	Centinela Ave./ Santa Monica Blvd.	A	AM	1.053	41	D
		A	PM	0.990	36	D
35	Centinela Ave./ Broadway/Ohio Ave.	A	AM	0.726	14	B
		A	PM	1.392	-- /c/	F
36	Centinela Ave./ Colorado Ave./Idaho Ave.	A	AM	0.780	16	B
		A	PM	1.132	53	D
37	Centinela Ave./Pennsylvania Ave./Iowa Ave. /f/	A	AM	n/a	2	A
		A	PM	n/a	2	A

TABLE 4.15-12: APPROVAL YEAR (YEAR 2011) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY

No.	Intersection [worst approach only] [worst approach only]	Class /a/	PEAK HOUR	APPROVAL YEAR BASE		
				V/C	Delay /b/	LOS
			AM	n/a	21	C
			PM	n/a	34	C
38	Centinela Ave./ Nebraska Ave.	A	AM	0.443	5	A
		A	PM	0.512	8	A
39	Centinela Ave. (west)/ Olympic Blvd.	A	AM	0.692	9	A
		A	PM	0.862	16	B
40	Centinela Ave. (east)/ Olympic Blvd.	A	AM	1.006	19	B
		A	PM	0.727	17	B
41	Centinela Ave./ Exposition Blvd. /f/ [worst approach only] [worst approach only]	A	AM	n/a	3	A
		A	PM	n/a	13	B
			AM	n/a	47	D
			PM	n/a	77	E
42	Centinela Ave./ I-10 WB Ramps	A	AM	1.843	-- /c/	F
		A	PM	1.569	-- /c/	F
43	Centinela Ave./ Pico Blvd.	A	AM	0.826	14	B
		A	PM	0.774	14	B
44	Centinela Ave./ I-10 EB On-Ramp	A	AM	0.567	10	A
		A	PM	0.559	7	A
45	Bundy Dr./ Wilshire Blvd.	A	AM	0.793	32	C
		A	PM	0.756	30	C
46	Bundy Dr./ Santa Monica Blvd.	A	AM	0.506	22	C
		A	PM	0.616	23	C
47	Bundy Dr./ Idaho Ave.	A	AM	0.644	10	A
		A	PM	0.729	13	B
48	Bundy Dr./ Olympic Blvd. /g/	A	AM	0.946	48	D
		A	PM	1.040	60	E
49	Bundy Dr./ Pico Blvd. /g	A	AM	0.807	28	C
		A	PM	1.421	-- /c/	F
50	Bundy Dr./ I-10 EB On-Ramp /g	A	AM	1.550	-- /c/	F
		A	PM	0.930	17	B
51	Bundy Dr./ Pearl St.	A	AM	0.634	6	A
		A	PM	0.746	16	B
52	Bundy Dr./ Ocean Park Blvd.	A	AM	0.812	24	C
		A	PM	1.360	51	D
53	Barrington Ave./ Wilshire Blvd.	A	AM	0.794	24	C
		A	PM	1.051	27	C
54	Barrington Ave./ Santa Monica Blvd.	A	AM	0.622	13	B
		A	PM	0.603	13	B
55	Barrington Ave./ Olympic Blvd. /g/	A	AM	0.797	25	C
		A	PM	1.236	-- /c/	F
56	Barrington Ave./ Pico Blvd.	A	AM	0.860	21	C
		A	PM	0.888	24	C

/a/ Class A is an arterial intersection. Class C is a collector intersection.
 /b/ Average stopped delay per vehicle, in seconds.
 /c/ Indicates oversaturated conditions. Delay cannot be calculated.
 /d/ Northbound left turn is yield-controlled. All other movements (northbound through, southbound through/right) are uncontrolled.
 /e/ Intersection is a four-way stop.
 /f/ Intersection controlled by stop signs on the minor approaches.
 /g/ Intersection saturation flow was adjusted based on empirical peak information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

The following adjustments were made to the TRAFFIX database:

1. Added cumulative development projects with a certificate of occupancy between 2007 traffic counts and the date of the project's NOP (June 2010);
2. Modified intersection geometries with street system improvements constructed between 2007 traffic counts and the date of the NOP (June 2010); and
3. Applied an ambient growth rate of 0.8 percent per year from the date of the project's NOP to expected approval year (2011).

In addition, the Approval Year (Year 2011) Conditions account for the following street system improvement:

- Ocean Park Boulevard from Lincoln Boulevard to 24th Street – Reduce to one lane in each direction (convert through/left lanes into left-turn lanes).

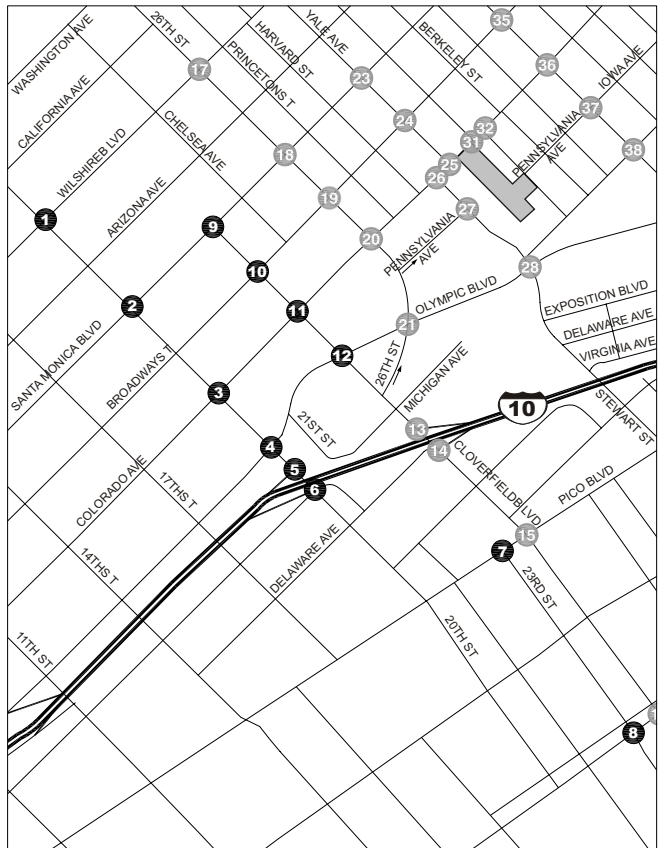
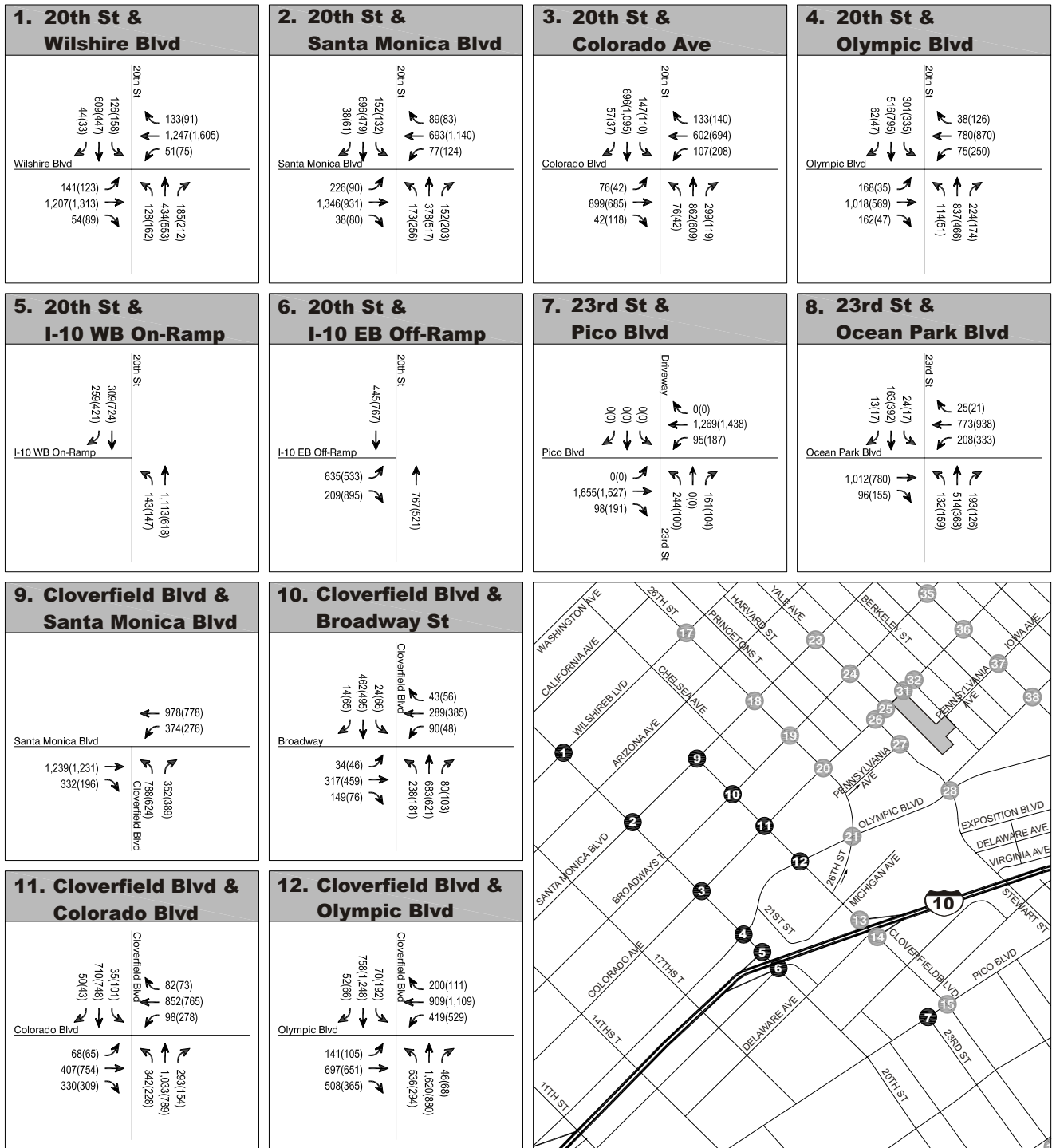
Figure 4.15-2 through **Figure 4.15-6** show Approval Year (2011) Conditions.

Approval Year Plus Project (Year 2011) Conditions

The traffic projections for the proposed project were developed using the following three steps: estimating the trip generation of the project, determining trip distribution, and assigning the project traffic to the roadway system.

Cumulative Base (Year 2020) Conditions

As part of the City's LUCE Update, the City developed its first comprehensive, citywide Travel Demand Forecasting Model (TDFM). The TDFM has a base year of 2008, based on 2008 land use data and 2007 traffic counts scaled up to 2008. The TDFM forecasts future year 2020 (and year 2030) conditions for the City's transportation network in the form of volumes for daily, as well as AM, PM, and weekend peak hours. The model contains the major roadways within the City and considers walking, bicycling, parking, and transit. Unlike less sophisticated transportation models, the TDFM contains a number of enhancements that allow it to capture the effects of LUCE land use and policy initiatives on traffic congestion. These enhancements include the effects of sustainable development patterns (e.g., mixed use and transit oriented development), urban streetscape design factors, alternative transportation networks, parking management, and transportation demand management (TDM) programs. The addition of the Exposition Light Rail line to the City in 2015 is also anticipated to influence mode split for people traveling to and from Santa Monica for both 2020 and 2030 future scenarios. The model also includes all identified related projects and street network changes, as relevant to the appropriate future year. Model volumes are post-processed following standard furnessing guidance from the Transportation Research Board in NCHRP 255. Furnessing is a process that minimizes the error between count volumes and forecast volumes based on the projected magnitude of change at an intersection. To analyze level of service, post-processed model volumes are loaded into the City's TRAFFIX database.

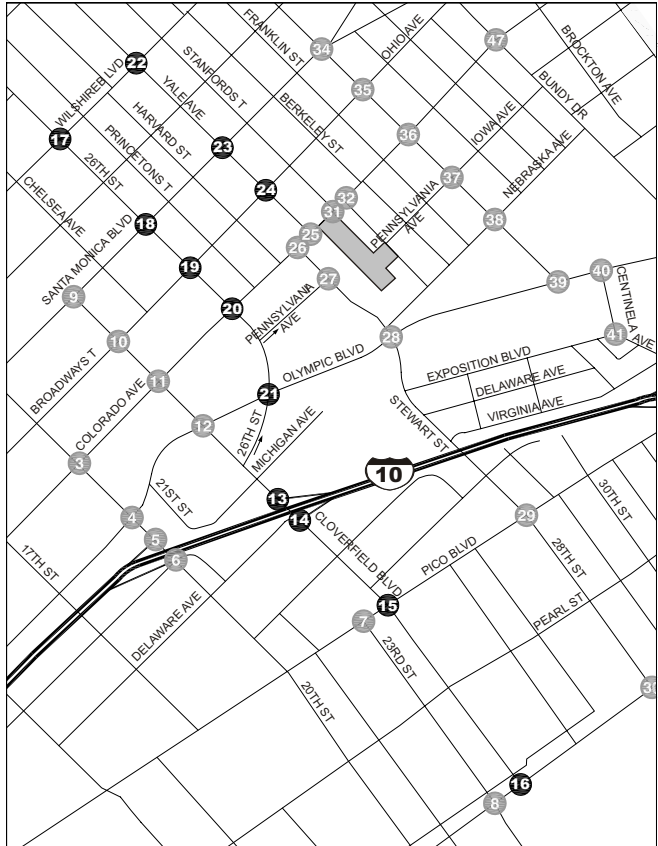
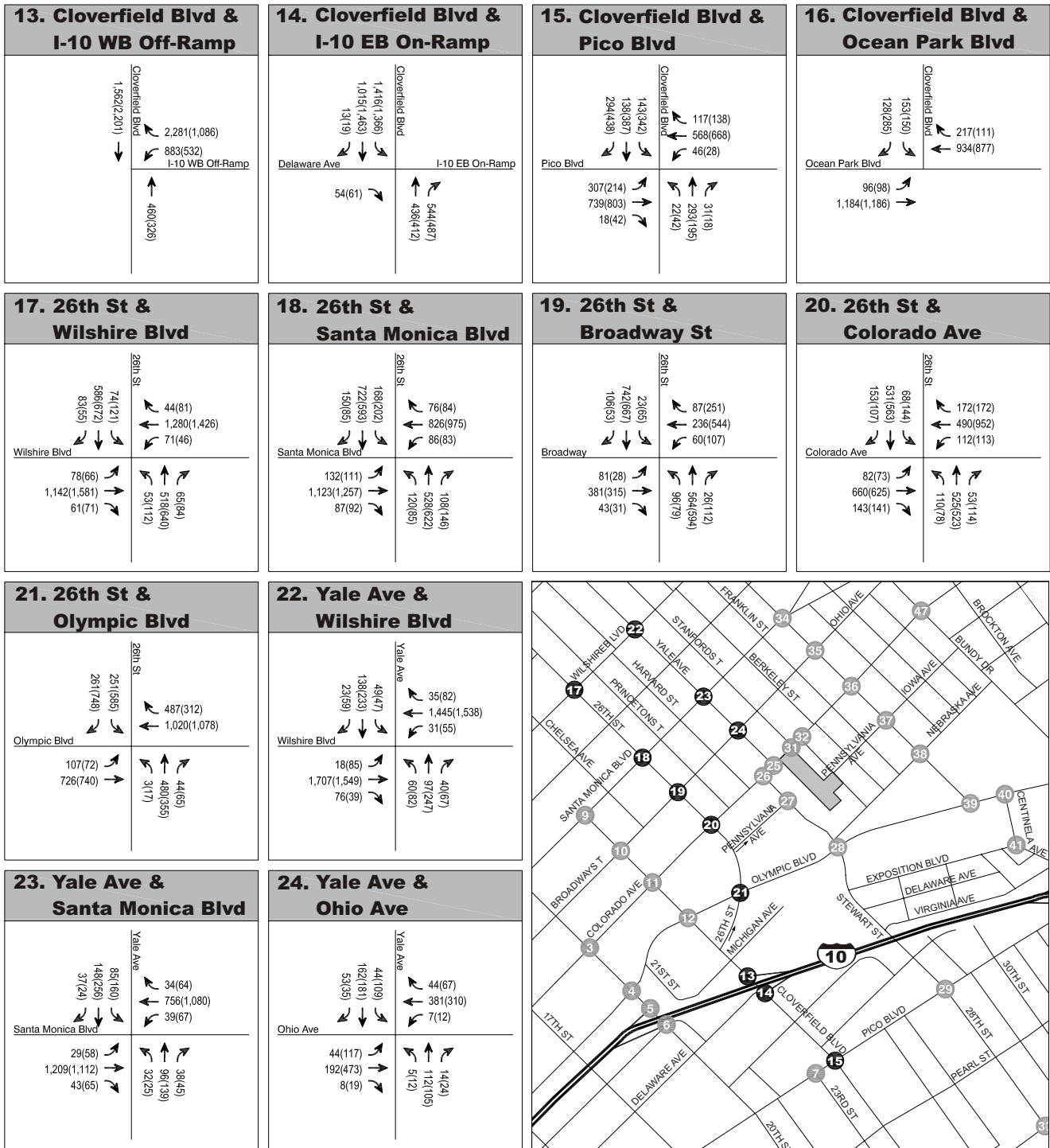


LEGEND:




- Project Site
- Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- Turn Lane

SOURCE: Fehr & Peers, 2011.





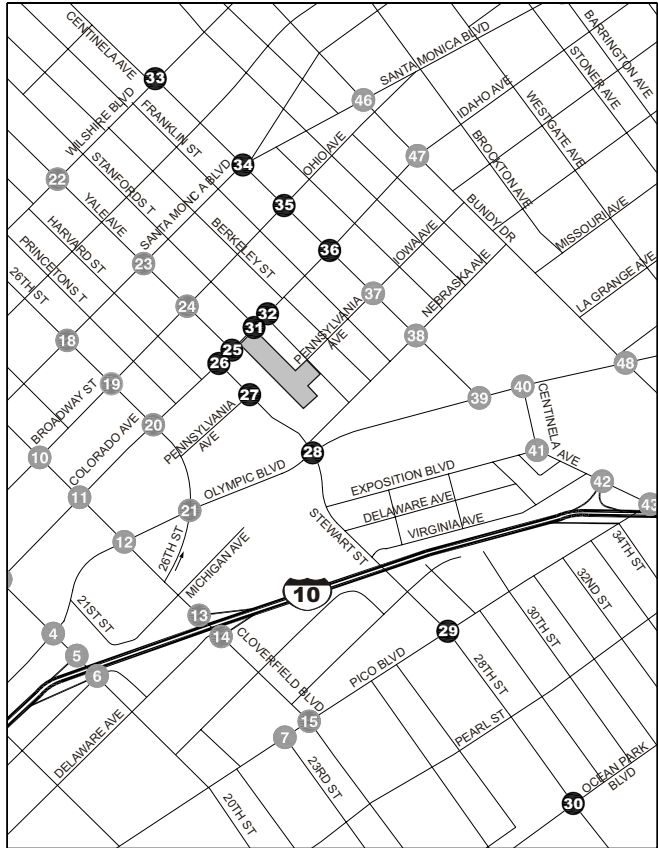
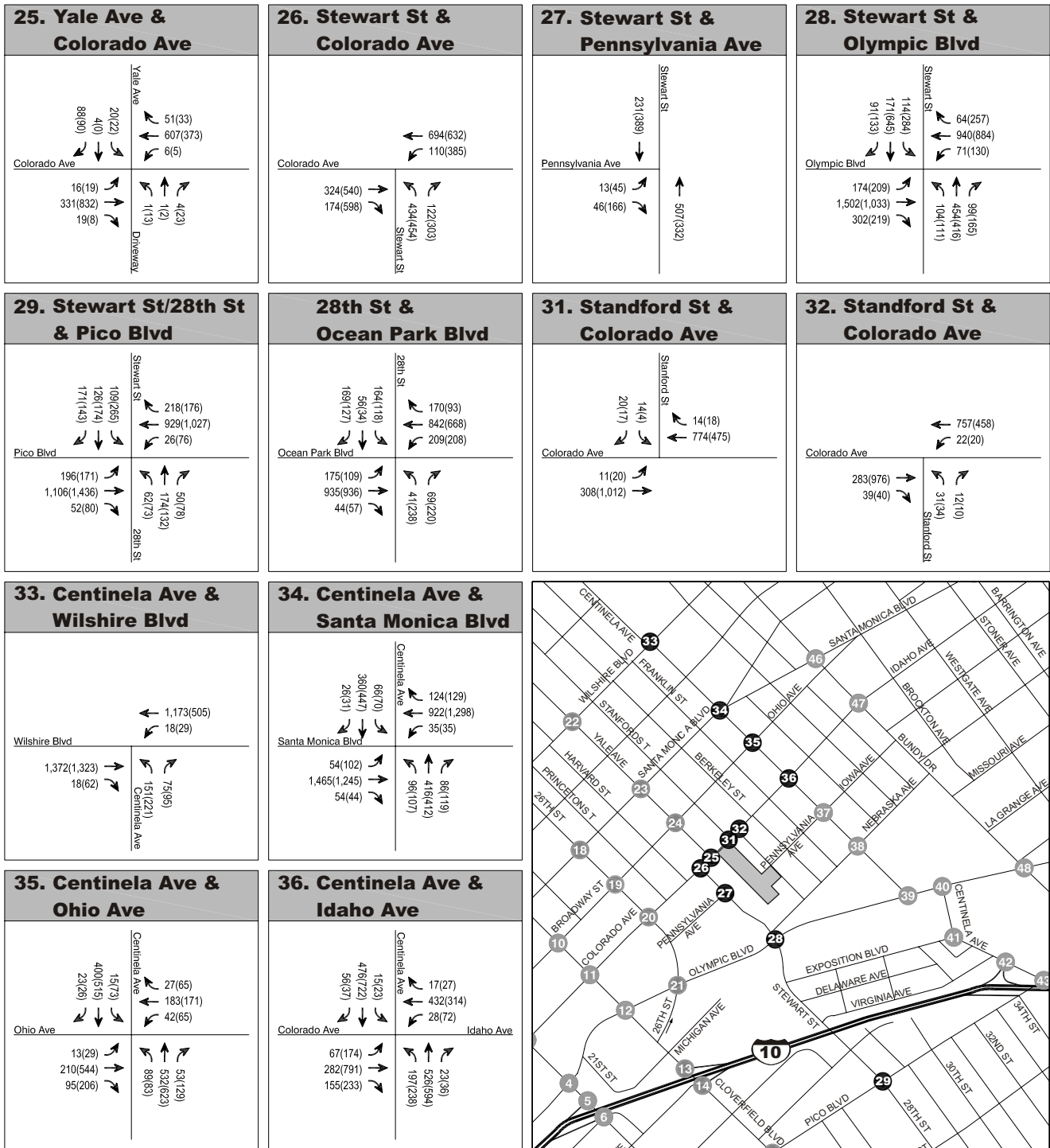
LEGEND:

-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane





SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-3
 APPROVAL YEAR (YEAR 2011) CONDITIONS
 PEAK HOUR TRAFFIC VOLUMES
 INTERSECTIONS 13-24

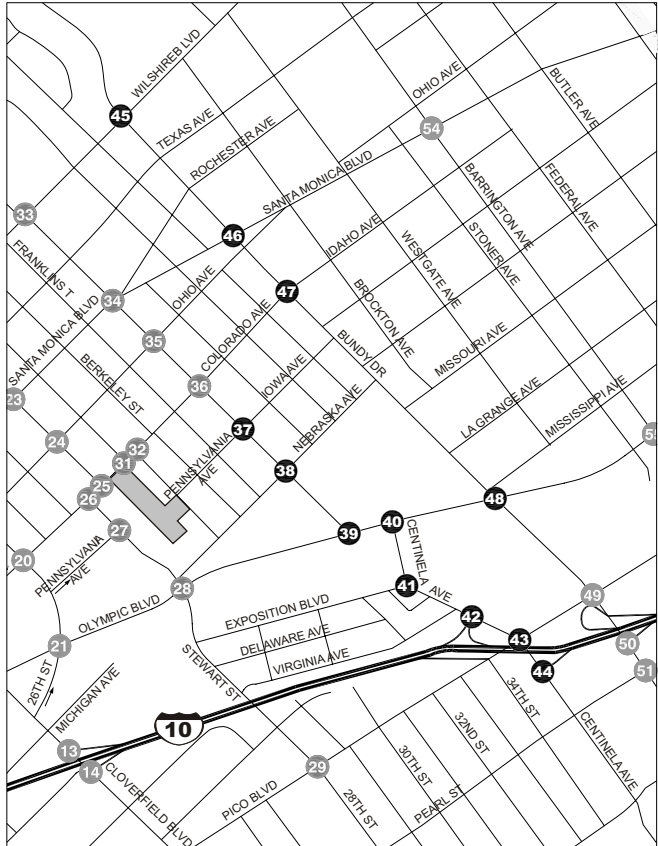
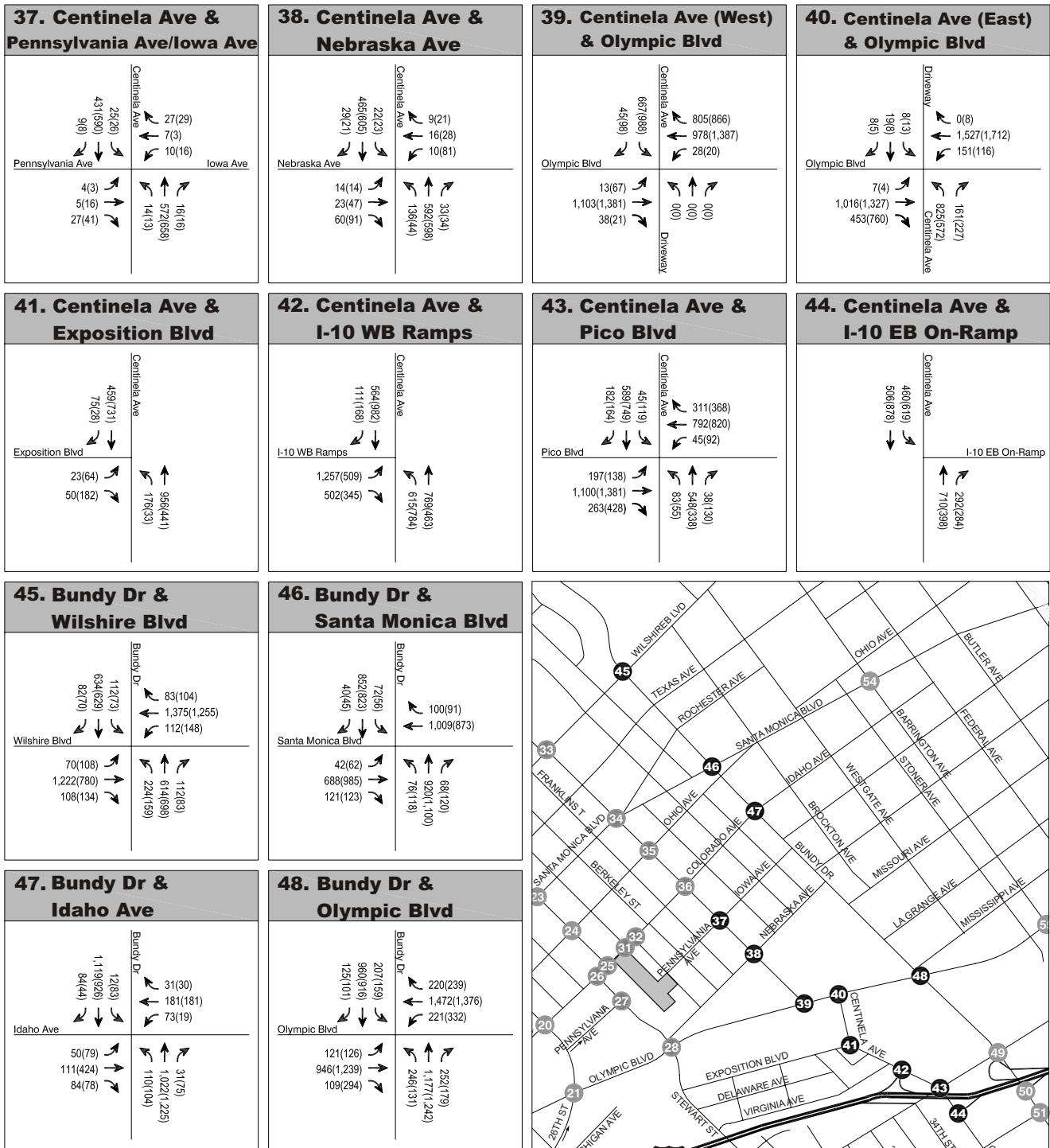


LEGEND:

-  Project Site
-  Analyzed Intersection
-  AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.

FIGURE 4.15-4
APPROVAL YEAR (YEAR 2011) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 25-36

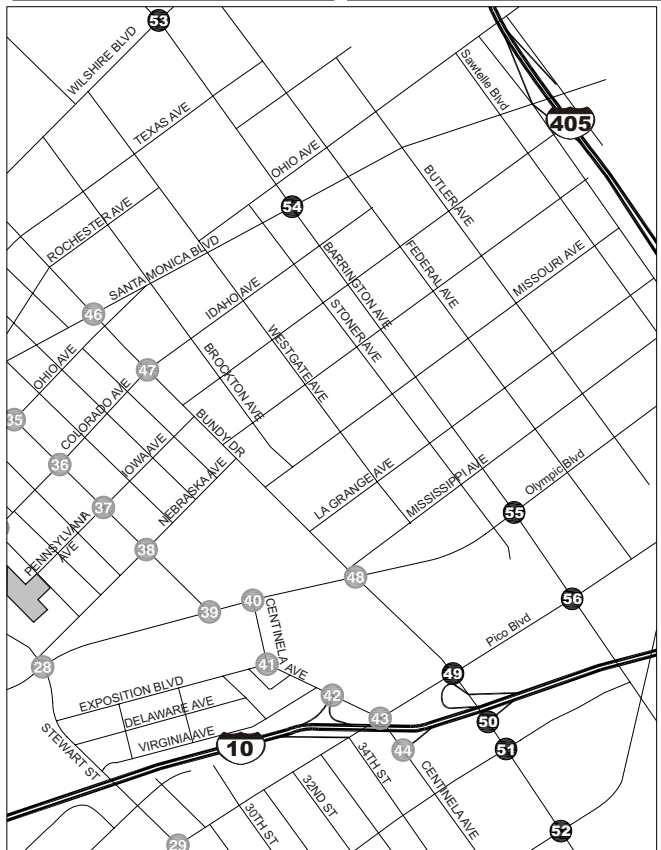
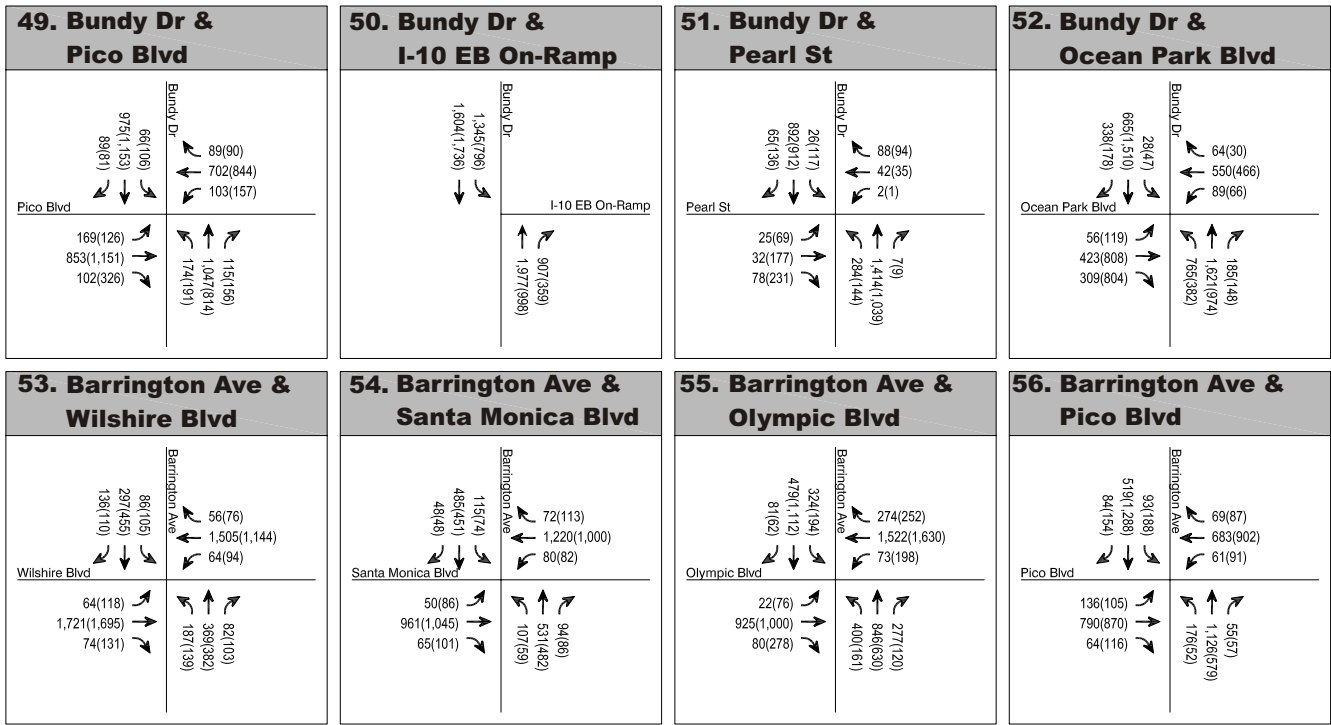


LEGEND:




- Project Site
- # Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- ↗ Turn Lane

SOURCE: Fehr & Peers, 2011.





LEGEND:

-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-6
APPROVAL YEAR (YEAR 2011) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 49-56

The City of Santa Monica's TDFM are used to project cumulative base traffic volumes. The Cumulative Base (Year 2020) Conditions traffic volumes take into account the expected changes in traffic over existing conditions up to the year 2020, including the following:

1. Traffic generated by specific development projects located in the City of Santa Monica and neighboring areas of the City of Los Angeles expected to be constructed by Year 2020 using trip generation rates calibrated for use in the Santa Monica TDFM. Specific development projects that have been accounted for in the TDFM are listed in Table 3-3 in Chapter 3.0 Project Description.
2. Capacity enhancements and in some cases, traffic shifts due to planned street modifications, such as changed related to the future Exposition Phase II Light Rail Line
3. Trip reductions by 2020 resulting from transportation and land use policies in the 2010 LUCE
4. Interaction between land uses that produce vehicle trips and land uses that attract vehicle trips
5. The effect of traffic congestion on route choice
6. Projected increases in regional traffic traveling through the City

There are several key roadway improvements in or near the vicinity of the project site that have been completed recently or are expected to be completed by 2020. These improvements would result in capacity changes at various locations and have been accounted for in the Cumulative Base (Year 2020) Conditions:

The following street network improvement was completed between Fall 2007 traffic counts and Year 2011:

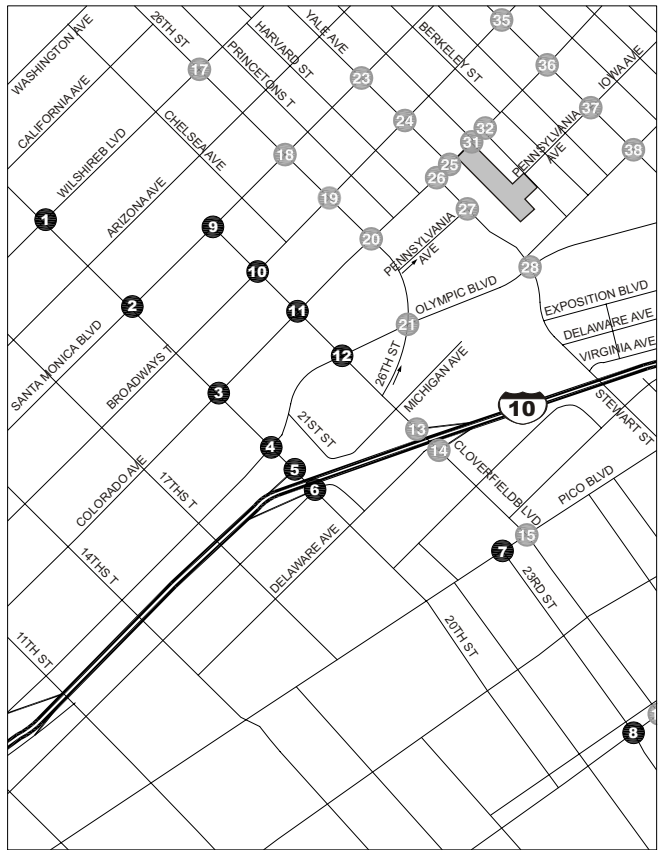
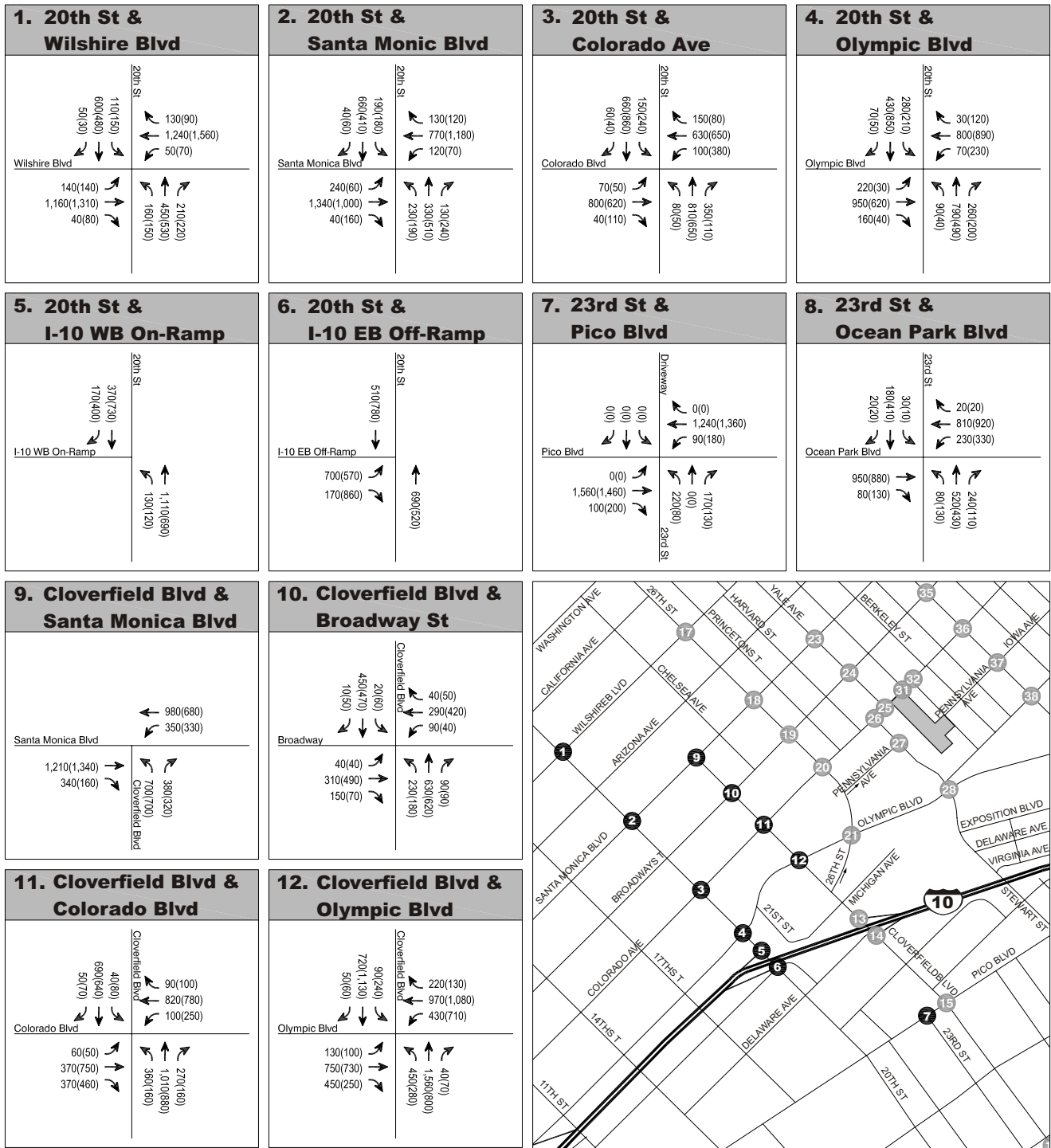
- Ocean Park Boulevard from Lincoln Boulevard to 24th Street – Reduce to one lane in each direction (convert through/left lanes into left-turn lanes).

The following improvements listed below are assumed to be completed between Year 2011 and the cumulative horizon year of 2020:




- 20th Street & Wilshire Boulevard – Provide protected permitted left turn phasing on the westbound approach
- 26th Street & Colorado Avenue – Provide protected-permitted left-turn phasing on the eastbound approach

The TRAFFIX database and the TDFM also include modifications necessary to account for Phase II of the Exposition LRT along Colorado Avenue. The completion of the Exposition LRT Phase II would result in the reduction of Colorado Avenue to one lane in each direction and the prohibition of left turns along Colorado Avenue between 4th Street and 17th Street. The cumulative base forecasts from the TDFM also accounts for increased transit ridership due to the Exposition LRT.

The TRAFFIX database was updated using the future year 2020 cumulative traffic forecasts from the Santa Monica TDFM. The resulting Cumulative Base (Year 2020) Conditions traffic volumes are shown in **Figures 4.15-7** through **4.15-11** for the analyzed peak hours. The Cumulative Base (Year 2020) Conditions traffic volumes are used as the cumulative base to perform LOS analysis of the study intersections under the HCM (City of Santa Monica) and the CMA (City of Los Angeles) methodologies. The results of the LOS analyses are shown in **Tables 4.15-13** and **4.15-14**.



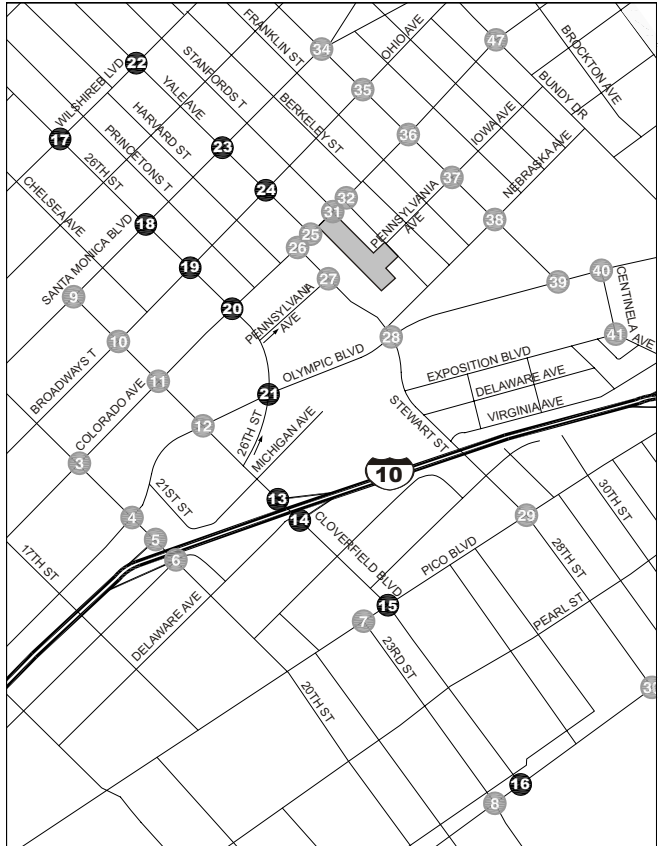
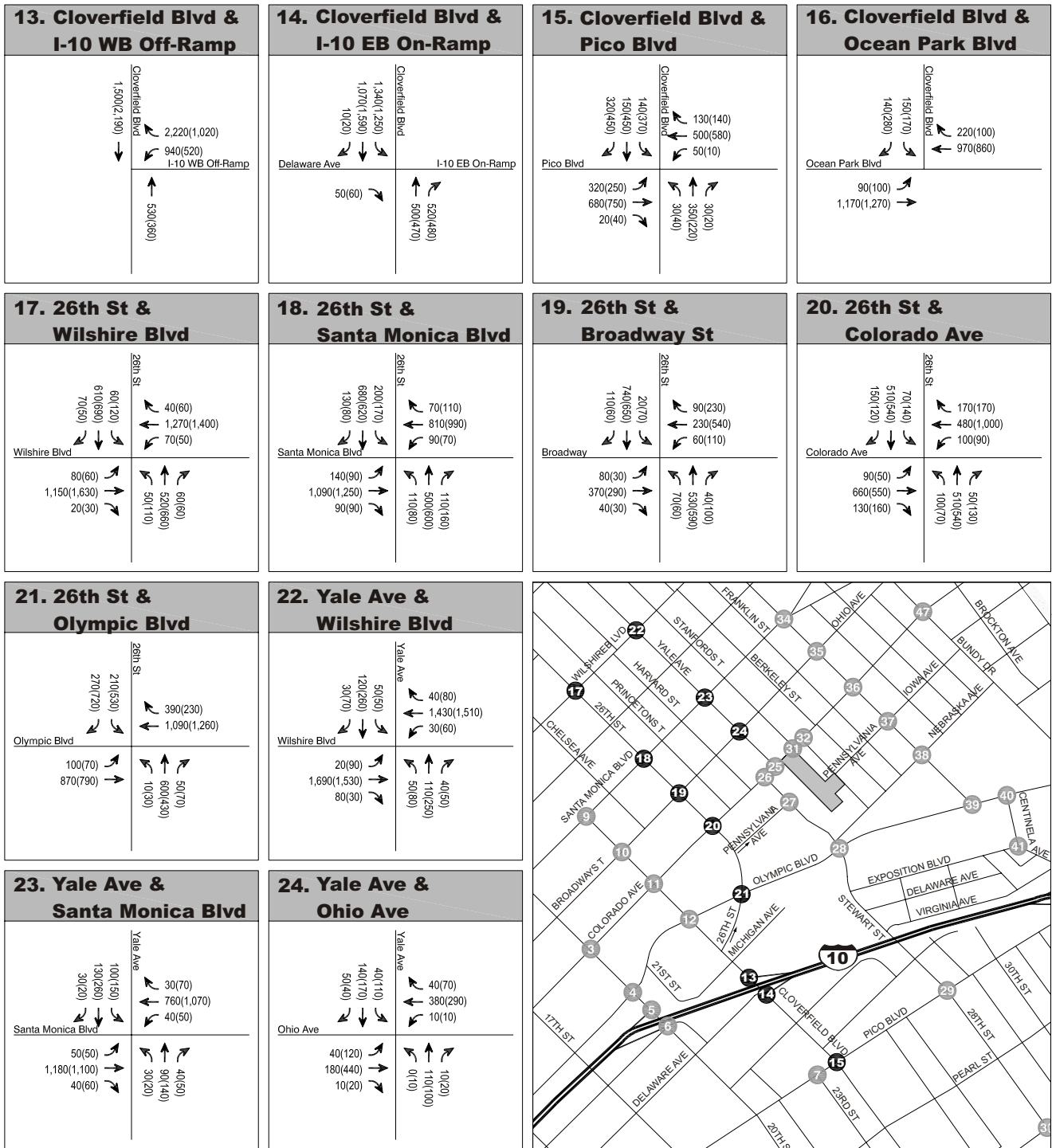
LEGEND:

-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2010.



FIGURE 4.15-7
CUMULATIVE BASE (YEAR 2020) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 1-12



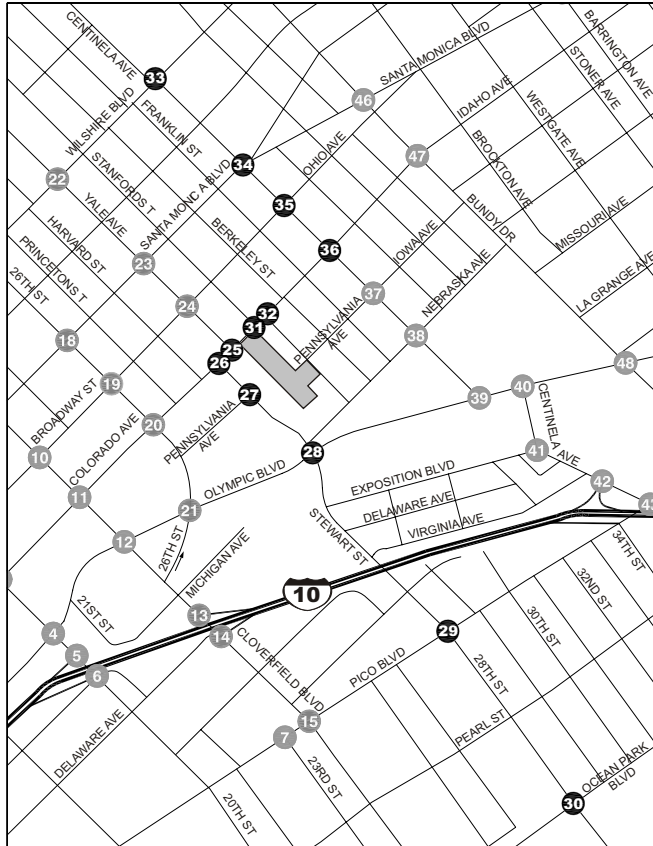
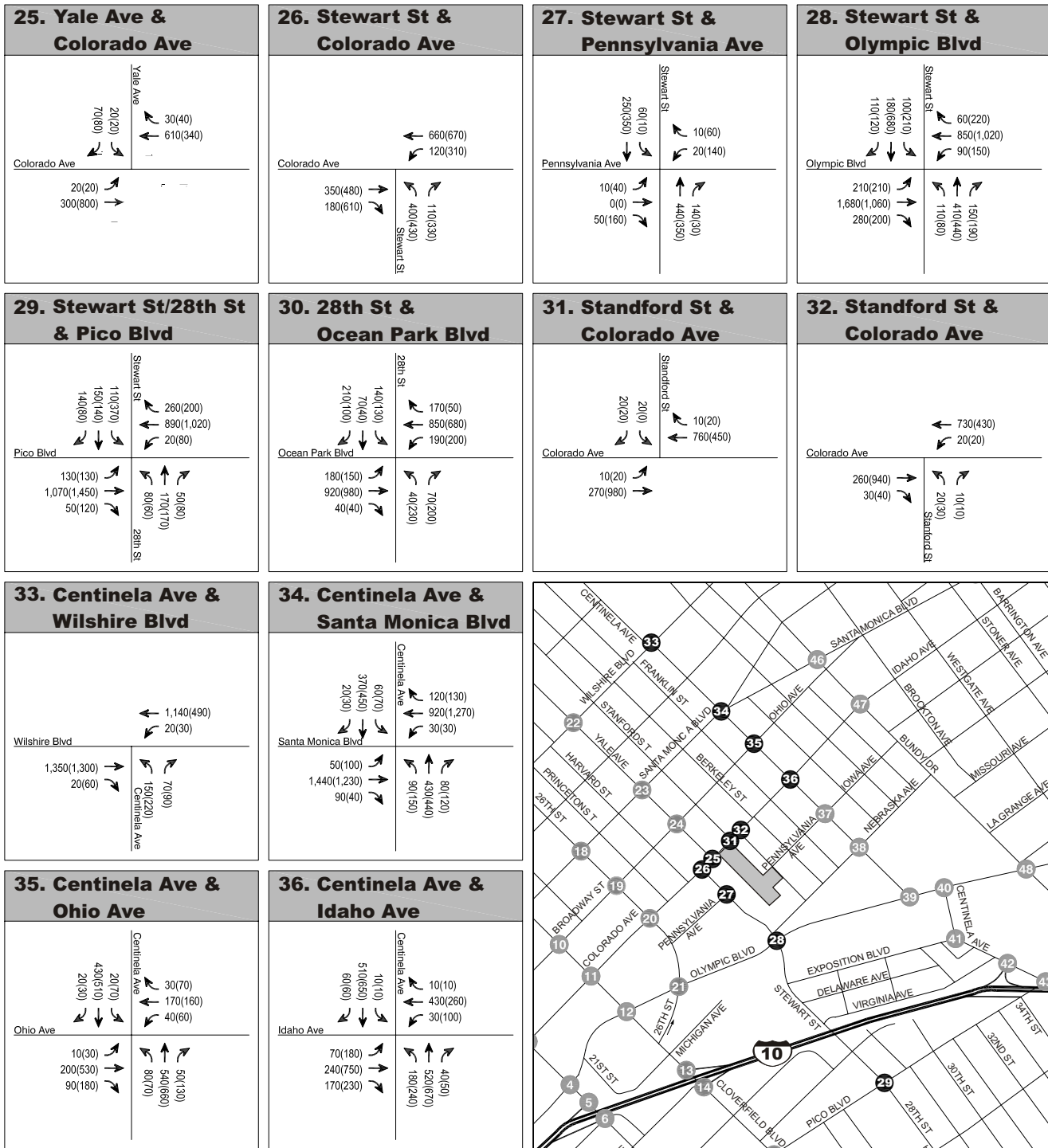
LEGEND:

- Project Site
- # Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- Turn Lane

SOURCE: Fehr & Peers, 2010.



FIGURE 4.15-8
CUMULATIVE BASE (YEAR 2020) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 13-24



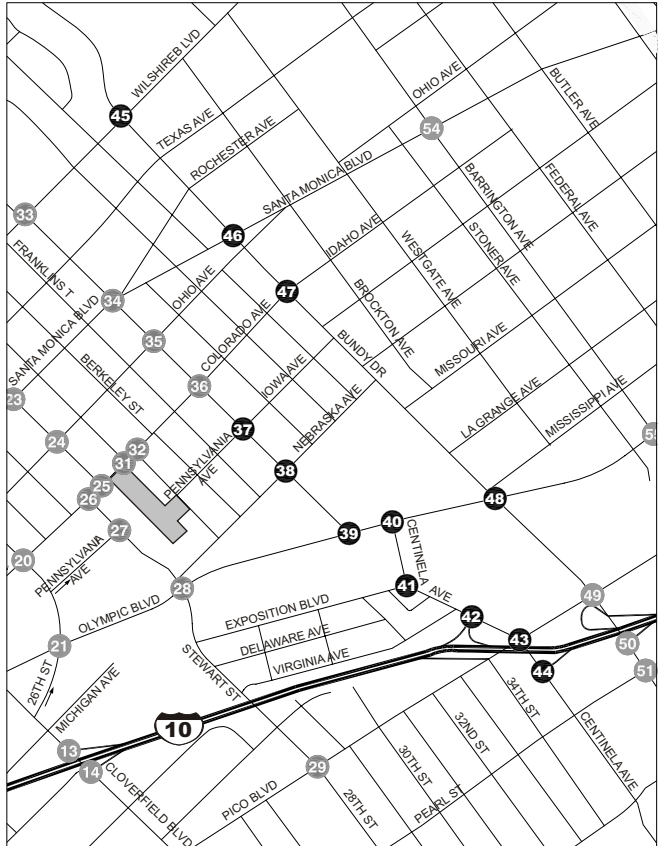
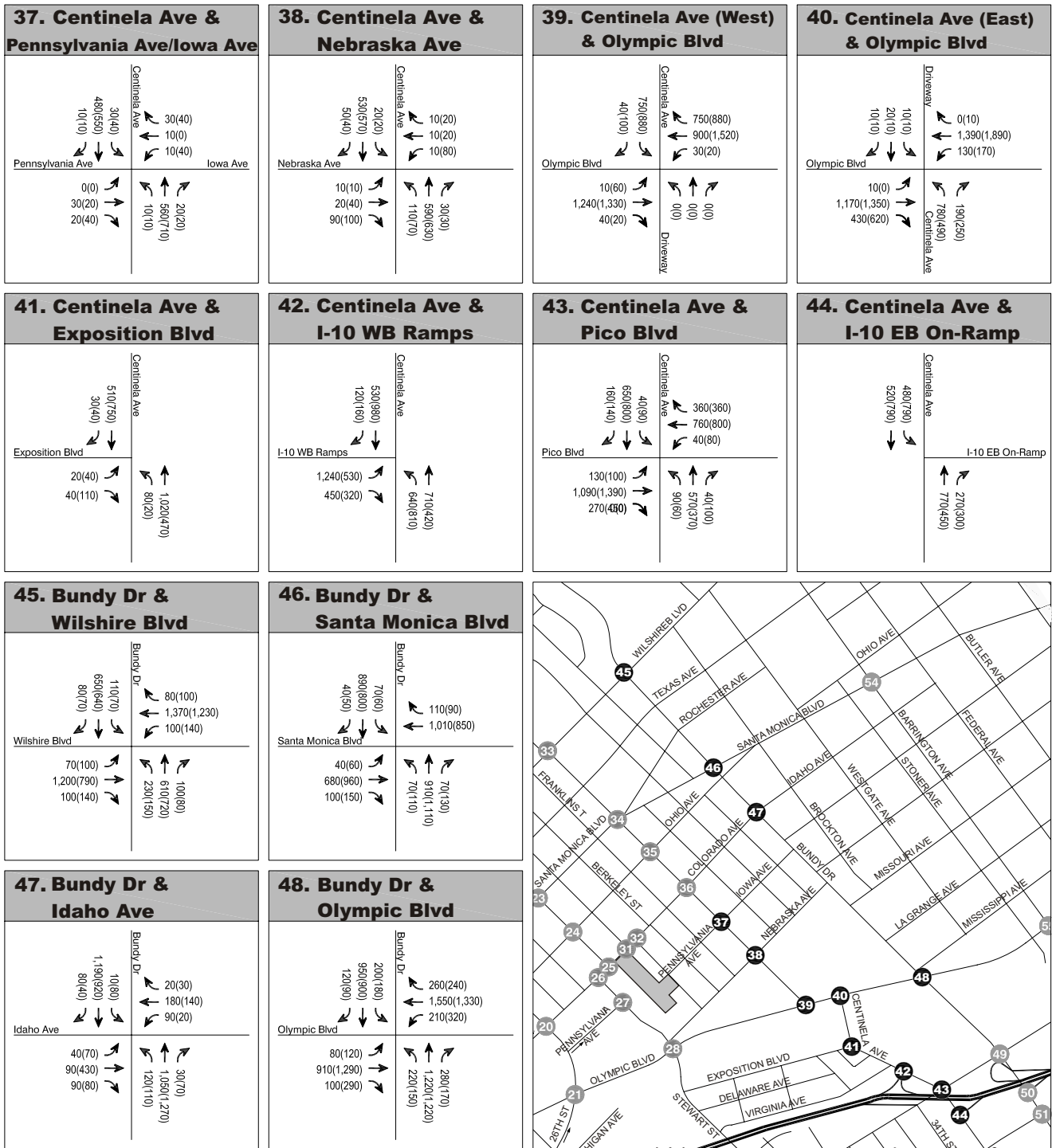
LEGEND:

- Project Site
- Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- Turn Lane

SOURCE: Fehr & Peers, 2010.



FIGURE 4.15-9
CUMULATIVE BASE (YEAR 2020) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 25-36

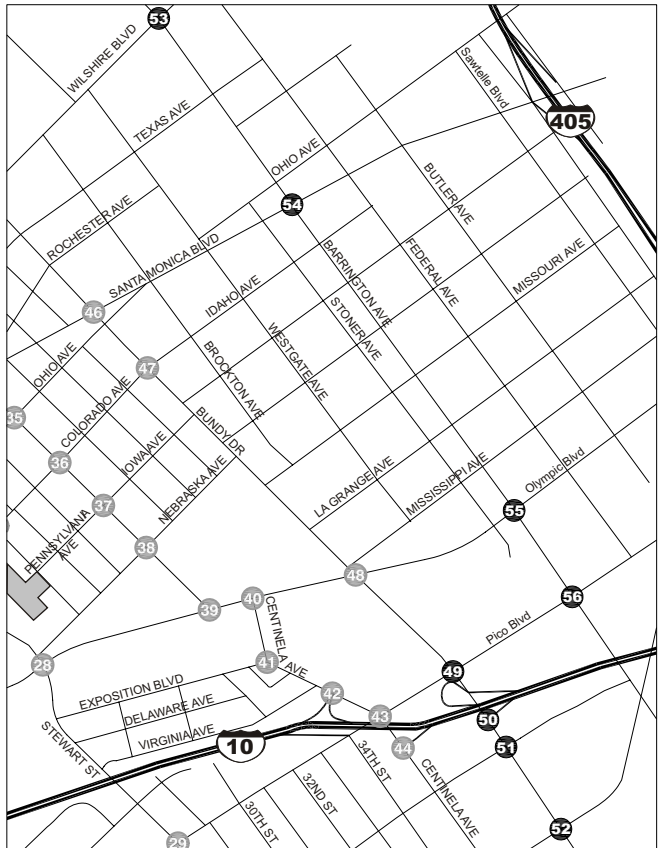
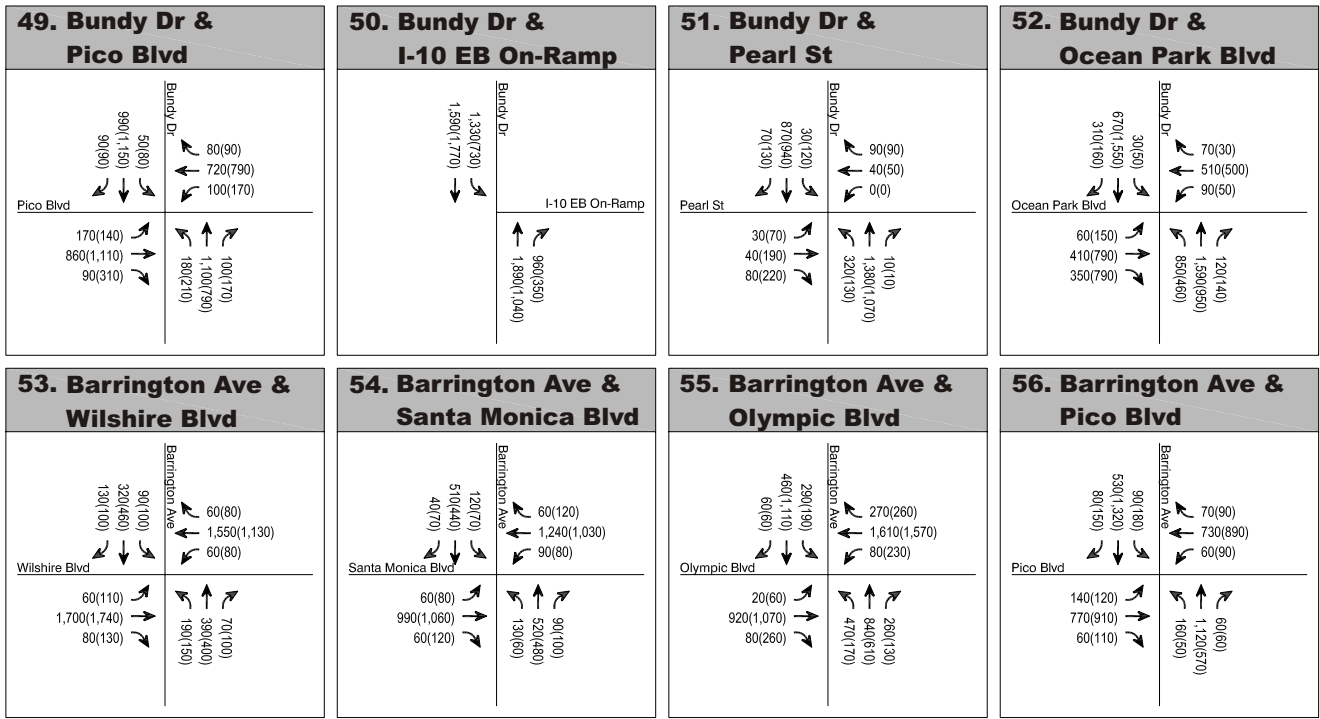


LEGEND:




- Project Site
- # Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- Turn Lane

SOURCE: Fehr & Peers, 2010.

FIGURE 4.15-10
CUMULATIVE BASE (YEAR 2020) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 37-48



LEGEND:

-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2010.



FIGURE 4.15-11
CUMULATIVE BASE (YEAR 2020) CONDITIONS
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 49-56

TABLE 4.15-13: CUMULATIVE BASE (YEAR 2020) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY						
No.	Intersection	Class	Peak Hour	Cumulative No Project (2020)		
				V/C	Delay /a/	LOS
1	20th St./Wilshire Blvd.	A	AM	1.456	44	D
		A	PM	1.393	60	E
2	20th St./Santa Monica Blvd.	A	AM	1.430	49	D
		A	PM	0.927	21	C
3	20th St./Colorado Ave.	A	AM	0.694	13	B
		A	PM	1.167	30	C
4	20th St./Olympic Blvd.	A	AM	0.989	53	D
		A	PM	0.761	33	C
5	20th St./I-10 WB On-Ramp /c/ [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	C	AM	n/a	1	A
		C	PM	n/a	1	A
			AM	n/a	9	A
			PM	n/a	13	B
6	20th St./I-10 EB Off-Ramp	A	AM	0.671	15	B
		A	PM	0.843	18	B
7	23rd St./Pico Blvd.	A	AM	0.892	17	B
		A	PM	0.875	13	B
8	23rd St./Ocean Park Blvd.	A	AM	1.334	/b/	F
		A	PM	1.326	/b/	F
9	Cloverfield Blvd./Santa Monica Blvd.	A	AM	1.113	62	E
		A	PM	0.998	40	D
10	Cloverfield Blvd./Broadway	A	AM	0.518	11	B
		A	PM	0.616	13	B
11	Cloverfield Blvd./Colorado Ave.	A	AM	0.736	36	D
		A	PM	0.743	37	D
12	Cloverfield Blvd./Olympic Blvd.	A	AM	0.784	39	D
		A	PM	0.876	46	D
13	Cloverfield Blvd./I-10 WB Off-Ramp	A	AM	1.384	/b/	F
		A	PM	0.891	18	B
14	Cloverfield Blvd./I-10 EB On-Ramp/Delaware Ave. /f/	A	AM	0.994	26	C
		A	PM	1.425	/b/	F
15	Cloverfield Blvd./Pico Blvd.	A	AM	0.691	26	C
		A	PM	0.770	27	C
16	Cloverfield Blvd./Ocean Park Blvd.	A	AM	1.017	/b/	F
		A	PM	1.070	/b/	F
17	26th Street/Wilshire Blvd.	A	AM	0.875	29	C
		A	PM	1.102	63	E
18	26th Street/Santa Monica Blvd.	A	AM	0.924	22	C
		A	PM	0.981	28	C
19	26th St./Broadway	A	AM	0.713	13	B
		A	PM	0.712	14	B
20	26th St./Colorado Ave.	A	AM	0.801	49	D
		A	PM	1.054	27	C
21	26th St./Olympic Blvd.	A	AM	0.871	36	D
		A	PM	1.023	56	E
22	Yale St./Wilshire Blvd.	A	AM	0.821	14	B
		A	PM	1.046	30	C

TABLE 4.15-13: CUMULATIVE BASE (YEAR 2020) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY

No.	Intersection	Class	Peak Hour	Cumulative No Project (2020)		
				V/C	Delay /a/	LOS
23	Yale St./Santa Monica Blvd.	A	AM	0.643	10	A
		A	PM	0.792	17	B
24	Yale St./Broadway /d/	C	AM	0.791	18	C
		C	PM	1.085	49	E
25	Yale St./Colorado Ave. /e/ [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	C	AM	n/a	2	A
		C	PM	n/a	2	A
			AM	n/a	17	B
			PM	n/a	24	C
26	Stewart St./Colorado Ave.	C	AM	0.753	32	C
		C	PM	0.810	18	B
27	Stewart St./Pennsylvania Ave. /e/ [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	C	AM	n/a	2	A
		C	PM	n/a	7	A
			AM	n/a	18	B
			PM	n/a	25	C
28	Stewart St./Olympic Blvd.	A	AM	1.079	66	E
		A	PM	1.912	/b/	F
29	Stewart St./Pico Blvd.	A	AM	0.851	25	C
		A	PM	0.980	33	C
30	28th St./Ocean Park Blvd.	A	AM	0.770	17	B
		A	PM	0.731	22	C
31	Stanford St. (west)/Colorado Ave. [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	C	AM	n/a	1	A
		C	PM	n/a	0	A
			AM	n/a	20	B
			PM	n/a	11	B
32	Stanford St. (east)/Colorado Ave. [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	C	AM	n/a	1	A
		C	PM	n/a	1	A
			AM	n/a	18	B
			PM	n/a	37	D
33	Centinela Ave./Wilshire Blvd.	A	AM	0.605	6	A
		A	PM	0.630	8	A
34	Centinela Ave./Santa Monica Blvd.	A	AM	1.053	41	D
		A	PM	1.084	57	E
35	Centinela Ave./Broadway/Ohio Ave.	A	AM	0.710	14	B
		A	PM	1.353	/b/	F
36	Centinela Ave./Colorado Ave./Idaho Ave.	A	AM	0.794	16	B
		A	PM	1.066	45	D
37	Centinela Ave./Pennsylvania Ave./Iowa Ave. [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	A	AM	n/a	2	A
		A	PM	n/a	5	A
			AM	n/a	24	C
			PM	n/a	74	E
			AM	0.360	4	
			PM	0.462	5	

TABLE 4.15-13: CUMULATIVE BASE (YEAR 2020) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF SANTA MONICA ANALYSIS METHODOLOGY						
No.	Intersection	Class	Peak Hour	Cumulative No Project (2020)		
				V/C	Delay /a/	LOS
38	Centinela Ave./Nebraska Ave.	A	AM	0.455	5	A
		A	PM	0.525	7	A
39	Centinela Ave. (west)/Olympic Blvd.	A	AM	0.645	12	B
		A	PM	0.864	14	B
40	Centinela Ave. (east)/Olympic Blvd.	A	AM	1.081	21	C
		A	PM	1.174	21	C
41	Centinela Ave./Exposition Blvd. /e/ [worst approach only] [worst approach only] Impact Analysis /g/ Impact Analysis /g/	A	AM	n/a	2	A
		A	PM	n/a	4	A
			AM	n/a	34	C
			PM	n/a	35	C
42	Centinela Ave./I-10 WB Ramps	A	AM	1.824	/b/	F
		A	PM	1.603	/b/	F
43	Centinela Ave./Pico Blvd.	A	AM	0.715	14	B
		A	PM	0.787	14	B
44	Centinela Ave./I-10 EB On-Ramp	A	AM	0.602	11	B
		A	PM	0.694	9	A
45	Bundy Drive/Wilshire Blvd.	A	AM	0.800	32	C
		A	PM	0.741	30	C
46	Bundy Drive/Santa Monica Blvd.	A	AM	0.513	22	C
		A	PM	0.612	22	C
47	Bundy Drive/Idaho Ave.	A	AM	0.739	10	A
		A	PM	0.747	14	B
48	Bundy Dr./Olympic Blvd. /f/	A	AM	0.946	46	D
		A	PM	1.056	64	E
49	Bundy Dr./Pico Blvd.	A	AM	0.811	28	C
		A	PM	1.409	-- /b/	F
50	Bundy Dr./I-10 EB On-Ramp /f/	A	AM	1.579	/b/	F
		A	PM	0.872	14	B
51	Bundy Dr./Pearl Street	A	AM	0.681	6	A
		A	PM	0.730	17	B
52	Bundy Dr./Ocean Park Blvd.	A	AM	1.002	28	C
		A	PM	1.401	59	E
53	Barrington Ave./Wilshire Blvd.	A	AM	0.777	24	C
		A	PM	1.034	27	C
54	Barrington Ave./Santa Monica Blvd.	A	AM	0.646	14	B
		A	PM	0.621	13	B
55	Barrington Ave./Olympic Blvd. /f/	A	AM	0.831	24	C
		A	PM	1.383	/b/	F
56	Barrington Ave./Pico Blvd.	A	AM	0.891	21	C
		A	PM	0.930	26	C

/a/ Average stopped delay per vehicle, in seconds
 /b/ Indicates oversaturated conditions. Delay cannot be calculated
 /c/ Northbound left turn is yield-controlled. All other movements (northbound through, southbound through/right) are uncontrolled
 /d/ Intersection is a four-way stop.
 /e/ Intersection controlled by stop signs on the minor approaches.
 /f/ Intersection saturation flow was adjusted based on empirical peak hour information
 /g/ For Impact analysis purposes, the intersection was treated as signalized and analyzed according to City criteria set forth in Table 4.15-9. Worst approach LOS was used to determine increment for impact.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

TABLE 4.15-14: CUMULATIVE BASE (YEAR 2020) CONDITIONS INTERSECTION LEVELS OF SERVICE CITY OF LOS ANGELES ANALYSIS METHODOLOGY						
No.	Intersection	Class	Peak Hour	Cumulative Base (2020)		
				V/C	Delay /a/	LOS
33	Centinela Ave./Wilshire Blvd.	A	AM	0.569	n/a	A
		A	PM	0.600	n/a	A
34	Centinela Ave./Santa Monica Blvd.	A	AM	0.955	n/a	E
		A	PM	0.962	n/a	E
35	Centinela Ave./Broadway/Ohio Ave.	A	AM	0.618	n/a	B
		A	PM	0.998	n/a	E
36	Centinela Ave./Colorado Ave./Idaho Ave.	A	AM	0.869	n/a	D
		A	PM	1.217	n/a	F
37	Centinela Ave./Pennsylvania Ave./Iowa Ave.	A	AM	n/a	n/a	n/a
		A	PM	n/a	n/a	n/a
38	Centinela Ave./Nebraska Ave.	A	AM	0.489	n/a	A
		A	PM	0.572	n/a	A
39	Centinela Ave. (west)/Olympic Blvd.	A	AM	0.761	n/a	C
		A	PM	0.917	n/a	E
40	Centinela Ave. (east)/Olympic Blvd.	A	AM	0.779	n/a	C
		A	PM	0.714	n/a	C
41	Centinela Ave./Exposition Blvd. /b/	A	AM	n/a	n/a	n/a
		A	PM	n/a	n/a	n/a
42	Centinela Ave./I-10 WB Ramps	A	AM	1.693	n/a	F
		A	PM	1.599	n/a	F
43	Centinela Ave./Pico Blvd.	A	AM	0.752	n/a	C
		A	PM	0.858	n/a	D
44	Centinela Ave./I-10 EB On-Ramp	A	AM	0.578	n/a	A
		A	PM	0.677	n/a	B
45	Bundy Drive/Wilshire Blvd.	A	AM	0.817	n/a	D
		A	PM	0.750	n/a	C
46	Bundy Drive/Santa Monica Blvd.	A	AM	0.574	n/a	A
		A	PM	0.670	n/a	B
47	Bundy Drive/Idaho Ave.	A	AM	0.695	n/a	B
		A	PM	0.813	n/a	D
48	Bundy Dr./Olympic Blvd. /c/	A	AM	1.030	n/a	F
		A	PM	1.166	n/a	F
49	Bundy Dr./Pico Blvd. /c/	A	AM	0.848	n/a	D
		A	PM	1.665	n/a	F
50	Bundy Dr./I-10 EB On-Ramp /c/	A	AM	1.645	n/a	F
		A	PM	0.924	n/a	E
51	Bundy Dr./Pearl Street	A	AM	0.569	n/a	A
		A	PM	0.726	n/a	C
52	Bundy Dr./Ocean Park Blvd.	A	AM	1.046	n/a	F
		A	PM	1.177	n/a	F
53	Barrington Ave./Wilshire Blvd.	A	AM	0.670	n/a	B
		A	PM	0.720	n/a	C
54	Barrington Ave./Santa Monica Blvd.	A	AM	0.748	n/a	C
		A	PM	0.644	n/a	B
55	Barrington Ave./Olympic Blvd. /c/	A	AM	0.827	n/a	D
		A	PM	1.699	n/a	F
56	Barrington Ave./Pico Blvd.	A	AM	0.792	n/a	C
		A	PM	0.916	n/a	E

/a/ V/C ratio includes reduction for intersections operating with ATSAC capability.
 /b/ Intersection controlled by stop signs on the minor approaches.
 /c/ Intersection saturation flow was adjusted based on empirical peak hour information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

Cumulative Plus Project (Year 2020) Conditions

The net change in traffic that would occur with the development of the proposed project was assigned to the street system and added to the cumulative base traffic projections. The resulting traffic volumes represent the projected Cumulative Plus Project (Year 2020) Conditions weekday peak hour traffic volumes. These projections include the incremental traffic from the development of the proposed project and are the basis of the analysis of the project's traffic-related cumulative impacts.

Project Trip Generation

The traffic projections for the proposed project were developed by estimating the trip generation of the proposed project, determining trip distribution, and assigning the proposed project traffic to the roadway system.

The *Trip Generation, 8th Edition* (Institute of Transportation Engineers [ITE], 2008) is the most widely used source for individual project vehicle trip generation rates. This book contains national averages of trip generation rates for a variety of land uses in what are generally suburban locations, "having little or no transit service, nearby pedestrian amenities, or TDM programs."² However, Santa Monica is generally characterized by compact urban development, high levels of public transit service, walkable and bikable streets, and employer-sponsored TDM programs. The unique local characteristics of Santa Monica require the development of specific trip generation rates to estimate trip generation of land uses in Santa Monica, including the proposed project.

Trip generation rates specific to the City of Santa Monica were developed as part of the TDFM development (Appendix E of the Traffic Study). The trip generation rates were initially based on residential trip generation surveys, the Southern California Association of Governments regional model, the San Diego Association of Governments' trip generation survey, recently calibrated models in similar areas, and the *Trip Generation, 8th Edition* book. The rates were then modified to account for local conditions based on counts, production-to-attraction balancing, and the difference between the ITE and model land use definitions.

The Santa Monica LUCE (adopted in 2010) provides a framework to integrate land use and transportation to reduce vehicle trips, encourage walking, bicycling and transit use, and create active pedestrian-oriented neighborhoods. The LUCE proposes the creation of a comprehensive multi-modal transportation system that builds on the City's investment in transit and the opportunity offered by the coming of the Exposition LRT line.

The Santa Monica trip generation rates calibrated in the TDFM model were adjusted as part of the model development to reflect the anticipated effect of the transportation policies, programs and initiatives contained in the LUCE and the Exposition LRT Line. Rates were developed for both year 2020 and year 2030. Since the proposed project would be subject to the LUCE TDM/trip reduction requirements, and for consistency with the LUCE, the year 2020 LUCE model rates were used to develop project-specific trip generation estimates. These trips rates assume a robust TDM program, which the project applicant will be required to prepare and implement.

Approval Year Plus Project (Year 2011)

For the Approval Year Plus Project (Year 2011) Conditions analysis, project trip generation rates are LUCE-Compliant for Area Type 1 without the vehicle trip reduction attributed to Metro Expo Phase II LRT. The estimated proposed project trip generation is shown in **Table 4.15-15**. The project is expected to generate a total of 2,605 new daily trips, including 172 weekday AM peak hour trips and 198 weekday PM peak hour trips. When taking into account the removal of the existing uses on the site, the project

²Institute of Transportation Engineers, *Trip Generation, 8th Edition, Users Guide*, 2008.

would generate 2,360 net new daily trips, including an increase of 155 trips in the weekday AM peak hour and an increase of 179 trips in the weekday PM peak hour. These estimates incorporate trip reductions assuming that the project implements effective TDM strategies in accordance with the LUCE policies.

TABLE 4.15-15: APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS TRIP ESTIMATES								
Land Use	Size	Trip Generation /a, b/						
		Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
PROPOSED PROJECT								
Creative Office	105.334 ksf	920	60	8	68	13	65	78
Condominium (1 bedroom)	191 du	611	8	32	40	29	15	44
Condominium (2 bedroom)	36 du	197	2	11	13	9	5	14
Apartment	166 du	531	7	28	35	25	13	38
Specialty Retail	11.710 ksf	346	10	6	16	11	13	24
<i>Total Proposed</i>		<i>2,605</i>	<i>87</i>	<i>85</i>	<i>172</i>	<i>87</i>	<i>111</i>	<i>198</i>
EXISTING USES TO BE REMOVED								
Mobile Homes	76 du	(245)	(3)	(14)	(17)	(11)	(7)	(19)
Net Incremental Trips		2,360	84	71	155	76	104	179
<i>/a/</i> Trip rates derived from the Santa Monica Travel Demand Forecasting Model Area Type 1 (locations near the central business district or high densities in employment), reflect the proposed project's vicinity to the proposed Exposition Light Rail station and LUCE trip reduction requirements <i>/b/</i> It was assumed that unites with two or more bedrooms would own two or more vehicles. Studio units, one-bedroom units, and affordable housing units were assumed to own one vehicle. SOURCE: Fehr & Peers, <i>Draft Traffic Study for the: Village Trailer Park Project</i> , October 2011.								

Cumulative Plus Project (Year 2020)

For the Cumulative Plus Project (Year 2020) Conditions analysis, project trip generation rates are LUCE-Compliant for Area Type 1 with vehicle trip reduction attributed to Metro Expo Phase II LRT. The proposed project trip generation is shown in **Table 4.15-16**. The proposed project is expected to generate 2,508 new daily trips, including 158 weekday AM peak hour trips and 187 weekday PM peak hour trips. When considering the removal of the existing uses from the project site, the proposed project would generate 2,278 net new daily trips, including a net increase of 144 trips in the weekday AM peak hour and 170 trips in the weekday PM peak hour.

TABLE 4.15-16: CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS TRIP GENERATION ESTIMATES								
Land Use	Size	Trip Generation /a, b/						
		Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
PROPOSED PROJECT								
Creative Office	105.334 ksf	903	59	8	67	13	63	76
Condominium (1 bedroom)	191 du	575	7	27	34	26	14	40
Condominium (2 bedroom)	36 du	186	2	10	12	9	4	13
Apartment	166 du	500	6	24	30	23	12	35
Specialty Retail	11.710 ksf	344	9	6	15	10	13	23
<i>Total Proposed</i>		<i>2,508</i>	<i>83</i>	<i>75</i>	<i>158</i>	<i>81</i>	<i>106</i>	<i>187</i>
EXISTING USES TO BE REMOVED								
Mobile Homes	76 du	(230)	(3)	(11)	(14)	(11)	(6)	(17)
Net Incremental Trips		2,278	80	64	144	70	100	170
<i>/a/</i> Trip rates derived from the Santa Monica Travel Demand Forecasting Model Area Type 1 (locations near the central business district or high densities in employment), reflect the proposed project's vicinity to the proposed Exposition Light Rail station and LUCE trip reduction requirements <i>/b/</i> It was assumed that unites with two or more bedrooms would own two or more vehicles. Studio units, one-bedroom units, and affordable housing units were assumed to own one vehicle. SOURCE: Fehr & Peers, <i>Draft Traffic Study for the: Village Trailer Park Project</i> , October 2011.								

Project Trip Distribution

Approval Year Plus Project (Year 2011) Conditions

A new north-south road (New Road) would connect Colorado Avenue and the Pennsylvania Avenue extension on the western side of the project site. Future development that has not been completed by the time of the proposed project's approval year was not assumed for the approval year plus project analysis. For this reason, the proposed New Road was assumed to operate as a one-way 20-foot wide southbound road connected to the portion of Pennsylvania Avenue constructed by the applicant (only connecting to Stanford Street to the east).

Under this scenario, all access to the proposed site would be taken from the following two locations:

- Stanford Street (via a proposed Pennsylvania Avenue extension; inbound and outbound)
- Colorado Avenue (via a proposed new road along the west side of the project site; inbound only)

The shift in access would result in a change in the distribution of traffic along nearby streets, but would not affect the overall distribution pattern in the study area.

The trip distribution patterns for creative office, residential, and retail uses were developed based on distribution patterns of previous analyses on similar types of land uses in the vicinity of the project site and by estimates derived from the TDFM. The distribution patterns used in assigning project trips are summarized below:

- 30 percent to and from the east via I-10 (also providing access to the north and south via I-405)
- 28 percent to and from the east via City streets
- 15 percent to and from the west via City Streets
- 12 percent to and from the south via City streets
- 10 percent to and from the north via City streets
- 5 percent to and from westbound I-10/Pacific Coast Highway

Cumulative Plus Project (Year 2020) Conditions

Under the Cumulative Plus Project (Year 2020) Conditions, the proposed full extension of Pennsylvania Avenue from Stanford Street to Stewart Street was taken into account.³ In addition, the New Road would include two travel lanes, one in each direction. Primary vehicular access to the site would be provided from Stanford Street (via the proposed Pennsylvania Avenue extension to the east), from Stewart Street (via the proposed Pennsylvania Avenue extension to the west), and from Colorado Avenue (via the proposed new road along the west side of the project). The overall trip distribution for the Cumulative Plus Project (Year 2020) Conditions is the same as the overall trip distribution developed for the Approval Year Plus Project (Year 2011) Conditions.

Project Trip Assignment

Approval Year Plus Project (Year 2011)

Project trips (and existing trips to be removed) were assigned to the street system using the TRAFFIX database assignment tool. When assigning the project traffic for this scenario, only the extension of Pennsylvania Avenue proposed by the applicant was taken into account. Primary access to the site would be provided from Stanford Street (via the proposed Pennsylvania Avenue extension to the east) and

³The Traffic Study for the proposed project analyzed a "stand-alone" scenario where development of the adjacent property to the west at 2848-2912 Colorado Avenue and the full Pennsylvania Avenue extension would not occur. As indicated therein, the "stand-alone" scenario would result in a shift in project access but would not result in greater impacts.

inbound only from Colorado Avenue (via the proposed New Road along the western boundary of the project site).

Cumulative Plus Project (Year 2020)

Under the Cumulative Plus Project (Year 2020) Conditions, the proposed full extension of Pennsylvania Avenue from Stanford Street to Stewart Street was taken into account. Primary vehicular access to the site would be provided from Stanford Street (via the proposed Pennsylvania Avenue extension to the east), from Stewart Street (via the proposed Pennsylvania Avenue extension to the west), and from Colorado Avenue (via the proposed new road along the west side of the project). It was assumed that vehicles traveling to and from the project site would use the all three access points for ingress or egress. Trips traveling to and from a particular direction were assumed to use the access point most convenient to the direction in which they would be traveling. For example, trips traveling from the east would be inclined to access the project site from Stanford Street. It was also assumed that trips would prefer to make right turns when entering and exiting the project site.

Impact T-1 The proposed project would generate a net new of 2,360 daily trips, including a net new of 155 weekday AM trips and 179 weekday PM peak hour trips under Approval Year Plus Project (Year 2011) Conditions. The increase in vehicles traveling on the surrounding roadway network would result in significant traffic impacts at 14 of 56 study area intersections. Implementation of Mitigation Measures T1 through T4 would reduce impacts at four affected intersections to a less-than-significant level. However, increased traffic volumes would result in significant and unavoidable impacts under approval year plus project conditions at 11 intersections.

For the Approval Year Plus Project (Year 2011) Conditions analysis, project trip generation rates are LUCE-Compliant for Area Type 1 without the vehicle trip reduction attributed to Metro Expo Phase II LRT. The estimated proposed project trip generation is shown in **Table 4.15-16**. The project is expected to generate a total of 2,605 new daily trips, including 172 weekday AM peak hour trips and 198 weekday PM peak hour trips. When taking into account the removal of the existing uses on the site, the project would generate 2,360 net new daily trips, including an increase of 155 trips in the weekday AM peak hour and an increase of 179 trips in the weekday PM peak hour. These estimates incorporate trip reductions assuming that the project implements effective TDM strategies in accordance with the LUCE policies.

A TDM plan and commitment to achieve the LUCE-compliant trip rates would be made a condition of approval for the project, TDM measures for the proposed project will be determined by the City during the project approval process and may include measures in the categories below. A full review of the TDM Measures can be found in the Traffic Study in Appendix F.

- TDM Coordinator
- Transportation Demand Management Association.
- Area Wide Transportation Management Associate
- Transit Pass Subsidy
- Ridesharing
- Parking Cash Out
- Unbundled Parking
- Guaranteed Ride Home
- Bicycle Facilities
- Flexible Work Hours
- Transportation Information Center
- Wayfinding Signage
- Commuter Club

In order to determine whether the LUCE rates are being achieved, annual monitoring and reporting would be required. Monitoring would include morning and afternoon trip counts at the project driveway, as well as observations around the project site to determine pickup/drop-off activity and other site-generated vehicle trips such as deliveries. The applicant would be required to summarize the results of the trip monitoring program, determine whether trip rates are being achieved, and describe the TDM efforts currently in place to reduce vehicular trip making in an annual report delivered to the City. The City, at its discretion, would determine the type of enforcement and may requirement implementation of additional TDM strategies and possible monetary (or other) penalties if annual monitoring determined the LUCE trip rates were not being met.

The Approval Year Plus Project (Year 2011) Conditions peak hour traffic volumes were analyzed to determine potential 2011 operating conditions at the study intersections and to identify specific traffic impacts resulting from the addition of project-generated traffic. The results of this analysis are summarized in **Tables 4.15-17** and **4.15-18** for comparison with the existing intersection conditions. The traffic volumes under the Approval Year Plus Project (Year 2011) Conditions are shown in **Figures 4.15-12** through **4.15-16**. Of the 56 analyzed intersections, a total of 14 were found to be significantly impacted by the proposed project based on both the City of Santa Monica and City of Los Angeles significance criteria. The locations of the significantly impacted analyzed intersections are shown in **Figure 4.15-17**.

Using approval year (Year 2011) traffic conditions as the baseline to conduct impact analysis, the project would result in significant traffic impacts at 13 of the 56 study intersections. Thirteen intersections would be impacted under City of Santa Monica significance criteria during at least one of the analyzed peak hours:

4. 20th Street/Olympic Boulevard (AM peak hour)
8. 23rd Street/Ocean Park Boulevard (AM and PM peak hours)
9. Cloverfield Boulevard/Santa Monica Boulevard (AM peak hour)
24. Yale Street/Broadway (PM peak hour)
26. Stewart Street/Colorado Avenue (AM peak hour)
28. Stewart Street/Olympic Boulevard (PM peak hour)
32. Stanford Street/Colorado Avenue (PM peak hour)
35. Centinela Avenue/Broadway/Ohio Avenue (PM peak hour)
36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour)
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours)
48. Bundy Drive/Olympic Boulevard (PM peak hour)
49. Bundy Drive/Pico Boulevard (PM peak hour)
50. Bundy Drive/I-10 Eastbound On-Ramp (AM peak hour)

Six intersections, wholly or partially located in the City of Los Angeles, would be impacted under City of Los Angeles significance criteria during at least one of the analyzed peak hours:

36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour)*
39. Centinela Avenue (west)/Olympic Boulevard (PM peak hour)
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours)*
48. Bundy Drive/Olympic Boulevard (PM peak hour)*
49. Bundy Drive/Pico Boulevard (PM peak hour)*
50. Bundy Drive/ I-10 Eastbound On-Ramp (AM and PM peak hour)*

Of the six intersections that are impacted under the City of Los Angeles significance criteria, five intersections (as indicated above with an *) are also impacted under the City of Santa Monica significance criteria. Therefore, under the approval year plus project conditions, the proposed project would result in significant traffic impacts at a total of 14 study intersections under both significance criteria.

TABLE 4.15-17: APPROVAL YEAR PLUS PROJECT (YEAR 2011) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	Intersection	Class	Peak Hour	Approval Year No Project			Approval Year Plus Project			V/C or Delay Change	Significant Impact?	Approval Year Plus Project With Mitigation			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
1	20th St./ Wilshire Blvd.	A A	AM PM	1.467 1.296	34 38	D D	1.466 1.296	38 37	D D	0 0	No No	/g/				
2	20th St./ Santa Monica Blvd.	A A	AM PM	1.117 1.011	26 22	C C	1.117 1.013	26 22	C C	0 0	No No	/g/				
3	20th St./Colorado Ave.	A A	AM PM	0.797 0.798	14 14	B B	0.810 0.806	14 15	B B	0 1	No No	/g/				
4	20th St./Olympic Blvd.	A A	AM PM	1.025 0.827	57 37	E D	1.028 0.830	58 37	E D	1 0	Yes No	/g/				Yes No
5	20th St./ I-10 WB On-Ramp [1] [worst approach only] [worst approach only] Impact Analysis /f/ Impact Analysis /f/	A A	AM PM	n/a n/a	1 1	A A	n/a n/a	1 1	A A	n/a n/a	n/a n/a	/g/				
			AM PM	n/a n/a	9 13	A B	n/a n/a	9 14	A B	n/a n/a	n/a n/a	/g/				
			AM PM	0.332 0.356	0 0		0.333 0.358	0 0		0 0	No No	/g/				
													/g/			
6	20th St./ I-10 EB Off-Ramp	A A	AM PM	0.658 0.862	14 19	B B	0.660 0.862	14 19	B B	0 0	No No	/g/				
7	23rd St./Pico Blvd.	A A	AM PM	0.942 0.878	21 13	C B	0.944 0.884	21 13	C B	0 0	No No	/g/				
8	23rd St./ Ocean Park Blvd.	A A	AM PM	1.380 1.256	-- /b/ -- /b/	F F	1.388 1.264	/b/ /b/	F F	0.008 0.008	Yes Yes	1.145 1.139	-- /b/ -- /b/	F F	0 0	No No
9	Cloverfield Blvd./ Santa Monica Blvd.	A A	AM PM	1.144 0.971	74 32	E C	1.145 0.972	75 32	E C	1 0	Yes No	1.112 0.972	65 27	F F	0 0	No No
10	Cloverfield Blvd./ Broadway	A A	AM PM	0.539 0.610	11 12	B B	0.539 0.610	11 12	B B	0 0	No No	/g/				
11	Cloverfield Blvd./ Colorado Ave.	A A	AM PM	0.749 0.690	36 38	D D	0.752 0.694	36 38	D D	0 0	No No	/g/				
12	Cloverfield Blvd./ Olympic Blvd.	A A	AM PM	0.779 0.889	39 45	D D	0.781 0.892	39 45	D D	0 0	No No	/g/				
13	Cloverfield Blvd./ I-10 WB Off-Ramp	A A	AM PM	1.434 0.962	-- /b/ 24	F C	1.435 0.963	/b/ 25	F C	0.001 1	No No	/g/				
14	Cloverfield Blvd./ I-10 EB On-Ramp/ Delaware Ave. /i/	A A	AM PM	1.046 1.525	35 -- /b/	C F	1.046 1.525	35 /b/	C F	0 0	No No	/g/				
15	Cloverfield Blvd./ Pico Blvd.	A A	AM PM	0.669 0.751	25 27	C C	0.670 0.754	25 27	C C	0 0	No No	/g/				
16	Cloverfield Blvd./ Ocean Park Blvd.	A A	AM PM	1.030 0.994	-- /b/ -- /b/	F F	1.032 0.996	/b/ /b/	F F	0.002 0.002	No No	/g/				
17	26th Street/Wilshire Blvd.	A A	AM PM	0.876 1.090	28 60	C E	0.877 1.092	29 60	C E	0 0	No No	/g/				
18	26th Street/Santa Monica Blvd.	A A	AM PM	1.053 1.034	25 39	C D	1.057 1.037	25 39	C D	0 0	No No	/g/				

TABLE 4.15-17: APPROVAL YEAR PLUS PROJECT (YEAR 2011) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	Intersection	Class	Peak Hour	Approval Year No Project			Approval Year Plus Project			V/C or Delay Change	Significant Impact?	Approval Year Plus Project With Mitigation			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
19	26th St./Broadway	A A	AM PM	0.718 0.725	13 14	B B	0.721 0.727	13 15	B B	0 1	No No	/g/				
20	26th St./Colorado Ave.	A A	AM PM	0.816 0.872	20 22	B C	0.824 0.913	20 23	B C	0 1	No No	/g/				
21	26th St./Olympic Blvd.	A A	AM PM	0.785 0.936	35 44	C D	0.786 0.939	35 44	C D	0 0	No No	/g/				
22	Yale St./Wilshire Blvd.	A A	AM PM	0.835 1.018	14 29	B C	0.838 1.019	15 29	B C	1 0	No No	/g/				
23	Yale St./Santa Monica Blvd.	A A	AM PM	0.656 0.813	10 17	A B	0.658 0.816	10 18	A B	0 1	No No	/g/				
24	Yale St./Broadway /d/	C C	AM PM	0.832 1.170	21 64	C F	0.837 1.178	21 65	C F	0 0.008	No Yes	/g/			No Yes	
25	Yale St./Colorado Ave. /e/	C C	AM PM	n/a n/a	2 3	n/a n/a	n/a n/a	2 3	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only]		AM	n/a	20	n/a	n/a	22	C	n/a	n/a					
	[worst approach only]		PM	n/a-	28	n/a	n/a	31	C	n/a	n/a					
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.446 0.525	6 6		0.462 0.541	6 6		No No	No No					
26	Stewart St./Colorado Ave.	C C	AM PM	0.801 0.892	36 22	D C	0.810 0.909	38 24	D C	2 2	Yes No	/g/			Yes No	
27	Stewart St./Pennsylvania Ave. /e/	C C	AM PM	n/a n/a	1 3	A A	n/a n/a	1 3	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only]		AM	n/a	10	A	n/a	10	A	n/a						
	[worst approach only]		PM	n/a	11	B	n/a	12	B	n/a						
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.180	4 14		0.183 0.225	4 14		0 0	No No					
28	Stewart St./Olympic Blvd.	A A	AM PM	0.987 1.803	48 --/b	D F	0.995 1.840	49 --/b	D F	1 0.037	No Yes	0.996 1.216	50 --/b	D F	2 0	No No
29	Stewart St./Pico Blvd.	A A	AM PM	1.051 0.981	31 26	C C	1.068 0.995	32 27	C C	1 1	No No	/g/				
30	28th St. / Ocean Park Blvd.	A A	AM PM	0.740 0.727	17 21	B C	0.748 0.727	17 21	B C	0 0	No No	/g/				
31	Stanford St. (west)/Colorado Ave.	C C	AM PM	n/a n/a	1 0	A A	n/a n/a	1 0	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only]		AM	n/a	19	B	n/a	20	B	n/a	n/a					
	[worst approach only]		PM	n/a	17	B	n/a	18	B	n/a	n/a					
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.459 0.573	2 1		0.477 0.572	2 1		0 0	No No					

TABLE 4.15-17: APPROVAL YEAR PLUS PROJECT (YEAR 2011) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	Intersection	Class	Peak Hour	Approval Year No Project			Approval Year Plus Project			V/C or Delay Change	Significant Impact?	Approval Year Plus Project With Mitigation			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
32	Stanford St. (east)/ Colorado Ave. [worst approach only] [worst approach only]	C	AM	n/a	1	A	n/a	2	A	n/a	n/a	/g/				
		C	PM	n/a	1	A	n/a	5	A	n/a	n/a					
		AM	n/a	21	C	n/a	25	C	n/a	n/a						
		PM	n/a	44	D	n/a	84	F	n/a	n/a						
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.448 0.597	2 2		0.478 0.635	4 5		2 3	No Yes					
33	Centinela Ave./ Wilshire Blvd.	A A	AM PM	0.613 0.640	6 8	A A	0.613 0.640	6 8	A A	0 0	No No	/g/				
34	Centinela Ave./ Santa Monica Blvd.	A A	AM PM	1.053 0.990	41 36	D D	1.057 0.996	42 37	D D	1 1	No No	/g/				
35	Centinela Ave./ Broadway/ Ohio Ave.	A A	AM PM	0.726 1.392	14 -- /c/	B F	0.730 1.401	14 -- /b/	B F	0 0.009	No Yes	/g/		No Yes		
36	Centinela Ave./ Colorado Ave./ Idaho Ave.	A A	AM PM	0.780 1.132	16 53	B D	0.786 1.145	16 56	B E	0 3	No Yes	/g/		No Yes		
37	Centinela Ave./ Pennsylvania Ave./ Iowa Ave. [worst approach only] [worst approach only]	A	AM	n/a	2	A	n/a	2	A	n/a	n/a	/g/				
		A	PM	n/a	2	A	n/a	3	A	n/a	n/a					
		AM	n/a	21	C	n/a	22	C	n/a	n/a						
		PM	n/a	34	C	n/a	38	D	n/a	n/a						
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.361 0.416	4 4		0.367 0.433	4 5		0 1	No No					
38	Centinela Ave./ Nebraska Ave.	A A	AM PM	0.443 0.512	5 8	A A	0.462 0.526	5 8	A A	0 0	No No	/g/				
39	Centinela Ave. (west)/Olympic Blvd.	A A	AM PM	0.692 0.862	9 16	A B	0.721 0.878	10 17	A B	1 1	No No	/g/				
40	Centinela Ave. (east)/Olympic Blvd.	A A	AM PM	1.006 0.727	19 17	B B	1.027 0.742	19 17	B B	0 0	No No	/g/				
41	Centinela Ave./ Exposition Blvd. /e/ [worst approach only] [worst approach only]	A	AM	n/a	3	A	n/a	3	A	n/a	n/a	/g/				
		A	PM	n/a	13	B	n/a	14	B	n/a	n/a					
		AM	n/a	47	D	n/a	50	D	n/a	n/a						
		PM	n/a	77	E	n/a	87	F	n/a	n/a						
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.811 0.599	7 11		0.822 0.611	7 11		0 0	No No					
42	Centinela Ave./ I-10 WB Ramps	A A	AM PM	1.843 1.569	-- /b/ -- /b/	F F	1.861 1.589	/b/ /b/	F F	0.018 0.02	Yes Yes	1.770 1.498	-- /b/ -- /b/	F F	0 0	No No
43	Centinela Ave./Pico Blvd.	A A	AM PM	0.826 0.774	14 14	B B	0.829 0.780	14 14	B B	0 0	No No	/g/				
44	Centinela Ave./ I-10 EB On-Ramp	A A	AM PM	0.567 0.559	10 7	A A	0.574 0.569	10 7	A A	0 0	No No	/g/				
45	Bundy Dr./ Wilshire Blvd.	A A	AM PM	0.793 0.756	32 30	C C	0.798 0.759	32 31	C C	0 1	No No	/g/				

TABLE 4.15-17: APPROVAL YEAR PLUS PROJECT (YEAR 2011) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA

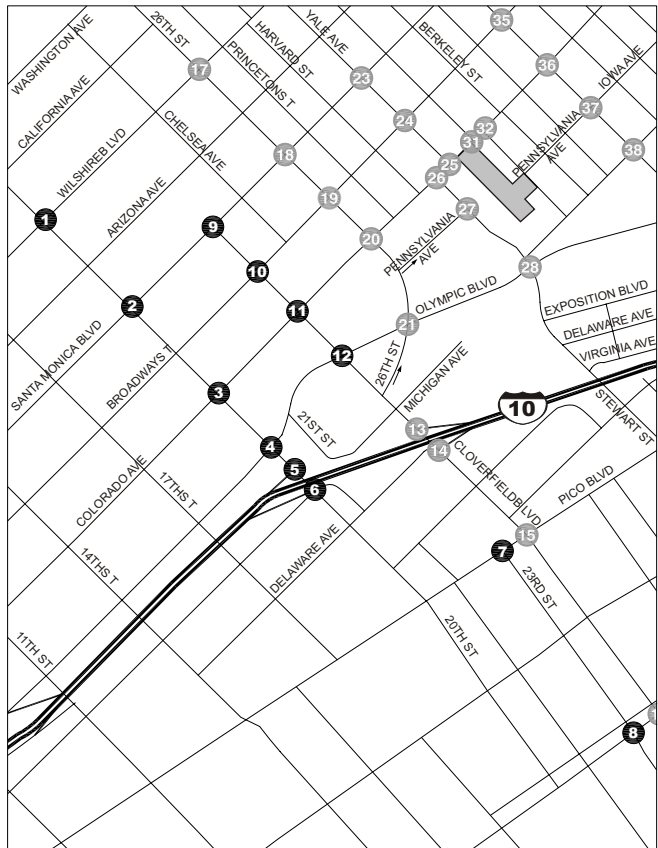
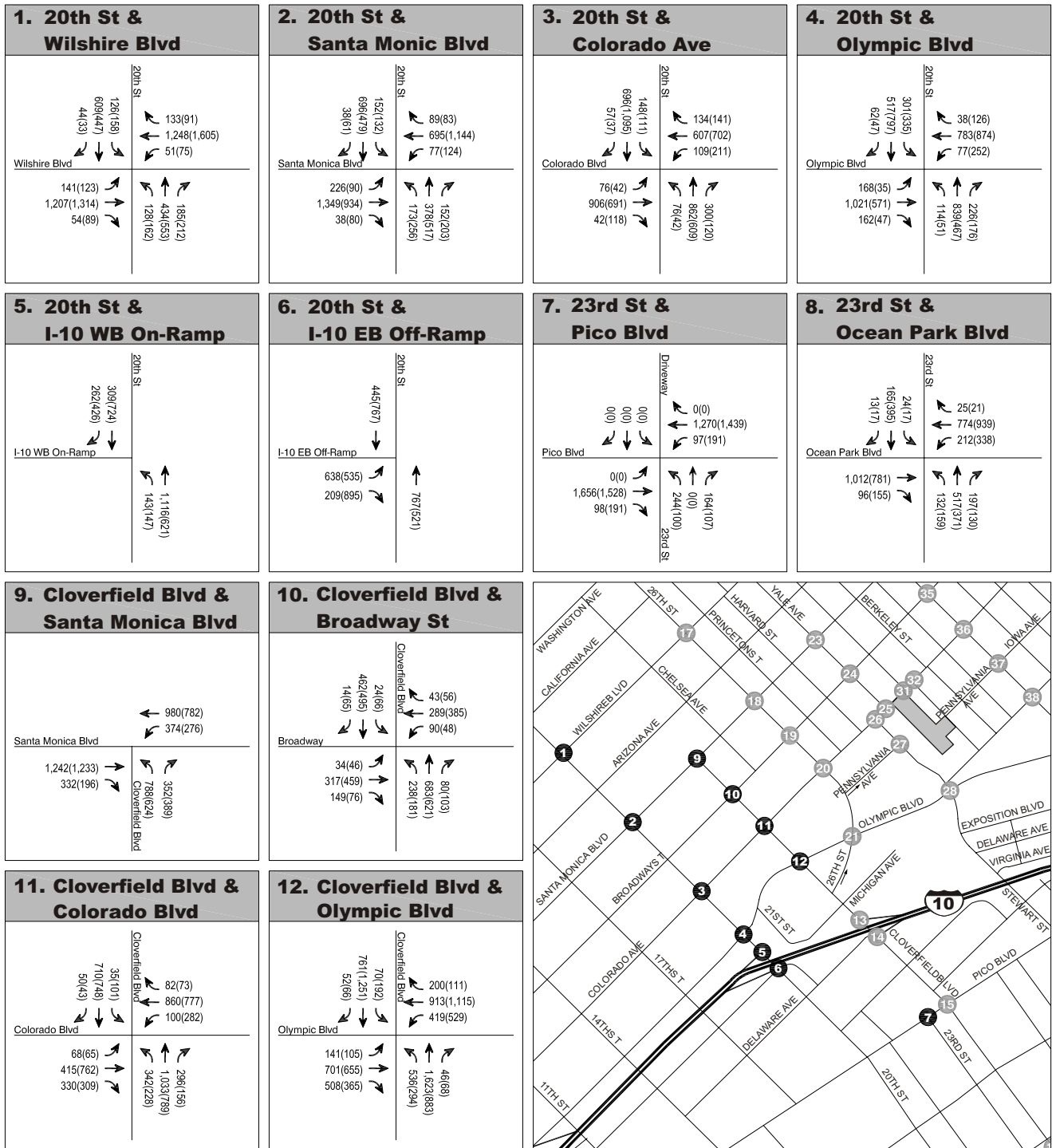
No.	Intersection	Class	Peak Hour	Approval Year No Project			Approval Year Plus Project			V/C or Delay Change	Significant Impact?	Approval Year Plus Project With Mitigation			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
46	Bundy Dr./ Santa Monica Blvd.	A A	AM PM	0.506 0.616	22 23	C C	0.508 0.620	22 23	C C	0 0	No No	/g/				
47	Bundy Drive/Idaho Ave.	A A	AM PM	0.644 0.729	10 13	A B	0.654 0.731	10 14	A B	0 1	No No	/g/				
48	Bundy Dr./ Olympic Blvd. /i/	A A	AM PM	0.946 1.040	48 60	D E	0.947 1.050	49 62	D E	1 2	No Yes	/h/			No Yes	
49	Bundy Dr./Pico Blvd.	A A	AM PM	0.807 1.421	28 -- /b/	C F	0.812 1.432	28 -- /b/	C F	0 0.011	No Yes	/h/			No Yes	
50	Bundy Dr./ I-10 EB On-Ramp /i/	A A	AM PM	1.550 0.930	-- /b/ 17	F B	1.557 0.939	/b/ 18	F B	0.007 1	Yes No	/h/			Yes No	
51	Bundy Dr./Pearl St.	A A	AM PM	0.634 0.746	6 16	A B	0.634 0.748	6 16	A B	0 0	No No	/g/				
52	Bundy Dr./ Ocean Park Blvd.	A A	AM PM	0.812 1.360	24 51	C D	0.814 1.362	24 51	C D	0 0	No No	/g/				
53	Barrington Ave./ Wilshire Blvd.	A A	AM PM	0.794 1.051	24 27	C C	0.802 1.059	24 27	C C	0 0	No No	/g/				
54	Barrington Ave./ Santa Monica Blvd.	A A	AM PM	0.622 0.603	13 13	B B	0.623 0.603	13 13	B B	0 0	No No	/g/				
55	Barrington Ave./ Olympic Blvd. /i/	A A	AM PM	0.797 1.236	25 -- /b/	C F	0.798 1.240	25 /b/	C F	0 0.004	No Yes	/g/				
56	Barrington Ave./ Pico Blvd.	A A	AM PM	0.860 0.888	21 24	C C	0.862 0.891	21 24	C C	0 0	No No	/g/				

/a/ Average stopped delay per vehicle in seconds.
 /b/ Indicates oversaturated conditions. Delay cannot be calculated.
 /c/ Northbound left turn is yield-controlled. All other movements (northbound through, southbound through/right) are uncontrolled.
 /d/ Intersection is a four-way stop.
 /e/ Intersection controlled by stop signs on minor approaches.
 /f/ For impact analysis purposes, the intersection was treated as signalized and analyzed according to the City criteria set forth in Table 4.15-9.
 /g/ Impact not significant. No mitigation required.
 /h/ Mitigation measures at intersection not feasible. Impact is significant and unavoidable.
 /i/ Intersection saturation flow was adjusted based on empirical peak hour information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.





TABLE 4.15-18: APPROVAL YEAR PLUS PROJECT (YEAR 2011) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF LOS ANGELES CRITERIA																
No.	Intersection	Class	Peak Hour	APPROVAL YEAR BASE (2001)			APPROVAL PLUS PROJECT (2011)			V/C or Delay Change	Significant Impact?	APPROVAL YEAR + PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay /a/	LOS			V/C	Delay /a/	LOS		
33	Centinela Ave./ Wilshire Blvd.	A	AM	0.575	n/a	A	0.576	n/a	A	0.001	No	/e/				
		A	PM	0.609	n/a	B	0.610	n/a	B	0.001	No					
34	Centinela Ave./ Santa Monica Blvd.	A	AM	0.958	n/a	E	0.963	n/a	E	0.005	No	/e/				
		A	PM	0.923	n/a	E	0.929	n/a	E	0.006	No					
35	Centinela Ave./Broadway/ Ohio Ave.	A	AM	0.627	n/a	B	0.631	n/a	B	0.004	No	/e/				
		A	PM	1.013	n/a	F	1.018	n/a	F	0.005	No					
36	Centinela Ave./ Colorado Ave./ Idaho Ave.	A	AM	0.861	n/a	D	0.871	n/a	D	0.010	No	/f/			No Yes	
		A	PM	1.282	n/a	F	1.282	n/a	F	0.013	Yes					
37	Centinela Ave./ Pennsylvania Ave./ Iowa Ave.	A	AM	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a				
		A	PM	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a					
38	Centinela Ave./ Nebraska Ave.	A	AM	0.444	n/a	A	0.469	n/a	A	0.025	No	/e/				
		A	PM	0.556	n/a	A	0.611	n/a	B	0.055	No					
39	Centinela Ave. (west)/ Olympic Blvd.	A	AM	0.671	n/a	B	0.684	n/a	B	0.013	No	/f/			No Yes	
		A	PM	0.917	n/a	E	0.936	n/a	E	0.019	Yes					
40	Centinela Ave. (east)/ Olympic Blvd.	A	AM	0.776	n/a	C	0.788	n/a	C	0.012	No	/e/				
		A	PM	0.680	n/a	B	0.704	n/a	C	0.024	No					
41	Centinela Ave./Exposition Blvd. /d/	A	AM	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a				
		A	PM	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a					
42	Centinela Ave./ I-10 WB Ramps	A	AM	1.712	n/a	F	1.729	n/a	F	0.017	Yes	/f/			Yes Yes	
		A	PM	1.567	n/a	F	1.587	n/a	F	0.020	Yes					
43	Centinela Ave./Pico Blvd.	A	AM	0.748	n/a	C	0.750	n/a	C	0.002	No	/e/				
		A	PM	0.850	n/a	D	0.855	n/a	D	0.005	No					
44	Centinela Ave./ I-10 EB On-Ramp	A	AM	0.540	n/a	A	0.548	n/a	A	0.008	No	/e/				
		A	PM	0.532	n/a	A	0.543	n/a	A	0.011	No					
45	Bundy Drive/Wilshire Blvd.	A	AM	0.808	n/a	D	0.811	n/a	D	0.003	No	/e/				
		A	PM	0.766	n/a	C	0.770	n/a	C	0.004	No					
46	Bundy Drive/ Santa Monica Blvd.	A	AM	0.571	n/a	A	0.574	n/a	A	0.003	No	/e/				
		A	PM	0.672	n/a	B	0.677	n/a	B	0.005	No					
47	Bundy Drive/Idaho Ave.	A	AM	0.668	n/a	B	0.678	n/a	B	0.010	No	/e/				
		A	PM	0.795	n/a	C	0.798	n/a	C	0.003	No					
48	Bundy Dr./Olympic Blvd. /g/	A	AM	1.031	n/a	F	1.032	n/a	F	0.001	No	/f/			No Yes	
		A	PM	1.148	n/a	F	1.159	n/a	F	0.011	Yes					
49	Bundy Dr./Pico Blvd.	A	AM	0.842	n/a	D	0.848	n/a	D	0.006	No	/f/			No Yes	
		A	PM	1.662	n/a	F	1.675	n/a	F	0.013	Yes					
50	Bundy Dr./ I-10 EB On-Ramp /g/	A	AM	1.677	n/a	F	1.687	n/a	F	0.010	Yes	/f/			Yes Yes	
		A	PM	0.964	n/a	E	0.976	n/a	E	0.012	Yes					
51	Bundy Dr./Pearl Street	A	AM	0.549	n/a	A	0.549	n/a	A	0.000	No	/e/				
		A	PM	0.730	n/a	C	0.731	n/a	C	0.001	No					
52	Bundy Dr./ Ocean Park Blvd.	A	AM	0.993	n/a	E	0.995	n/a	E	0.002	No	/e/				
		A	PM	1.136	n/a	F	1.137	n/a	F	0.001	No					

TABLE 4.15-18: APPROVAL YEAR PLUS PROJECT (YEAR 2011) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF LOS ANGELES CRITERIA																
No.	Intersection	Class	Peak Hour	APPROVAL YEAR BASE (2001)			APPROVAL PLUS PROJECT (2011)			V/C or Delay Change	Significant Impact?	APPROVAL YEAR + PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay /a/	LOS			V/C	Delay /a/	LOS		
53	Barrington Ave./ Wilshire Blvd.	A A	AM PM	0.669 0.713	n/a n/a	B C	0.670 0.714	n/a n/a	B C	0.001 0.001	No No	/e/				
54	Barrington Ave./ Santa Monica Blvd.	A A	AM PM	0.716 0.630	n/a n/a	C B	0.717 0.630	n/a n/a	C B	0.001 0.001	No No	/e/				
55	Barrington Ave./ Olympic Blvd. /g/	A A	AM PM	0.852 1.629	n/a n/a	D F	0.853 1.634	n/a n/a	D F	0.001 0.005	No No	/e/				
56	Barrington Ave./Pico Blvd.	A A	AM PM	0.774 0.901	n/a n/a	C E	0.775 0.902	n/a n/a	C E	0.001 0.001	No No	/e/				

/a/ VC ratio includes reduction for intersections operating with ATSAC capability.
 /b/ Average stopped delay per vehicle in seconds.
 /c/ Indicates oversaturated conditions. Delay cannot be calculated.
 /d/ Intersection controlled by stop signs on the minor approaches.
 /e/ Impact not significant. No mitigation required.
 /f/ Mitigation measures at intersection not feasible. Impact is significant and unavoidable.
 /g/ Intersection saturation flow was adjusted based on empirical peak hour information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

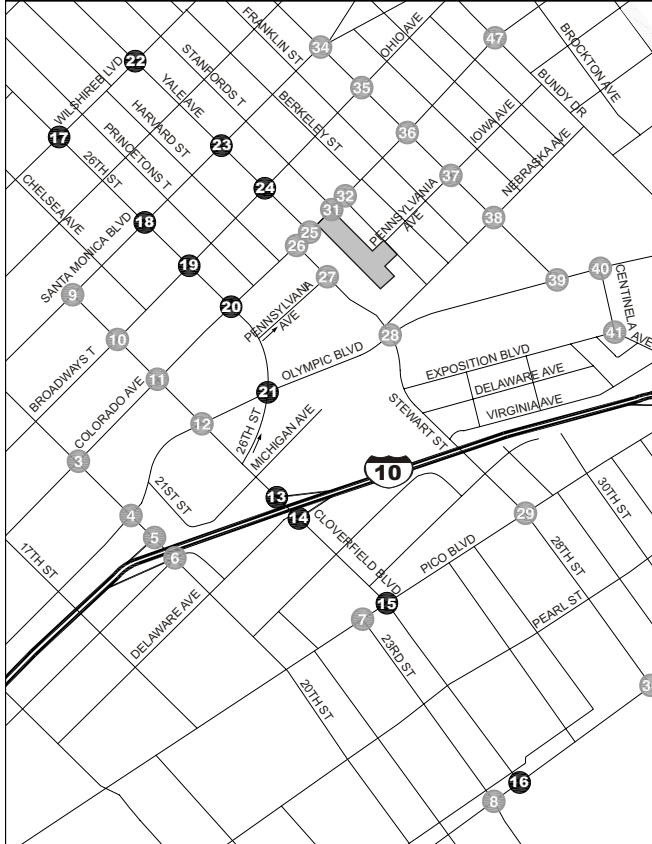
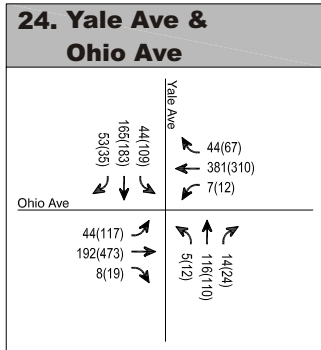
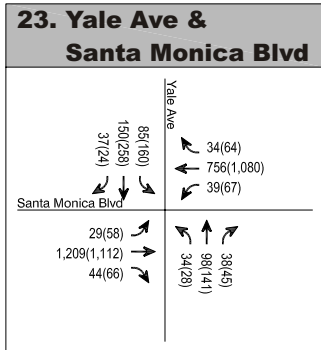
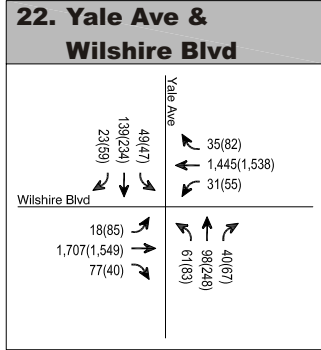
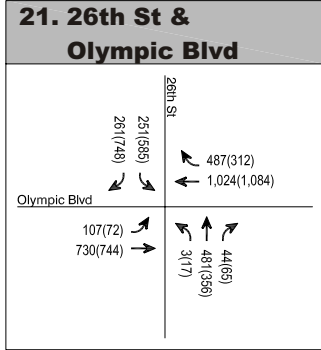
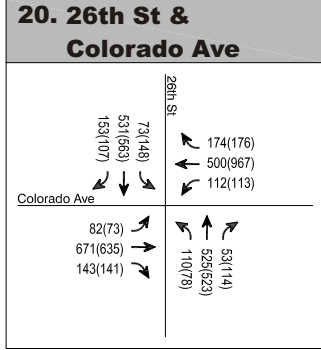
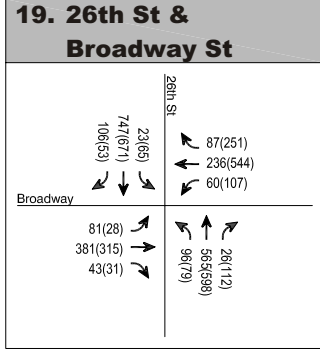
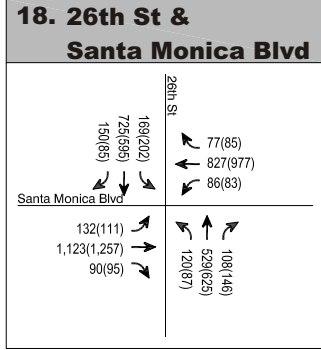
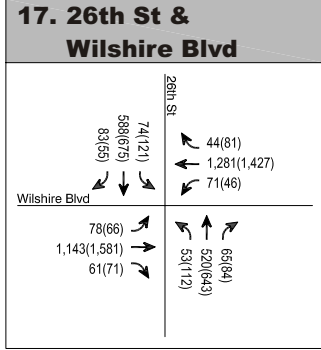
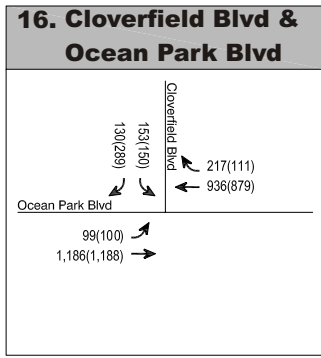
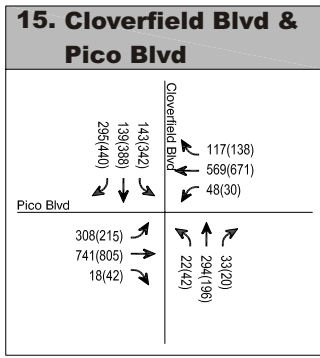
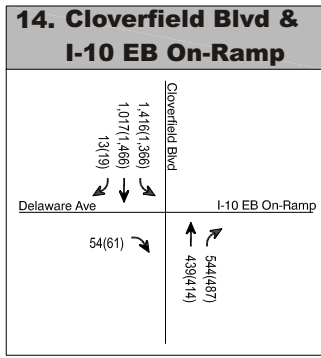
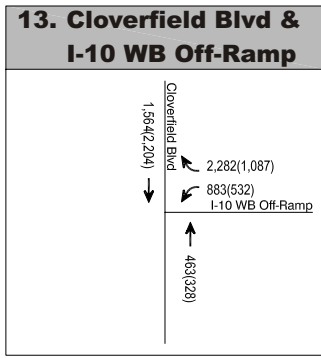


LEGEND:





-  Project Site
-  Analyzed Intersection
-  AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.





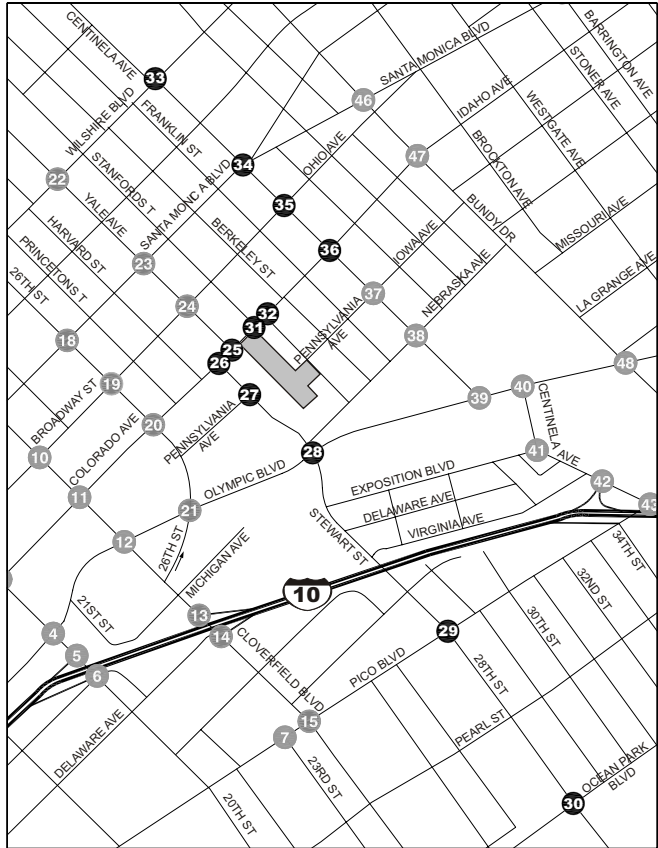
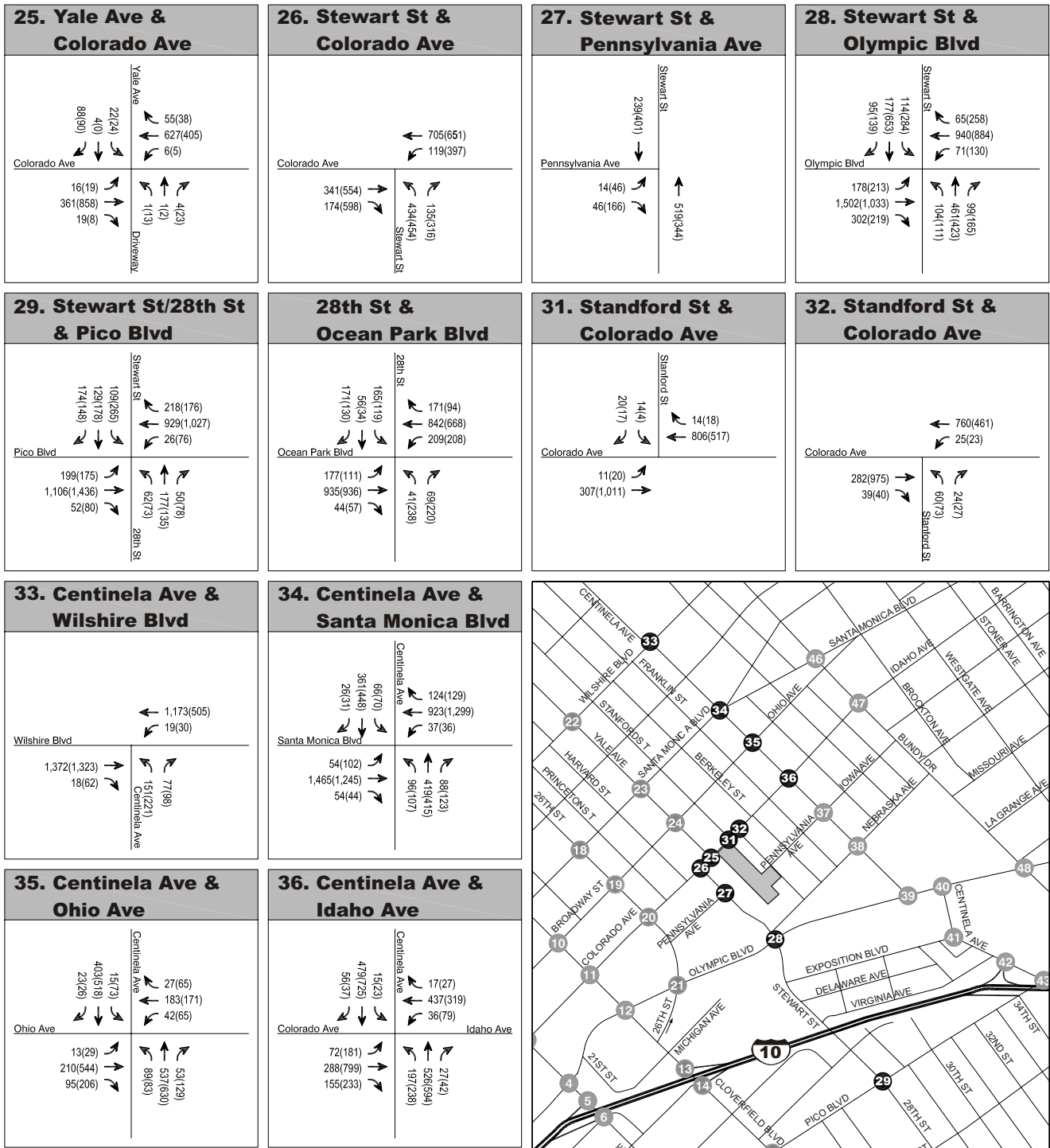
LEGEND:

-  Project Site
-  Analyzed Intersection
-  AM(PM) Peak Hour Traffic Volumes
-  Turn Lane




SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-13
APPROVAL YEAR PLUS PROJECT (YEAR 2011)
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 13-24



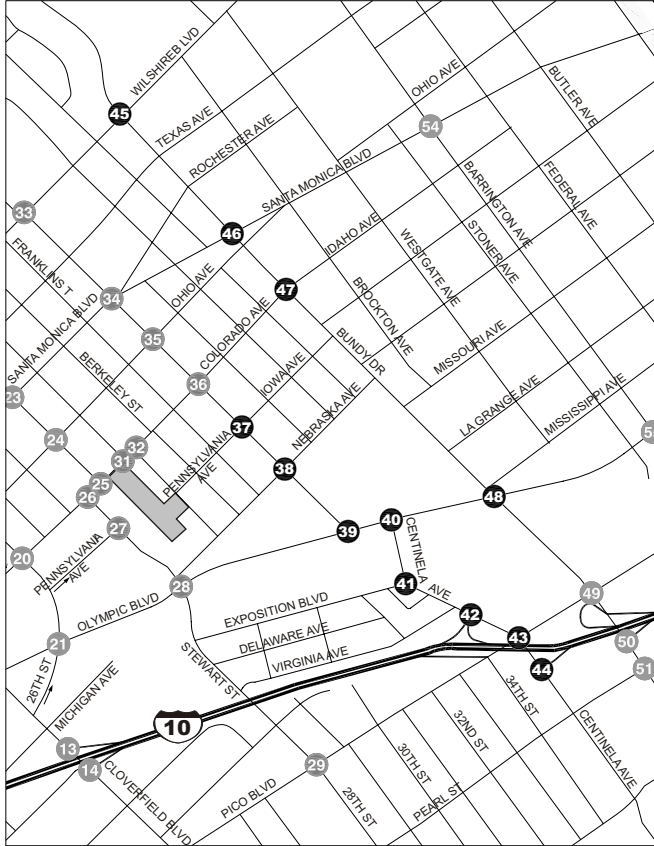
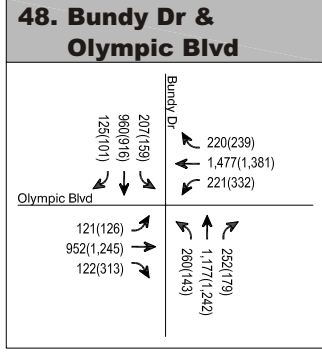
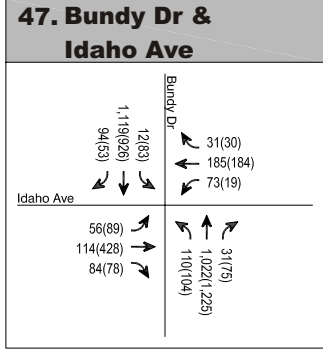
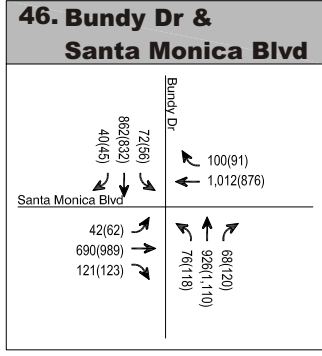
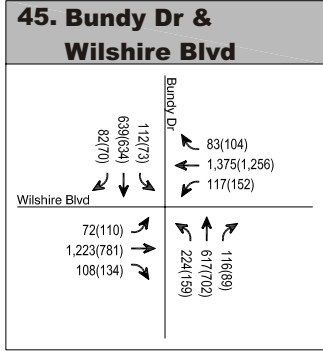
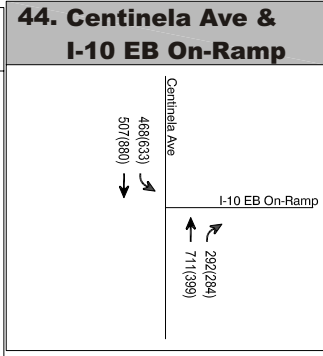
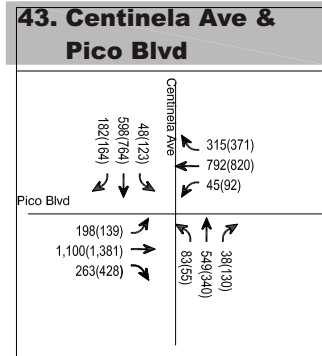
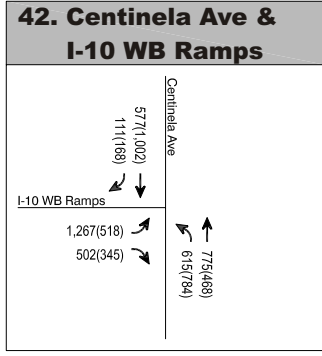
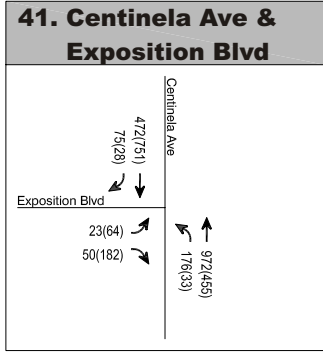
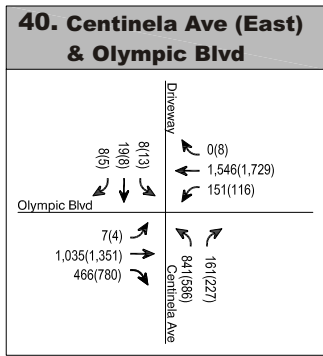
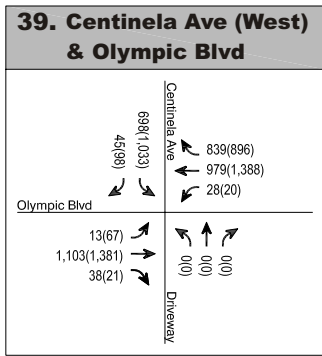
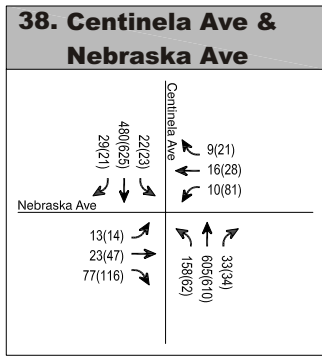
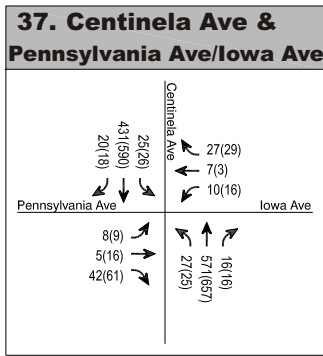
LEGEND:

-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-14
APPROVAL YEAR PLUS PROJECT (YEAR 2011)
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 25-36

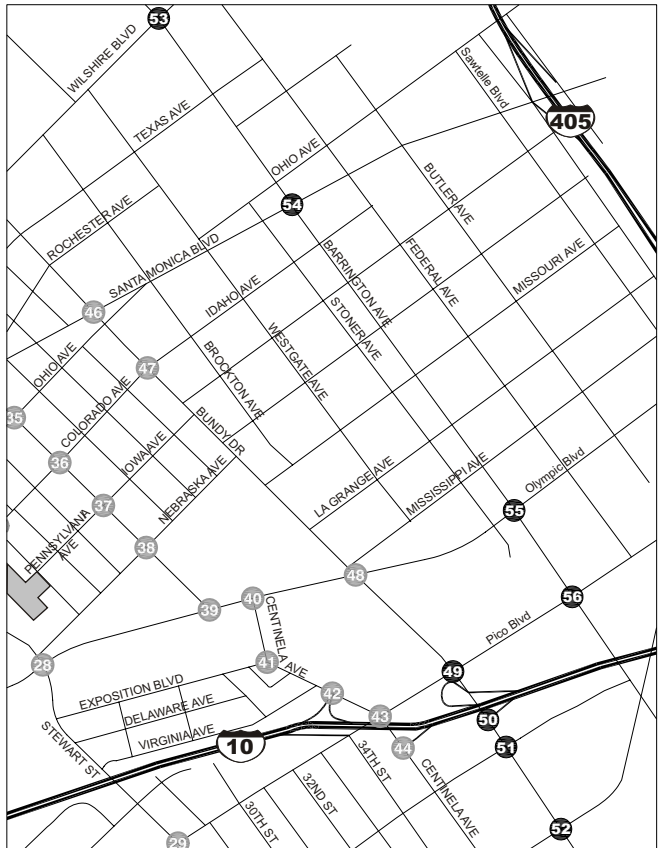
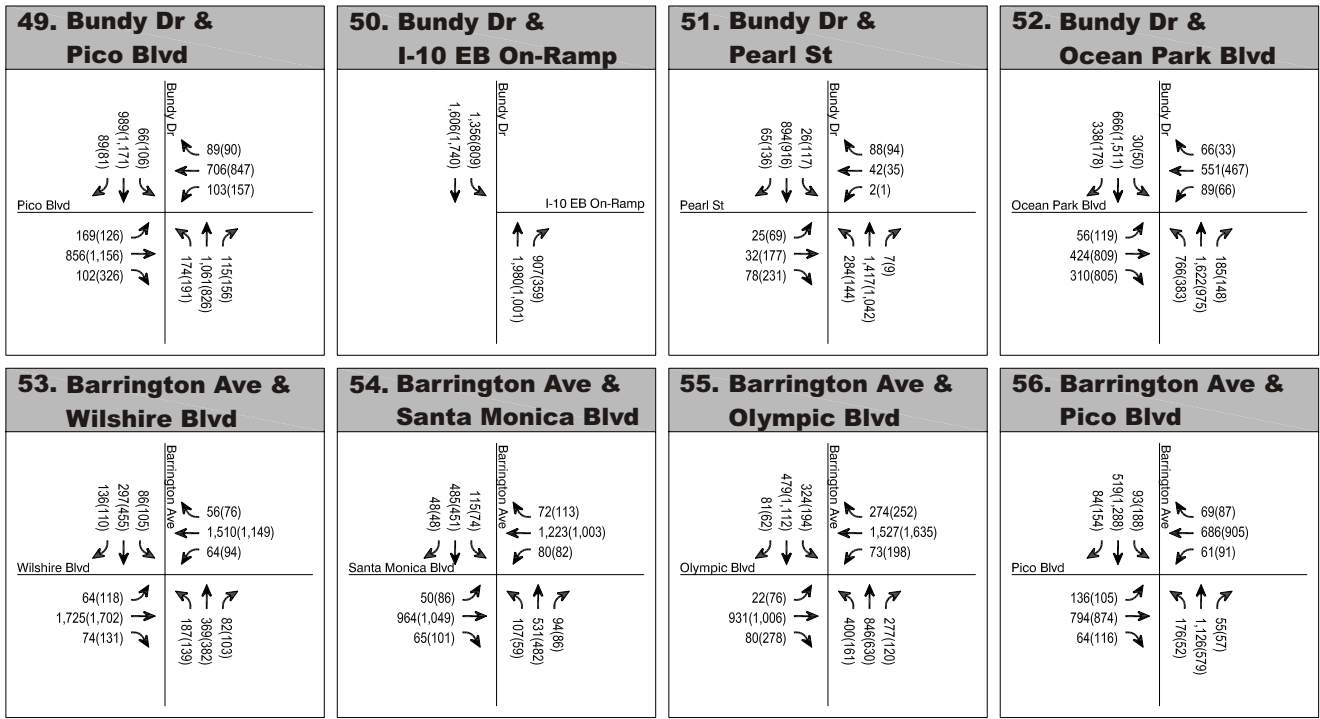


LEGEND:

- Project Site
- Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- Turn Lane

SOURCE: Fehr & Peers, 2011.

FIGURE 4.15-15
APPROVAL YEAR PLUS PROJECT (YEAR 2011)
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 37-48



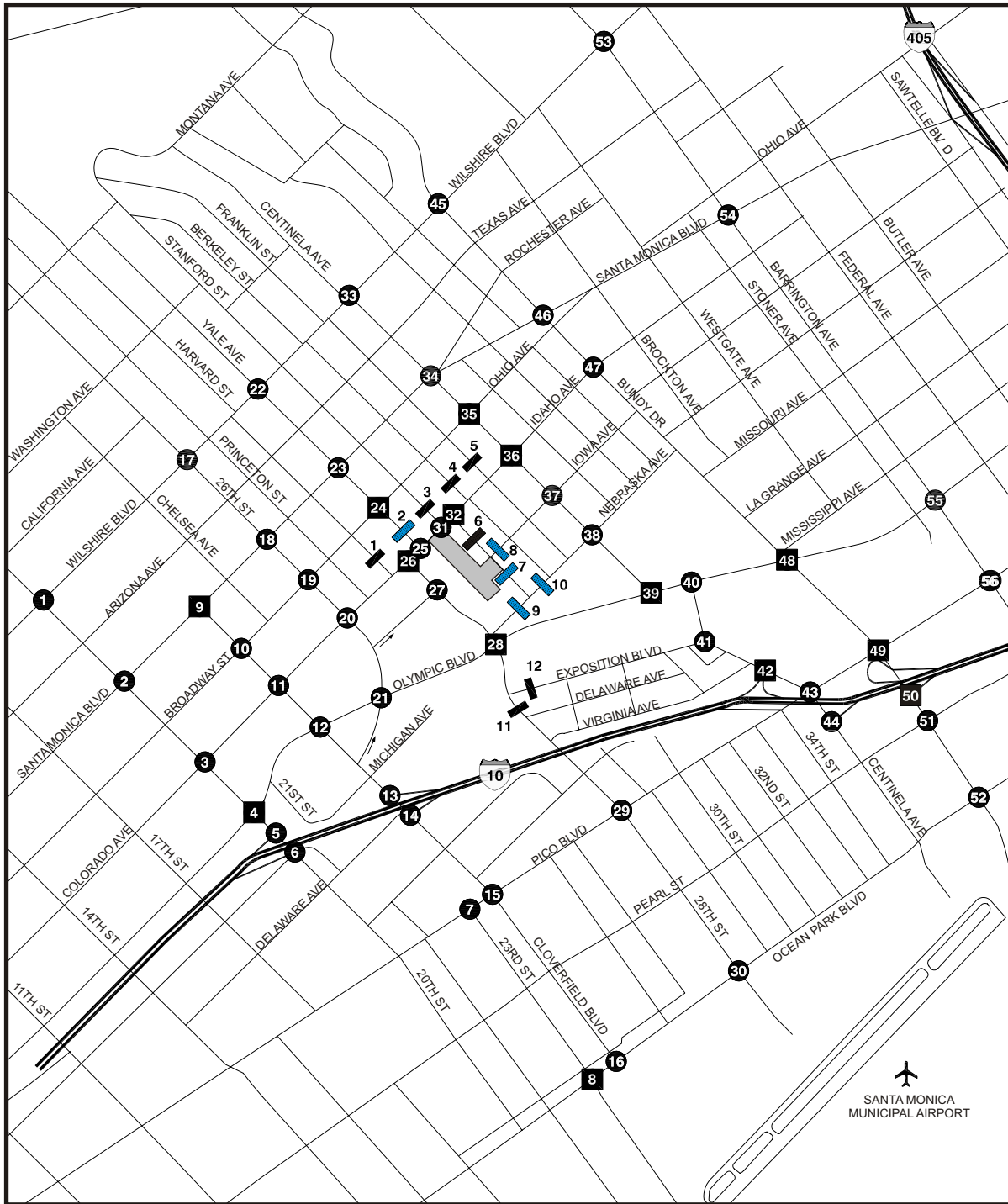
LEGEND:

- Project Site
- # Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
- Turn Lane

SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-16
APPROVAL YEAR PLUS PROJECT (YEAR 2011)
PEAK HOUR TRAFFIC VOLUMES
INTERSECTIONS 49-56



LEGEND:

Project Site

Analyzed Intersection

Significant Impact, see text for details

Analyzed Street Segment

Significant Impact, see text for details

SOURCE: Fehr & Peers, 2010.



FIGURE 4.15-17
APPROVAL YEAR (YEAR 2011) PLUS PROJECT
LOCATION OF SIGNIFICANTLY IMPACTED ANALYZED
INTERSECTIONS AND STREET SEGMENTS

Mitigation Measures - (Approval Year Plus Project 2011 Scenario)

- T1 23rd Street/Ocean Park Boulevard.** Add an exclusive right-turn lane on the eastbound approach of Ocean Park Boulevard. The mitigation measure was proposed due to the heavy existing eastbound through movement volumes. The proposed mitigation would require shifting the existing eastbound through lane approach approximately two feet to the north to provide room for a functional right-turn lane. The proposed mitigation would require implementation of peak period parking restrictions for the first 75 feet of parking (approximately three parking spaces) closest to the intersection (eastbound on Ocean Park Boulevard, west of 23rd Street) so vehicles can make eastbound right-turns onto 23rd Street from Ocean Park Boulevard during the peak periods or when there is available space outside of peak periods. The proposed mitigation measure would require some restriping and peak period parking restriction signage at the eastbound approach of this intersection.
- T2 Cloverfield Boulevard/Santa Monica Boulevard.** The left-turn phasing for the westbound leg of the Cloverfield Boulevard/Santa Monica Boulevard intersection shall be modified from a protected phase to a permitted-protected phase to decrease delay at the worst approach of the intersection to address the AM peak hour impact. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. Implementation of this mitigation measure would necessitate the provision of a combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.
- T3 Stewart Street/Olympic Boulevard.** The traffic signal at the Stewart Street/Olympic Boulevard intersection shall be modified to provide protected-permitted left-turn phasing for northbound and eastbound approaches to decrease delay at the worst approaches of the intersection to address the impact. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. Implementation of this mitigation measure would necessitate the provision of a combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.
- T4 Centinela Avenue/I-10 Westbound Ramps.** The traffic signal at the Centinela Avenue/I-10 Westbound Ramps intersection shall be modified to provide protected-permitted left-turn phasing for northbound approach to decrease delay at the worst approach of the intersection to address. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the permitted-protected left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. Since this intersection is shared by the City of Santa Monica and City of Los Angeles, this mitigation measure must be approved by LADOT. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

Level of Impact After Mitigation

23rd Street/Ocean Park Boulevard. Mitigation Measure **T1** would implement parking restrictions near the intersection. Using the TRAFFIX database, Mitigation Measure **T1** would fully mitigate the project-related impacts. Therefore, with implementation of Mitigation Measure **T1**, the proposed project's impact at this intersection would be less than significant.

Cloverfield Boulevard/Santa Monica Boulevard Intersection. Mitigation Measure **T2** would require the phasing to be modified to address the AM peak hour impact. Using the TRAFFIX database, Mitigation Measure **T2** would fully mitigate the project-related impacts. Therefore, with implementation of Mitigation Measure **T2**, the proposed project's impact at this intersection would be less than significant.

Stewart Street/Olympic Boulevard. Mitigation Measure **T3** would require the modification of the traffic signal's left-turn phasing at this intersection to address the impacts at the worst approaches. Using the City's TRAFFIX database, Mitigation Measure **T3** was determined to fully mitigate the project related impacts. Therefore, with implementation of Mitigation Measure **T3**, the proposed project's impact at this intersection would be less than significant.

Centinela Avenue/I-10 Westbound Ramps. Mitigation Measure **T4** would require the traffic signal at the Centinela Avenue/I-10 Westbound Ramps intersection to be modified to provide protected-permitted left-turn phasing for the northbound approach. Using the City's TRAFFIX database, Mitigation Measure **T4** was determined to fully mitigate the project related impacts based on the City of Santa Monica significance criteria. Therefore, the proposed project's impact at this intersection would be less than significant. However, this mitigation measure would not fully mitigate the significant impact based on the City of Los Angeles' significance criteria. This intersection is shared with the City of Los Angeles, so any mitigation measure implemented at this intersection must be approved by LADOT and therefore, the impact will be considered significant and unavoidable.

Mitigation Measures **T1** and **T4** would mitigate the impacts at the four identified intersections to less than significant levels based on the City of Santa Monica significance criteria. However, Mitigation Measure **T4** must be approved by LADOT and/or Caltrans and therefore, the impact will be considered significant and unavoidable. As indicated in the Traffic Study, there are no feasible mitigation measures to fully mitigate the six significantly impacted intersections wholly or partially in the City of Los Angeles. As shown in **Table 4.15-19**, after mitigation, impacts to the following 11 of intersections would be significant and unavoidable:

4. 20th Street/Olympic Boulevard (AM)
24. Yale Street/Broadway (PM)
26. Stewart Street/Colorado Avenue (AM)
32. Stanford Street/Colorado Avenue (PM)
35. Centinela Avenue/Broadway/Ohio Avenue (PM)
36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM) *[also impacted under City of Los Angeles criteria]*
39. Centinela Avenue (west)/Olympic Boulevard (PM) *[impacted under City of Los Angeles criteria only]*
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM) *[impacted under City of Los Angeles criteria only]*
48. Bundy Drive/Olympic Boulevard (PM) *[also impacted under City of Los Angeles criteria]*
49. Bundy Drive/Pico Boulevard (PM) *[also impacted under City of Los Angeles criteria]*
50. Bundy Drive/I-10 Eastbound On-Ramp (AM and PM) *[also impacted under City of Los Angeles criteria]*

TABLE 4.15-19: INTERSECTION IMPACTS SUMMARY TABLE – APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS

No.	Intersection	HCM Impact?	CMA Impact?	Feasible Mitigation?
1	20th St./Wilshire Blvd.	No	N/A	N/A
2	20th St./Santa Monica Blvd.	No	N/A	N/A
3	20th St./Colorado Ave.	No	N/A	N/A
4	20th St./Olympic Blvd.	Yes	N/A	No
5	20th St./I-10 WB On-Ramp	No	N/A	N/A
6	20th St./I-10 EB Off-Ramp	No	N/A	N/A
7	23rd St./Pico Blvd.	No	N/A	N/A
8	23rd St./Ocean Park Blvd.	Yes	N/A	Yes
9	Cloverfield Blvd. &/Santa Monica Blvd.	Yes	N/A	Yes
10	Cloverfield Blvd./Broadway	No	N/A	N/A
11	Cloverfield Blvd./Colorado Ave.	No	N/A	N/A
12	Cloverfield Blvd./Olympic Blvd.	No	N/A	N/A
13	Cloverfield Blvd./I-10 WB Off-Ramp	No	N/A	N/A
14	Cloverfield Blvd./I-10 EB On-Ramp/Delaware Ave.	No	N/A	N/A
15	Cloverfield Blvd./Pico Blvd.	No	N/A	N/A
16	Cloverfield Blvd./Ocean Park Blvd.	No	N/A	N/A
17	26th Street/Wilshire Blvd.	No	N/A	N/A
18	26th Street/Santa Monica Blvd.	No	N/A	N/A
19	26th St./Broadway	No	N/A	N/A
20	26th St./Colorado Ave.	No	N/A	N/A
21	26th St./Olympic Blvd.	No	N/A	N/A
22	Yale St./Wilshire Blvd.	No	N/A	N/A
23	Yale St./Santa Monica Blvd.	No	N/A	N/A
24	Yale St./Broadway	Yes	N/A	No
25	Yale St./Colorado Ave.	No	N/A	N/A
26	Stewart St./Colorado Ave.	Yes	N/A	No
27	Stewart St./Pennsylvania Ave.	No	N/A	N/A
28	Stewart St./Olympic Blvd.	Yes	N/A	Yes
29	Stewart St./Pico Blvd.	No	N/A	N/A
30	28th St. /Ocean Park Blvd.	No	N/A	N/A
31	Stanford Street (west)/Colorado Ave.	No	N/A	N/A
32	Stanford Street (east)/Colorado Ave.	Yes	N/A	No
33	Centinela Ave./Wilshire Blvd.	No	No	N/A
34	Centinela Ave./Santa Monica Blvd.	No	No	N/A
35	Centinela Ave./Broadway/Ohio Ave.	Yes	No	No
36	Centinela Ave./Colorado Ave./Idaho Ave.	Yes	Yes	No
37	Centinela Ave./Pennsylvania Ave./Iowa Ave.	No	No	N/A
38	Centinela Ave./Nebraska Ave.	No	No	N/A
39	Centinela Ave. (west)/Olympic Blvd.	No	Yes	No
40	Centinela Ave. (east)/Olympic Blvd.	No	No	N/A
41	Centinela Ave./Exposition Blvd.	No	No	N/A
42	Centinela Ave./I-10 WB Ramps	Yes	Yes	Yes
43	Centinela Ave./Pico Blvd.	No	No	N/A
44	Centinela Ave./I-10 EB On-Ramp	No	No	N/A
45	Bundy Drive/Wilshire Blvd.	No	No	N/A
46	Bundy Drive/Santa Monica Blvd.	No	No	N/A
47	Bundy Drive/Idaho Ave.	No	No	N/A
48	Bundy Dr./Olympic Blvd.	Yes	Yes	No
49	Bundy Dr./Pico Blvd.	Yes	Yes	No

TABLE 4.15-19: INTERSECTION IMPACTS SUMMARY TABLE – APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS				
No.	Intersection	HCM Impact?	CMA Impact?	Feasible Mitigation?
50	Bundy Dr./I-10 EB On-Ramp	Yes	Yes	No
51	Bundy Dr./Pearl Street	No	No	N/A
52	Bundy Dr./Ocean Park Blvd.	No	No	N/A
53	Barrington Ave./Wilshire Blvd.	No	No	N/A
54	Barrington Ave./Santa Monica Blvd.	No	No	N/A
55	Barrington Ave./Olympic Blvd.	No	No	N/A
56	Barrington Ave./Pico Blvd.	No	No	N/A
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i> , October 2011.				

Additional mitigation measures to reduce significant impact on intersections were considered. However, as discussed in further detail in the Traffic Study (Appendix F to this EIR), these measures are rejected since they would require the taking of public or private property for public right of way in order to implement the proposed physical mitigations. These measures could negatively impact the built environment and existing pedestrian network, and there were rejected.

Impact T-2 **The proposed project would generate an estimated net new 2,278 daily trips, including a net new of 144 weekday AM peak hour trips and 170 weekday PM peak hour trips under Cumulative Plus Project (Year 2020) Conditions. The increase in vehicles traveling on the surrounding roadway network would result in significant traffic impacts at 13 of 56 study area intersections. Implementation of Mitigation Measures T1, T3 through T6 would reduce impacts at three affected intersections to a less-than-significant level. However, increased traffic volumes would result in significant and unavoidable impacts at 10 intersections.**

For the Cumulative Plus Project (Year 2020) Conditions analysis, project trip generation rates are LUCE-Compliant for Area Type 1 with vehicle trip reduction attributed to Metro Expo Phase II LRT. The proposed project trip generation is shown in Table 4.15-17. The proposed project is expected to generate 2,508 new daily trips, including 158 weekday AM peak hour trips and 187 weekday PM peak hour trips. When considering the removal of the existing uses from the project site, the proposed project would generate 2,278 net new daily trips, including a net increase of 144 trips in the weekday AM peak hour and 170 trips in the weekday PM peak hour. These estimates incorporate trip reductions assuming that the project implements effective TDM strategies in accordance with the LUCE policies.

As indicated previously, TDM plan and commitment to achieve the LUCE-compliant trip rates would be made a condition of approval for the project, TDM measures for the proposed project will be determined by the City during the project approval process and may include the TDM measures mentioned previously.

The Cumulative Plus Project (Year 2020) Conditions peak hour traffic volumes were analyzed to determine potential operating conditions in 2020 at the study intersections and to identify specific traffic impacts resulting from the addition of project-generated traffic. The results of this analysis are summarized in **Tables 4.15-20** and **4.15-21** for comparison with the Cumulative Base (Year 2020) Conditions. The traffic volumes under the Cumulative Plus Project (Year 2020) Conditions are shown in **Figures 4.15-18** through **4.15-22**. The locations of the significantly impacted analyzed intersections and street segments are shown in **Figure 4.15-23**. Of the 56 analyzed intersections, a total of 13 were found to be significantly impacted by the proposed project based on both the City of Santa Monica and City of Los Angeles significance criteria. The locations of the significantly impacted analyzed intersections are shown in **Figure 4.15-17**, above.

TABLE 4.15-20: CUMULATIVE PLUS PROJECT(YEAR 2020) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE PLUS PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
1	20th St./ Wilshire Blvd.	A	AM	1.456	44	D	1.459	44	D	0	No	/g/				
		A	PM	1.393	60	E	1.399	60	E	0	No					
2	20th St./ Santa Monica Blvd.	A	AM	1.430	49	D	1.432	49	D	0	No	/g/				
		A	PM	0.927	21	C	0.928	21	C	0	No					
3	20th St./Colorado Ave.	A	AM	0.694	13	B	0.707	13	B	0	No	/g/				
		A	PM	1.167	30	C	1.180	31	C	1	No					
4	20th St./Olympic Blvd.	A	AM	0.989	53	D	0.991	53	D	0	No	/g/				
		A	PM	0.761	33	C	0.763	33	C	0	No					
5	20th St./ I-10 WB On-Ramp [1] [worst approach only] [worst approach only] Impact Analysis // Impact Analysis //	A	AM	n/a	1	A	n/a	1	A	n/a	n/a	/g/				
		A	PM	n/a	1	A	n/a	1	A	n/a	n/a					
			AM	n/a	9	A	n/a	9	A	n/a	n/a					n/a
			PM	0.331	0		0.332	0		0	No					
			PM	0.351	0		0.352	0		0	No					
6	20th St./ I-10 EB Off-Ramp	A	AM	0.671	15	B	0.673	15	B	0	No	/g/				
		A	PM	0.843	18	B	0.843	18	B	0	No					
7	23rd St./Pico Blvd.	A	AM	0.892	17	B	0.897	17	B	0	No	/g/				
		A	PM	0.875	13	B	0.880	14	B	1	No					
8	23rd St./ Ocean Park Blvd.	A	AM	1.334	/b/	F	1.349	/b/	F	0.015	Yes	1.130	-- /b/	F	0	No
		A	PM	1.326	/b/	F	1.334	/b/	F	0.008	Yes	1.138	-- /b/	F	0	No
9	Cloverfield Blvd./ Santa Monica Blvd.	A	AM	1.113	62	E	1.114	62	E	0	No	/g/				
		A	PM	0.998	40	D	1.000	41	D	1	No					
10	Cloverfield Blvd./ Broadway	A	AM	0.518	11	B	0.518	11	B	0	No	/g/				
		A	PM	0.616	13	B	0.616	13	B	0	No					
11	Cloverfield Blvd./ Colorado Ave.	A	AM	0.736	36	D	0.738	36	D	0	No	/g/				
		A	PM	0.743	37	D	0.744	37	D	0	No					
12	Cloverfield Blvd./ Olympic Blvd.	A	AM	0.784	39	D	0.785	39	D	0	No	/g/				
		A	PM	0.876	46	D	0.879	46	D	0	No					
13	Cloverfield Blvd./ I-10 WB Off-Ramp	A	AM	1.384	/b/	F	1.386	/b/	F	0.001	No	/g/				
		A	PM	0.891	18	B	0.892	18	B	0	No					

TABLE 4.15-20: CUMULATIVE PLUS PROJECT(YEAR 2020) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE PLUS PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
14	Cloverfield Blvd./ I-10 EB On-Ramp/ Delaware Ave. /i/	A A	AM PM	0.994 1.425	26 /b/	C F	0.995 1.427	26 /b/	C F	0 0.002	No No	/g/				
15	Cloverfield Blvd./ Pico Blvd.	A A	AM PM	0.691 0.770	26 27	C C	0.692 0.772	26 27	C C	0 0	No No	/g/				
16	Cloverfield Blvd./ Ocean Park Blvd.	A A	AM PM	1.017 1.070	/b/ /b/	F F	1.018 1.072	/b/ /b/	F F	0.001 0.002	No No	/g/				
17	26th Street/Wilshire Blvd.	A A	AM PM	0.875 1.102	29 63	C E	0.877 1.103	29 64	C E	0 1	No Yes	0.962 1.078	27 56	F F	0 0	No No
18	26th Street/Santa Monica Blvd.	A A	AM PM	0.924 0.981	22 28	C C	0.927 0.986	23 28	C C	1 0	No No	/g/				
19	26th St./Broadway	A A	AM PM	0.713 0.712	13 14	B B	0.713 0.715	13 14	B B	0 0	No No	/g/				
20	26th St./Colorado Ave.	A A	AM PM	0.801 1.054	49 27	D C	0.808 1.007	51 26	D C	2 0	No No	/g/				
21	26th St./Olympic Blvd.	A A	AM PM	0.871 1.023	36 56	D E	0.874 1.026	40 56	D E	1 0	No No	/g/				
22	Yale St./Wilshire Blvd.	A A	AM PM	0.821 1.046	14 30	B C	0.824 1.046	14 30	B C	0 0	No No	/g/				
23	Yale St./Santa Monica Blvd.	A A	AM PM	0.643 0.792	10 17	A B	0.644 0.794	10 17	A B	0 0	No No	/g/				
24	Yale St./Broadway /d/	C C	AM PM	0.791 1.085	18 49	C E	0.794 1.090	19 50	C E	1 1	No Yes	/h/			No Yes	
25	Yale St./ Colorado Ave. /e/	C C	AM PM	n/a n/a	2 2	A A	n/a n/a	2 2	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only]		AM	n/a	17	B	n/a	18	B	n/a	n/a	/g/				
	[worst approach only]		PM	n/a	24	C	n/a	25	C	n/a	n/a	/g/				
	Impact Analysis /f/		AM	0.424	5		0.429	5		0	No	/g/				
	Impact Analysis /f/		PM	0.501	5		0.511	5		0	No	/g/				
26	Stewart St./ Colorado Ave.	C C	AM PM	0.753 0.810	32 18	C B	0.761 0.824	34 19	C B	2 1	No No	/g/				

TABLE 4.15-20: CUMULATIVE PLUS PROJECT(YEAR 2020) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE PLUS PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
27	Stewart St./ Pennsylvania Ave. /e/	C C	AM PM	n/a n/a	2 7	A A	n/a n/a	2 8	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only] [worst approach only]		AM PM	n/a n/a	18 25	B C	n/a n/a	18 29	B C	n/a n/a						
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.210 0.272	5 16		0.223 0.304	5 17		0 1						
28	Stewart St./Olympic Blvd.	A A	AM PM	1.079 1.912	66 /b/	E F	1.087 2.003	69 /b/	E F	3 0.091	Yes Yes	1.078 1.227	66 /b/	E F	0 0	No No
29	Stewart St./Pico Blvd.	A A	AM PM	0.851 0.980	25 33	C C	0.870 1.003	26 33	C C	1 0	No No	/g/				
30	28th St. / Ocean Park Blvd.	A A	AM PM	0.770 0.731	17 22	B C	0.777 0.732	18 22	B C	1 0	No No	/g/				
31	Stanford St. (west)/ Colorado Ave.	C C	AM PM	n/a n/a	1 0	A A	n/a n/a	1 0	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only] [worst approach only]		AM PM	n/a n/a	20 11	B B	n/a n/a	20 11	B B	n/a n/a	n/a n/a					
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.453 0.555	2 1		0.455 0.561	2 1		0 0	n/a n/a					
32	Stanford St. (east)/ Colorado Ave.	C C	AM PM	n/a n/a	1 1	A A	n/a n/a	1 1	A A	n/a n/a	n/a n/a	/g/				
	[worst approach only] [worst approach only]		AM PM	n/a n/a	18 37	B D	n/a n/a	18 38	B D	n/a n/a	n/a n/a					
	Impact Analysis /f/ Impact Analysis /f/		AM PM	0.424 0.574	2 2		0.427 0.582	2 2		0 0	No No					
33	Centinela Ave./ Wilshire Blvd.	A A	AM PM	0.605 0.630	6 8	A A	0.605 0.630	6 8	A A	0 0	No No	/g/				
34	Centinela Ave./ Santa Monica Blvd.	A A	AM PM	1.053 1.084	41 57	D E	1.055 1.089	42 58	D E	1 1	No Yes	/h/			No Yes	
35	Centinela Ave./ Broadway/ Ohio Ave.	A A	AM PM	0.710 1.353	14 /b/	B F	0.712 1.355	14 /b/	B F	0 0.002	No No	/g/				
36	Centinela Ave./ Colorado Ave./ Idaho Ave.	A A	AM PM	0.794 1.066	16 45	B D	0.800 1.082	17 48	B D	1 3	No Yes	/g/				

TABLE 4.15-20: CUMULATIVE PLUS PROJECT(YEAR 2020) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE PLUS PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
37	Centinela Ave./ Pennsylvania Ave./ Iowa Ave. [worst approach only] [worst approach only] Impact Analysis // Impact Analysis //	A	AM	n/a	2	A	n/a	2	A	n/a	n/a	/h/	No Yes			
		A	PM	n/a	5	A	n/a	6	A	n/a	n/a					
			AM	n/a	24	C	n/a	24	C	n/a	n/a			n/a		
			PM	n/a	74	E	n/a	84	F	n/a	n/a					
			AM	0.360	4		0.367	5		1	No					
			PM	0.462	5		0.463	6		1	Yes					
38	Centinela Ave./ Nebraska Ave.	A	AM	0.455	5	A	0.468	6	A	1	No	/g/				
		A	PM	0.525	7	A	0.537	8	A	1	No					
39	Centinela Ave. (west)/Olympic Blvd.	A	AM	0.645	12	B	0.654	12	B	0	No	/g/				
		A	PM	0.864	14	B	0.887	15	B	1	No					
40	Centinela Ave. (east)/Olympic Blvd.	A	AM	1.081	21	C	1.098	22	C	1	No	/g/				
		A	PM	1.174	21	C	1.207	22	C	1	No					
41	Centinela Ave./ Exposition Blvd. /e/ [worst approach only] [worst approach only] Impact Analysis // Impact Analysis //	A	AM	n/a	2	A	n/a	2	A	n/a	n/a	/g/				
		A	PM	n/a	4	A	n/a	4	A	n/a	n/a					
			AM	n/a	34	C	n/a	36	D	n/a	n/a			n/a		
			PM	n/a	35	C	n/a	38	D	n/a	n/a					
			AM	0.707	4		0.720	4		0	No					
			PM	0.552	7		0.562	7		0	No					
42	Centinela Ave./ I-10 WB Ramps	A	AM	1.824	/b/	F	1.839	/b/	F	0.015	Yes	1.748	/b/	F	0	No
		A	PM	1.603	/b/	F	1.620	/b/	F	0.017	Yes	1.529	/b/	F	0	No
43	Centinela Ave./Pico Blvd.	A	AM	0.715	14	B	0.715	14	B	0	No	/g/				
		A	PM	0.787	14	B	0.791	14	B	0	No					
44	Centinela Ave./ I-10 EB On-Ramp	A	AM	0.602	11	B	0.607	11	B	0	No	/g/				
		A	PM	0.694	9	A	0.702	9	A	0	No					
45	Bundy Dr./ Wilshire Blvd.	A	AM	0.800	32	C	0.802	32	C	0	No	/g/				
		A	PM	0.741	30	C	0.743	30	C	0	No					
46	Bundy Dr./ Santa Monica Blvd.	A	AM	0.513	22	C	0.516	22	C	0	No	/g/				
		A	PM	0.612	22	C	0.617	22	C	0	No					
47	Bundy Drive/Idaho Ave.	A	AM	0.739	10	A	0.750	10	A	0	No	/g/				
		A	PM	0.747	14	B	0.749	14	B	0	No					
48	Bundy Dr./ Olympic Blvd. //i/	A	AM	0.946	46	D	0.948	47	D	1	No	/g/				
		A	PM	1.056	64	E	1.065	65	E	1	Yes					
49	Bundy Dr./Pico Blvd.	A	AM	0.811	28	C	0.816	28	C	0	No	/h/	No Yes			
		A	PM	1.409	/b/	F	1.418	/b/	F	0.009	Yes					

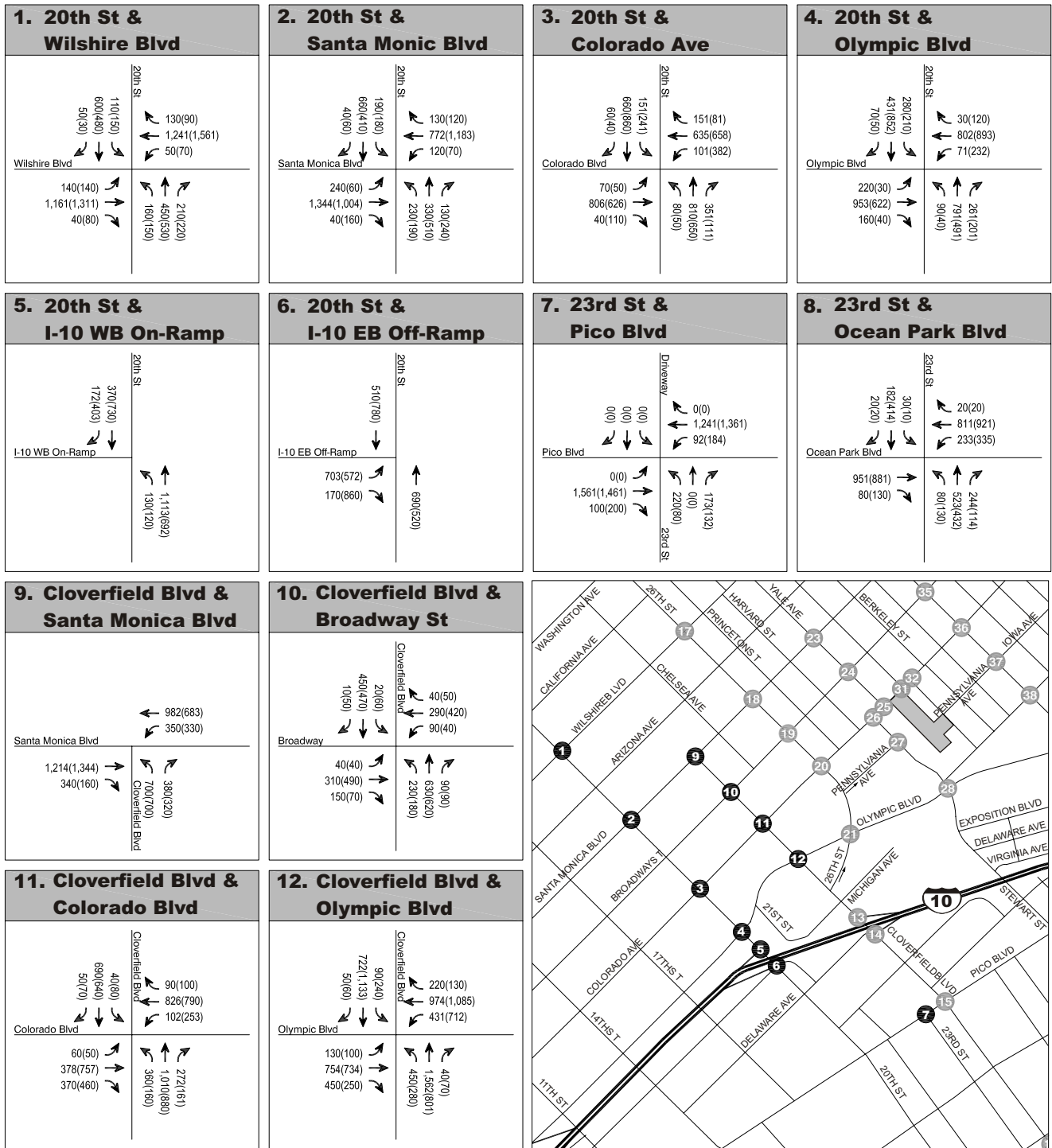
TABLE 4.15-20: CUMULATIVE PLUS PROJECT(YEAR 2020) INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF SANTA MONICA CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE PLUS PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay	LOS			V/C	Delay /a/	LOS		
50	Bundy Dr./ I-10 EB On-Ramp /i/	A A	AM PM	1.579 0.872	/b/ 14	F B	1.585 0.882	/b/ 15	F B	0.0076 1	Yes No	/h/			Yes No	
51	Bundy Dr./Pearl St.	A A	AM PM	0.681 0.730	6 17	A B	0.681 0.730	6 17	A B	0 0	No No	/g/				
52	Bundy Dr./ Ocean Park Blvd.	A A	AM PM	1.002 1.401	28 59	C E	1.002 1.403	29 59	C E	1 0	No No	/g/				
53	Barrington Ave./ Wilshire Blvd.	A A	AM PM	0.777 1.034	24 27	C C	0.784 1.040	24 27	C C	0 0	No No	/g/				
54	Barrington Ave./ Santa Monica Blvd.	A A	AM PM	0.646 0.621	14 13	B B	0.646 0.623	14 13	B B	0 0	No No	/g/				
55	Barrington Ave./ Olympic Blvd. /i/	A A	AM PM	0.831 1.383	24 /b/	C F	0.833 1.390	24 /b/	C F	0 0.007	No Yes	0.804 1.208	24 79	C E	0 0	No No
56	Barrington Ave./Pico Blvd.	A A	AM PM	0.891 0.930	21 26	C C	0.891 0.933	21 26	C C	0 0	No No	/g/				

/a/ Average stopped delay per vehicle in seconds.
 /b/ Indicates oversaturated conditions. Delay cannot be calculated.
 /c/ Northbound left turn is yield-controlled. All other movements (northbound through, southbound through/right) are uncontrolled.
 /d/ Intersection is a four-way stop.
 /e/ Intersection controlled by stop signs on minor approaches.
 /f/ For impact analysis purposes, the intersection was treated as signalized and analyzed according to the City criteria set forth in Table 4.15-9.
 /g/ Impact not significant. No mitigation required.
 /h/ Mitigation measures at intersection not feasible. Impact is significant and unavoidable.
 /i/ Intersection saturation flow was adjusted based on empirical peak hour information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.




TABLE 4.15-21: CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF LOS ANGELES CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE + PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay /a/	LOS			V/C	Delay /a/	LOS		
33	Centinela Ave./ Wilshire Blvd.	A A	AM PM	0.569 0.600	n/a n/a	A A	0.569 0.601	n/a n/a	A B	0.000 0.001	No No	/e/				
34	Centinela Ave./ Santa Monica Blvd.	A A	AM PM	0.955 0.962	n/a n/a	E E	0.959 0.966	n/a n/a	E E	0.004 0.004	No No	/e/				
35	Centinela Ave. /Broadway/ Ohio Ave.	A A	AM PM	0.618 0.998	n/a n/a	B E	0.620 1.001	n/a n/a	B F	0.002 0.003	No No	/e/				
36	Centinela Ave./ Colorado Ave./ Idaho Ave.	A A	AM PM	0.869 1.217	n/a n/a	D F	0.876 1.231	n/a n/a	D F	0.007 0.014	No Yes	/f/			No Yes	
37	Centinela Ave./ Pennsylvania Ave./ Iowa Ave.	A A	AM PM	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a				
38	Centinela Ave./ Nebraska Ave.	A A	AM PM	0.489 0.572	n/a n/a	A A	0.516 0.608	n/a n/a	A B	0.027 0.036	No No	/e/				
39	Centinela Ave. (west)/ Olympic Blvd.	A A	AM PM	0.761 0.917	n/a n/a	C E	0.772 0.941	n/a n/a	C E	0.011 0.024	No Yes	/f/			No Yes	
40	Centinela Ave. (east)/ Olympic Blvd.	A A	AM PM	0.779 0.714	n/a n/a	C C	0.788 0.714	n/a n/a	C C	0.009 0.000	No No	/e/				
41	Centinela Ave. /Exposition Blvd. /d/	A A	AM PM	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a n/a	n/a				
42	Centinela Ave./ I-10 WB Ramps	A A	AM PM	1.693 1.599	n/a n/a	F F	1.708 1.617	n/a n/a	F F	0.015 0.018	Yes Yes	/f/			Yes Yes	
43	Centinela Ave. /Pico Blvd.	A A	AM PM	0.752 0.858	n/a n/a	C D	0.755 0.862	n/a n/a	C D	0.003 0.004	No No	/e/				
44	Centinela Ave. /I-10 EB On-Ramp	A A	AM PM	0.578 0.677	n/a n/a	A B	0.588 0.686	n/a n/a	A B	0.005 0.009	No No	/e/				
45	Bundy Drive/Wilshire Blvd.	A A	AM PM	0.817 0.750	n/a n/a	D C	0.819 0.752	n/a n/a	D C	0.002 0.002	No No	/e/				
46	Bundy Drive/ Santa Monica Blvd.	A A	AM PM	0.574 0.670	n/a n/a	A B	0.578 0.675	n/a n/a	A B	0.004 0.005	No No	/e/				
47	Bundy Drive/Idaho Ave.	A A	AM PM	0.695 0.813	n/a n/a	B D	0.706 0.816	n/a n/a	C D	0.011 0.003	No No	/e/				
48	Centinela Ave./ Wilshire Blvd.	A A	AM PM	1.030 1.166	n/a n/a	F F	1.032 1.176	n/a n/a	F F	0.002 0.010	No Yes	/f/			No Yes	
49	Centinela Ave./ Santa Monica Blvd.	A A	AM PM	0.848 1.153	n/a n/a	D F	0.854 1.665	n/a n/a	D F	0.006 0.012	No Yes	/f/			No Yes	

TABLE 4.15-21: CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS INTERSECTION LEVELS OF SERVICE ANALYSIS - CITY OF LOS ANGELES CRITERIA																
No.	INTERSECTION	Class	Peak Hour	CUMULATIVE BASE (2020)			CUMULATIVE PLUS PROJECT (2020)			V/C or Delay Change	Significant Impact?	CUMULATIVE + PROJECT WITH MITIGATION			V/C or Delay Change	Residual Impact?
				V/C	Delay /a/	LOS	V/C	Delay /a/	LOS			V/C	Delay /a/	LOS		
50	Centinela Ave. /Broadway/ Ohio Ave.	A A	AM PM	1.645 0.924	n/a n/a	F E	1.653 0.936	n/a n/a	F E	0.008 0.012	No Yes	/f/			No Yes	
51	Centinela Ave./ Colorado Ave./ Idaho Ave.	A A	AM PM	0.569 0.726	n/a n/a	A C	0.570 0.727	n/a n/a	A C	0.001 0.001	No No	/e/				
52	Centinela Ave./ Pennsylvania Ave./ Iowa Ave.	A A	AM PM	1.046 1.177	n/a n/a	F F	1.049 1.178	n/a n/a	F F	0.003 0.001	No No	/e/				
53	Centinela Ave./ Nebraska Ave.	A A	AM PM	0.670 0.720	n/a n/a	B C	0.671 0.721	n/a n/a	B C	0.001 0.001	No No	/e/				
54	Centinela Ave. (west)/ Olympic Blvd.	A A	AM PM	0.748 0.644	n/a n/a	C B	0.749 0.645	n/a n/a	C B	0.001 0.001	No No	/e/				
55	Centinela Ave. (east)/ Olympic Blvd.	A A	AM PM	0.827 1.699	n/a n/a	D F	0.828 1.704	n/a n/a	D F	0.001 0.005	No No	/e/				
56	Centinela Ave. /Exposition Blvd. /d/	A A	AM PM	0.792 0.916	n/a n/a	C E	0.793 0.917	n/a n/a	C E	0.001 0.001	No No	/e/				

/a/ VC ratio includes reduction for intersections operating with ATSAC capability.
 /b/ Average stopped delay per vehicle in seconds.
 /c/ Indicates oversaturated conditions. Delay cannot be calculated.
 /d/ Intersection controlled by stop signs on the minor approaches.
 /e/ Impact not significant. No mitigation required.
 /f/ Mitigation measures at intersection not feasible. Impact is significant and unavoidable.
 /g/ Intersection saturation flow was adjusted based on empirical peak hour information.
SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

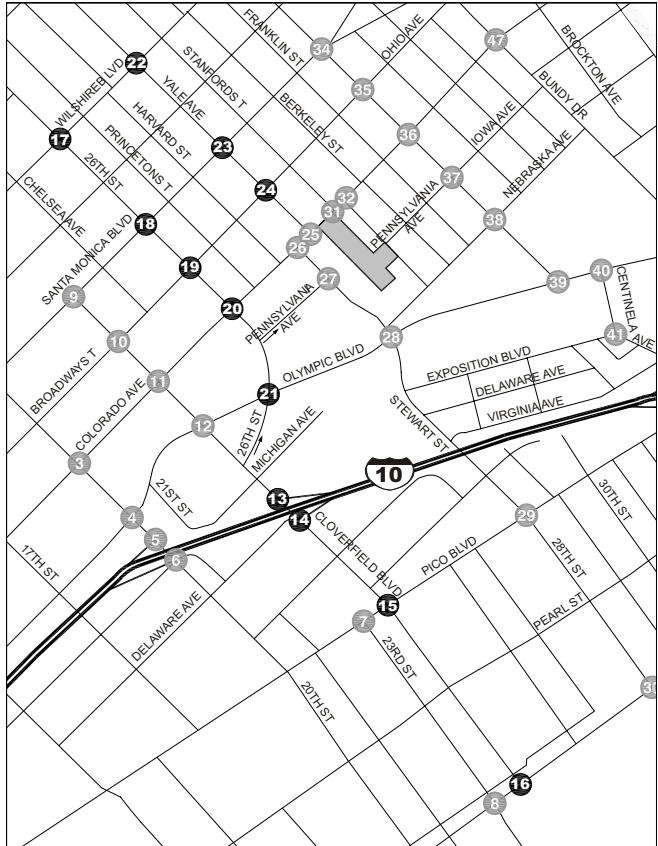
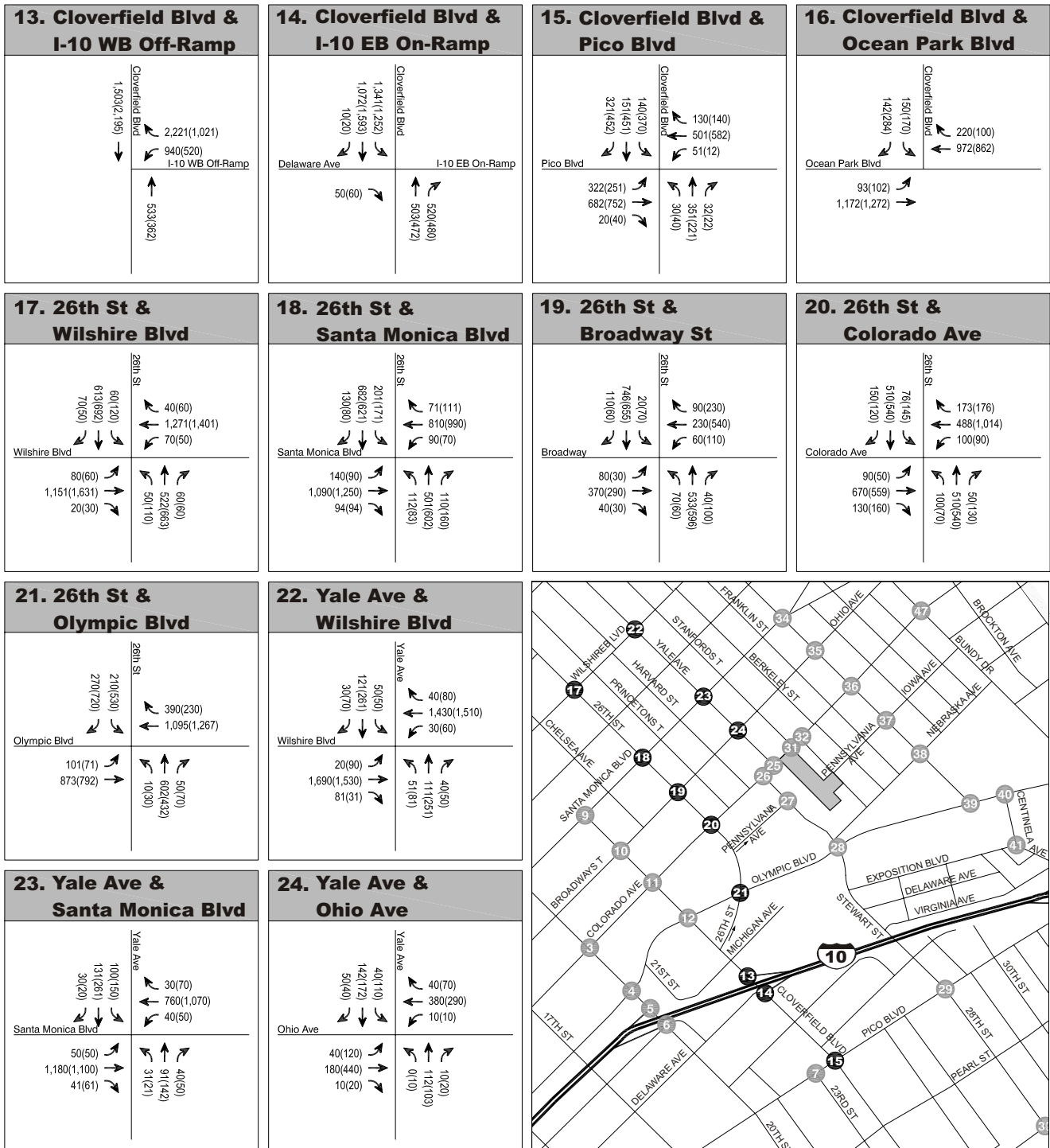


LEGEND:




-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.





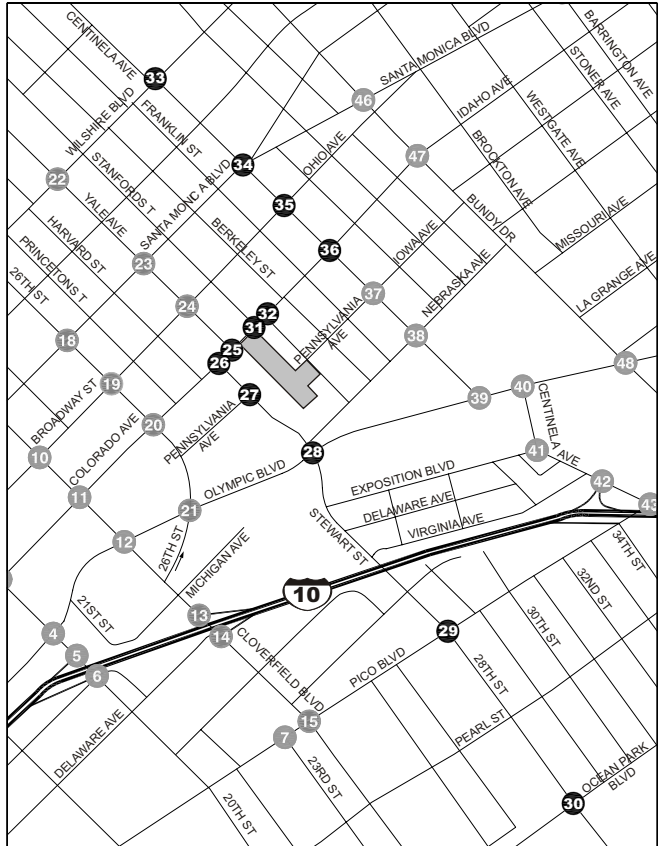
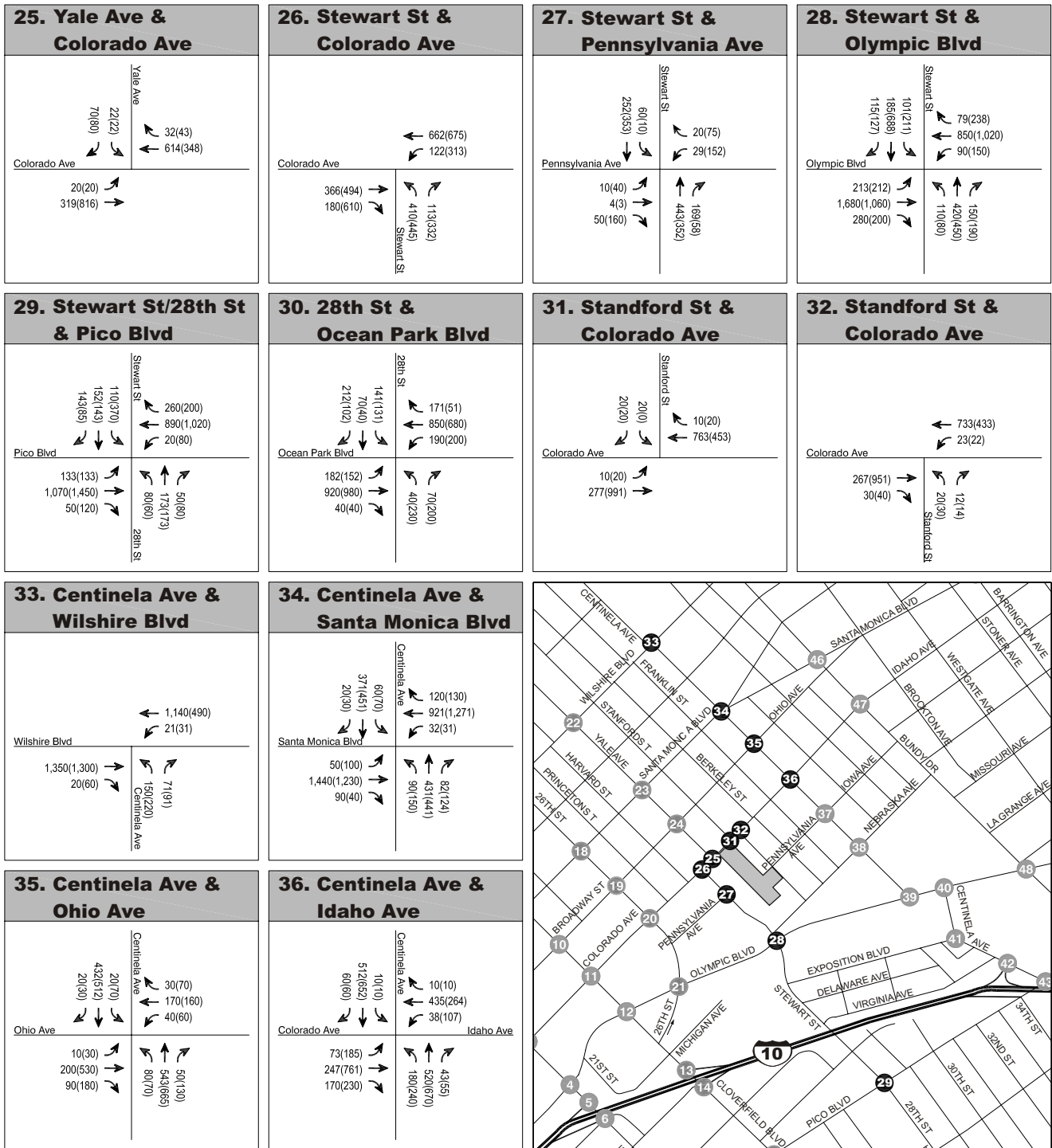
LEGEND:

-  Project Site
-  Analyzed Intersection
- x(x) AM(PM) Peak Hour Traffic Volumes
-  Turn Lane





SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-19
CUMULATIVE PLUS PROJECT
(YEAR 2020) SCENARIO PEAK HOUR
TRAFFIC VOLUMES INTERSECTIONS 13-24

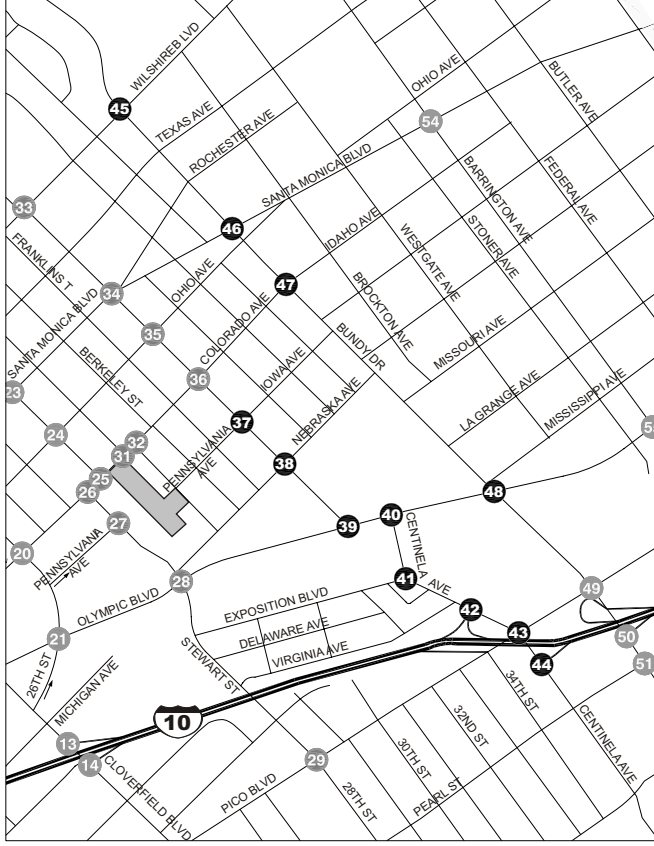
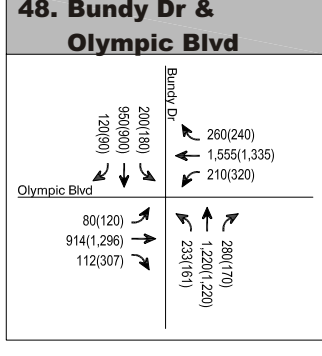
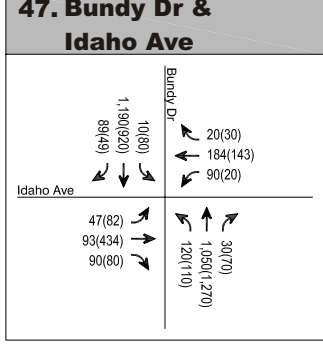
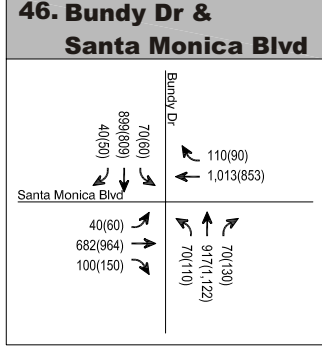
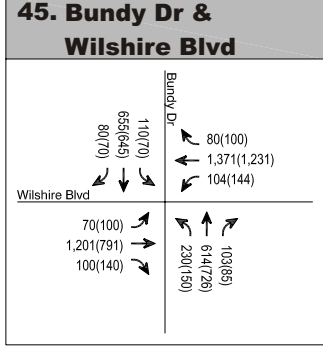
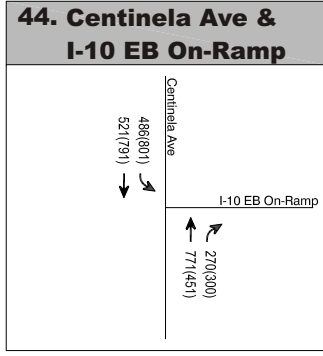
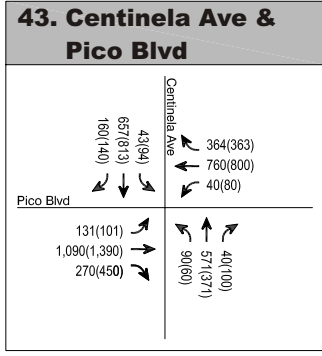
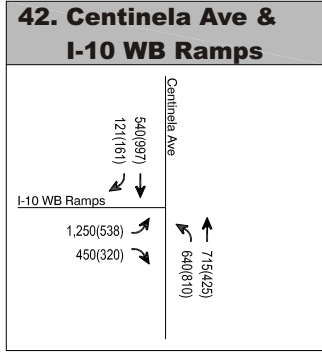
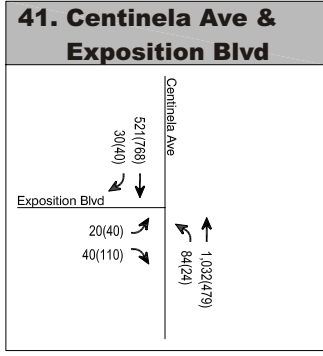
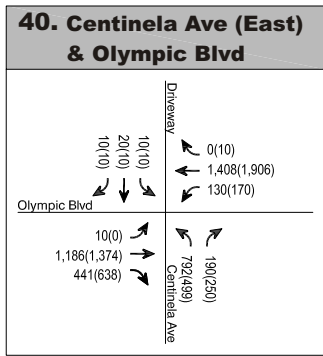
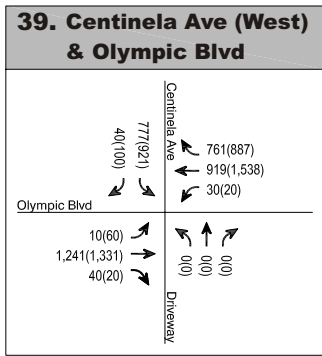
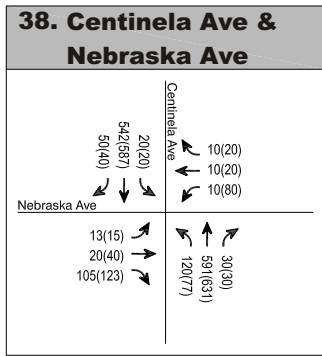
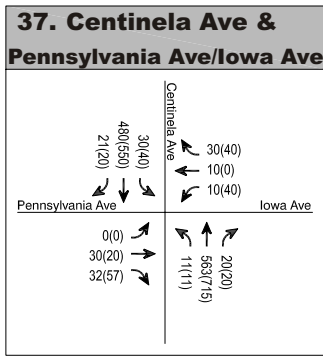


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



-  Project Site
-  Analyzed Intersection
-  AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.





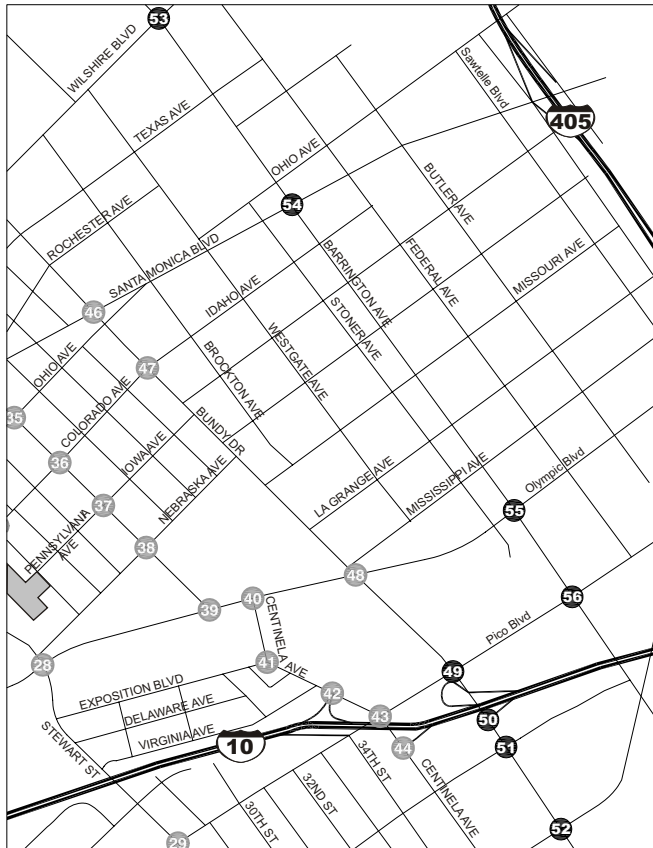
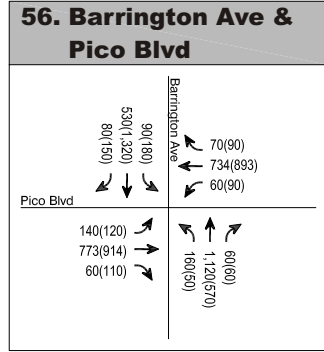
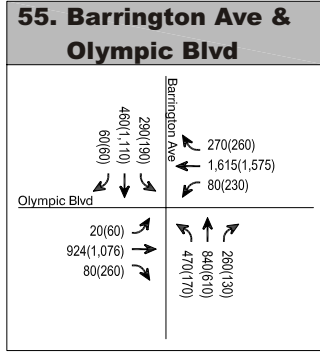
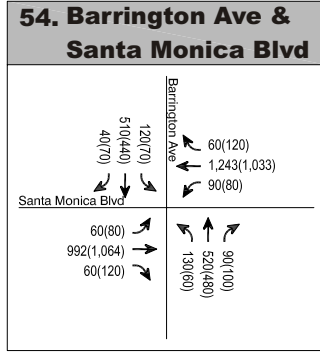
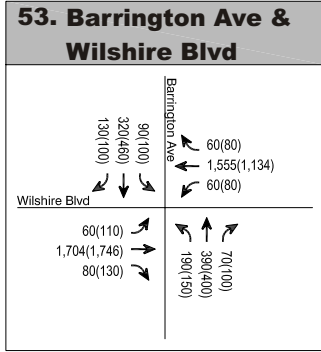
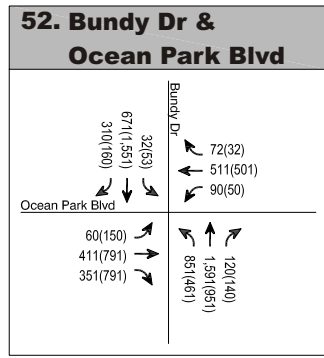
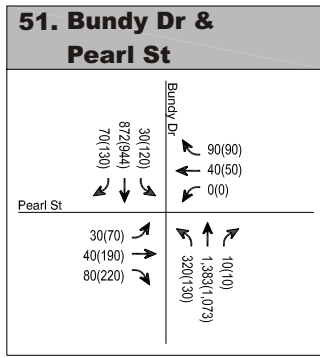
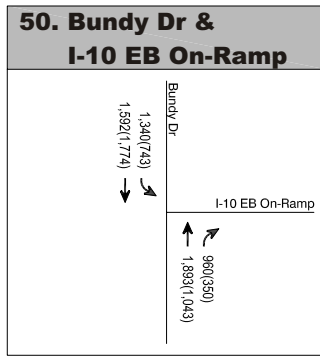
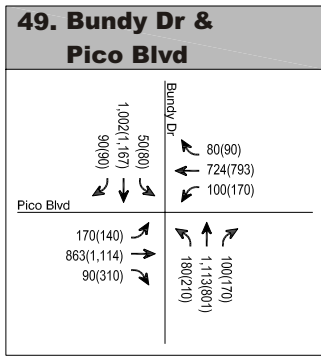
LEGEND:

-  Project Site
-  Analyzed Intersection
-  AM(PM) Peak Hour Traffic Volumes
-  Turn Lane





SOURCE: Fehr & Peers, 2011.



FIGURE 4.15-21
CUMULATIVE PLUS PROJECT
(YEAR 2020) SCENARIO PEAK HOUR
TRAFFIC VOLUMES INTERSECTIONS 37-48

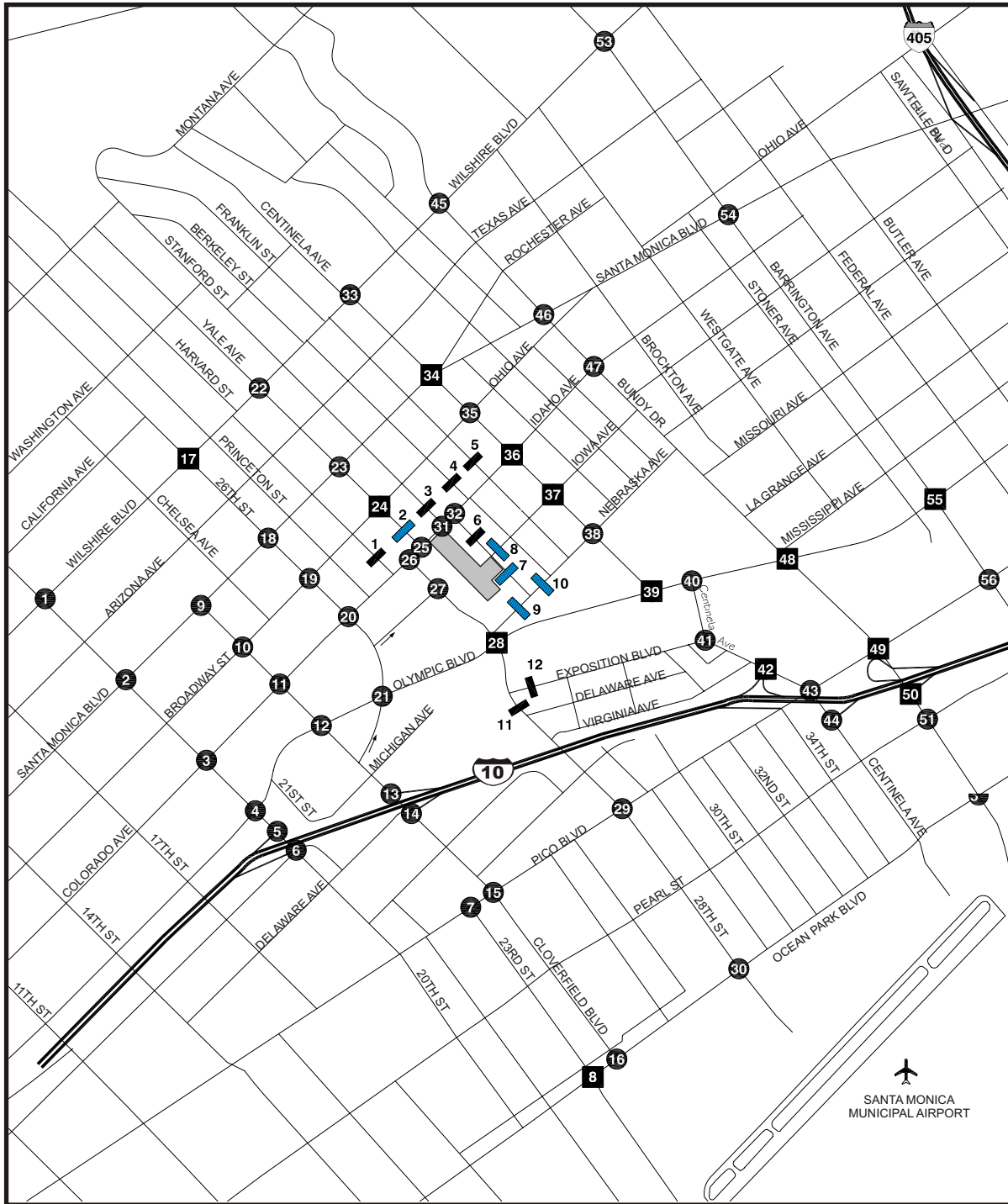


LEGEND:

-  Project Site
-  Analyzed Intersection
-  AM(PM) Peak Hour Traffic Volumes
-  Turn Lane

SOURCE: Fehr & Peers, 2011.





LEGEND:

- Project Site
- Analyzed Intersection
- Significant Impact, see text for details
- Analyzed Street Segment
- Significant Impact, see text for details

SOURCE: Fehr & Peers, 2011.

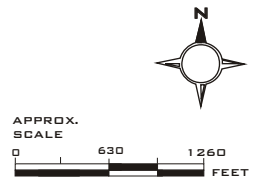


FIGURE 4.15-23
 LOCATION OF SIGNIFICANTLY IMPACTED ANALYZED
 INTERSECTIONS AND STREET SEGMENTS -
 CUMULATIVE PLUS PROJECT (YEAR 2020)

Using Cumulative Base (Year 2020) traffic conditions without the project as the baseline to conduct impact analysis, the proposed project would result in significant traffic impacts at 13 of the 56 study intersections. Twelve intersections would be impacted under City of Santa Monica significance criteria:

8. 23rd Street/Ocean Park Boulevard (AM and PM peak hours)
17. 26th Street/Wilshire Boulevard (PM peak hour)
24. Yale Street/Broadway (PM peak hour)
28. Stewart Street/Olympic Boulevard (AM and PM peak hours)
34. Centinela Avenue/Santa Monica Boulevard (PM peak hour)
36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour)
37. Centinela Avenue/Pennsylvania Avenue/Iowa Avenue (PM peak hour)
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours)
48. Bundy Drive/Olympic Boulevard (PM peak hour)
49. Bundy Drive/Pico Boulevard (PM peak hour)
50. Bundy Drive/I-10 Eastbound On-Ramp (AM peak hour)
55. Barrington Avenue/Olympic Boulevard (PM peak hour)

Six intersections would be impacted under City of Los Angeles significance criteria:

36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour)*
39. Centinela Avenue (west)/Olympic Boulevard (PM peak hour)
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours)*
48. Bundy Drive/Olympic Boulevard (PM peak hour)*
49. Bundy Drive/Pico Boulevard (PM peak hour)*
50. Bundy Drive/I-10 Eastbound On-Ramp (PM peak hour)*

Of the six intersections that are impacted under the City of Los Angeles significance criteria, five intersections (as indicated above with an *) are also impacted under the City of Santa Monica significance criteria. Therefore, under the Cumulative Plus Project (Year 2020) Conditions, the proposed project would result in significant traffic impacts at a total of 13 study intersections under both significance criteria.

Mitigation Measures – (Cumulative Plus Project 2020 Scenario)

Refer to Mitigation Measures **T1**, **T3**, and **T4**, above. In addition, the following additional mitigation measures are proposed for the Cumulative Plus Project scenario:

- T5** **26th Street & Wilshire Boulevard.** Convert the protected permitted phasing for the eastbound and westbound left turn movements to permitted phasing. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. This mitigation measure would require temporary signage during a period of adjustment for motorists and the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.
- T6** **Barrington Avenue/Olympic Boulevard.** Convert the eastbound left-turn phasing from permitted to protected permitted. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the protected-permitted left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors and/or signal heads. Furthermore this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

Level of Impact After Mitigation

T1 23rd Street/Ocean Park Boulevard. Mitigation Measure **T1** would fully mitigate the project-related impacts. Therefore, the proposed project's impact at this intersection would be less than significant.

T3 Stewart Street/Olympic Boulevard. Mitigation Measure **T3** was determined to fully mitigate the project related impacts. Therefore, the proposed project's impact at this intersection would be less than significant.

T4 Centinela Avenue/I-10 Westbound Ramps. Mitigation Measure **T4** was determined to fully mitigate the project related impacts. Therefore, the proposed project's impact at this intersection would be less than significant based on the City of Santa Monica significance criteria. However, this mitigation measure would not fully mitigate the impact per the City of Los Angeles' significance criteria. Since this intersection is shared with the City of Los Angeles, this mitigation measure must be approved by LADOT. Therefore, the project impact at this intersection remains significant and unavoidable until approval by the City of Los Angeles, since the decision of implementing this improvement cannot be made entirely by the City of Santa Monica. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

T5 26th Street & Wilshire Boulevard. Using the city's TRAFFIX, it was determined that changing the protected-permitted phasing for the eastbound and westbound left-turn movements to permitted only phasing would fully mitigate the project related impacts. Under the Cumulative Plus Project scenario, the left-turn volumes in both directions at this intersection would not exceed 80 vehicles and therefore, a protected phase is not warranted.

T6 Barrington Avenue/Olympic Boulevard. Using both the City of Santa Monica and City of Los Angeles methodology and criteria, it was determined that Mitigation Measure ~~T5~~ **T6** would fully mitigate project impacts at this location. Since this intersection is owned and controlled by the City of Los Angeles, this mitigation measure must be approved by LADOT. Therefore, the project impact at this intersection remains significant and unavoidable until approval by the City of Los Angeles, since the decision of implementing this improvement cannot be made entirely by the City of Santa Monica. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

Mitigation Measures **T1**, **T3**, **T4**, **T5**, and **T6** would mitigate the impacts at five intersections to less-than-significant levels, based on the City of Santa Monica significance criteria. However, Mitigation Measures **T4** and **T6** would require the approval of LADOT as the intersections are shared or owned and controlled by the City of Los Angeles. Therefore, the impacts at these two intersections will be considered significant and unavoidable. As shown in **Table 4.15-22**, after mitigation, impacts to the following ten intersections would be significant and unavoidable:

24. Yale Street/Broadway (PM peak hour)
34. Centinela Avenue/Santa Monica Boulevard (PM peak hour)
36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour) [*also impacted under City of Los Angeles criteria*]
37. Centinela Avenue/Pennsylvania Avenue/Iowa Avenue (PM peak hour)
39. Centinela Avenue (west)/ Olympic Boulevard (PM peak hour) [*impacted under City of Los Angeles criteria only*]
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours) [*also impacted under City of Los Angeles criteria*]

- 48. Bundy Drive and Olympic Boulevard (PM peak hour) *[also impacted under City of Los Angeles criteria]*
- 49. Bundy Drive/Pico Boulevard (PM peak hour) *[also impacted under City of Los Angeles criteria]*
- 50. Bundy Drive/I-10 Eastbound On-Ramp (AM peak hour under City of Santa Monica criteria and PM peak hour under City of Los Angeles criteria)
- 55. Barrington Avenue/Olympic Boulevard (PM) *[also impacted under City of Los Angeles criteria]*

TABLE 4.15-22: CUMULATIVE PLUS PROJECT INTERSECTION IMPACTS SUMMARY TABLE				
No.	Intersection	HCM Impact?	CMA Impact?	Feasible Mitigation?
1	20th St./Wilshire Blvd.	No	N/A	N/A
2	20th St./Santa Monica Blvd.	No	N/A	N/A
3	20th St./Colorado Ave.	No	N/A	N/A
4	20th St./Olympic Blvd.	No	N/A	N/A
5	20th St./I-10 WB On-Ramp	No	N/A	N/A
6	20th St./I-10 EB Off-Ramp	No	N/A	N/A
7	23rd St./Pico Blvd.	No	N/A	N/A
8	23rd St./Ocean Park Blvd.	Yes	N/A	Yes
9	Cloverfield Blvd. &/Santa Monica Blvd.	No	N/A	N/A
10	Cloverfield Blvd./Broadway	No	N/A	N/A
11	Cloverfield Blvd./Colorado Ave.	No	N/A	N/A
12	Cloverfield Blvd./Olympic Blvd.	No	N/A	N/A
13	Cloverfield Blvd./I-10 WB Off-Ramp	No	N/A	N/A
14	Cloverfield Blvd./I-10 EB On-Ramp/Delaware Ave.	No	N/A	N/A
15	Cloverfield Blvd./Pico Blvd.	No	N/A	N/A
16	Cloverfield Blvd./Ocean Park Blvd.	No	N/A	N/A
17	26th Street/Wilshire Blvd.	Yes	N/A	Yes
18	26th Street/Santa Monica Blvd.	No	N/A	N/A
19	26th St./Broadway	No	N/A	N/A
20	26th St./Colorado Ave.	No	N/A	N/A
21	26th St./Olympic Blvd.	No	N/A	N/A
22	Yale St./Wilshire Blvd.	No	N/A	N/A
23	Yale St./Santa Monica Blvd.	No	N/A	N/A
24	Yale St./Broadway	Yes	N/A	No
25	Yale St./Colorado Ave.	No	N/A	N/A
26	Stewart St./Colorado Ave.	No	N/A	N/A
27	Stewart St./Pennsylvania Ave.	No	N/A	N/A
28	Stewart St./Olympic Blvd.	Yes	N/A	Yes
29	Stewart St./Pico Blvd.	No	N/A	N/A
30	28th St. /Ocean Park Blvd.	No	N/A	N/A
31	Stanford Street (west)/Colorado Ave.	No	N/A	N/A
32	Stanford Street (east)/Colorado Ave.	No	N/A	N/A
33	Centinela Ave./Wilshire Blvd.	No	No	N/A
34	Centinela Ave./Santa Monica Blvd.	Yes	No	No
35	Centinela Ave./Broadway/Ohio Ave.	No	No	N/A
36	Centinela Ave./Colorado Ave./Idaho Ave.	Yes	Yes	No
37	Centinela Ave./Pennsylvania Ave./Iowa Ave.	Yes	No	No
38	Centinela Ave./Nebraska Ave.	No	No	N/A
39	Centinela Ave. (west)/Olympic Blvd.	No	Yes	No
40	Centinela Ave. (east)/Olympic Blvd.	No	No	N/A

TABLE 4.15-22: CUMULATIVE PLUS PROJECT INTERSECTION IMPACTS SUMMARY TABLE				
No.	Intersection	HCM Impact?	CMA Impact?	Feasible Mitigation?
41	Centinela Ave./Exposition Blvd.	No	No	N/A
42	Centinela Ave./I-10 WB Ramps	Yes	Yes	Yes/a/
43	Centinela Ave./Pico Blvd.	No	No	N/A
44	Centinela Ave./I-10 EB On-Ramp	No	No	N/A
45	Bundy Drive/Wilshire Blvd.	No	No	N/A
46	Bundy Drive/Santa Monica Blvd.	No	No	N/A
47	Bundy Drive/Idaho Ave.	No	No	N/A
48	Bundy Dr./Olympic Blvd.	Yes	Yes	No
49	Bundy Dr./Pico Blvd.	Yes	Yes	No
50	Bundy Dr./I-10 EB On-Ramp	Yes	Yes	No
51	Bundy Dr./Pearl Street	No	No	N/A
52	Bundy Dr./Ocean Park Blvd.	No	No	N/A
53	Barrington Ave./Wilshire Blvd.	No	No	N/A
54	Barrington Ave./Santa Monica Blvd.	No	No	N/A
55	Barrington Ave./Olympic Blvd.	Yes	No	Yes/b/
56	Barrington Ave./Pico Blvd.	No	No	N/A
<small>/a/The proposed mitigation measure would mitigate the impact under City of Santa Monica methodology only. Since the intersection is shared with the City of Los Angeles, any mitigation measure must be approved by LADOT; therefore, impact would remain significant and unavoidable. /b/The intersection is controlled by the City of Los Angeles, so any mitigation measure must be approved by LADOT; therefore, impact would remain significant and unavoidable.</small>				
<small>SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i>, October 2011.</small>				

Additional mitigation measures to reduce significant impact related to intersections were considered. However, as discussed in further detail in the Traffic Study (Appendix F to this EIR), these measures are rejected since they would require the taking of public or private property for public right of way in order to implement the proposed physical mitigations. These measures could negatively impact the built environment and existing pedestrian network, and there were rejected.

Impact T-3 **The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) Conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) Conditions. No feasible mitigation measures are available to reduce project impacts. Therefore, ~~without mitigation,~~ the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.**

The City of Santa Monica has developed criteria to evaluate potential traffic impacts related to neighborhood traffic. The City’s significance criteria to evaluate these impacts are listed in **Table 4.15-11**, above. The Approval Year Plus Project (Year 2011) Conditions neighborhood traffic impact analysis is presented in **Table 4.15-23**. The analysis indicates that average daily traffic increase attributable to the proposed project ranges from 0.4 to 32.3 percent at the 15 studied street segments. Based on this analysis, the following six segments would exceed the thresholds of significance:

- Yale Avenue, north of Colorado Avenue (Segment 2)
- Stanford Street, north of Pennsylvania Avenue (Segment 6)
- Stanford Street, south of Pennsylvania Avenue (Segment 7)
- Pennsylvania Avenue, east of Stanford Street (Segment 8)
- Nebraska Avenue, west of Stanford Street (Segment 9)
- Nebraska Avenue, east of Stanford Street (Segment 10)

The Cumulative Plus Project (Year 2020) neighborhood traffic impact analysis is presented in **Table 4.15-24**. The analysis indicates that average daily traffic increase attributable to the proposed project ranges from 0.4 to 34.9 percent at the 15 studied street segments. Based on this analysis, the following five segments would exceed the thresholds of significance:

- Yale Avenue, north of Colorado Avenue (Segment 2)
- Stanford Street, south of Pennsylvania (Segment 7)
- Pennsylvania Avenue, east of Stanford Street (Segment 8)
- Nebraska Avenue, west of Stanford Street (Segment 9)
- Nebraska Avenue, east of Stanford Street (Segment 10)

Therefore, without mitigation, the proposed project would result in a significant impact related to neighborhood traffic.

Mitigation Measures

There are no feasible mitigation measures to reduce the significant impact related to neighborhood traffic.

Various traffic calming strategies were considered for Segments 2, 9, and 10, such as the addition of curb extensions at neighborhood intersections and chokers along neighborhood segments. While these traffic calming measures can reduce and slow traffic along a roadway, they do not eliminate traffic. Thus, with traffic calming the project would still contribute to traffic along analyzed neighborhood segments and the single trip threshold would be exceeded at street segments #2, #9, and #10. There is no feasible mitigation measure, including relocating the project's access point or turn restrictions that would limit motorists that access or depart the project site segments. Short of full closure of the affected street segments, which would not be acceptable since these streets serve adjacent land uses and carry substantial traffic volumes that would then need to shift to other nearby streets, there are no mitigation measures that would reduce the number of potential project-related vehicle trips on these three street segments to a less than significant level. Therefore, the project impacts to the Yale Street and Nebraska Avenue street segments would be significant and unavoidable.

In addition, for Segments 6, 7, and 8, various traffic calming strategies were considered, such as the addition of curb extensions at neighborhood intersections and chokers along neighborhood roadway segments. While these traffic calming measures can reduce and slow traffic along a roadway, they do not eliminate traffic. Segments 6, 7, and 8 are adjacent to the project's eastern access point, indicating that traffic calming would not be very effective in reducing project traffic and more aggressive measures would be needed to reduce impacts to below significant levels. There is no feasible mitigation measure, including relocating the project's access point or turn restrictions that would limit motorists that access or depart the project site from using the public street grid and these street segments.

Level of Impact After Mitigation

No feasible mitigation measures were identified to reduce the significant impact related to neighborhood traffic to less than significant. Therefore, the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.

TABLE 4.15-23: NEIGHBORHOOD TRAFFIC IMPACT ANALYSIS – APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS										
Segment Number	Location	City	Street Classification	Existing ADT	Project ADT	ADT	ADT Change	% Change	Significance Threshold	Significant Impact?
1	Harvard St., north of Colorado Ave.	Santa Monica	Local	1,053	70	1,123	70	6.2%	+25.0%	NO
2	Yale Ave., north of Colorado Avenue	Santa Monica	Local	2,893	70	2,963	70	2.4%	+1 trip	YES
3	Stanford St., north of Colorado Ave.	Santa Monica	Local	803	70	873	70	8.0%	+25.0%	NO
4	Berkeley St., north of Colorado Ave.	Santa Monica	Local	1,715	70	1,785	70	3.9%	+12.5%	NO
5	Franklin St., north of Colorado Ave.	Santa Monica	Local	667	70	737	70	9.5%	+25.0%	NO
6	Stanford St., north of Pennsylvania Ave	Santa Monica	Local	1,227	610	1,887	610	32.3%	+12.5%	YES
7	Stanford St., south of Pennsylvania Ave	Santa Monica	Local	1,107	500	1,607	500	31.1%	+25.0%	YES
8	Pennsylvania Ave. east of Stanford St.	Santa Monica	Local	633	290	923	290	31.4%	+25.0%	YES
9	Nebraska Ave., west of Stanford St.	Santa Monica	Local	4,017	110	4,127	110	2.7%	+1 trip	YES
10	Nebraska Ave., east of Stanford St.	Santa Monica	Local	3,260	440	3,700	440	11.9%	+1 trip	YES
11	Stewart St., south of Exposition Blvd.	Santa Monica	Collector	9,150	100	9,250	100	1.1%	+12.5%	NO
12	Exposition Blvd., east of Stewart St.	Santa Monica	Local	1,838	70	1,908	70	3.7%	+12.5%	NO
13	Stewart St., south of Pico Blvd.	Santa Monica	Collector	6,429	110	6,539	110	1.7%	+25.0%	NO
14	Cloverfield Blvd., south of Pico Blvd.	Santa Monica	Collector	8,414	60	8,474	60	0.7%	+12.5%	NO
15	23 rd St., south of Pico Blvd	Santa Monica	Collector	8,377	30	8,407	30	0.4%	+12.5%	NO

SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

TABLE 4.15-24: NEIGHBORHOOD TRAFFIC IMPACT ANALYSIS – CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS										
Segment Number	Location	City	Street Classification	Existing ADT	Project ADT	ADT	ADT Change	% Change	Significance Threshold	Significant Impact?
1	Harvard St., north of Colorado Ave.	Santa Monica	Local	1,053	70	1,123	70	6.2%	+25.0%	NO
2	Yale Ave., north of Colorado Avenue	Santa Monica	Local	2,893	70	2,963	70	2.4%	+1 trip	YES
3	Stanford St., north of Colorado Ave.	Santa Monica	Local	803	70	873	70	8.0%	+25.0%	NO
4	Berkeley St., north of Colorado Ave.	Santa Monica	Local	1,715	70	1,785	70	3.9%	+12.5%	NO
5	Franklin St., north of Colorado Ave.	Santa Monica	Local	667	70	737	70	9.5%	+25.0%	NO
6	Stanford St., north of Pennsylvania Ave	Santa Monica	Local	1,227	70	1,347	70	5.2%	+12.5%	NO
7	Stanford St., south of Pennsylvania Ave	Santa Monica	Local	1,107	450	1,557	450	28.9%	+25.0%	YES
8	Pennsylvania Ave. east of Stanford St.	Santa Monica	Local	633	340	973	340	34.9%	+25.0%	YES
9	Nebraska Ave., west of Stanford St.	Santa Monica	Local	4,017	70	4,087	70	1.7%	+1 trip	YES
10	Nebraska Ave., east of Stanford St.	Santa Monica	Local	3,260	390	3,650	390	10.7%	+1 trip	YES
11	Stewart St., south of Exposition Blvd.	Santa Monica	Collector	9,150	100	9,250	100	1.1%	+12.5%	NO
12	Exposition Blvd., east of Stewart St.	Santa Monica	Local	1,838	70	1,908	70	3.7%	+12.5%	NO
13	Stewart St., south of Pico Blvd.	Santa Monica	Collector	6,429	110	6,539	110	1.7%	+25.0%	NO
14	Cloverfield Blvd., south of Pico Blvd.	Santa Monica	Collector	8,414	60	8,474	60	0.7%	+12.5%	NO
15	23 rd St., south of Pico Blvd	Santa Monica	Collector	8,377	30	8,407	30	0.4%	+12.5%	NO

SOURCE: Fehr & Peers, *Draft Traffic Study for the Village Trailer Park Project*, October 2011.

Impact T-4 Driveways would provide adequate access to the project site. Parking for the proposed project would be provided in a two-level subterranean parking structure with two ingress/egress points. Therefore, the proposed project would result in less-than-significant impacts related to site access and circulation.

Site Access

Approval Year Plus Project (Year 2011) Conditions. Primary vehicular access to the site would be provided from:

- Stanford Street via the proposed Pennsylvania Avenue extension to the east (inbound and outbound)
- Colorado Avenue via the proposed new north/south road along the west side of the project (inbound only)

Running along the western side of the project site, a new north-south road (New Road) would connect Colorado Avenue and the Pennsylvania Avenue extension. The proposed New Road would be constructed as a one-way southbound road connected to the portion of Pennsylvania constructed by the Applicant (only connecting to Stanford Street to the east).

As indicated in **Table 4.15-18** above, the proposed project is not expected to result in a significant impact at the Stewart Street/Pennsylvania Avenue intersection. Because the project is proposing to construct an extension of Pennsylvania Avenue that would complete the portion between the proposed project and Stanford Street, a substantial increase in traffic is expected at the Stanford Street/Pennsylvania Avenue intersection.

The completion of this project would result in the construction of a three-legged intersection north of the existing intersection of the Stanford Street/Pennsylvania Avenue intersection. The Stanford Street approach would be controlled by a stop sign. Based on existing counts, Stanford Street north and south of Pennsylvania Avenue carries approximately 100 vehicles in the peak hour. These volumes, combined with project traffic plus related project traffic and through traffic (Pennsylvania Avenue would be open to through traffic) would not warrant a signal upon completion of the project and roadway extension. The introduction of a multi-way stop at the intersection was also analyzed and the intersection is not anticipated to warrant a multi-way stop. Stanford Street and Colorado Avenue would provide adequate access to the project site and impacts associated with access would be less than significant.

Cumulative Plus Project (Year 2020) Conditions. Primary vehicular access (inbound and outbound) to the site would be provided from:

- Stanford Street via the proposed Pennsylvania Avenue extension to the east
- Stewart Street via the proposed Pennsylvania Avenue extension to the west
- Colorado Avenue via the proposed new north/south road along the west side of the project

The Pennsylvania Avenue extension from Stewart Street to Stanford Street would be dedicated to the City as a public right-of-way (ROW) and classified as a Neighborhood Street. The proposed extension of Pennsylvania Avenue would be constructed in an approximately 62-foot ROW comprised of two traffic lanes (one in each direction) with sidewalks on both sides. On the project site, the street would be constructed at-grade over a section of the project's subterranean parking garage, which would span both portions of the site. The proposed New Road would provide north-south access along the west side of the project and would be comprised of two traffic lanes, one in each direction. The project's portion of the New Road would be a minimum of 20 feet.

Parking for the proposed project would be accommodated in a two-level subterranean parking structure, with one entrance along and one entrance south of the proposed new extension of Pennsylvania Avenue. Vehicles would access the south entrance from the new north/south road on the west side of the project site.

Because the project is proposing to construct an extension of Pennsylvania Avenue that would complete the portion between the proposed project and Stanford Street, a substantial increase in traffic is expected at the Stanford Street/Pennsylvania Avenue intersection. The completion of Pennsylvania Avenue between Stewart Street and Stanford Street would also result in an increase in traffic at the Stewart Street/Pennsylvania Avenue intersection.

Similar to the Approval Year Plus Project (Year 2011) Conditions assessment, the Stanford Street approach at Pennsylvania Avenue would be controlled by a stop sign, and the intersection is not anticipated to warrant a multi-way stop. In addition, based on the Cumulative Plus Project (Year 2020) Conditions volumes, the Stewart Street/Pennsylvania Avenue intersection was not found to warrant signalization. The signal warrant analysis is provided in the Traffic Study (Appendix F to this EIR).

Based on the City's current adopted classification criteria, the existing segments of Pennsylvania Avenue (east and west of the project site) are categorized as neighborhood/local streets. The completed Pennsylvania Avenue extension would be classified as a neighborhood/local street. Total daily traffic on the Pennsylvania Avenue extension is estimated to be in the range of 2,500 to 3,000 trips upon project completion, including traffic generated by the project, adjacent related projects, and through traffic. Local streets have a typical design capacity (maintaining and acceptable LOS) of 3,000 trips over the course of a day. The volumes expected on the Pennsylvania Avenue extension indicate that a neighborhood/local street classification is appropriate, and one travel lane in each direction would meet travel demand needs. Stanford Street, Stewart Street, and Colorado Avenue would provide adequate access to the project site.

Parking

Parking for the proposed project would be provided in a two-level subterranean parking structure with two ingress/egress points. One ingress/egress point would be located at the southwest portion of the project site and another ingress/egress point would be located at the center-western portion of the project site. No potential operational issues have been identified with regard to this access scheme.

The above analysis demonstrates that impacts related to site access would be less than significant.

Mitigation Measures

Impacts related to site access and circulation would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact T-5 The proposed project would not impact arterial intersections or mainline freeway locations identified in the CMP. In addition, the proposed project would not impact the regional transit system serving the project area. Therefore, the proposed project would result in less-than-significant impacts related to the CMP.

The CMP guidelines require that the first issue addressed is the determination of the geographic scope of the study area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

- All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic; and
- All CMP mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.

The CMP arterial monitoring intersections nearest to the project site are the Santa Monica Boulevard/Bundy Drive, Santa Monica Boulevard/Cloverfield Boulevard, and Wilshire Boulevard/26th Street intersections. Based on the trip generation estimates and trip assignment, the proposed project would not add more than 50 vehicles per hour (vph) to any of these three locations during either peak hour. Therefore, a CMP arterial intersection analysis is not required.

The mainline freeway monitoring locations nearest to the project site are I-10 at Lincoln Boulevard, I-10 east of Overland Avenue, and I-405 north of Venice Boulevard. Project traffic would not exceed the CMP freeway analysis criteria on the I-10 or I-405 freeway segments closer to the project site that are not CMP monitoring locations but are more likely to be affected by the proposed project (e.g., I-10 between 20th Street/Cloverfield Boulevard and Centinela Avenue, I-10 between Centinela Avenue and I-405, I-405 north and south of Olympic Boulevard). Therefore, a CMP freeway analysis is not required.

The CMP provides a methodology for estimating the number of transit trips associated with the proposed project. This methodology assumes an Average Vehicle Ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project. To estimate project-generated transit trips, person trips should be multiplied by 3.5 percent of Total Person Trips Generated except under the following conditions:

- Ten percent of Total Person Trips Generated by a project that is primary residential within 0.25 miles of a CMP transit center;
- 15 percent Total Person Trips Generated by a project that is primarily commercial within 0.25 miles of a CMP transit center;
- Seven percent Total Person Trips Generated by a project that is primarily residential within 0.25 miles of a CMP multi-modal transportation center;
- Nine percent Total Person Trips Generated by a project that is primarily commercial within 0.25 miles of a CMP multi-modal transportation center;
- Five percent Total Person Trips Generated by a project that is primarily residential within 0.25 miles of a CMP transit corridor;
- Seven percent Total Person Trips Generated by a project that is primarily commercial within 0.25 of a CMP transit corridor; or
- Zero percent if no fixed-route transit service operates within one miles of the project.

Approval Year Plus Project (Year 2011). Since the project area does not qualify as a CMP transit center, a CMP multi-modal transportation center, or a CMP transit corridor under Approval Year Plus Project (Year 2011) Conditions, a factor of 3.5 percent was applied to person trips generated to estimate transit trips. The Approval Year Plus Project (Year 2011) Conditions would generate a net increase of approximately 158 AM and 181 PM peak hour trips. By applying the CMP guidelines, (i.e., converting the vehicle trips to person trips by multiplying by a 1.4 AVR and assuming 3.5 percent transit use), it is estimated that the project will generate about eight transit person trips in the AM peak hour and about nine transit person trips in the PM peak hour. At this level of ridership increase, project-related impacts on the regional transit system are not anticipated to be significant.

Cumulative Plus Project (Year 2020) Conditions. The future Exposition LRT would be located 0.25 miles south of the project site. The CMP guidelines estimate that approximately five percent may use public transit to and from the project site. The proposed project would generate a net increase in approximately 144 AM and 170 PM peak hour trips. By applying the CMP guidelines (i.e., converting vehicle trips to person trips and assuming approximately 15 percent may use public transit to and from the project site), it is estimated that the proposed project would generate approximately 30 AM and 36 PM

transit person trips in the peak hours. At this level of ridership increase, project-related impacts on the regional transit system are not anticipated to be significant.

The estimated increase in traffic volume, attributable to the proposed project, at the CMP arterial intersections and mainline freeways near the project site do not warrant a CMP arterial intersection or freeway analysis. In addition, project-related transit ridership would not interfere with regional transit systems. Therefore, the proposed project would not impact the freeway or transit system; impacts would be less than significant.

Mitigation Measures

Impacts related to the CMP would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to the CMP were determined to be less than significant without mitigation.

CUMULATIVE IMPACTS

Cumulative impacts are the effect of the proposed project, combined with other related projects. Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. In the case of the traffic analysis, the “Cumulative Plus Project (Year 2020) conditions represents what is typically described as the cumulative conditions. The analysis presented above and accounts for related projects and ambient growth through the future year of 2020. Specifically, as indicated previously, the Cumulative Plus Project adds on the project’s trip generation to Cumulative Base (Year 2020) Conditions traffic volumes which take into account the expected changes in traffic over Approval Year (Year 2011) conditions up to the year (2020), including the following:

1. Traffic generated by specific development projects located in the City of Santa Monica and neighboring areas of the City of Los Angeles expected to be constructed by Year (2020) using trip generation rates calibrated for use in the Santa Monica TDFM. Specific development projects that have been accounted for in the TDFM are listed in Table 3-3 of Section 3.0, Project Description;
2. Capacity enhancements and in some cases, traffic shifts due to planned street modifications, such as changes related to the future Exposition Phase II Light Rail Line;
3. Trip reductions by (2020) resulting from transportation and land use policies in the 2010 LUCE;
4. Interaction between land uses that produce vehicle trips and land uses that attract vehicle trips;
5. The effect of traffic congestion on route choice; and
6. Projected increases in regional traffic traveling through the City.

As such, no further cumulative impact analysis is required. Impacts related to intersection operations would be cumulatively considerable.

In addition, as analyzed above, the proposed project would result in significant and unavoidable impacts on street segments and would be cumulatively considerable.

4.16.1 UTILITIES AND SERVICE SYSTEMS

WATER

This section addresses the water demand that would result due to implementation of the proposed project, evaluates whether this demand can be met with existing and planned water supplies and infrastructure, and whether the proposed project would be in compliance with water regulations.

EXISTING SETTING

The City of Santa Monica is the public water supplier to residential, commercial, and industrial water users within its jurisdiction. In addition, the City supplies water for City landscape and fire protection uses. The City's water supply is comprised of local groundwater from the Santa Monica Groundwater Basin, imported water from the Metropolitan Water District of Southern California (MWD), and recycled water. **Table 4.16.1-1**, shows the daily average water usage of the City over the course of the past five years.

TABLE 4.16.1-1: CITY OF SANTA MONICA WATER USAGE	
Water Year /a/	Water Demand (million gallons per day)
2009/2010	11.89
2008/2009	12.56
2007/2008	13.01
2006/2007	13.77
2005/2006	13.13
/a/ The City's water year begins July 1 and ends June 30 of the following year.	
SOURCE: City of Santa Monica, Susan Lowell, Water Resources Engineer, e-mail correspondence, dated September 8, 2010.	

~~Up~~ Historically until 1996, local groundwater comprised up to 70 percent of the City's water supply. However, in 1996, the Charnock groundwater sub-basin, a source of City groundwater, was found to be contaminated. The groundwater contamination resulted in the reduction of groundwater pumped and used by the City. ~~Since that time~~ Between 1996 and mid-2011, the City ~~has~~ relied on imported water from the MWD.¹ ~~Over the past water year~~ In 2010, imported water represented 78.35 percent of the City's water supply.² The City plans to reduce its reliance upon imported water and maximize groundwater production in the near future.

In December 2010, the City opened a new groundwater treatment plant, the Santa Monica Water Treatment Plant (SMWTP) in the Charnock groundwater sub-basin. With the addition of the SMWTP, the City anticipates that it will produce 65 to 75 percent of its water supply from its groundwater sources.^{3,4}

Water production is recorded monthly by Santa Monica water staff and reported annually to the California Department of Water Resources (DWR). Although no formal safe yield determination has been made for the Santa Monica Basin, based upon studies performed by the USGS, the average yield based upon estimated inflows and outflows between 1971 and 2000 was about 7,500 afy. Empirical evidence suggests that the practical pumping maximum is approximately 7,680 gpm (12,400 afy). Currently, there are no established limits on groundwater withdrawal in the Santa Monica [Groundwater]

¹City of Los Angeles, *Opportunities and Challenges Report*, July 2005.

²City of Santa Monica Public Works Department Water Resources Division, Susan Lowell, P.E, e-mail correspondence, dated September 8, 2010.

³City of Santa Monica Public Works Department Water Resources Division, Myriam Cardenas, e-mail correspondence, Dated March 7, 2011.

⁴City of Santa Monica, *Water Supply Assessment for the Proposed Land Use and Circulation Element*, January 2010.

Basin. To further assess safe groundwater yields, the City has engaged the services of a hydrogeology firm to prepare a groundwater production model that will provide numerical information and groundwater sufficiency related to annual withdrawals and long-term safe yield.

Local Groundwater

As described in Section 4.9 Hydrology & Water Quality, the City obtains local groundwater from the Arcadia, Olympic, and Charnock sub-basins of the Santa Monica Groundwater Basin. The City pumps groundwater from the following groundwater well fields: the Arcadia Well Field, which extracts groundwater from the Arcadia Subbasin; the Santa Monica Well Field, which extracts groundwater from the Olympic Subbasin; and the Charnock Well Field, which extracts groundwater from the Charnock Subbasin. From 1995 until December 2010, the City's groundwater production was limited because of the cessation of groundwater pumping activities within the Charnock sub-basin related to groundwater contamination. Groundwater remediation and the operation of the recently-upgraded SMWTP currently allows the City to maximize local groundwater production and resume groundwater pumping activities within the Charnock sub-basin. ~~The City currently meets 70 percent of water demand through groundwater pumping activities.⁵~~

Based on current data and assumptions groundwater supplies can be relied upon for all hydrologic years and in some instances could be increased (maximized) on a short-term basis, if necessary. As stated previously, Santa Monica has improved its local groundwater supply through construction and operation of a new water treatment facility in the Charnock subbasin; Santa Monica could sustainably produce 8,200 afy from that one subbasin. In addition, Santa Monica will produce approximately 4,200 afy from the Arcadia and Santa Monica subbasins. These sources combined could sustainably supply safe yields of up to approximately 12,400 afy of groundwater and, if necessary, the City could purchase imported water.

Metropolitan Water District

The MWD is the largest water wholesaler for domestic and municipal uses in Southern California. The MWD is a consortium of 26 member agencies, which includes the City. Per Section 135 of the MWD Act, each of MWD's 26 member agencies has a preferential right to purchase water from the MWD.⁶ MWD has a two-tier rate structure with a penalty rate charge under dry year conditions.⁷ The City's Tier 1 Annual limit is 11,109 acre-feet per year and its Purchase Order Commitment is currently 74,062 acre-feet.^{8,9} Dry weather conditions and environmental restrictions upon water pumping operations within the San Francisco Bay/Sacramento-San Joaquin River Delta (Delta) have affected the MWD water supplies and have created a possibility that the MWD may not meet future water demand of its member agencies. Environmental restrictions affecting MWD water supplies are related to the State Water Project (SWP), and are discussed below. To address the possibility that MWD water supplies may not meet member water demand, the MWD and its 26 member agencies have prepared a Water Supply Allocation Plan (WSAP). Under the WSAP, the City's water allocation would be ~~allocated~~ approximately 12,229 acre-feet per year until 2025. The City receives its apportionment of water from the MWD through 24-inch connections at the City's Arcadia Water Treatment Plant and the Charnock Well Field.

⁵~~City of Santa Monica, Press Release: Santa Monica Achieves Landmark Sustainability Milestone with Opening of Water Treatment Plant, February 24, 2011.~~

⁶The Metropolitan Water District Act was passed in 1928 to form the MWD. MWD Act governs how the MWD operates within the State.

⁷MWD's two-tiered rate structure is used by the MWD to meet the costs of maintaining existing supplies and developing additional supplies. MWD recovers its cost to supply water and the costs of its water supplies with revenue related to Tier 1 rates. MWD recovers its costs of developing long-term firm supplies with revenue related to Tier 2 rates.

⁸City of Santa Monica, *Water Supply Assessment for the Proposed Land Use and Circulation Element*, January 2010.

⁹A purchase order commitment is a quantity of water a MWD member agency will purchase over a 10-year period starting from January 2003 to December 2012.

Colorado River. MWD water supplies include imported water from the Colorado River. Water from the Colorado River is conveyed to the MWD's service area through the MWD-owned Colorado Aqueduct. Water from the Colorado River, and its tributaries, is also available to other users in the State and those in the states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming.

The State has a basic apportionment of water from the Colorado River of 4.4 million acre-feet. In addition, the State is able to use Colorado River water that is apportioned to, but not used by, the states of Arizona and Nevada. The State has a priority system to distribute its basic water apportionment of Colorado River water to water agencies within the State. MWD may receive up to 550,000 acre-feet of water from the State's basic apportionment of Colorado River water. In addition, the MWD may also receive 662,000 acre-feet of water from the Colorado River, which is in excess of the State's basic apportionment. However, the states of Arizona and Nevada have increased their water usage from the Colorado River, which has resulted in no unused water apportionment available to California since 2002. In addition, severe drought in the Colorado River Basin has reduced the storage in the system reservoirs. As a response, in 2003, the MWD ceased taking surplus deliveries in an effort to mitigate the effects of the drought. MWD's net diversions from the Colorado River have been limited to a low of 633,000 acre-feet of water in 2006 and a high of 905,000 acre-feet in 2008. MWD anticipates that its Colorado River Aqueduct deliveries would exceed one million acre-feet per year under its Five-Year Supply Plan.¹⁰

State Water Project. MWD water supplies include imported water from the SWP. Water from the SWP is conveyed from Northern California to the MWD's service area through the California Aqueduct (CAA). The CAA receives water from the Oroville Dam. The Oroville Dam stores and releases water from the Feather River, and other unregulated flows diverted directly from the Delta. A contract with the State Department of Water Resources (DWR) enables the MWD to obtain water from the SWP. MWD's current contract with the DWR is scheduled to expire in 2035, however, MWD presently intends to exercise its option to renew its contract with the DWR and continue service to at least year 2052.

Currently, water deliveries from the SWP are restricted due to ecological issues associated with agricultural and water pumping operations within the Delta. Biological opinions have been issued in connection with the federal and State Endangered Species Acts (ESAs) and have resulted in the reduction of water deliveries from the SWP to ensure the survival of certain aquatic species within the Delta. Operational constraints associated with water pumping operations within the Delta are likely to continue until a long-term solution is identified and implemented.¹¹ A detailed discussion of ecological issues within the Delta, federal and State actions to address the aforementioned issues, and the resultant impacts federal and State actions have had upon water deliveries via SWP can be found in the MWD Draft 2010 Regional Urban Water Management Plan.

Recycled Water

The City produces recycled water from dry runoff via the Pico-Kenter and the Pier storm drains year-round. Dry runoff is treated at the Santa Monica Urban Runoff Recycling Facility (described in the following pages), and is used in City parks, medians, the Woodlawn Cemetery, and dual-plumbed buildings. Dual-plumbed buildings currently using recycled water include the City's Public Safety Facility and the RAND Corporation building.

¹⁰Metropolitan Water District of Southern California, *Appendix A to the Official Statement dated June 16, 2010*, June 16, 2010.

¹¹Metropolitan Water District of Southern California, *Draft 2010 Regional Urban Water Management Plan*, August 2010.

Water Treatment Facilities

City Facilities

The City operates two water treatment plants, a pumping plant, and a variety of water transmission and distribution infrastructure.

Santa Monica Water Treatment Plant. The Santa Monica Water Treatment Plant (SMWTP) is located at 1228 South Bundy Drive in the City of Los Angeles. Groundwater pumped by the City's groundwater wells is treated at the SMWTP. In addition to treating groundwater, the SMWTP is one of the City's two water connection locations to the MWD water distribution system. Recently, infrastructure improvements including treatment system modifications, the addition of a fluoridation system, a switch from chlorine to chloramines for disinfection treatment, and upgrades to the water softening system and distribution delivery system were made to the SMWTP. These improvements to the SMWTP have increased the plant's treatment capacity to 8.5 million gallons per day (mgd).¹²

Santa Monica Urban Runoff Recycling Facility. The Santa Monica Urban Runoff Recycling Facility (SMURRF) is located at 1623 Appian Way, adjacent to the Santa Monica Pier. As previously mentioned, dry runoff from the Pico-Kenter and the Pier storm drains are treated at the SMURRF year-round. The SMURRF utilizes coarse and fine screen filters, dissolved air flotation, microfiltration, and ultraviolet radiation to treat dry runoff. It has the capacity to treat, clean, and reuse up to 500,000 gallons per day (gpd) of dry-runoff.

Pico-Kenter Pumping Plant. The Pico-Kenter Pumping Plant is located on the Santa Monica Beach, near the Pico Boulevard/Ocean Avenue intersection. It pumps dry-run off from the Pico-Kenter storm drain into the SMURRF, and has a pumping capacity of 500,000 mgd.

MWD Facilities

The MWD operates and maintains five water treatment facilities within its system: the F.E Weymouth Treatment Plant, the Robert B. Diemer (Diemer) Treatment Plant, the Joseph Jensen (Jensen) Treatment Plant, the Henry J. Mills Treatment Plant, and the Robert A. Skinner Treatment Plant. The MWD treats imported water at each of these water treatment plants prior to transmission and distribution to its member agencies throughout the Los Angeles basin, Orange County, and San Diego County. The City of Santa Monica receives treated water from either the Diemer Treatment Plant or the Jensen Treatment Plant.

Robert B. Diemer Treatment Plant. The Diemer Filtration Plant is located in the Orange County City of Yorba Linda. The plant has an operating capacity of 520 mgd and delivers up to 400 mgd.^{13,14} The remaining capacity is approximately 120 mgd.

Joseph Jensen Treatment Plant. The Jensen Treatment Plant is located in the San Fernando Valley and in the City of Los Angeles neighborhood Granada Hills. The Plant currently has an operating capacity of 750 mgd and treats approximately 420 mgd.^{15,16} The remaining capacity is approximately 330 mgd.

¹²City of Santa Monica Public Works Department Water Resources Division, Myriam Cardenas, e-mail correspondence, Dated March 7, 2011.

¹³Available at: <http://www.mwdh2o.com/mwdh2o/pages/yourwater/plants/diemer01.html>, December 13, 2010.

¹⁴Metropolitan Water District, *Robert B. Diemer Water Treatment Plan Water Quality Upgrade*, Available at http://www.mwdh2o.com/mwdh2o/pages/news/at_a_glance/New_DiemerFS.pdf, December 13, 2010.

¹⁵Available at: <http://www.mwdh2o.com/mwdh2o/pages/yourwater/plants/jensen01.html>, December 13, 2010.

¹⁶City of Santa Monica, Final Santa Monica Land Use and Circulation Element EIR, April 2010.

Water Conveyance System

The City provides water to the project site through two water connections from a City-owned water main beneath Colorado Avenue. The segment of the Colorado Avenue water main serving the project site is approximately 40 inches in diameter. The project site is developed with 109 trailer home lots. Although there are 109 spaces at the project site, approximately 76 of them are currently occupied by trailers. **Table 4.16.1-2** shows the estimated existing water usage of the project site. The estimated existing water usage is approximately 9,424,437 gpd. This represents less than one percent of the total water the City supplied daily during the 2009/2010 water year and of the treatment capacity of the SMWTP, respectively.

TABLE 4.16.1-2: ESTIMATED EXISTING WATER USAGE				
Use	Quantity	Units	Water Usage Rate (gpd/unit) /a/	Wastewater Generation (gpd)
Village Trailer Park	76	Dwelling units	124,111	9,424,436
Estimated Usage of Existing Uses on the Project Site				9,424,436
<i>/a/ Rate based on average gallons per day from water bills for the project site from July 2009 through July 2010. Total water usage on the project site was divided by 76 dwelling units (the number of existing mobile homes on the project site).</i>				
SOURCE: City of Santa Monica, <i>Land Use and Circulation Element Final Environmental Impact Report Volume 1: Final EIR</i> , April 2010.				

REGULATORY FRAMEWORK

State

Urban Water Management Planning Act. In 1983, the California Legislature enacted the Urban Water Management Planning Act (UWMPA), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. Requirements of the UWMPA were codified into the California Water Code Division 6, Part 2.6, Sections 10610-10656. The UWMPA requires water suppliers to develop Urban Water Management Plans (UWMPs) to identify short- and long-term water demand management measures to meet growing water demands every five years. As a water supplier, the City has prepared and adopted an UWMP, which was completed and adopted in 2005. The proposed project is expected to comply with the requirements of the Urban Water Management Planning Act.

California Water Code Section 10910. Section 10910 et seq. of the California Water Code provides regulations with relevant to land use planning and water supply availability. Provisions relevant to land use planning and water supply availability were codified into Section 10910 of the Water code by the California State Senate Bill (SB) 610. SB 610 was passed by the State Senate in 2001. Water Code Section 10910 requires the identification of any public water system that may supply water for a proposed project that is subject to the CEQA. In addition, a water supply assessment would be required under the following circumstances:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space
- A proposed hotel or motel, or both, having more than 500 rooms
- A mixed-use project that includes one or more of the projects specified in this subdivision
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project

Also, if a project requires a water supply assessment and is not included in a recently adopted public water system's Urban Water Management Plan (UWMP), then it must include a discussion "with regard to whether the public water system's total projected water supplies available during normal, single-dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project in addition to the public water system's existing and planned future uses, including agriculture and manufacturing uses." A water supply assessment would not be required to be prepared in connection to the proposed project. The number of dwelling units (393), the total commercial/retail building square footage (117,044), and the water demand of the project does not meet the California Water Code Section 10910 requirements for the preparation of a water supply assessment.¹⁷

Local

City of Santa Monica 2010 Urban Water Management Plan. The City of Santa Monica UWMP was prepared in accordance to the State UWMPA. The rules and regulations of the UWMPA can be found in the California Water Code Division 6, Part 2.6, Sections 10610-10656. The CWMPA requires that urban water suppliers develop water management plans, every five years, to actively pursue efficient use of available supplies. In accordance to the CWMPA, the ~~LADWP~~ City of Santa Monica prepared an UWMP. The latest ~~LADWP~~ UWMP was ~~recently~~ released in July 2011. The City's UWMP includes a (1) description the existing and planned sources of water available to the supplier, (2) discussion of water supply reliability, (3) water demand management measures, and (4) a water shortage contingency plan. The proposed project would comply with the requirements of the City's UWMP. The City's 2010 UWMP analyzes future water demand and water supplies through 2020. The 2010 UWMP accounted for future growth that would occur in the City, including growth that would occur with forecasted buildout of the LUCE. This growth includes future development projects such as the proposed project. The Draft EIR concluded that the project's water demand would constitute an incremental portion of the forecasted 2010 UWMP demand and therefore, impacts on water supply would be less than significant.

Santa Monica Municipal Code Section 7.16. The City of Santa Monica Municipal Code (SMMC) Section 7.16 sets forth rules and regulations of the City's Water Conservation Ordinance, which was adopted in June 1988 and amended in later years. SMMC Section 7.16 is intended to minimize the effect of water shortage in the City by reducing long and short term water consumption for future City water requirements. To reduce water consumption, SMMC Section 7.16 sets forth the following water conservation requirements:

- No lawn or landscape area shall be irrigated between the hours of 10:00 A.M. and 4:00 P.M. on any day, with the exception of any drip irrigation system approved by the Director of Environmental and Public Works Management (EPWM).
- Water shall not spray or flow to any impermeable private or public surface including, but not limited to walkways, driveways, sidewalks, alleys, streets, or storm drains.
- No person shall (1) use water to wash, clean or clear any sidewalks, streets, walkways, patios, driveways, alleys or parking areas, whether paved or unpaved, with a hose connected to a domestic water source, the exception is pressure washing approved by the director of EPWM; or (2) wash or clean with water any vehicle, including, but not limited to any automobile, truck, van, bus, motorcycle, boat or trailer, whether motorized or non-motorized, except by use of a hand-held bucket or similar container or a hose equipped with a positive action quick release shutoff valve or nozzle, this requirement shall not apply to any commercial car washing facility that uses a recycling system to capture or reuse water.

¹⁷Based on the water demand factor of 124 gpd, a 500 dwelling unit project would result in a demand of 62,000 gpd. The project's water demand would be less than this threshold as calculated below. Therefore, a water supply assessment is not required.

- No person shall (1) fill, for the first time, any water feature such as a fountain, pond, lake or water display unless the water feature is constructed with a water recycling system and, prior to the issuance of a building permit, a fee is paid to the Director of EPWM equal to the first year water consumption of the water feature as determined by the Director of EPWM; or (2) fill, for the first time, any water recreation facility such as a hot tub, spa, permanent swimming or wading pool unless the water recreation facility is constructed, installed or equipped with a cover to reduce water loss due to evaporation and, prior to the issuance of a building permit, a fee is paid to the Director of EPWM equal to the first year water consumption of the water recreation facility, as determined by the Director of EPWM.
- No person shall (1) cause, permit or allow water leak from any exterior or interior pipe, hose or plumbing fixture whatsoever; (2) cause, permit or allow water to flow from any source on private or public property into gutters, streets, alleys or storm drains except as a result of rainfall or from a source approved in writing by the Director of EPWM; (3) cause, permit or allow water from any source to pond on private or public property except as a result of rainfall or unless approved in writing by the Director of EPWM; or (4) cause, permit or allow water to flow from any source on private or public property without beneficial use.
- All eating and drinking establishments of any kind whatsoever including, but not limited to, any restaurant, hotel, cafe, cafeteria, bar or club, whether public or private, shall only provide drinking water to any person upon receipt of an express request.

Santa Monica Municipal Code Section 7.12.090. SMMC Section 7.12.090 sets forth the City's Water Capital Facility Fee and requires developers to pay the City a water capital facility fee prior to obtaining a permit to develop a building or a certificate of occupancy. In addition, Section 7.12.090 requires that developers perform, if required by the City Utilities Manager, any necessary improvements to the City's water distribution system to ensure there is adequate water supply service to the project site.

Santa Monica Municipal Code Section 8.108. SMMC Section 8.108 sets forth the City's Green Building Ordinance. The ordinance requires developers of new construction and substantial remodels to incorporate measures that address energy conservation, green building materials, landscaping and irrigation, and construction/demolition waste. The landscaping and irrigation component of the ordinance mandates that new development incorporate water-efficient landscape and irrigation standards to minimize water demand.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to stormwater, drainage, and water if it would:

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or
- Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed.

IMPACTS

Impacts U-1 Construction activity for the proposed project could temporarily increase the demand for water. This demand would be short-term and offset by reductions in water consumption from removal of existing uses; therefore, this would be a less-than-significant impact.

A short-term demand for water would occur during project construction. Demand for water would be associated with dust control, concrete mixer, truck cleanout, cleaning of equipment, and other short-term related activities. These activities would occur incrementally through project construction and would be

temporary in nature. The amount of water used during construction would vary depending on daily conditions and activity, but generally would be offset by the reduction in water consumption resulting from the removal of existing uses. Furthermore, such water demand would be temporary.

Overall, demolition and construction activities would require minimal water demand and would not be expected to have a significant impact on available water supplies and infrastructure. Therefore, construction impacts related to water supply would be less than significant.

Mitigation Measures

Impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact U-2 Operation of the proposed project would result in an increase in water demand over existing conditions. However, the City has adequate water supplies to serve the proposed project. This would be a less-than-significant impact.

The proposed project would include the development of a 399,581-square-foot mixed-use project with 166 apartments, 227 condominiums, 105,334 square feet of creative office, and 11,710 square feet of neighborhood-serving retail. Development of the proposed project would result in an increase in long-term water demand for consumption, operational uses, maintenance and other activities on the project site. The estimated water usage of the proposed project is shown in **Table 4.16.1-3**. The proposed project would result in a water demand of approximately 61,022 gpd. When accounting for the removal of the existing trailers on the site, the net water usage of the proposed project is approximately ~~51,598~~ 52,586 gpd of water, which represents approximately 0.4 percent of the City’s water demand per day in 2009/2010.

TABLE 4.16.1-3: ESTIMATED WATER USAGE OF THE PROPOSED PROJECT				
Use	Quantity	Units	Water Usage Rate (gpd/unit) /a/	Water Usage (gpd)
Dwelling Unit	393	Dwelling units	124	48,732
Production/Office	105,334	Square feet	0.1	10,533
Retail	11,710	Square Feet	0.15	1,757
Estimated Total Water Usage of Proposed Project				61,022
Less Existing Water Usage				(9,4248,436)
Net Water Usage of Proposed Project				51,598 52,586

/a/: City of Santa Monica, Land Use and Circulation Element Final Environmental Impact Report Volume 1: Final EIR, April 2010.

Additionally, according to the City’s 2010 UWMP, the City projects that in 2020 it would supply 24,475 acre-feet of water during a normal water year or 24,015 acre-feet of water during a single dry year or multiple dry years.¹⁸ The proposed project’s net water usage would represent approximately less than 0.1 percent of the City’s projected total water supply in 2020 during a normal water year and single dry/multiple dry years. This would be an incremental increase of the water forecasted to be supplied in 2020, and thus, it is anticipated that City would have sufficient groundwater and imported water entitlements to serve the proposed project. It should be noted that the project’s net water demand of ~~51,598~~ 52,586 gpd is conservative since it does not account for water use reductions that would occur from implementation of the project’s water conservation measures that are required to comply with the City’s Green Building Ordinance and to achieve a LEED rating. Thus, project water demand would

¹⁸City of Santa Monica, 2010 Urban Water Management Plan, 2011.

likely be less than the calculated net increase of ~~51,598~~ 52,586 gpd. In addition, the City has indicated that it would be able to supply water to the proposed project.¹⁹ Therefore, the proposed project would not result in an increase in water demand that would strain available supply. Impacts would be less than significant.

Impact U-3 The proposed project could require new water connections or conveyance systems. However, the project would not require or result in the construction of new or expanded water treatment facilities, the construction of which could cause a significant environmental effect. Compliance with Santa Monica Municipal Code requirements would reduce the proposed project's impacts related to water infrastructure to less than significant.

The proposed project would result in an overall increase in the water demand on-site, which could exceed the capacity of the City's existing water distribution infrastructure. The proposed project may require the construction of new, or improvements to existing, water connections and City water distribution infrastructure. In accordance with SMMC Section 9.20.10.040, the applicant will be required to submit a Water Study to the City of Santa Monica Public Works Department prior to the issuance of the building permit that verifies that the City's water system can accommodate the project's fire flows and all potable water demand. The applicant will be responsible to upgrade any water flow/pressure deficiencies, to the satisfaction of the Water Resources Manager, if calculations show that the project will cause such mains to receive greater demand than can be accommodated. Improvement plans will be submitted to the Engineering Division. All necessary improvements identified in the Water Study must be conducted pursuant to SMMC Section 7.12.090. All reports and plans will also be approved by the Water Resources Engineer. Future construction of water infrastructure would adhere to existing laws and regulations, and the water conveyance infrastructure would be appropriately sized for project development, which includes potable water, domestic irrigation, and fire flow demands. With compliance with the required municipal code requirements, operation of the proposed project would result in less-than-significant impacts related to water conveyance infrastructure.

Mitigation Measures

Impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The proposed project, in combination with the related projects, would increase the demand for water in the City of Santa Monica, thus potentially resulting in cumulative impacts on water supplies and water infrastructure.

Future new residences, commercial and other uses would increase the demand on the City's water supplies. However, future related projects would be required to comply with the City's Green Building Ordinance and thus, would be required to incorporate water conservation features to reduce their respective water demand. In addition, under the provisions of SB 610, every new development project with at least 500 dwelling units; shopping centers employing more than 1,000 persons or having more

¹⁹City of Santa Monica Public Works Department – Water Resources, Susan Lowell, P.E., written correspondence, September 21, 2010.

than 500,000 square feet of floor space; and commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space, etc. would be required to prepare water supply assessments to ensure that adequate water supplies would be available. As required by state law, the City would also update its UWMP every five years to ensure that adequate water supplies exist to accommodate future, long term growth in the City. Based on the latest 2010 UWMP, adequate water supplies exist during a normal water year, single dry year, and multiple dry years to meet City water demand.

Future related projects would also be required to comply with the City of Santa Monica Public Works Department requirements and City municipal code requirements addressing water infrastructure. In compliance with these requirements, related projects would be subject to review on a case by case basis to determine the specific improvements necessary to adequately supply water services.

As discussed above, the proposed project would represent less than 0.1 percent of the City's available water supply in 2020. While this would represent an increase in demand from existing conditions, the project's contribution to water demand in the City would not be cumulatively considerable. In addition, with compliance with City municipal code requirements, operation of the proposed project would result in less-than-significant impacts related to water conveyance infrastructure. Therefore, the proposed project would not contribute to a cumulative impact related to water supply and infrastructure.

4.16.2 UTILITIES AND SERVICE SYSTEMS

WASTEWATER TREATMENT AND CONVEYANCE

EXISTING SETTING

Wastewater generated within the City of Santa Monica is treated by the City of Los Angeles' Hyperion Treatment Plant (HTP). City-generated wastewater is conveyed to the HTP through the City's sewer collection system and the City of Los Angeles Department of Public Works (LADPW) Bureau of Sanitation (BOS) Coastal Interceptor Sewer (CIS).

Wastewater Treatment

The LADPW BOS operates wastewater treatment infrastructure that serves the City of Los Angeles and 29 contract cities, including the City of Santa Monica.¹

The HTP is located in the community of Playa Del Rey which is approximately seven miles southwest of the project site. Wastewater treated at the HTP, also known as effluent, is discharged into the Santa Monica Bay through a five-mile outfall. This outfall discharges primary and secondary treated effluent at a depth of 187 feet. The HTP also has a one-mile outfall which is in standby condition in case of an emergency. The HTP effluent discharge into the Pacific Ocean is regulated by the National Pollutant Discharge Elimination System (NPDES) Permit Number CA0109991 and subject to water quality requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB). A small remaining portion of effluent is reused to recharge barrier walls. Treated sewer sludge, or biosolids, is not discharged into the Santa Monica Bay. Biosolids are either reused in agriculture or used by landfills for daily cover.

The HTP was designed to provide full secondary treatment for 450 million gallons per day (mgd).² During the month of August, 2010, the HTP treated an average of 295 mgd of wastewater. Typically, the average wastewater treated at the HTP is 305 mgd.³

Wastewater Conveyance

The City's sewer collection system is comprised of 2,875 active pipe segments, totaling approximately 151 miles of pipeline. The City sewer pipes range from 6 to 36 inches in diameter.⁴ Wastewater collected by the City's sewer collection system is conveyed to the CIS.

The CIS begins in the Pacific Palisades and runs along the coastal area of Los Angeles County where it terminates at the HTP. The CIS is 9.4 miles in length, ranges from 24 to 72 inches in diameter, and is made of vitrified clay pipe and reinforced concrete pipe that has a polyvinyl chloride liner. The CIS has a capacity range of 14 to 61 mgd or 22 to 95 cubic feet per second (cfs).⁵ The segment of the CIS downstream from the City has a conveyance capacity of 51 mgd at its point of connection with the City of Los Angeles.⁶

¹City of Los Angeles Department of Public Works Bureau of Sanitation, *LA Sewers*, available at: <http://www.lasewers.org/index.htm>, Date Accessed: September 1, 2010.

²City of Los Angeles Department of Public Works and Department of Water and Power, *City of Los Angeles Integrated Resources Plan: Summary Report*, July 2004.

³City of Los Angeles Department of Public Works, Steve Fan, Telephone Conversation, dated September 1, 2010.

⁴City of Santa Monica, *2005 Opportunities and Challenges Report*, 2005.

⁵City of Los Angeles Department of Public Works and Department of Water and Power, *City of Los Angeles Integrated Resources Plan: Facilities Plan*, July 2004.

⁶City of Santa Monica Public Works Department Water Resources Division, Susan Lowell, P.E, e-mail correspondence, dated September 8, 2010.

Beneath the project site are two six-inch vitrified clay pipes that collect wastewater from the existing uses. These two pipes convey wastewater off-site to a six- to eight-inch vitrified-clay sewer main that runs beneath Pennsylvania Avenue. This main connects to the City’s wastewater system which ultimately connects to the CIS.

Existing uses on the project site generate an estimated 8,512 gpd of wastewater (**Table 4.16.2-1**), representing less than one percent of the total downstream capacity of the CIS and less than one percent of the total treatment capacity of the HTP.

TABLE 4.16.2-1: EXISTING WASTEWATER GENERATION				
Use	Quantity	Units	Wastewater Generation Rate (gpd/unit) /a/	Wastewater Generation (gpd)
Village Trailer Park /a/	76	Dwelling units	112	8,512
Estimated Wastewater Generated from Existing Uses				8,512
<small>/a/ Based on the City's 2009 wastewater data, wastewater generation is estimated to be 90 percent of the water demand rate. (City of Santa Monica Office of Sustainability)</small>				
<small>SOURCE: TAHA 2011.</small>				

REGULATORY FRAMEWORK

Local

Santa Monica Municipal Code Section 7.08. The City of Santa Monica Municipal Code (SMMC) Section 7.08 sets forth the City’s Wastewater Control requirements and regulations. The wastewater control requirements and regulations were adopted by ordinance in 1988. SMMC Section 7.08 requires that a sewer allocation permit be required prior to obtaining a building permit. The issuance of a sewer allocation permit is determined by the Director of the General Services (Director) who determines whether the City’s sewer system has sufficient capacity to accommodate the net increase in wastewater created by a project.

Santa Monica Municipal Code Section 7.04.460. The City of Santa Monica Municipal Code (SMMC) Section 7.04.460 is the City’s Wastewater Capital Facility Fee. SMMC Section 7.04.460 requires developers to pay the City a wastewater capital facility fee prior to obtaining a permit to develop a building or a certificate of occupancy.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to sewage and wastewater treatment if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or
- 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.

IMPACTS

Impact U-6 Construction activities would result in a temporary increase in wastewater generation on-site; however this increase would be offset by the removal of existing uses from the project site. Project construction generated wastewater would not exceed capacity of existing wastewater infrastructure, nor would it require the construction of new or expanded facilities. Therefore, impacts would be less than significant.

Construction activities for the proposed project would temporarily result in wastewater generation as a result of construction workers on-site. However, such wastewater generation would be nominal when compared with the wastewater generated by the existing uses on the project site. In addition, the wastewater generated from project construction would be offset by the reduction in wastewater generation that would occur from the removal of the existing uses on-site. Thus, wastewater generation from project construction activities is not anticipated to cause a measureable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. For these same reasons, construction of the proposed project is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of wastewater treatment plant facilities and conveyance systems by generating flows greater than those anticipated. Therefore, project construction impacts related to the wastewater system would be less than significant.

Mitigation Measures

Impacts would be less than significant; no mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact U-7 Development of the proposed project would result in an increase in wastewater flows from the project site. However, this would not exceed the capacity of existing wastewater infrastructure, nor would it require the construction of new, or expansion of existing, wastewater treatment facilities or conveyance systems that could cause significant environmental effects. Impacts would be less than significant.

The proposed project would development of a 399,581-square-foot mixed-use project with 166 apartments, 227 condominiums, 105,334 square feet of creative office, and 11,710 square feet of neighborhood-serving retail. Development of the proposed project would result in an increase in wastewater flows during operation. The estimated wastewater generation of the proposed project is identified in **Table 4.16.2-2**. The proposed project would generate a total of 55,077 gpd of wastewater. When accounting for removal of the existing uses, the net wastewater generation of the proposed project is 46,565 gpd. The HTP currently treats an average of 305 mgd of wastewater and estimated to have a remaining treatment capacity of 145 mgd.⁷ Wastewater generated by the proposed project would represent approximately a 0.03 percent reduction of the remaining treatment capacity of the HTP. The proposed project's wastewater generation would represent an incremental increase in wastewater treated by the HTP and is not anticipated to require the LADPW BOS to expand the existing treatment capacity of the HTP. In addition, the proposed project would not cause the HTP to exceed applicable wastewater treatment requirements because the HTP operates under the NPDES permit and is required to comply with all LARWQCB wastewater treatment requirements to operate. It should be noted that the project's wastewater generation estimate of 46,565 gpd is conservative since it does not account for wastewater reductions that would occur from implementation of the project's water conservation measures that are required to comply with the City's Green Building Ordinance and to achieve a LEED rating. Thus, project wastewater generation would likely be less than the calculated net increase of 46,565 gpd. Therefore, the operation of the proposed project would result in less-than-significant impacts related to wastewater treatment systems.

⁷The remaining capacity of the Hyperion Treatment Plant was determined by subtracting the average volume of wastewater treated by the Hyperion Treatment Plant (305 mgd) from its treatment capacity (450 mgd).

TABLE 4.16.2-2: ESTIMATED WASTEWATER GENERATION OF THE PROPOSED PROJECT				
Use	Quantity	Units	Wastewater Generation Rate (gpd) /a/	Wastewater Generation (gpd)
Dwelling Units	393	Dwelling units	112	44,016
Production/Office	105,334	Square feet	0.09	9,480
Retail	11,710	Square Feet	0.135	1,581
Estimated Total Wastewater Generated by the Proposed Project				55,077
Less Existing Wastewater Generation				(8,512)
Net Wastewater Generation of Proposed Project				46,565
/a/ Wastewater generation is estimated to be 90 percent of the water demand rate.				
SOURCE: TAHA 2011.				

With regard to wastewater conveyance systems, wastewater generated by the proposed project would be conveyed via local sewer lines and to the CIS prior to treatment at the HTP. The project’s wastewater generation of 46,565 gpd represents less than one percent of the City’s downstream conveyance capacity of the CIS of 51 mgd. The incremental increase of wastewater generated by the proposed project is not anticipated to require the LADPW BOS to expand the segment of the CIS that is downstream of the City to accommodate the proposed project. The City of Santa Monica recently completed a multi-year upgrade of the entire sewer system, increasing the capacity of the system to the maximum demand of the sunset year of 2090 to 51.7 mgd. Therefore, it is anticipated that the existing sewer lines would be adequate to serve the proposed project. Additional wastewater flows from the proposed project would not exceed existing capacity of the City’s sewer system. In addition, pursuant to SMMC Section 9.20.10.040(q), should it be deemed necessary by the Director of Planning, a flow capacity report could be required in order to determine if improvements are necessary to adequately serve the proposed project. Prior to the issuance of the building permit, the applicant will be required to submit a sewer study to the City of Santa Monica Public Works Department that shows that the City’s sewer system can accommodate the proposed project’s wastewater flows. The applicant will be responsible to upgrade any downstream deficiencies, to the satisfaction of the Water Resources Manager, if calculations show that the project will cause such mains to receive greater demand than can be accommodated. Improvement plans will be submitted to the Engineering Division. All reports and plans will also be approved by the Water Resources Engineer. Therefore, impacts related to wastewater conveyance infrastructure would be less than significant.

Mitigation Measures

The proposed project would have less-than-significant impact related to wastewater conveyance.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The proposed project combined with the related projects would increase demand on the City’s sewer system. However, as previously discussed, the City of Santa Monica recently completed a multi-year upgrade of the entire sewer system, increasing the capacity of the system to the maximum demand of 51.7 mgd for the sunset year of 2090. The additional demand presented by the proposed project and related projects would not exceed the capacity of the City’s sewer system. Therefore, the proposed project would not contribute to a cumulative impact related to wastewater.

4.16.3 UTILITIES AND SERVICE SYSTEMS

SOLID WASTE

EXISTING SETTING

The City of Santa Monica Public Works Department (PWD) Resource Recovery and Recycling Division (RRRD) provides solid waste collection, disposal, and recycling services for residential, commercial, and industrial land uses. The RRRD serves all of the residential land uses and 80 percent of the commercial and industrial businesses within the City. Commercial and industrial businesses that are not served by the RRRD contract with private waste haulers. Solid waste collected by the RRRD is transported and sorted at the Santa Monica Refuse Transfer Station located at 2401 Delaware Avenue, approximately 0.5 miles south of the project site.

Solid waste that is not hazardous is transported to Class III (municipal) landfills. **Table 4.16.3-1** lists the Class III landfills that are available to accept solid waste from the City. These Class III landfills, which are located in Los Angeles County and Orange County, currently have a remaining capacity of 168,371,000 tons and a total maximum permitted daily capacity of 56,000 tons per day. Solid waste that includes inert debris such as concrete, asphalt, rocks, earth and earth-like products, are disposed of at inert waste facilities. **Table 4.16.3-1** also lists the Inert Waste and Refuse-to-Energy facilities that are available to accept inert debris from the City. These Inert Waste and Refuse-to-Energy facilities have a maximum permitted daily intake of approximately 9,740 tons per day. During the year 2010, the City disposed of approximately 78,504 tons of solid waste.¹

¹Los Angeles County Department of Public Works, *Pre-defined Report: Detailed Solid Waste Activity Report by Jurisdiction of Origin*, Available at: http://dpw.lacounty.gov/swims/reports/predefined_master.asp?Action=GENERATEREPORT&rpt=23&rptType=DWDPDF, Accessed on March 3, 2011.

TABLE 4.16.3-1: LANDFILLS SERVING THE CITY OF SANTA MONICA						
Landfill	Location (City)	Remaining Capacity (As of January 2010) (tons)	Maximum Permitted Daily Capacity (tons/day)	2009 Average Daily Intake (tons/day)	Permit Expiration Date	Estimated Remaining Life (years) /a/
CLASS III LANDFILLS						
Chiquita Canyon Sanitary Landfill	Valencia	7,323,000	6,000	2,161	11/24/2019	5
Frank R. Bowerman Sanitary Landfill	Irvine	37,000,000	11,500	4,611	12/31/2022	45
Lancaster Landfill	Lancaster	13,070,000	1,700	767	08/01/2012	37
Olinda Alpha Sanitary Landfill	Brea	14,000,000	8,000	5,471	12/31/2013	13
Puente Hills Landfill	Whittier	14,351,000	13,200	8,375	10/31/2013	6
Simi Valley Landfill & Recycling Center	Simi Valley	16,000,000	3,500	2,521	1/31/2027	17-25
Sunshine City/ County Canyon Landfill	Sylmar	80,627,000	12,100	7,541	02/05/2037	22
Total Capacity Class III Landfills		168,371,000	56,000	31,447		
INERT WASTE AND REFUSE TO ENERGY FACILITIES						
Azusa Land Reclamation	Azusa/CA	46,425,000	6,500	440	--	--
Commerce Refuse-to-Energy Facility	Commerce/ CA	466,640,000	1,000	321	--	--
Southeast Resource Recovery Facility	Long Beach/CA	1,602,450,000	2,240	1,570	--	--
Total Capacity Inert Waste and Refuse to Energy Facilities		2,115,515,000	9,740	2,331		
TOTAL CAPACITY		2,283,886,000	65,740	3,778		
/a/ Estimated remaining life is based upon assuming that the daily intake at the landfill would be equivalent to the average daily intake in 2008 or the maximum permitted daily capacity. SOURCE: Los Angeles County Department of Public Works, <i>County of Los Angeles Countywide Integrated Waste Management Plan – 2009 Annual Report, 2010.</i>						

Solid waste generated from the project site is collected and disposed of by the RRRD. **Table 4.16.3-2** lists the estimated amount of solid waste generated by the existing uses on the project site. The estimated amount of solid waste generated by existing uses is approximately 0.15 tons per day, or less than one percent of the maximum daily intake capacity of the Class III landfills listed in **Table 4.16.3-1**. Solid waste generated by the existing uses is approximately less than one percent of the total solid waste disposed of by the City in 2010.

TABLE 4.16.3-2: ESTIMATED SOLID WASTE GENERATED BY EXISTING USES ON THE PROJECT SITE					
Use	Quantity	Units	Solid Waste Generation Rate /a/	Solid Waste Generated (ppd)	Solid Waste Generated (tons/day)
Village Trailer Park	76	Dwelling units	4 pounds/dwelling unit/day	304	0.15
Total Solid Waste Generation of Existing Uses on Project Site				304	0.15
/a/ Generation rates from the City of Santa Monica Land Use and Circulation Element Draft EIR, 2010.					

REGULATORY FRAMEWORK

State

California Integrated Waste Management Act of 1989 (AB 939). Solid waste regulation in California is governed by the California Integrated Waste Management Act of 1989, which is commonly known as Assembly Bill (AB) 939. The Act, codified into the California Public Resources Code, emphasizes a reduction of waste disposed in California landfills. To achieve a reduction of waste in California landfills, AB 939 required all city and county plans to include a waste diversion schedule with the goals to divert 25 percent of solid waste from landfills by 1995 and divert 50 percent of solid waste from landfills by the year 2000. To achieve these goals, AB 939 emphasizes that cities and counties reduce the production of solid waste through recycling and the reuse of solid waste. As indicated in the City's Jurisdiction Profile on the California Department of Resources Recycling and Recovery (CDRRR) website, the City has met AB 939 requirements and has diverted at least 50 percent of its solid waste from landfills since 2000.² Since 2000, the City has continued to meet and exceed AB 939 diversion requirements as it diverted more than 70 percent of the City-generated solid waste from landfills in 2010.³

Regional/Local

Los Angeles County Countywide Integrated Waste Management Plan. The Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP), approved in 1999, by the Los Angeles County Department of Public Works provides an integrated and regional approach to solid waste management. The plan recognizes that while landfills are important in managing the County's solid waste stream, new approaches should be undertaken to address source reduction, recycling, composting, and alternative technology. In addition, the CoIWMP assures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939. To provide an annual update on the CoIWMP, the County Department of Public Works prepares the CoIWMP annual reports, which address solid waste management for a 15-year planning period. The CoIWMP annual reports analyze solid waste disposal and estimated future remaining capacity at County landfills. The 2009 CoIWMP Annual Report is the most recent report available.

Santa Monica Municipal Code Chapter 5.08. The City of Santa Monica Municipal Code (SMMC) Chapter 5.08 establishes the City's general sanitation regulations and requirements. This chapter of the SMMC sets forth regulations regarding the collection of solid waste, points of collections, and fees/rates structure for collection. In addition, SMMC Chapter 5.08 requires solid waste handlers in the City to provide recycling services consistent with the City's Source Reduction and Recycling Element and AB 939.

Santa Monica Municipal Code Chapter 8.108 Subpart C. SMMC Chapter 8.108 Subpart C sets forth the City's construction and demolition regulations. Covered projects required of SMMC Chapter 8.108 Subpart C include private projects that have demolition project costs that are, or are projected to be, \$55,000, or are 1,000 square feet or greater; and all demolition-only projects shall be required to divert at least 65 percent of project-related construction and demolition material in compliance with the chapter. The Chapter requires construction and demolition permit applicants to prepare a Waste Management Plan, as part of an application packet for a construction and demolition permit, that would (1) estimate the volume or weight of project construction and demolition material, by material type, to be generated; (2)

²California Department of Resources Recycling and Recovery, *Jurisdiction Profile for Santa Monica*, Available at: <http://www.calrecycle.ca.gov/Profiles/Juris/JurProfile2.asp?RG=C&JURID=474&JUR=Santa+Monica>, Accessed on March 3, 2011.

³City of Santa Monica Sustainability Report Card, 2010. http://www.smgov.net/Departments/OSE/Categories/Sustainability/Sustainable_City_Report_Card.aspx; Accessed on March 29, 2011.

indicate the maximum volume or weight of such materials that can be feasibly be diverted via reuse or recycling; (3) indicate the vendor or facility where the applicant proposes to use to collect or receive that material; and (4) estimate the volume or weight of construction and demolition materials that would be sent to Class III landfills and inert disposal facilities.

Santa Monica Sustainable City Plan. The Santa Monica Sustainable City Plan was adopted in 1994 and revised in 2006. The Sustainable City Plan was designed to assist the City's community to think, plan, and operate more sustainably. The Sustainable City Plan includes goals and strategies, for the City government and all sectors of the community, to conserve and enhance local resources, safeguard human health and the environment, maintain a healthy and diverse economy, and improve the livability and quality of life for all community members in Santa Monica. Specific to solid waste, the Resource Conservation section of the Sustainable City Plan establishes a target for diverting 70 percent of solid waste generated within the City from landfills by 2010. As previously stated, the City's diversion rate was over 70 percent in 2011. In addition, in 2010, the City Council gave direction to City staff to prepare a Zero Waste Plan.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to solid waste if it would:

- Not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or
- Comply with federal, state, and local statutes and regulations related to solid waste.

IMPACTS

Impact US-8 Construction activities would generate debris on-site; however, existing landfills have sufficient capacity to accommodate the estimated solid waste generated during the proposed project's construction.

Construction of the proposed project would generate construction and demolition waste such as asphalt, concrete, and dirt. Existing trailers on the project site would not be disposed of at any landfills and would be stored in a location off-site for storage and/or re-use. **Table 4.16.3-3** shows the amount of solid waste generated during the demolition and construction phases of the proposed project. Approximately ~~391,134~~ **252,524** tons of solid waste would be generated during the construction and demolition phase of the proposed project, including exported soil. Developers of the proposed project would comply with SMMC Chapter 8.108 Subpart C and consequently, would divert at least 65 percent of solid waste generated during the demolition and construction phases away from landfills. Compliance with SMMC Chapter 8.108 Subpart C would result in a maximum of ~~136,897~~ **88,383** tons of solid waste disposed of at landfills serving the City. The Class III landfills, inert waste, and refuse-to-energy facilities serving the project site have a remaining capacity of approximately 2.3 billion tons, and a combined daily capacity of 65,740 tons per day. Solid waste generated by the proposed project would reduce the remaining capacities of the disposal facilities by less than one percent. This is a nominal reduction of the remaining capacities of the Class III landfills, inert waste, and refuse-to-energy facilities serving the project site. The Class III landfills, inert waste, and refuse-to-energy facilities serving the project site would have sufficient permitted capacity to accommodate the proposed project's construction waste disposal needs. Therefore, the proposed project would be served by a landfill with sufficient capacity to handle construction debris; impacts would be less than significant.

TABLE 4.16.3-3: ESTIMATED SOLID WASTE GENERATION DURING THE DEMOLITION AND CONSTRUCTION PHASE OF THE PROPOSED PROJECT				
Use	Building Area (sq ft)	Solid Waste Generation Rate (pounds/sq ft) /a/	Solid Waste Generated (pounds)	Solid Waste Generated (tons)
DEMOLITION PHASE				
Existing Structures	3,454	115	397,210	199
Asphalt and Concrete Roadway and Trailer Pads /b/	n/a	n/a	737,656	368
Soil Export /c/, /d/	n/a	n/a	18,666,000	9,333
Total Solid Waste Generated During Demolition Phase			19,800,866	9,900
CONSTRUCTION PHASE				
Residential	231,875	115	26,665,625	13,333
Production/Office	105,334	155	16,326,770	8,163
Retail	11,710	155	1,815,050	908
Soil Export /e/, /c/	n/a	n/a	236,667,000 440,439,000	118,334 220,220
Total Solid Waste Generated During Construction Phase			554,807,445 485,246,445	277,404 242,624
Total Solid Waste Generated during Construction and Demolition Phases			781,134,311 505,047,311	391,134 252,524
<p>/a/ Solid waste generation rates obtained from US EPA Characterization of Building-Related Construction and Demolition Debris study. /b/ Assumes that asphalt is 721 kilograms per cubic meter or 9.26 pounds per cubic foot. Also assumes that, currently, project site includes 159,321 square feet, or 95 percent of the project site has asphalt that is six inches thick. There is 79,661 cubic feet, or 737,656 pounds, of asphalt. /c/ URBEMIS Model, found in Appendix C of this EIR, assumes that 6,222 cubic yards of soil would be exported off the project site during the demolition phase. /d/ Assumes one cubic yard is equivalent to 1.5 tons. /e/ The URBEMIS model, found in Appendix C of this EIR, assumes that 78,889 cubic yards of soil would be exported off the project site during the construction phase.</p> <p>SOURCE: United States Environmental Protection Agency, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i>, 1998 and TAHA, 2011.</p>				

Impact US-9 Implementation of the proposed project would result in an increase in solid waste generation on-site; however, existing landfills would have sufficient capacity to accommodate solid waste generated during the operation of the proposed project.

Operation of the proposed project would generate municipal solid waste typical of residential and commercial uses (e.g., organic/food waste, paper, plastic, glass, etc.) Solid waste generated by the proposed project would be recycled or collected by the RRRD, or a private waste hauler, and transported for disposal at one of the Class III landfills available to the City.

Table 4.16.3-4 shows the amount of solid waste generated during the operation of the proposed project. Operation of the proposed project would generate approximately 1.15 tons of solid waste per day and a net total of one ton of solid waste per day. Currently, the total permitted daily intake at the landfills serving the City of Santa Monica is 56,000 tons per day. Estimated proposed project solid waste generation represents less than one percent of the maximum daily intake volume of the Class III landfills currently serving the City of Santa Monica. Therefore, these landfills are anticipated to have sufficient permitted daily capacity to receive solid waste generated by the proposed project. However, it should be noted that only five of these landfills have lifespans that would allow them to operate at the time of the proposed project build out in 2017: the Frank R. Bowerman Sanitary Landfill, Lancaster Landfill, Olinda Alpha Sanitary Landfill, Simi Valley Landfill & Recycling Center, and the Sunshine City/County Landfill. The total maximum daily intake capacity of these five landfills is 36,800 tons. The proposed project solid waste generation would represent less than one percent of the maximum daily intake capacity at these five landfills. In addition, it should be noted that the generation rates do not account for recycling and/or reuse measures that would occur. As a result, the proposed project’s actual disposal at landfills would be less than the estimated 1.15 tons of solid waste per day. Therefore, the proposed project would be served by a landfill with sufficient capacity; impacts would be less than significant.

TABLE 4.16.3-4: ESTIMATED SOLID WASTE GENERATED BY THE PROPOSED PROJECT					
Use	Quantity	Units	Solid Waste Generation Rate	Solid Waste Generated (ppd)	Solid Waste Generated (tons/day)
Residential	393	Dwelling units	4 pounds/dwelling unit/day	1,572	0.79
Production/Office	105,334	Square Feet	0.006 pounds/square feet/day	632	0.32
Retail	11,710	Square Feet	0.006 pounds/square feet/day	70	0.04
Total Solid Waste Generated During Operation of Proposed Project				2,274	1.15
Less Solid Waste Generated By Existing Uses on Project Site				(304)	(0.15)
Net Solid Waste Generated During Operation of Proposed Project				1,970	1.0
SOURCE: Estimated Solid Waste Generation Rates from the City of Santa Monica Land Use and Circulation Element Draft EIR, 2010.					

Impact US-10 The proposed project would be in compliance with local regulations related to project waste; therefore, this would be a less-than-significant impact.

There are no applicable federal or State statutes that would regulate the generation of solid waste during project operation. The proposed project, however, would participate in the City’s recycling program and would comply with SMMC Chapter 8.108 Subpart C (for construction and demolition waste) as well as SMMC Chapter 5.08 regulations regarding the storage and collection of solid waste during its operation. Therefore, the proposed project would comply with local regulations related to project waste; impacts would be less than significant.

Mitigation Measures

Impacts related to solid waste would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to solid waste would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The proposed project and the related projects would result in an increase in the amount of solid waste diverted to landfills. However, similar to the proposed project, it is anticipated that related projects would be subject to discretionary review to ensure that solid waste generation would be less than significant. Also, as previously stated, the City has been given directive to prepare a Zero Waste Plan. It is anticipated that implementation of the strategies identified in the future Zero Waste Plan would result in decreased solid waste generation throughout the City. Furthermore, the 2009 CoIWMP annual report estimates that solid waste generation in 2022 could be accommodated with various strategies that would include the use of existing landfills, transformation facilities, proposed expansions of existing landfills, new landfills, use of out-of-County landfills, alternative technologies, and increase waste reduction and recycling. In addition, solid waste generated by the proposed project represents less than one percent of the maximum daily intake of the five Class III landfills that would be available to serve the City. Remaining landfills serving the project site are anticipated to have sufficient permitted daily capacity to receive solid waste generated by the proposed project. Therefore, the proposed project would not contribute to a cumulative impact related to solid waste.

4.16.4 UTILITIES AND SERVICE SYSTEMS

ENERGY

EXISTING SETTING

Electricity

The City of Santa Monica is served by Southern California Edison (SCE). SCE is an investor-owned utility that operates within a 50,000-square-mile service area and serves 180 cities. SCE owns and operates the majority of its generation, transmission and distribution infrastructure, and distributes power to its customers by utilizing 16 utility connections and 4,990 transmission and distribution circuits. SCE's power supplies originate from SCE-owned power plants within California and shared-ownership power generating facilities in Arizona and New Mexico. SCE's power supply is generated from coal, nuclear, and hydroelectric power. SCE provided its customers approximately 90,008 million kilowatt hours (kWh) of electricity in 2008.

Sources of SCE's electricity include the coal-generated electricity from the Four Corners Generating Station located in New Mexico; nuclear-generated electricity from the San Onofre Nuclear Facility and the Palo Verde Nuclear Facility located in California and Arizona, respectively; hydroelectric-generated electricity from the SCE-owned Big Creek Hydroelectric facilities (Big Creek); solar-generated electricity from the California Solar Initiative and SCE Rooftop Program; and large-scale power contracts.

Approximately 90 percent of SCE's hydroelectric power comes from the Big Creek. Big Creek is located in Shaver Lake, California and is comprised of nine power houses that have a capacity to produce 1,000 megawatts of power.

Table 4.16.4-1 lists the estimated electricity usage by the existing uses on the project site. This electricity usage is approximately 427,614 kWh per year, or approximately less than one percent of the total electricity usage by SCE customers in 2008.

TABLE 4.16.4-1: ESTIMATED ELECTRICITY USAGE FROM EXISTING USES ON PROJECT SITE				
Use	Quantity	Units	Electricity Usage Rate (kWh/unit/year)	Electricity Usage (kWh/year)
Proposed Project	76	Dwelling units	5,626.50	427,614
Estimated Total Electricity Usage of Existing Uses on Project Site				427,614
<small>SOURCE: South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i>, April 1993.</small>				

Natural Gas

The City of Santa Monica is served by the investor-owned Southern California Gas Company (SoCalGas), a unit of Sempra Energy. SoCalGas serves approximately 20.3 million customers through 5.7 million meters within a 20,000-square-mile service area that includes over 530 cities in Central and Southern California.¹ In 2008, approximately 5,521.9 million therms, or 533,968 million cubic feet of natural gas was consumed within the SoCalGas service area. Residential, industrial, and commercial customers consumed 2,489 million, 1,542 million, and 874 million therms of natural gas, respectively.^{2,3}

¹Southern California Gas Company Profile website, <http://www.socalgas.com/aboutus/profile.html>, accessed August 3, 2010.

²California Energy Commission. California Energy Consumption Database.

³One therm is equal to 96.7 cubic feet.

The 2008 California Gas Report showed that, in 2007, the single- and multi-family average annual use per meter totaled 515 therms and 312 therms, respectively. The 2010 California Gas Report showed that the single- and multi-family average annual use per meter have decreased to 493 and 303, respectively. SoCalGas anticipates average usage to continue to decline due in part to increased energy efficiency of appliances, tighter building shells, and the impact of energy efficiency programs.⁴

SoCalGas natural gas supplies originate from sedimentary basins located in California, New Mexico, West Texas, the Rocky Mountains, and Western Canada. Interstate pipelines used by SoCalGas and the San Diego Gas and Electricity Company (SDG&E) have a natural gas upstream capacity of 7,725 million cubic feet per day, or 218,250 million cubic feet per month.⁵ Locally, SoCalGas distributes natural gas through an extensive network of approximately 41,500 miles of underground gas mains.

Table 4.16.4-2 lists the estimated natural gas usage by the existing uses on the project site. The natural gas usage of existing uses is approximately 304,874 cubic feet per month, or approximately less than one percent of the total electricity usage by SoCalGas customers in 2008.

TABLE 4.16.4-2: ESTIMATED NATURAL GAS USAGE FROM EXISTING USES ON PROJECT SITE				
Use	Quantity	Units	Natural Gas Usage Rate (cubic feet/unit/month)	Natural Gas Usage (cubic feet/month)
Proposed Project	76	Dwelling units	4,011.5	304,874
Estimated Total Natural Gas Usage of Existing Uses on Project Site				304,874
<small>SOURCE: South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.</small>				

REGULATORY FRAMEWORK

State

California Building Energy Efficiency Standards: Title 24. California established statewide building energy standards following legislative action. The legislation required the standards to be:

- Cost effective
- Based on the building life cycle
- include both prescriptive and performance-based approaches

California’s building efficiency standards (along with those of energy efficient appliances) have saved more than \$56 billion in electricity and natural gas costs since 1978. It is estimated the standards will save an additional \$23 billion by 2013.⁶ As technology and design have evolved, the standards have been periodically updated, generally, every three years.

Title 24 of the California Code of Regulations (CCR) comprises the State Building Standards Code. Part 6 of Title 24 is the California Energy Code (CEC) that includes the building energy efficiency standards. The standards include provisions applicable to all buildings—residential and non-residential—that describe the documentation and certificate requirements for buildings to meet the building energy efficiency standards.

⁴Southern California Gas Company, 2008 California Gas Report, 2008.

⁵Ibid.

⁶California Code of Regulations. Title 24, Part 6.

These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances:

- Air conditioning systems
- Heat pumps
- Water chillers
- Gas and oil-fired boilers
- Cooling equipment
- Water heaters and equipment
- Pool and spa heaters and equipment
- Gas fired equipment including furnaces and stoves/ovens
- Windows and exterior doors
- Joints and other building structures openings
- Insulation and cool roofs
- Lighting control devices

The standards include additional mandatory requirements for space conditioning (heating and cooling), water heating, and indoor and outdoor lighting systems and equipment in non-residential, high-rise residential, and hotel or motel buildings. Mandatory requirements for low-rise residential buildings involve indoor and outdoor lighting, fireplaces, space cooling and heating equipment (including ducts and fans), insulation of the structure, building foundation, and water piping. In addition to the mandatory requirements, the standards necessitate further energy efficiency measures that can be provided through a choice between performance and prescriptive compliance approaches. In buildings designed for mixed-use (e.g., commercial and residential), each section must meet the standards applicable to that type of occupancy.⁷

The performance approach provides for the calculation of an energy budget for each building and allows flexibility in building systems and features to meet the budget. The energy budget addresses space-conditioning (cooling and heating), lighting, and water heating. Compliance with the budget is determined by the use of a CEC-approved computer software energy model. The alternative prescriptive standards require demonstrating compliance with specific minimum efficiency for components of the building such as building envelope insulation R-values, fenestration areas (U-factor and solar heat gain coefficients of windows and doors), heating and cooling, and water heating and lighting system design requirements. These requirements vary depending on the building's location in the State's 16 climate zones. The CEC adopted the 2008 standards, which became effective on January 1, 2010 for a number of reasons:

- To provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy.
- To respond to the California Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that the State must reduce its greenhouse gas emissions to 1990 levels by 2020
- To pursue State energy policy that energy efficiency is the resource of first choice for meeting the State's energy needs.
- To act on findings of the State's Integrated Energy Policy Report that Standards are most cost effective means to achieve energy efficiency, expects the Building Energy Efficiency Standards to continue to be upgraded over time to reduce electricity and peak demand, and recognizes the role of the Standards in reducing energy related to meeting the State's water needs and in reducing greenhouse gas emissions.

⁷California Energy Commission, *2005 Building Energy Efficiency Standards for Residential and Non Residential Buildings, P400-03-001F, Section 100(f)*, October 1, 2005.

- To meet the West Coast Governors’ Global Warming Initiative commitment to include aggressive energy efficiency measures into updates of state building codes.
- To meet the Executive Order in the Green Building Initiative to improve energy efficiency of nonresidential buildings through aggressive standards.

Assembly Bill 32. In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the CARB to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB 32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the State.

The CARB AB 32 Scoping Plan contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by the CARB with input from the Climate Action Team and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. To meet GHG reduction goals, and specific to energy usage, the Scoping Plan makes an emphasis to promote energy efficiency in the State. Energy-efficient measures would reduce the demand for electricity and natural gas. A positive benefit of the reduction in electricity and natural gas usage would be reduction of GHGs, since the production of electricity and natural gas would decrease. The Scoping Plan includes the following emission reduction measure related to energy efficiency:

Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).

This emission reduction measure would set targets for Statewide annual energy demand reductions of 33,000 gigawatt hours and 800 million therms. To meet these reductions the Scoping Plan recommends the energy efficiency measures listed in **Table 4.16.4-3**.

TABLE 4.16.4-3: ENERGY EFFICIENCY RECOMMENDATION (MMTCO₂E IN 2020)		
Measure No.	Measure Description	Reductions
ELECTRICITY		
E-1	Energy Efficiency (32,000 GWh of Reduced Demand) <ul style="list-style-type: none"> • Increased Utility Energy Efficiency Programs • More Stringent Building & Appliance Standards • Additional Efficiency and Conservation Programs 	15.2
E-2	Increased Combined Heat and Power Use by 30,000 GWh	6.7
COMMERCIAL AND RESIDENTIAL		
CR-1	Energy Efficiency (800 Million Therms Reduced Consumption) <ul style="list-style-type: none"> • Utility Energy Efficiency Programs • Building and Appliance Standards • Additional Efficiency and Conservation Programs 	4.3
CR-2	Solar Water Heating (AB 1470 goal)	0.1
SOURCE: California Air Resources Board, <i>Climate Change Scoping Plan</i> , December 2008.		

Local

Santa Monica Municipal Code Section 8.36. The City of Santa Monica Municipal Code (SMMC) Chapter 8.36 is the City's Energy Code. The City adopted the California Building Energy Efficiency Standards, found in Title 24, Part 6 of the CCR, as its energy code. The City's Energy Code is intended to reduce energy consumption within City boundaries. City Energy Code standards are identical to the those found in the CEC, and include provisions applicable to all buildings—residential and non-residential—that describe the documentation and certificate requirements for buildings to meet the building energy efficiency standards. City Energy Code provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances. These mandatory requirements are outlined in the previous discussion on the California Building Energy Efficiency Standards, Title 24.

Santa Monica Municipal Code Section 8.108. SMMC Chapter 8.108 is the City's Green Building, Landscape Design, Resource Conservation, and Construction and Demolition Waste Management Standards. The purpose of Chapter 8.108 is to establish green building standards for design and construction, landscape maintenance, irrigation design, and construction and demolition waste management. The standards are intended to reduce human exposure to noxious materials; conserve non-renewable energy and scarce materials; minimize the ecological impact of energy and materials used; support the use of renewable energy and materials that are sustainably harvested; and to protect, preserve and restore local air, water, flora and fauna. All new buildings and existing buildings whose repair, alteration or rehabilitation costs exceed 50 percent of their replacement cost as determined by SMMC Section 8.84.040, are subject to the provisions of SMMC Chapter 8.108.

The provisions of SMMC Chapter 8.108 include mandatory measures related to the installation of appliances that use renewable energy, building features that conserve energy, and mandatory performance requirements of appliances in buildings subject to SMMC Chapter 8.108.

THRESHOLDS OF SIGNIFICANCE

The State CEQA Guidelines Appendix G does not contain significance thresholds related to energy. However, Appendix F of the CEQA Guidelines requires that EIRs discuss energy impacts of a proposed project with a particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy. Energy impacts may include:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the proposed project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources; and/or
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

IMPACTS

Impact US-11 Implementation of the proposed project would not encourage the wasteful or inefficient use of energy. This is a less-than-significant impact.

Energy would be consumed during construction activities, primarily in the form of petroleum fuels. Fuel would be needed to operate vehicles and construction equipment and to run electrical generators for uses such as lighting, welding machines, and power tools. Fuel would also be consumed during the production and transport of raw materials. Construction of the proposed project would also result in the permanent consumption of finite energy resources. However, construction would consist of temporary activities that would not result in long-term demand for energy. CARB recently passed amendments to Title 13 of the CCR which would require heavy diesel vehicles to restrict idling to five minutes or less. In addition to preventing pollutant emissions (see Section 4.2 Air Quality for a complete list of measures), this measure has the added benefit of reducing fuel consumption. Therefore, construction of the proposed project would have a less-than-significant impact related to fuels.

The proposed project would comply with SMMC Chapters 8.108 and incorporate design features to achieve a Leadership in Energy and Environmental Design (LEED) Silver Rating. Compliance with SMMC Chapter 8.108 and design features to achieve a LEED Silver Rating would ensure that the proposed project would not result in wasteful or inefficient use of energy.

Operation of the proposed project would consume energy in the form of electricity and natural gas for operation of appliances/equipment, heating and cooling, transportation, and communication. **Table 4.16.4-4** lists the estimated electricity usage of the proposed project. The proposed project would use a total of approximately 3,733,961 kWh per year of electricity. The net electricity usage of the proposed project is 3,306,347 kWh per year of electricity. The proposed project represents an increase in the amount of electricity that would be used on the site compared to current condition. However, it is less than one percent of the electricity used by SCE customers in 2008.

TABLE 4.16.4-4: ESTIMATED ELECTRICITY USAGE OF THE PROPOSED PROJECT				
Use	Quantity	Units	Electricity Usage Factor (kwh/sq ft/year)	Electricity Use (kwh/year)
Residential	393	Dwelling units	5,626.50	2,211,215
Production/Office	105,334	Square Feet	12.95	1,364,075
Retail	11,710	Square Feet	13.55	158,671
Total Estimated Electricity Usage of the Proposed Project				3,733,961
Less Existing Electricity Usage of Existing Uses on Project Site				(427,614)
Net Electricity Usage				3,306,347
SOURCE: South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i> , April 1993.				

Table 4.16.4-5 shows the estimated natural gas usage of the proposed project. The proposed project would use approximately 1.8 million cubic feet of gas per month, or 21.6 million cubic feet of gas per year. In 2008, approximately 533,968 million cubic feet natural gas was consumed within the SoCalGas service area, equivalent to approximately 1,462 million cubic feet per day. The proposed project represents an increase in the amount of natural gas that would be used on-site compared to current conditions. However, the proposed project's estimated natural gas usage represents approximately 0.000034 percent of the natural gas demand in 2008 and is not anticipated to cause the need for SoCalGas to obtain additional natural gas resources.

TABLE 4.16.4-5: ESTIMATED NATURAL GAS USAGE OF THE PROPOSED PROJECT				
Use	Quantity	Units	Natural Gas Use Factor (cubic feet/month)	Natural Gas usage (cubic feet/month)
Residential /a/	393	Dwelling units	4011.5	1,576,520
Production/Office	105,334	Square Feet	2.0	210,668
Retail	11,710	Square Feet	2.9	33,959
Total Estimated Natural Gas Usage of the Proposed Project				1,821,147
Less Existing Natural Gas Usage of Existing Uses on Project Site				(304,874)
Net Natural Gas Usage				1,516,273
/a/ Assuming the residential land uses are all multi-family				
SOURCE: South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i> , April 1993.				

Transportation energy is derived from petroleum products as automobiles and trucks consume gasoline and diesel fuel. It is anticipated that operation of the proposed project will generate an additional 9,129,015 vehicle miles traveled (VMT) per year. Assuming the average fuel economy of 20.3 miles per gallon for standard passenger cars, petroleum fuel consumed as a result of the proposed project is estimated to be approximately 449,705 gallons per year⁸. The VMT for Los Angeles County in 2008 was estimated to be 39,159 million miles⁹. Assuming the same average fuel economy of 20.3 miles per gallon for passenger vehicles, Los Angeles County fuel consumption in 2008 was estimated to be approximately 1,929 million gallons. Thus, the proposed project's estimated fuel consumption represents approximately 0.02 percent of the fuel demand in 2008. Furthermore, the proposed project would create a mixed-use community within walking distance to the future Bergamot Exposition Light Rail Station, as well as adjacent residential and neighborhood-serving retail uses. Consequently, this would reduce automobile reliance and related fuel consumption by providing housing opportunities for the community within close proximity to transit, as well as local-serving businesses and retail. In addition, the proposed project would implement a TDM plan to reduce vehicular trips.

While energy would be consumed, the proposed project would be required to follow the rules and regulations of Title 24, as well as the policies and regulations relating to energy conservation identified by existing City requirements. The City policies would ensure that energy efficient appliances, practices, and building design is used. In addition, the estimated amount of electricity use does not take into account the proposed project's energy conservation features that would be implemented as part of the LEED Silver Rating. Therefore, actual electricity and natural gas consumption from the project is anticipated to be lower than that estimated. It is not anticipated that the proposed project would require the construction of new electricity or natural gas facilities, or the expansion of existing generating facilities, in order to accommodate the proposed project due to the incremental increase in energy demand of the proposed project. As a result, while the proposed project would result in the consumption of energy, such consumption would not be expected to be wasteful or inefficient. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts related to wasteful or inefficient use of energy would be less than significant. No mitigation measures are required.

⁸USEPA, *Emissions Facts: Greenhouse Gas Emissions from a Typical Passenger Vehicle*, April 12, 2011, available at: <http://www.epa.gov/oms/climate/420f05004.htm#step2>, accessed June 30, 2011.

⁹California Department of Transportation, *County Vehicle Miles of Travel*, available at: <http://traffic-counts.dot.ca.gov/monthly/StateHwy%20County%20VMT%201990-2009.pdf>, accessed June 30, 2011.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact US-12 Construction and operation of the proposed project would require the use of energy in the form of electricity, natural gas, and petroleum fuels. However, this energy use would result in a less-than-significant impact.

As previously mentioned, construction activities associated with the proposed project would require the consumption of energy; primarily in the form of petroleum fuels. Fuel would be needed for vehicles and construction equipment and to run electrical generators for uses such as lighting, welding machines, and power tools, as well as during the production and transport of raw materials. Construction of the proposed project would also result in the permanent consumption of finite energy resources. However, construction would consist of temporary activities that would not result in long-term demand for energy. Therefore, construction of the proposed project would have a less-than-significant impact related to energy consumption.

The proposed project would consume energy in the form of electricity and natural gas for operation of appliances/equipment, heating and cooling, transportation, and communication. The net electricity usage of the proposed project would be approximately 3,306,347 kWh per year, and the natural gas consumption would be approximately 1.8-million cubic feet of gas per month, or 21.6-million cubic feet of gas per year. The proposed project represents an increase in electricity and natural gas consumption as compared to current conditions, however, this increase in energy usage would be equivalent to less than one percent of the total energy consumed by SCE and SoCalGas customers in 2008. Therefore, construction of the proposed project would have a less-than-significant impact related to energy consumption.

Mitigation Measures

Impacts related to energy consumption would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to energy consumption would be less than significant without mitigation.

Impact US-13 Implementation of the proposed project would not result in substantial effects to the local and regional energy supplies. This is a less-than-significant impact.

Construction of the proposed project would consume energy, primarily in the form of petroleum fuels, as well as electricity from the existing grid. However, this energy consumption would be temporary and would not be greater than the amount that is normally consumed in the region. Thus, the energy demands for construction of the proposed project would not create a noticeable impact to the local or regional energy supplies. In addition, heavy diesel vehicles used for construction would be subject to Title 13 of the CCR, which requires such vehicles to restrict idling to five minutes or less, which will reduce fuel consumption. Therefore, the construction of the proposed project would have a less-than-significant impact related to local and regional energy supplies.

Energy consumption associated with operation of the proposed project would total less than one percent of the energy consumed by SCE and SoCalGas customers in 2008. As previously mentioned, the proposed project would be required to follow the rules and regulations of Title 24, as well as the policies and regulations relating to energy conservation identified by existing City requirements. It is not

anticipated that the proposed project would require the construction of new electricity or natural gas facilities, or the expansion of existing generating facilities, in order to accommodate the proposed project. Therefore, the proposed project would result in a less-than-significant impact related to local and regional energy supplies.

Mitigation Measures

Impacts related to local and regional energy supplies would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to energy consumption would be less than significant without mitigation.

Impact US-14 Construction and operation of the proposed project would not result in a strain on peak or base period energy demands. This would be a less-than-significant impact.

Construction of the proposed project would require the use of petroleum fuels in order to run vehicles and construction equipment, as well as electrical generators. Energy resources would be consumed during both peak and base demand periods throughout construction of the proposed project. However, the amount of energy required for construction would not be greater than the amount normally consumed for similar projects in the region. In addition, construction activities would be temporary and would not impose a long-term demand on energy resources in the area. Therefore, energy consumption would not result in a strain on energy resources during peak or base demand period, and this impact would be less than significant.

Operation of the proposed project would consume energy in the form of electricity and natural gas. While energy would be consumed, the proposed project would be required to follow the rules and regulations of Title 24, as well as the policies and regulations relating to energy conservation identified by existing City requirements. These policies would ensure that energy efficient appliances, practices, and building design are used. In addition, the proposed project would incorporate design features to achieve a Leadership in Energy and Environmental Design (LEED) Silver Rating, which would reduce the amount of electricity and natural gas consumed during project operation. As previously stated, the amount of energy consumed by the proposed project is anticipated to be a less than 0.0004 percent of the total amount consumed by SCE and SoCalGas consumers, which is not a sufficient amount to result in effects to peak or base period energy demand. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts related to peak and base period energy demands would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to peak and base period energy demands would be less than significant without mitigation.

Impact US-14 The proposed project would exceed current energy standards, and would not result in impacts to compliance with these standards.

Construction activities associated with the proposed project would adhere to the energy standards set forth in the Santa Monica Municipal Code. In addition, Title 13 of the CCR would ensure that heavy diesel

vehicles restrict idling to five minutes or less, thus reducing fuel consumption used for construction. Therefore, construction activities would result in no impacts related to compliance with energy standards.

The proposed project would adhere to Title 24 of the CCR. Part 6 of Title 24 is the California Energy Code that includes building energy efficiency standards, with provisions including mandatory requirements for efficiency and design in equipment and appliances in residential and non-residential building. The proposed project would also adhere to City policies and regulations, including the City's Energy Code and Green Building, Landscape Design, Resource Conservation, and Construction and Demolition Waste Management Standards. These elements of the SMMC would ensure that energy efficient appliances, practices, and building design are used. In addition, the proposed project would incorporate design features to achieve a LEED Silver Rating, which involves the use of strategies intended to improve energy efficiency. Therefore, the proposed project would exceed current energy standards. No impact would result.

Mitigation Measures

Impacts related to compliance with energy standards would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts would be less than significant without mitigation.

Impact US-15 The proposed project would involve the consumption of energy in the form of electricity, natural gas and petroleum fuels. This consumption would not impose a strain on energy resources during construction or operation, therefore impacts would be less-than-significant.

As stated in the discussion for Impact US-12 above, construction of the proposed project would consume energy, primarily in the form of petroleum fuels, as well as electricity from the existing grid. This energy consumption would be temporary and would not exceed the consumption that is normally consumed for related activities. Therefore, construction of the proposed project would not result in a strain on energy resources, and impacts would be less than significant.

Energy consumption associated with operation of the proposed project would total less than one percent of the energy consumed by SCE and SoCalGas customers in 2008, and petroleum fuel consumption would be less than one percent of that consumed by Los Angeles County drivers in 2008. It is not anticipated that the proposed project would require the construction or expansion of electricity or natural gas facilities, nor would it require additional sources of petroleum fuels. The proposed project would implement energy efficiency measures to obtain a LEED Silver Rating, and would adhere to measures in the SMMC that would ensure green building design and energy efficiency standards. Therefore, the proposed project would result in less-than-significant impacts related to energy resources.

Mitigation Measures

Impacts related to energy resources would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to energy resources would be less than significant without mitigation.

Impact US-16 Future residents, as well as patrons of neighborhood-serving retail associated with the proposed project are anticipated to use energy in the form of petroleum fuels for transportation. However, the proposed project includes elements that would reduce vehicle dependence and related fuel consumption. Impacts related to transportation energy requirements would be less than significant.

Transportation energy in the form of diesel and petroleum fuels would be consumed during construction of the proposed project. Construction would require vehicle trips by construction workers traveling to and from the project site, as well as diesel-powered heavy construction equipment. As previously mentioned, Title 13 of the CCR would restrict idling of diesel equipment to five minutes or less, thus reducing fuel consumption. In addition, construction activities would be temporary and would not result in long-term effects to transportation energy supply. Therefore, construction of the proposed project result in less-than-significant impacts related to transportation energy.

It is anticipated that the proposed project would result in additional vehicle miles traveled compared to baseline conditions, as a result of increased residential and local-serving retail on site. However, the project site is located within close proximity to the future Bergamot Exposition Light Rail Station, and includes elements to promote walkability and improve bicycle and pedestrian access. The proposed project would be a mixed-use development, which would include a variety of residential, neighborhood serving retail and creative-office uses, all within close proximity to transit, as well as adjacent residential and commercial/retail uses. This would reduce the reliance on automobile transportation, thereby reducing fuel consumption. Therefore, the proposed project would result in a less-than-significant impact related to transportation energy.

Mitigation Measures

Impacts related to transportation energy would be less than significant. No mitigation measures are required.

Level of Impact After Mitigation

Impacts related to transportation energy would be less than significant without mitigation.

CUMULATIVE IMPACTS

Table 3-3 in Chapter 3.0 Project Description provides a list of planned and pending individual construction projects located throughout the City. The proposed project and the related projects would result in an increase in electricity and natural gas usage from SCE and SoCalGas distribution systems. As previously discussed, the net increase in electricity and natural gas usage attributed to the proposed project is not anticipated to cause SCE to expand existing, or construct new, electricity generating facilities or cause SoCalGas to obtain new natural gas resources. In addition, the proposed project's energy consumption would not be wasteful or inefficient because it would follow the rules and regulations of Title 24, as well as the policies and regulations relating to energy conservation identified by existing City requirements. Therefore, the proposed project would not contribute to a cumulative impact related to energy.

5.0 ALTERNATIVES

CEQA requires that an EIR describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project.¹ An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and provides a qualitative analysis of each alternative and a comparison of each alternative to the proposed project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.²

- The discussion of alternatives shall focus on alternatives to the project including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and, therefore, merit in-depth consideration.³ Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.⁴

¹CEQA Guidelines, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, § 15126.6.

²Ibid.

³CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, §15126.6(f)(3).

⁴CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, §15126.6(c).

5.1 PROJECT-LEVEL IMPACTS AND OBJECTIVES

As analyzed in this EIR, the proposed project would create significant and unavoidable adverse impacts associated with:

Construction Effects:

- Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied.
- Construction activity would generate vibration levels that exceed the established standards.
- Cumulative effects related to construction air quality and vibration.

Traffic and Transportation:

- Increased traffic volumes would result in significant and unavoidable impacts under Approval Year (Year 2011) plus Project conditions at 10 intersections. These include:
 - 20th Street/Olympic Boulevard (AM peak hour)
 - Yale Street/Broadway (PM peak hour)
 - Stewart Street/Colorado Avenue (AM peak hour)
 - Stanford Street/Colorado Avenue (PM peak hour)
 - Centinela Avenue/Broadway/Ohio Avenue (PM peak hour)
 - Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Centinela Avenue (west)/Olympic Boulevard (PM peak hour) [*impacted under City of Los Angeles criteria only*]
 - Centinela Avenue/I-10 Westbound Ramps (AM and PM) [*impacted under City of Los Angeles criteria only*]
 - Bundy Drive/Olympic Boulevard (PM peak hour) [*also impacted under City of Los Angeles Criteria*]
 - Bundy Drive/Pico Boulevard (PM peak hour) [*also impacted under City of Los Angeles Criteria*]
 - Bundy Drive/I-10 Eastbound On-Ramp (AM and PM peak hours) [*also impacted under City of Los Angeles criteria*]
- Increased traffic volumes would result in significant and unavoidable impacts under the Cumulative Plus Project (Year 2020) conditions at 10 intersections. These include:
 - Yale Street/Broadway (PM peak hour)
 - Centinela Avenue/Santa Monica Boulevard (PM peak hour)
 - Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Centinela Avenue/Pennsylvania Avenue/Iowa Avenue (PM peak hour)
 - Centinela Avenue (west)/ Olympic Boulevard (PM peak hour) [*impacted under City of Los Angeles criteria only*]
 - Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours) [*also impacted under City of Los Angeles criteria*]
 - Bundy Drive and Olympic Boulevard (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Bundy Drive/Pico Boulevard (PM peak hour) [*also impacted under City of Los Angeles criteria*]
 - Bundy Drive/I-10 Eastbound On-Ramp (AM peak hour under City of Santa Monica criteria and PM peak hour under City of Los Angeles criteria)
 - Barrington Avenue/Olympic Boulevard (PM) [*also impacted under City of Los Angeles criteria*]

The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year (Year 2011) plus Project conditions:

- Yale Street north of Colorado Avenue
- Stanford Street north of Pennsylvania Avenue
- Stanford Street south of Pennsylvania Avenue
- Pennsylvania Avenue east of Stanford Street
- Nebraska Avenue west of Stanford Street
- Nebraska Avenue east of Stanford Street

The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) conditions:

- Yale Street north of Colorado Avenue
- Stanford Street south of Pennsylvania Avenue
- Pennsylvania Avenue east of Stanford Street
- Nebraska Avenue west of Stanford Street
- Nebraska Avenue east of Stanford Street

Other potentially significant impacts have been identified; however, all of these impacts would be reduced to less-than-significant levels with implementation of the mitigation measures identified in the respective impact analysis sections of this EIR.

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. As stated in Section 3.0 Project Description, the proposed project's objectives include:

- Close the existing mobile home park pursuant to applicable California law and the City's Rent Control Charter Amendment and land use designation for the Mixed Use Creative District;
- Provide a mix of jobs, neighborhood serving commercial uses and housing on the same site to reduce trips;
- Contribute to the affordable housing stock of the City by providing on-site affordable housing units for existing mobile home park residents and qualifying Santa Monica residents;
- Increase the diverse housing supply in the City by providing a mix of rent control, affordable, and market rate housing;
- Construct a sustainable project that will maximize energy efficiency and minimize vehicle trips;
- Enhance existing streetscapes by designing pedestrian-scale buildings, active ground floor uses, open space, and sidewalk improvements; Provide for the extension of Pennsylvania Avenue and the creation of a new road connecting Colorado Avenue with Pennsylvania Avenue, improving traffic circulation, reducing congestion, and providing pedestrian access through the project area and adjacent project areas to the proposed Bergamot Station;
- Maximize housing and job opportunities near the future Bergamot Station for the Exposition Light Rail Line, scheduled to open in 2015, located approximately 0.25 miles to the south of the project site;
- Attract and retain entertainment companies by providing creative office space with sufficiently sized floor plates and amenities; and
- Maximize the creation of good-paying jobs and revenue to the City by including creative office space.

Any evaluated alternative should meet as many of these project objectives as possible. In addition, while not specifically required under CEQA, other parameters may be used to further establish criteria for selecting alternatives such as adjustments to project phasing, conformance to all existing zoning requirements, and other “fine-tuning” that could shape feasible alternatives in a manner that may result in reducing identified environmental impacts. In some instances, when the project results in environmental impacts that are reduced to less-than-significant levels with mitigation, an alternative may reduce these less-than-significant impacts even further.

5.2 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the factors that may be used to eliminate an alternative from detailed consideration include: the alternative’s failure to meet most of the basic project objectives, the alternative’s infeasibility, or the alternative’s inability to avoid significant environmental impacts. Alternatives to the project that have been considered and rejected are provided below.

Alternative to Retain the Village Trailer Park

LUCE Policy D24.14 states the following: “Explore means to sustain Village Trailer Park’s economic viability by incorporating it into a larger multi-property master plan, if feasible, or by the transfer of development rights that have as a goal, preserving existing housing as an integral part of a new mixed-use project.” A multi-property master plan that included the retention of the Village Trailer Park as a community benefit and transferring the development rights from Village Trailer Park to the two adjacent properties was considered. This alternative was deemed infeasible due to the following:

- A TDR program does not yet exist to implement such a transfer of development rights and therefore it totally dependent on the cooperation of individual property owners to participate in common ownership
- Adjacent property owners did not express an interest in participating in a transfer of development rights or in forming a single ownership entity
- The maximum height and floor area ratio (FAR) established in the LUCE cannot be exceeded and therefore, the LUCE cannot accommodate the amount of development rights that would be transferred from the Village Trailer Park property to the adjacent two properties

Reduced Project Alternative to Reduce Traffic Impacts

As discussed previously, the proposed project would result in significant and unavoidable traffic impacts at 11 intersections under the Approval Year (Year 2011) plus Project conditions. Based on information provided by the project’s traffic consultant, the proposed project would need to be reduced by 30 percent to reduce the impact at one intersection (Bundy Drive/I-10 Eastbound On-ramp). Under the Cumulative (Year 2020) plus Project conditions, the proposed project would need to be reduced by 25 percent to reduce the impact at one intersection (Bundy Drive/I-10 Eastbound On-ramp). This would result in a project with approximately 73,700 square feet of creative office, 158 condominium units, 116 apartments, and 8,200 square feet of retail. An alternative that would reduce the amount of development proposed under the project by up to 30 percent would not achieve the project’s objectives to the same extent that the project would. Specifically, this alternative would not maximize housing and job opportunities near the future Bergamot Station for the Exposition Light Rail Line to the same extent as the project. In addition, with the reduction in creative office, it would be difficult to meet the project objective to attract and retain entertainment companies by providing creative office space with sufficiently sized floor plates and amenities. Furthermore, this alternative would not achieve the objective to maximize the creation of good-paying jobs and revenue to the City by including creative office space to the same extent as the

project. In addition, the financial feasibility analysis provided by the project applicant determined that this alternative would not be financially feasible. As such, this alternative has been eliminated from further consideration. Notwithstanding, an in-depth analysis of this alternative has been provided in Appendix K of this EIR.

It should be noted that the 30 percent reduced project alternative would not avoid certain other significant and unavoidable impacts. Specifically, significant and unavoidable impacts would still remain for traffic at other intersections and construction-related air quality and vibration impacts would still occur, similar to the project.

Alternative Site

As the project applicant does not own any other properties in the City, development of the project at an alternative location is not feasible. In addition, development of the project at an alternative location would not ensure that potentially significant impacts would be avoided or substantially lessened. Depending on the specific site and the environmental constraints present within that area, an alternative location could potentially result in the same (or even greater) environmental impacts when compared to the proposed project. For example, development of the proposed project at an alternate location would not take advantage of the future Exposition Light Rail line as it may not be located within walking distance of a transit station (as is the case of the proposed project site) and as such, would result in greater vehicle trips. Furthermore, development of the proposed project at an alternative site would not avoid the significant and unavoidable construction-related air quality and vibration impacts associated with the proposed project as such impacts would only be relocated to another location. Therefore, development of the project at an alternative location is rejected and considered infeasible.

5.3 ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA statute, the CEQA Guidelines, and related recent court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice.”⁵ At the same time, Section 15126.6(b) of the CEQA Guidelines requires that “...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project” and Section 15126.6(f) requires, “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Accordingly, alternatives that would not address potentially significant effects are not considered herein. However, the CEQA Guidelines require that a "No Project" alternative must be included and, if appropriate, an alternative site location should be analyzed.⁶ Other project alternatives may involve a modification of the proposed land uses, density, or other project elements at the same project location.

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project’s significant environmental effects. The CEQA Guidelines state that “...[t]he EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project.”⁷ The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that “[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations [and] jurisdictional

⁵Section 15126.6(f).

⁶Section 15126.6(e) and Section 15126(f)(2).

⁷Section 15126.6(e) and Section 15126(f).

boundaries...”⁸ “The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”⁹ Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives. Based on these considerations, the following three alternatives are evaluated here for the proposed project.

Alternative 1 – No Project Alternative. The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, “no project” does not mean that development on the project site will be prohibited. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]). The No Project Alternative assumes any and all scenarios and procedural actions taken whereby the existing mobile home park would remain as is and no project would be developed. This includes a scenario where a resident owned mobile home park subdivision is created or a scenario where the existing mobile home park remains due to City and/or other third party acquisition of the property. Furthermore, it can be reasonable to assume that the No Project Alternative could result in occupation of all of the existing 109 mobile home lots on the project site.

Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for the purposes of this analysis, under the No Project Alternative, the existing mobile home park uses on-site (approximately 76 mobile homes) would remain. Pennsylvania Avenue would not be extended through the project site, and there would not be a connection to Colorado Avenue via a new street. All existing utility infrastructure would remain.

Alternative 2 – Reduced Residential/Increased Commercial Alternative. This alternative would involve reducing the proposed residential component from 71 percent to approximately 40 percent of the total project, resulting in a reduction of 172 residential units and an increase in 125,116 square feet of creative office and neighborhood-serving retail compared to the proposed project (**Table 5-1**).

Specifically, Alternative 2 would develop a mix of apartments and condominiums/townhouses that would provide a total of 221 residential units. Similar to the project, a portion of the residential units would be subject to the City of Santa Monica’s rent control ordinance with some units deed restricted as affordable housing units. Provisions related to the rent control and dedication of apartment units for the Village Trailer Park residents would also be included as part of a Development Agreement between the City and the project applicant. The commercial component would include approximately 242,160 square feet of ground level commercial space. Of this area, approximately 217,944 square feet would be developed as creative office/production uses and 24,216 square feet would be developed as retail uses.

Alternative 2 would include a site layout and street improvements (e.g., Pennsylvania Avenue extension and New Road) similar to the proposed project. In addition, this alternative would be built to the same height and building massing/design as the proposed project. This alternative would achieve some of the project objectives by improving traffic circulation through the extension of Pennsylvania Avenue and the New Road.

⁸Section 15126.6(f)(1).

⁹Section 15126.6(f).

Alternative 2 would include street improvements similar to the proposed project (i.e., extension of Pennsylvania Avenue, and New Road) and would be built to the same height as the proposed project. This alternative would achieve some of the project objectives by improving traffic circulation through the extension of Pennsylvania Avenue and the New Road.

A two-level subterranean parking garage would also be provided for this alternative to meet anticipated parking demand. In addition, on-street public parking spaces would be provided along New Road on the western boundary of the site and along the new Pennsylvania Avenue extension. This alternative would also include courtyard/plaza areas within the project site and a pedestrian paseo that would connect through the site. The adjacent sidewalks along Colorado Avenue and new Pennsylvania Avenue extension would also be enhanced and improved with new landscaping.

It is expected that Alternative 2 would also be designed to achieve a minimum LEED silver certification. Furthermore, a TDM plan would also be implemented with the specific TDM strategies to be determined by the City. A Development Agreement establishing community benefits and a tenant impact report and relocation plan for Village Trailer Park residents would also be required for this alternative.

Alternative 2 would also maximize housing opportunities near the future Metro Exposition Light Rail Line station and co-locate jobs, neighborhood serving commercial and housing on the same site to reduce trips. Further, it would attract and retain entertainment companies by providing creative office space with sufficiently sized floor plates and amenities; and it would maximize the creation of good-paying jobs and revenue to the City by including creative office space. However, as this Alternative 2 would result in an increase in trips, this alternative would not achieve the objective to minimize vehicle trips to the same extent as the proposed project.

TABLE 5-1: RESIDENTIAL AND COMMERCIAL COMPONENTS OF ALTERNATIVE 2			
Use	Alternative 2 Quantity	Proposed Project Quantity	Difference
Apartments (Studios/One Bedroom Units)	93 du	166 du	(73)
Condominiums (One Bedroom Units)	104 du	191 du	(87)
Condominiums (Two-Bedroom Units)	24 du	36 du	(12)
Total Residential Units	221 du	393 du	(172)
Production/Office (square feet)	217,944 sf	105,334 sf	112,610
Retail (square feet)	24, 216 sf	11,710 sf	12,506
Total Commercial (square feet)	242,160 sf	117,044 sf	125,116
SOURCE: TAHA, 2011.			

Alternative 3 – Increased Residential/Decreased Commercial Alternative. This alternative would involve increasing the proposed residential component from 71 percent to approximately ~~80~~ 92 percent of the project, resulting in an increase of ~~50~~ 93 residential units and a reduction of ~~36,324~~ 88,747 square feet of creative office and neighborhood-serving retail compared to the proposed project (**Table 5-2**). ~~Under this Alternative, the developer would be expected to include 89 low income housing units to achieve the density bonus.~~ Alternative 3 would include street improvements similar to the proposed project and would be built to the same height and FAR as the proposed project. The total proposed gross building area would be 395,939 square feet for a FAR of 2.36, which is slightly less than the proposed project.

Specifically, Alternative 3 would develop a mix of apartments and condominiums/townhouses that would provide a total of 486 residential units. As with the proposed project, a portion of the residential units would be subject to the City of Santa Monica’s rent control ordinance with some units deed restricted as affordable housing units. Provisions related to the rent control and dedication of apartment units for the Village Trailer Park residents would also be included as part of a Development Agreement between the

City and the project applicant. The commercial component would include approximately 28,297 square feet of ground level commercial space. Of this area, up to approximately 11,270 square feet could be developed used for either creative office/production uses or retail uses depending on market conditions. Since creative office/production uses would generate a greater number of trips, for a conservative analysis, it is assumed that the 11,270 square feet of commercial space would be developed for creative office/production uses.

Alternative 3 would include a site layout and street improvements (e.g., Pennsylvania Avenue extension and New Road) similar to the proposed project. In addition, this alternative would be built to the same height and building massing/design as the proposed project. This alternative would achieve some of the project objectives by improving traffic circulation through the extension of Pennsylvania Avenue and the New Road.

A two-level subterranean parking garage would also be provided for this alternative to meet anticipated parking demand. In addition, on-street public parking spaces would be provided along New Road on the western boundary of the site and along the new Pennsylvania Avenue extension. This alternative would also include courtyard/plaza areas within the project site and a pedestrian paseo that would connect through the site. The adjacent sidewalks along Colorado Avenue and new Pennsylvania Avenue extension would also be enhanced and improved with new landscaping.

Alternative 3 would also be designed to achieve a minimum LEED silver certification. Furthermore, a TDM plan would also be implemented with the specific TDM strategies to be determined by the City. A Development Agreement establishing community benefits and a tenant impact report and relocation plan for Village Trailer Park residents would also be required for this alternative.

Alternative 3 would also maximize housing opportunities near the future Metro Exposition Light Rail Line station and co-locate jobs, neighborhood serving commercial and housing on the same site to reduce trips. Further, it would contribute to the affordable housing stock of the City by providing on-site apartment units for existing mobile home park residents and qualifying Santa Monica residents and assist in maintaining affordable housing in the City by providing rent control apartments. As this alternative would increase the amount of housing proposed as part of the project, it would also add to the entry-level housing stock in the City by constructing for-sale residential units.

Use	Alternative 3 Quantity	Proposed Project Quantity	Difference
Apartment s (Studio/One-Bedroom Units)	141 du	166 du	(25)
Condominiums (One Bedroom Units)	270 du	191 du	79
Condominiums (Two-Bedroom Units)	75 du	36 du	39
Total Residential Units	486 du	393 du	93
Creative Office / Production(square feet) /a/	11,270 sf	105,334 sf	(94,064)
Retail	17,027 sf	11,710 sf	(5,317)
Total Commercial (square feet)	28,297 sf	117,044 sf	(88,747)

/a/ Depending on market conditions, this square footage could be converted into retail space. However, as creative office/production space would generate more trips than retail uses, this EIR conservatively analyzes this space as creative office/production space.
SOURCE: TAHA, 2011.

The summary comparison of impacts of the project alternatives and the proposed project is included in **Table 5-3**.

TABLE 5-3: COMPARISON OF ALTERNATIVES				
Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Residential/Increased Commercial Alternative	Alternative 3 Increased Residential/Reduced Commercial Alternative
AESTHETICS				
Light & Glare	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Shade & Shadows	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
AIR QUALITY				
Regional Emissions	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
Localized CO Concentrations	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Odors	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
AQMP Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
BIOLOGICAL RESOURCES				
Migratory Birds	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Tree Preservation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
CONSTRUCTION EFFECTS				
Regional Emissions	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Localized Emissions	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Odors	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Noise	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Vibration	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Traffic	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)

TABLE 5-3: COMPARISON OF ALTERNATIVES				
Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Residential/Increased Commercial Alternative	Alternative 3 Increased Residential/Reduced Commercial Alternative
CULTURAL RESOURCES				
Historic Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
GEOLOGY & SOILS				
<i>Seismic Hazards</i>				
Fault Rupture	Less Than Significant with Mitigation	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Ground Shaking	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Liquefaction	Less Than Significant with Mitigation	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<i>Soils and Geological Materials</i>				
Erosion	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Expansive Soils	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
GREENHOUSE GASES				
GHG Emissions	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
GHG plans, policies, or regulations	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
HAZARDS & HAZARDOUS MATERIALS				
Hazardous Materials	Less Than Significant	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Lead Based Paint and Asbestos	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Proximity to Schools	Less Than Significant	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Emergency Evacuation Plan	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
HYDROLOGY & WATER QUALITY				
Groundwater	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Stormwater Runoff	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
LAND USE				
Division of Established Community	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Consistency with Adopted Plans & Policies	Less Than Significant	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

TABLE 5-3: COMPARISON OF ALTERNATIVES				
Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Residential/Increased Commercial Alternative	Alternative 3 Increased Residential/Reduced Commercial Alternative
NEIGHBORHOOD EFFECTS				
Neighborhood Effects	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
NOISE				
Traffic Noise	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)
Stationary Noise Sources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Noise/Land Use Compatibility	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
POPULATION AND HOUSING				
Population and Housing Growth	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Displacement of Residents and Housing	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
PUBLIC SERVICES & RECREATION				
Fire Protection & Emergency Services	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Police	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Public Schools	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Libraries	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Parks	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
TRANSPORTATION & TRAFFIC				
Intersection Analysis	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable)	Less (Significant and Unavoidable)
Street Segment Analysis	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable)	Less (Significant and Unavoidable)
Site Access and Circulation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Congestion Management Program	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

TABLE 5-3: COMPARISON OF ALTERNATIVES				
Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Residential/Increased Commercial Alternative	Alternative 3 Increased Residential/Reduced Commercial Alternative
UTILITIES & SERVICE SYSTEMS				
<i>Water</i>				
Construction Demand	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Water Supplies	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Construction of new or expanded water facilities	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Wastewater</i>				
Construction Generation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Construction of new or expanded wastewater treatment facilities	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Greater (Less Than Significant)
<i>Solid waste</i>				
Construction Generation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Landfill Capacity	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)
Local Regulations	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Energy</i>				
Electricity	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
Natural Gas	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
CUMULATIVE IMPACTS				
Aesthetics	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Air Quality	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Biological Resources	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Construction Effects	Cumulatively Considerable	Less (Not Cumulatively Considerable)	Similar (Cumulatively Considerable)	Similar (Cumulatively Considerable)
Cultural Resources	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Geology and Soils	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Greenhouse Gases	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Hazards & Hazardous Materials	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)

TABLE 5-3: COMPARISON OF ALTERNATIVES				
Environmental Issue	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Residential/Increased Commercial Alternative	Alternative 3 Increased Residential/Reduced Commercial Alternative
Hydrology & Water Quality	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Land Use	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Neighborhood Effects	Cumulatively Considerable	Similar (Cumulatively Considerable)	Similar (Cumulatively Considerable)	Similar (Cumulatively Considerable)
Noise	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Population and Housing	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Public Services & Recreation	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
Traffic and Transportation	Cumulatively Considerable	Less (Not Cumulatively Considerable)	Similar (Cumulatively Considerable)	Similar (Cumulatively Considerable)
Utilities & Service Systems	Not Cumulatively Considerable	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)	Similar (Not Cumulatively Considerable)
SOURCE: TAHA, 2011				

ANALYSIS OF ALTERNATIVE 1 – NO PROJECT ALTERNATIVE

Aesthetics

Under the No Project Alternative, no construction activities would occur and no new structures would be proposed that would modify the existing visual character or affect views and vistas, scenic resources, lighting and glare, or shade and shadows. The existing uses on the project site would remain unchanged, and no impacts related to aesthetics would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Air Quality

Under the No Project Alternative, there would not be a source of new operational emissions associated with new development, including stationary source and vehicular emissions. Mobile and stationary source emissions would remain as they currently are and would not exceed SCAQMD regional or localized thresholds. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Biological Resources

Under the No Project Alternative, no construction activities would occur and no trees would be removed or disturbed. Potential bird nesting sites that may exist would not be disturbed. The existing uses on the project site would remain unchanged and no impacts related to biological resources would occur. Impacts under the No Project Alternative would be less than the proposed project.

Construction Effects

Under the No Project Alternative, no construction activities or new structures are proposed. No construction activities would occur that would result in construction-related traffic, air quality, or noise. Therefore, significant project-related construction air quality impacts and vibration impacts would be avoided. Impacts under the No Project Alternative would be less than the proposed project.

Cultural Resources

Under the No Project Alternative, no construction activities would occur and no new excavation would occur such that potential buried cultural resources could be disturbed. The existing uses on the project site would remain unchanged and no impacts related to historic, archaeological, and paleontological resources would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Geology and Soils

Under the No Project Alternative, no construction activities would occur and no new structures would be proposed that would increase the risk of exposure to seismic movement, ground shaking, rupture, soil erosion, unstable geologic units or soils, or encountering expansive soils. The risk of exposure to these geologic forces and features is anticipated to remain the same, and no impacts related to geology and soils would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Greenhouse Gases

Under the No Project Alternative, no construction activities would occur and no new structures would be proposed that would increase level of greenhouse gases generated on-site. The project site's greenhouse gas emissions would remain unchanged. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Hazards and Hazardous Materials

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would result in increased exposure to hazardous materials. The risk of exposure to hazardous materials is anticipated to remain the same as existing conditions and no impacts related to hazardous materials would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Hydrology and Water Quality

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would result in the depletion of groundwater supplies, modification of drainage patterns, or an increase in the amount of impervious surfaces. The existing uses on the project site would remain unchanged, and no impacts related to hydrology and water quality would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Land Use

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would divide an established community or modify existing land use relationships. The existing boundaries and land use composition of the project site would remain and no impacts related to land use and planning would occur. However, it should be noted that the No Project Alternative would not be consistent with the LUCE policies (D24.1 and D24.4) to create a mix of creative arts uses, neighborhood-serving retail and services, and residential types in proximity to the Bergamot Station of the Exposition Light Rail line. In addition, this alternative would not create the new Pennsylvania Avenue extension, which would enhance circulation and access in the area. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Neighborhood Effects

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would have a considerable impact on the neighborhood. In particular, as no construction would occur, localized construction emissions, noise, and neighborhood traffic impacts would not occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Noise

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would generate noise or vibration. As such, there is no anticipated incremental increase in operation noise levels or ground-borne vibration and no impacts would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Population and Housing

Under the No Project Alternative, no new structures would be proposed that would displace the existing population or housing. In addition, since no new residential uses are proposed, population or housing growth would not occur on the project site and no impacts would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Public Services and Recreation

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would increase demand for fire protection and emergency services, police protection, public schools, parks, or libraries. The population of the project site is not anticipated to increase significantly due to the limited number of trailer home spaces on-site and no impacts would occur related to public services. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Transportation and Traffic

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would increase vehicular trips. The only additional vehicular trips anticipated are those from ambient traffic growth. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Utilities and Services Systems

Under the No Project Alternative, no construction activities would occur and no new structures would be proposed that would increase demand for water and associated utility infrastructure, increase wastewater or solid waste generation, or require more energy use. Demand for utilities and services systems are anticipated to remain the same and no impacts would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project.

Cumulative Impacts

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would have significant impacts to any of the environmental topics discussed above. Therefore, impacts under the No Project Alternative would not be cumulatively considerable.

ANALYSIS OF ALTERNATIVE 2 – REDUCED RESIDENTIAL/INCREASED COMMERCIAL ALTERNATIVE

Under Alternative 2, the total number of residential units would be reduced from 393 to 221, and the commercial and retail space would increase from 117,044 square feet to 242,160 square feet, of which approximately 24,000 square feet would be neighborhood serving retail. Alternative 2 would include street improvements similar to the proposed project. A summary of Alternative 2 impacts is shown in **Table 5-4**. Refer to the appropriate section for a comprehensive discussion of impacts to that particular topic.

TABLE 5-4: SUMMARY OF IMPACTS FOR ALTERNATIVE 2			
Topic	Subtopic	Impact Conclusion	Section
Aesthetics	<ul style="list-style-type: none"> • Lighting and Glare • Shade and Shadows 	Less-than-significant impacts	4.1
Air Quality (Operational)	<ul style="list-style-type: none"> • Regional Emissions • Localized CO Concentrations • Toxic Air Contaminants • Odors • AQMP Consistency 	Less-than-significant impacts	4.2
Biological Resources	• Migratory Birds	Less-than-significant impacts with Mitigation	4.3
	• Tree Preservation	Less-than-significant impacts	
Construction Effects	<ul style="list-style-type: none"> • Toxic Air Contaminants • Odors 	Less-than-significant impacts	4.4
	<ul style="list-style-type: none"> • Regional Emissions • Noise • Traffic 	Less-than-significant impacts with Mitigation	
	<ul style="list-style-type: none"> • Localized Emissions • Vibration 	Significant and unavoidable impacts	
Cultural Resources	• Historic Resources	Less-than-significant impacts	4.5
Geology & Soils	Seismic Hazards	<ul style="list-style-type: none"> • Fault Rupture • Ground Shaking • Liquefaction 	4.6
	Soils & Geo Materials	<ul style="list-style-type: none"> • Erosion • Expansive Soils 	
Greenhouse Gases	• GHG Emissions	Less-than-significant impacts	4.7
	• GHG plans/policies/regulations		
Hazards & Hazardous Materials	<ul style="list-style-type: none"> • Hazardous Materials • Proximity to Schools 	Less Than Significant	4.8
	<ul style="list-style-type: none"> • Lead Based Paint and Asbestos • Emergency Access (Construction only) 	Less Than Significant with Mitigation	
Hydrology & Water Quality	<ul style="list-style-type: none"> • Groundwater • Stormwater Runoff 	Less-than-significant impacts	4.9
Land Use	<ul style="list-style-type: none"> • Division of Established Community • Consistency with Plans & Policies 	Less-than-significant impacts	4.10
Neighborhood Effects	• Neighborhood Effects	Significant and unavoidable impacts	4.11
Noise (Operational)	<ul style="list-style-type: none"> • Traffic Noise • Stationary Noise Sources • Noise/Land Use Compatibility 	Less-than-significant impacts	4.12
	• Vibration	Less-than-significant impacts	
Population and Housing	<ul style="list-style-type: none"> • Population and Housing Growth • Displacement of People and Housing 	Less-than-significant impacts	4.13
Public Services	<ul style="list-style-type: none"> • Fire Protection & Emergency Services • Police • Schools • Parks • Library 	Less-than-significant impacts	4.14
Transportation and Traffic	<ul style="list-style-type: none"> • Site Access and Circulation • Congestion Management Program 	Less-than-significant impacts	4.15
	<ul style="list-style-type: none"> • Intersections • Street Segment Analysis 	Significant and Unavoidable	

TABLE 5-4: SUMMARY OF IMPACTS FOR ALTERNATIVE 2			
Topic	Subtopic	Impact Conclusion	Section
Utilities & Service Systems	<ul style="list-style-type: none"> • Water • Wastewater • Solid Waste • Energy 	Less-than-significant impacts	4.16
Cumulative Impacts	<ul style="list-style-type: none"> • Construction Effects • Transportation and Traffic 	Cumulatively Considerable	4.1 to 4.16
	<ul style="list-style-type: none"> • All Other Topics 	Not Cumulatively Considerable	
SOURCE: TAHA, 2011.			

It is anticipated that reducing the residential units and increasing the commercial square footage under Alternative 2 would have the following impacts:

Aesthetics

Alternative 2 would result in a site layout that would be generally similar to the proposed project. In addition, the buildings under Alternative 2 would be similar in height and massing as the proposed project and as such, would generate similar shadow effects. Therefore, impacts under Alternative 2 would be similar to that of the proposed project and would be less than significant.

Similar to the project, Alternative 2 would create new sources of light from exterior building illumination and lighted courtyard/common areas, as well as glare from reflective building surfaces or the headlights of increased vehicular traffic. These new sources of permanent light or glare could affect day or nighttime views of nearby light-sensitive uses, including the residential uses to the north of the project site across Colorado Avenue. However, as with the project, new lighting would be required to comply with Section 9.04.10.02.270 of the City’s Municipal Code, which requires that all outdoor lighting associated with commercial uses be shielded and directed away from the surrounding uses to limit light spillover. Further, Alternative 2 would also be subject to design review by the City’s Architectural Review Board. The Architectural Review Board ensures that new uses are compatible with their surroundings, and therefore, do not include materials that could create new sources of substantial glare that would adversely affect daytime views. As with the proposed project, impacts related to lighting/glare would be less than significant.

Air Quality

Under Alternative 2, there would be a net increase of 3,067 daily trips, which is 26 percent more than the proposed project. With the increase in trips as compared to the proposed project, air pollutant emissions attributable to vehicles would be greater. Regional air quality emissions are shown in **Table 5-5**. As shown, daily emissions would be greater than the proposed project. However, regional emissions would still be less than the SCAQMD significance thresholds. Regional air quality impacts would be less than significant under Alternative 2 and would be greater than the proposed project.

TABLE 5-5: ALTERNATIVE 2 – ESTIMATED DAILY REGIONAL OPERATIONAL EMISSIONS						
Operational Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
Area Source	14	4	10	<1	<1	<1
Mobile Sources	16	21	169	<1	11	57
Maximum Daily Regional Emissions	30	25	179	<1	11	57
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	No	No	No	No	Yes	No
SOURCE: TAHA, 2011.						

Similarly, since Alternative 2 would result in increased air emissions, localized operational air quality impacts would be greater. However, similar to the proposed project, this alternative would result in less than significant impacts relative to localized CO hotspot.

With regard to toxic air contaminants, Alternative 2 would develop the same types of land uses on the project site (residential, neighborhood serving retail, and creative office uses). As with the project, these uses would not generate a substantial number of daily truck trips and associated TAC emissions. Furthermore, none of the uses would be sited within proximity of TAC sources. Therefore, similar to the project, Alternative 2 would result in less than significant impacts related to TACs.

Finally, Alternative 2 would not result in land uses that would produce substantial odors. Similar to the project, impacts related to odors would be less than significant.

Biological Resources

Under Alternative 2, removal of existing trees would also occur similar to the proposed project. Trees would be removed from the site to accommodate the buildings. Impacts under Alternative 2 would be similar to those of the proposed project and would require mitigation related to potential nesting birds. Therefore, impacts to nesting birds under Alternative 2 would be less than significant with mitigation. Protection, replacement, and/or the removal of trees within public right of ways for construction of Alternative 2 would be conducted in accordance with the City's Tree Code. Therefore, impacts related to the City's Tree Code would be less than significant.

Construction Effects

Under Alternative 2, construction activities such as ground clearing, trenching, paving, building, and coating would also occur. It is anticipated that the duration of construction and intensity of construction activities would be similar to that of the proposed project. As a result, construction-related air quality, noise, and traffic impacts would be similar to those of the proposed project.

Localized construction emissions would exceed SCAQMD thresholds for fugitive dust and as a result, would be significant and unavoidable. In addition, construction vibration would exceed 87 dBA at nearby sensitive receptors, and therefore, would also be significant and unavoidable. Other construction effects would be reduced to less-than-significant with Mitigation Measures **CON1** through **CON16**, similar to the proposed project.

Cultural Resources

Under Alternative 2, the existing structures on the site would be removed similar to the proposed project. However, the existing structures are not historical resources. Therefore, impacts related to historic resources would be less than significant. Impacts under Alternative 2 would be similar to those of the proposed project.

Geology and Soils

Alternative 2 would be located on the same site as the proposed project and thus, would be subject to similar geologic conditions as the proposed project. Under Alternative 2, the risk for seismic hazards (e.g., fault rupture, ground shaking, and liquefaction), erosion, and expansive soils would also exist. Similar to the project, implementation of Mitigation Measures **GS1** through **GS5** would reduce impacts to less than significant. Therefore, impacts under Alternative 2 would be similar to those of the proposed project.

Greenhouse Gas

Greenhouse gas emissions are shown in **Table 5-6**. Annual emissions would be greater than the proposed project due to the increase in daily vehicle trips. However, greenhouse gas emissions would still be less than the established significance threshold. Regional and greenhouse gas emissions would result in less-than-significant impacts. Therefore, impacts under Alternative 2 would be greater than the proposed project due to the increase in greenhouse gas emissions.

TABLE 5-6: ALTERNATIVE 2 – GREENHOUSE GAS EMISSIONS	
Source	Carbon Dioxide Equivalent (Metric Tons per Year)
EXISTING USES	
Mobile	386
General Electricity	157
Water Cycle Electricity	14
Natural Gas	263
Solid Waste Decomposition	170
Total Existing	990
PROPOSED USES	
Mobile	5,503
General Electricity	1,609
Water Cycle Electricity	108
Natural Gas	877
Solid Waste Decomposition	1,313
Total Proposed	9,410
PROJECT EMISSIONS	
Total Net Operational Emissions	8,420
Construction Emissions Amortized /a/	84
Total Emissions	8,504
Regional Significance Threshold	10,000
Exceed Threshold?	No
/a/ The SCAQMD recommends accounting for construction emissions by averaging them over a 30-year project lifetime.	
SOURCE: TAHA, 2011.	

Hazards and Hazardous Materials

Alternative 2 would result in the same types of land uses (residential, retail, and creative office/production). As with the proposed project, operation of these land uses would also involve the occasional use and storage of hazardous materials that could include limited quantities of lubricating products, paints, solvents, and custodial products (mainly cleaning supplies), pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. Use and transport of hazardous materials would be regulated by the County of Los Angeles Department of Environmental Health and the Cal/OSHA, and all hazardous materials would be required to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant and similar to the proposed project.

Under Alternative 2, asbestos and lead based paint could be uncovered during demolition of existing structures. However, to reduce the potential for exposure to asbestos or lead based paints, Mitigation Measures **HM1** and **HM2** would be required. Impacts would be less than significant with mitigation.

Alternative 2 would have a similar site layout and street improvements as the proposed project and would introduce new traffic patterns. However, these new patterns would not conflict with emergency response

and evacuation planning. Therefore, impacts would be less than significant. Impacts under Alternative 2 would be similar to the proposed project.

Hydrology and Water Quality

Alternative 2 would also require similar excavation as the proposed project for construction of a subterranean parking garage. Similar to the project, excavation further below the ground surface for foundation and other related work could potentially encounter groundwater. Therefore, Alternative 2 may also require temporary (construction) and/or permanent dewatering of groundwater on the project site. Temporary and/or permanent dewatering could have impacts related to groundwater water quality. Implementation of Mitigation Measure **HW1** would also apply and would mitigate impacts to less than significant.

Alternative 2 would include minor connections to the existing storm drain infrastructure. Similar to the proposed project, this alternative would include landscaping and as such, would not increase impervious surfaces. Furthermore, this alternative would be subject to stormwater runoff regulations and requirements to ensure that the existing stormdrain infrastructure would not be adversely affected. Therefore, Alternative 2 would not result in the need for new or expanded storm drains; impacts would be less than significant and similar to the proposed project.

Land Use

Alternative 2 proposes the same types of land uses as the proposed project. Therefore, similar to the proposed project, the uses proposed under Alternative 2 would be compatible with the existing neighborhood. This alternative would also be consistent with regional and local plans and policies. Therefore, impacts would be less than significant. Impacts under Alternative 2 would be similar to the proposed project.

Neighborhood Effects

Under Alternative 2, construction activities would also affect the surrounding neighborhood. Significant and unavoidable neighborhood effects related to traffic and construction-related air quality emissions and vibrations would occur. Less than significant impacts would occur related to construction-related noise, and shade and shadow. Impacts under Alternative 2 would be similar to the proposed project.

Noise

Under Alternative 2, traffic would be greater than the proposed project due to the increase in commercial uses. Therefore, increased traffic and roadway noise would occur. However, these noise levels would not exceed the 5-dBA significance threshold. Therefore, mobile noise impacts would be less than significant. Impacts under Alternative 2 would be greater than the proposed project due to the increase in trips.

In addition, Alternative 2 would result in similar on-site stationary noise sources (i.e., mechanical equipment, truck loading, parking activity, and recreational activity) as the project. Therefore, noise associated with on-site sources would also be similar to the project and would be less than significant.

Furthermore, as with the proposed project, Alternative 2 would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. Similar to the proposed project, Alternative 2 would not result in perceptible groundborne vibration. Operational vibration impacts would be less than significant and similar to the proposed project.

Population and Housing

Table 5-7 shows the population and housing growth under Alternative 2 and how this growth relates to the proposed project and projected growth in 2020 for the City of Santa Monica.

TABLE 5-7: ALTERNATIVE 2 – POPULATION GROWTH						
Land Use Type	Alternative 2 Housing Units	Alternative 2 Population Generation	Proposed Project Housing Units	Proposed Project Population Generation	City of Santa Monica Population Projection	Alternative 2 % Projected Population Growth
POPULATION GROWTH (PERSONS)						
Total	221	377 /a/	393	672 /a/	10,843	3.5
/a/ Population generation is based on City of Santa Monica average household size of 1.71 persons per household.						
SOURCE: TAHA, 2011.						

Alternative 2 would result in less residential development than the proposed project, resulting in 295 fewer persons (**Table 5-7**). The population generated under Alternative 2 would represent 3.5 percent of the City’s projected growth in 2020. Therefore, less-than-significant impacts are anticipated under Alternative 2. Population growth impacts under Alternative 2 would be less than the proposed project.

Alternative 2 would result in 172 fewer housing units (**Table 5-7**) than the proposed project. Alternative 2 would nonetheless represent 15 percent of the total housing units projected for the City of Santa Monica for 2020. Housing impacts under Alternative 2 would be similar to the proposed project.

In addition, similar to the proposed project, Alternative 2 would result in the displacement of existing residents of the mobile homes. However, as with the proposed project, Alternative 2 would require a tenant relocation plan. Therefore, impacts associated with the displacement of people and housing would be less than significant.

Public Services

Fire Protection. Alternative 2 includes less residential development than the proposed project, resulting in 295 fewer residents. Under Alternative 2, the demand on services provided by the Santa Monica Fire Department would be decreased when compared to the proposed project. Since the population under Alternative 2 would be less than that of the proposed project, less-than-significant impacts related to fire protection services are anticipated for Alternative 2. Impacts under Alternative 2 would be less than the proposed project due to the decrease in residential population.

Police Protection. Alternative 2 includes less residential development than the proposed project, resulting in 295 fewer residents. Under Alternative 2, the demand on services provided by the Santa Monica Police Department would be decreased when compared to the proposed project. Since the population under Alternative 2 would be less than that of the proposed project, less-than-significant impacts related to police protection services are anticipated for Alternative 2. Impacts under Alternative 2 would be less than the proposed project due to the decrease in residential population.

Public Schools. Alternative 2 includes less residential development than the proposed project, resulting in 295 fewer residents. As shown in **Table 5-8**, Alternative 2 would generate 21 fewer students. Therefore, the demand on existing public schools would be less when compared to the proposed project. As with the proposed project, this alternative would require the payment of school facility fees, as determined by the SMMUSD. Per Section 65996 of the California Government Code, compliance with Section 65995 is “deemed to provide full and complete school facilities mitigation”. Therefore, less-than-

significant impacts related to public schools are anticipated for Alternative 2. Impacts under Alternative 2 would be less than the proposed project due to the decrease in student generation.

TABLE 5-8: ESTIMATED STUDENT GENERATION UNDER ALTERNATIVE 2 COMPARED TO THE PROPOSED PROJECT					
Use	Quantity	Students Generated /a/			
		Elementary School	Middle School	High School	Total Students
ALTERNATIVE 2					
Residential	221 dwelling units	18	8	11	37
PROPOSED PROJECT					
Multi-family Housing	393 dwelling units	33	15	20	68
<small>/a/ The residential SMMUSD student generation rate for elementary schools (K-5) is 0.083 students per dwelling unit, the residential SMMUSD student generation rate for middle schools (6-8) is .038 students per dwelling unit, and the residential SMMUSD student generation rate for high schools (9-12) is .051 students per dwelling unit.</small>					
<small>SOURCE: Santa Monica-Malibu Unified School District, <i>School Facility Fee Study</i>, June 9, 1997.</small>					

Parks. Alternative 2 would include less residential development than the proposed project, resulting in 295 fewer residents. Under Alternative 2, the demand on existing parks and recreation areas would be decreased when compared to the proposed project. As discussed in Section 4.14 Public Services and Recreation, the CCSD has determined that the existing City parks could accommodate the additional residents and employees created by the proposed project. Since the population under Alternative 2 would be less than that of the proposed project, less-than-significant impacts related to parks are anticipated for Alternative 2. Impacts under Alternative 2 would be less than the proposed project due to the decrease in residential population.

Libraries. Alternative 2 would include less residential development than the proposed project, resulting in 295 fewer residents. Under Alternative 2, the demand on existing libraries would be decreased when compared to the proposed project. As discussed in Section 4.14 Public Services and Recreation, the SMPL determined that it would have adequate facilities to accommodate the increased demand on library services anticipated with the proposed project. Since the population under Alternative 2 would be less than that of the proposed project, less-than-significant impacts related to libraries are anticipated for Alternative 2. Impacts under Alternative 2 would be less than the proposed project due to the decrease in residential population.

Transportation and Traffic

Under Approval Year Plus Project (Year 2011) conditions, Alternative 2 is estimated to generate a net increase of 3,137 daily trips, a net increase of 208 trips during the AM peak hour, and a net increase of 245 trips during the PM peak hour as shown in **Table 5-9**. Compared to the proposed project, this alternative is projected to generate 34 percent more daily, 38 percent more AM peak hour, and 39 percent more PM peak hour trips. Since the residential component of the project was reduced for this alternative, trips associated with the residential uses decreased, while the number of trips associated with the creative office and retail uses increased.

TABLE 5-9: ALTERNATIVE 2 APPROVAL YEAR PLUS PROJECT (YEAR 2001) TRIP GENERATION ESTIMATES								
Land Use	Size	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
ALTERNATIVE 2								
Creative/Production Office	217,944 ksf	1,903	125	17	142	27	134	161
Condominium (1 bedroom)	104 du	333	4	18	22	16	8	24
Condominium (2 bedroom)	24 du	131	2	7	9	6	3	9
Apartment	93 du	298	4	16	20	14	7	21
Specialty Retail	24,216 ksf	717	20	12	32	22	27	49
<i>Total</i>		<i>3,382</i>	<i>155</i>	<i>70</i>	<i>225</i>	<i>85</i>	<i>179</i>	<i>264</i>
EXISTING USES TO BE REMOVED								
Mobile Homes	76 du	(245)	(3)	(14)	(17)	(12)	(7)	(19)
Net Incremental Trips		3,137	152	56	208	73	172	245
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the: Village Trailer Park Project</i> , October 2011.								

Under Cumulative Plus Project (Year 2020) conditions, Alternative 2 would generate a net increase of 3,067 daily trips, 201 AM peak hour trips, and a net increase of 239 PM peak hour trips as shown in **Table 5-9**. As compared to the proposed project, Alternative 2 would represent 35 percent more daily trips, 40 percent more AM peak hour trips, and 41 percent more PM peak hour trips.

Since the total daily, AM and PM peak hour estimated trip generation of Alternative 2 would be more than that of the proposed project, the increase in trips would likely increase the amount of project impacts under both Approval Year and Cumulative Plus Project scenarios. LOS at some intersections could worsen as a result of this increase.

The project impacts on the residential street segments would not be avoided with this alternative, as the trip generation for this project is higher than that of the proposed project. Based on the City’s adopted thresholds, no additional residential street segment impacts are anticipated under both Approval Year and Cumulative Plus Project scenarios.

TABLE 5-10: ALTERNATIVE 2 CUMULATIVE PLUS PROJECT (YEAR 2020) TRIP GENERATION ESTIMATES								
Land Use	Size	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
ALTERNATIVE 2								
Creative/Production Office	217,944 ksf	1,868	122	17	139	27	130	157
Condominium (1 bedroom)	104 du	313	4	15	19	14	8	22
Condominium (2 bedroom)	24 du	124	1	7	8	6	3	9
Apartment	93 du	280	3	14	17	13	7	20
Specialty Retail	24,216 ksf	712	20	12	32	21	27	48
<i>Total</i>		<i>3,297</i>	<i>150</i>	<i>65</i>	<i>215</i>	<i>81</i>	<i>175</i>	<i>256</i>
EXISTING USES TO BE REMOVED								
Mobile Homes	76 du	(230)	(3)	(11)	(14)	(11)	(6)	(17)
Net Incremental Trips		3,067	147	54	201	70	169	239
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the: Village Trailer Park Project</i> , October 2011.								

Utilities and Services Systems

Water. Under Alternative 2, the net water demand would be ~~43,406~~ 44,393 gpd, which is a reduction of ~~8,192~~ 8,193 gpd as compared to the proposed project (**Table 5-11**). This change is largely attributed to the decrease in residential units. Therefore, water demand impacts under Alternative 2 would be less than that under the proposed project. Less-than-significant impacts related to water demand are anticipated under Alternative 2. Impacts under Alternative 2 would be less than the proposed project.

TABLE 5-11: ESTIMATED WATER USAGE UNDER ALTERNATIVE 2				
Use	Quantity	Units	Water Usage Rate (gpd/unit)	Water Usage (gpd)
Residential	221	Dwelling units	124	27,464
Production/Office	217,944	Square feet	0.1	21,794
Retail	24, 216	Square Feet	0.15	3,632
Estimated Total Water Usage of Alternative 2				52,830
<i>Less Existing Water Usage</i>				<i>(9,424 8,436)</i>
Net Water Usage of Alternative 2				43,406 44,393
Net Water Usage of Proposed Project				51,598 52,586
Difference from Proposed Project				(8,192) (8,193)
SOURCE: TAHA, 2011				

Wastewater. Under Alternative 2, the net wastewater generation would be approximately 39,124 gpd, which is a decrease of 6,813 gpd compared to the proposed project (Table 5-12). This would be a negligible decrease. Therefore, wastewater generation impacts under Alternative 2 would be similar to those under the proposed project. Less-than-significant impacts related to wastewater generation are anticipated under Alternative 2. Impacts under Alternative 2 would be similar to the proposed project.

TABLE 5-12: ESTIMATED WASTEWATER GENERATION UNDER ALTERNATIVE 2				
Use	Quantity	Units	Wastewater Generation Rate (gpd/unit) /a/	Wastewater Generation (gpd)
Residential	221	Dwelling units	112	24,752
Production/Office	217,944	Square feet	0.09	19,615
Retail	24, 216	Square Feet	0.135	3,269
Estimated Total Wastewater Generation of Alternative 2				47,636
<i>Less Existing Wastewater Generation</i>				<i>(8,512)</i>
Net Wastewater Generation of Alternative 2				39,124
Net Wastewater Generation of Proposed Project				45,937
Difference from Proposed Project				(6,813)
/a/ Wastewater generation is estimated to be 90 percent of the water demand rate.				
SOURCE: TAHA, 2011				

Solid Waste. Under Alternative 2, the net solid waste generation would be 1.02 tons per day, which is an increase of 63 pounds per day or 0.03 ton per day as compared to the proposed project (Table 5-13). This would be a negligible increase compared to project conditions. Therefore, solid waste generation impacts under Alternative 2 would be similar to those under the proposed project. Less-than-significant impacts related to solid waste generation are anticipated under Alternative 2. Impacts under Alternative 2 would be greater than the proposed project.

TABLE 5-13: ESTIMATED SOLID WASTE GENERATED UNDER ALTERNATIVE 2					
Use	Quantity	Units	Solid Waste Generation Rate /a/	Solid Waste Generated (ppd)	Solid Waste Generated (tons/day)
Residential	221	Dwelling units	4 pounds/dwelling unit/day	884	0.44
Production/Office	217,944	Square Feet	0.006 pounds/square feet/day	1,308	0.65
Retail	24, 216	Square Feet	0.006 pounds/square feet/day	145	0.07
Total Solid Waste Generation of Alternative 2				2,337	1.17
<i>Less Existing Solid Waste Generation of Existing Uses on Project Site</i>				<i>(304)</i>	<i>(0.15)</i>
Net Solid Waste Generation of Alternative 2				2,033	1.02
Net Solid Waste Generation of the Proposed Project				1,970	0.99
Difference from Proposed Project				63	0.03
/a/: California Department of Resources Recycling and Recovery, <i>Estimated Solid Waste Generation Rates</i> , Available at: http://www.calrecycle.ca.gov/WASTECHAR/WasteGenRates/default.htm , December 13, 2010.					
SOURCE: TAHA, 2011					

Electricity. As shown in **Table 5-14**, the estimated electricity usage under Alternative 2 is approximately 3.96 GWh per year. The electricity usage under Alternative 2 would be approximately 0.66 GWh more per year compared to the proposed project, although Alternative 2 would not require construction of new or expansion of existing electricity generating resources. Although electricity usage under Alternative 2 would be greater than the proposed project, it represents less than one percent of the electricity usage of the SCE customers in 2008 (90,008 million kWh). Therefore, less-than-significant impacts related to electricity usage are anticipated under Alternative 2. Impacts under Alternative 2 would be greater than the proposed project.

TABLE 5-14: ESTIMATED ELECTRICITY USAGE UNDER ALTERNATIVE 2				
Use	Quantity	Units	Electricity Usage Factor (kwh/sq ft/year)	Electricity Use (Kwh/year)
Residential	221	Dwelling units	5,626.50	1,242,130
Production/Office	217,944	Square Feet	12.95	2,822,374
Retail	24,216	Square Feet	13.55	328,127
Total Estimated Electricity Usage of Alternative 2				4,392,631
Less Existing Electricity Usage of Existing Uses on Project Site				(427,614)
Net Electricity Usage of Alternative 2				3,965,017
Net Electricity Usage of the Proposed Project				3,306,347
Difference from Proposed Project				658,670
SOURCE: South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i> , April 1993.				

Natural Gas. As shown in **Table 5-15**, the estimated natural gas usage under Alternative 2 is approximately 1.08 million cubic feet per month. The natural gas usage of Alternative 2 would be approximately 428,490 cubic feet fewer per month compared to the proposed project and, Alternative 2 would not require construction of new or expansion of existing natural gas resources. Therefore, less-than-significant impacts related to natural gas usage are anticipated under Alternative 2. Impacts under Alternative 2 would be less than the proposed project.

TABLE 5-15: ESTIMATED NATURAL GAS USAGE OF ALTERNATIVE 2				
Use	Quantity	Units	Natural Gas Use Factor (cubic feet/month)	Natural Gas usage (cubic feet/month)
Residential /a/	221	Dwelling units	4,011.5	886,542
Production/Office	217,944	Square Feet	2.0	435,888
Retail	24,216	Square Feet	2.9	70,226
Total Estimated Natural Gas Usage of Alternative 2				1,392,656
Less Existing Natural Gas Usage of Existing Uses on Project Site				(304,874)
Net Natural Gas Usage of Alternative 2				1,087,782
Net Natural Gas Usage of the Proposed Project				1,516,273
Difference from Proposed Project				(428,491)
<i>/a/ Assuming the residential land uses are all multi-family</i>				
SOURCE: South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i> , April 1993.				

Table 5-16 summarizes the utility impacts under Alternative 2 compared to the proposed project. Water demand, wastewater and solid waste generation would be similar to the proposed project, however, electricity usage would be greater while natural gas usage would decrease compared to the proposed project.

TABLE 5-16: SUMMARY OF ALTERNATIVE 2 NET UTILITY DEMAND/GENERATION RATES COMPARED TO THE PROPOSED PROJECT				
Utility	Units	Alternative 2	Proposed Project	Difference Relative to Proposed Project
Water Demand	gallons per day	43,406	51,598	(8,192)
Wastewater Generation	gallons per day	45,941	45,937	4
Solid Waste Generation	pounds per day	2,033	1,970	63
Electricity	Kilowatt-hours per year	3,965,017	3,306,347	658,670
Natural Gas	cubic feet per month	1,087,782	1,516,273	(428,491)
SOURCE: TAHA, 2011.				

ANALYSIS OF ALTERNATIVE 3 – INCREASED RESIDENTIAL/DECREASED COMMERCIAL ALTERNATIVE

Under Alternative 3, the total number of residential units would increase from 393 to 486, and the commercial and retail space would decrease from 117,044 square feet to 28,297 square feet. Under Alternative 3, approximately 11,270 square feet of commercial space could be used for either retail or creative office/production uses. Alternative 3 would include a site layout and street improvements similar to the proposed project. In addition, building heights and massing would be similar to the proposed project. A summary of Alternative 3 impacts are shown in **Table 5-17**. Refer to the appropriate section for a comprehensive discussion of impacts to that particular topic.

TABLE 5-17: SUMMARY OF IMPACTS FOR ALTERNATIVE 3			
Topic	Subtopic	Impact Conclusion	Section
Aesthetics	<ul style="list-style-type: none"> • Lighting and Glare • Shade and Shadows 	Less-than-significant impacts	4.1
Air Quality (Operational)	<ul style="list-style-type: none"> • Regional Emissions • Localized CO Concentrations • Toxic Air Contaminants • Odors • AQMP Consistency 	Less-than-significant impacts	4.2
Biological Resources	• Migratory Birds	Less-than-significant impacts with Mitigation	4.3
	• Tree Preservation	Less-than-significant impacts	
Construction Effects	<ul style="list-style-type: none"> • Toxic Air Contaminants • Odors 	Less-than-significant impacts	4.4
	<ul style="list-style-type: none"> • Regional Emissions • Noise • Traffic 	Less-than-significant impacts with Mitigation	
	<ul style="list-style-type: none"> • Localized Emissions • Vibration 	Significant and unavoidable impacts	
Cultural Resources	• Historic Resources	Less-than-significant impacts	4.5
Geology & Soils	Seismic Hazards	<ul style="list-style-type: none"> • Fault Rupture • Ground Shaking • Liquefaction 	4.6
	Soils & Geo Materials	<ul style="list-style-type: none"> • Erosion • Expansive Soils 	
Greenhouse Gases	<ul style="list-style-type: none"> • GHG Emissions • GHG plans/policies/regulations 	Less-than-significant impacts	4.7
Hazards & Hazardous Materials	<ul style="list-style-type: none"> • Hazardous Materials • Proximity to Schools 	Less Than Significant	4.8
	<ul style="list-style-type: none"> • Lead Based Paint and Asbestos • Emergency Evacuation Plan (construction only) 	Less Than Significant with Mitigation	
Hydrology & Water Quality	<ul style="list-style-type: none"> • Groundwater • Stormwater Runoff 	Less-than-significant impacts	4.9
Land Use	<ul style="list-style-type: none"> • Division of Established Community • Consistency with Plans & Policies 	Less than significant impacts	4.10
Neighborhood Effects	• Neighborhood Effects	Significant and unavoidable impacts	4.11

TABLE 5-17: SUMMARY OF IMPACTS FOR ALTERNATIVE 3			
Topic	Subtopic	Impact Conclusion	Section
Noise (operational)	<ul style="list-style-type: none"> • Traffic Noise • Stationary Noise Sources • Noise/Land Use Compatibility 	Less-than-significant impacts	4.12
	<ul style="list-style-type: none"> • Vibration 	Less-than-significant impacts	
Population and Housing	<ul style="list-style-type: none"> • Population and Housing Growth • Displacement of People and Housing 	Less-than-significant impacts	4.13
Public Services	<ul style="list-style-type: none"> • Fire Protection & Emergency Services • Police • Schools • Parks • Library 	Less-than-significant impacts	4.14
Transportation and Traffic	<ul style="list-style-type: none"> • Site Access and Circulation • Congestion Management Program 	Less-than-significant impacts	4.15
	<ul style="list-style-type: none"> • Intersections • Street Segment Analysis 	Significant and Unavoidable	
Utilities & Service Systems	<ul style="list-style-type: none"> • Water • Wastewater • Solid Waste • Energy 	Less-than-significant impacts	4.16
Cumulative Impacts	<ul style="list-style-type: none"> • Construction Effects • Transportation and Traffic 	Cumulatively Considerable	4.1 to 4.16
	<ul style="list-style-type: none"> • All Other Topics 	Not Cumulatively Considerable	
SOURCE: TAHA, 2011.			

Aesthetics

Alternative 3 would result in a site layout that would be generally similar to the proposed project. In addition, the buildings under Alternative 3 would be similar in height and massing as the proposed project and as such, would generate similar shadow effects. Therefore, as with the proposed project, shadows would not shade nearby shadow sensitive uses for longer than the City’s established significance thresholds. Shadow impacts under Alternative 3 would be similar to that of the proposed project and would be less than significant.

Similar to the project, Alternative 3 would create new sources of light from exterior building illumination and lighted courtyard/common areas, as well as glare from reflective building surfaces or the headlights of increased vehicular traffic. These new sources of permanent light or glare could affect day or nighttime views of nearby light-sensitive uses, including the residential uses to the north of the project site across Colorado Avenue. However, as with the project, new lighting would be required to comply with Section 9.04.10.02.270 of the City’s Municipal Code, which requires that all outdoor lighting associated with commercial uses be shielded and directed away from the surrounding uses to limit light spillover. Further, Alternative 3 would also be subject to design review by the City’s Architectural Review Board. The Architectural Review Board ensures that new uses are compatible with their surroundings, and therefore, do not include materials that could create new sources of substantial glare that would adversely affect daytime views. As with the proposed project, impacts related to lighting/glare would be less than significant.

Air Quality

Alternative 3 would result in a net increase of 2,082 daily trips, which is 9 percent fewer than the proposed project. With the reduction in trips as compared to the proposed project, air pollutant emissions attributable to vehicles would be less. Regional air quality emissions for Alternative 3 are shown in **Table 5-18**. As shown, daily emissions would be less than the proposed project and would be less than the SCAQMD significance thresholds. Regional air quality impacts would be less than significant under Alternative 3 and would be less than the proposed project.

TABLE 5-18: ALTERNATIVE 3 ESTIMATED DAILY REGIONAL OPERATIONAL EMISSIONS						
Operational Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
Area Source	26	5	10	<1	<1	<1
Mobile Sources	12	12	120	<1	8	40
Maximum Daily Regional Emissions	38	17	130	<1	8	40
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
SOURCE: TAHA, 2011.						

Similarly, since Alternative 3 would result in decreased air emissions, localized operational air quality impacts are anticipated to be less. Since the localized CO hotspot analysis for the project did not result in any significant impacts, this alternative also would result in less than significant impacts.

With regard to toxic air contaminants, Alternative 3 would develop the same types of land uses on the project site (residential, neighborhood serving retail, and creative office uses). As with the project, these uses would not generate a substantial number of daily truck trips and associated TAC emissions. Furthermore, none of the uses would be sited within proximity of TAC sources. Therefore, similar to the project, Alternative 3 would result in less than significant impacts related to TACs.

Finally, Alternative 3 would not result in land uses that would produce substantial odors. Similar to the project, impacts related to odors would be less than significant.

Biological Resources

Similar to the proposed project, Alternative 3 would require the removal of existing trees on the project site and on adjacent street right of ways. Trees would be removed from the site to accommodate the buildings. Impacts under Alternative 3 would be similar to those of the proposed project and would require mitigation related to potential nesting birds. Therefore, similar to the proposed project, impacts to nesting birds under Alternative 3 would be less than significant with Mitigation Measure **BR1**. Protection, replacement, and/or the removal of trees within public right of ways for construction of Alternative 3 would be conducted in accordance with the City's Tree Code. Therefore, impacts related to biological resources would be less than significant.

Construction Effects

The total building area proposed under Alternative 3 would be similar to the proposed project. Therefore, it is anticipated that construction duration and the intensity of construction activities would be similar to that of the proposed project. As with the project, construction activities such as ground clearing, trenching, paving, building, and coating would be required. In addition, earthwork/grading quantity would be similar to the proposed project as the number of subterranean parking levels proposed would be

similar. As a result, construction-related air quality, noise, and traffic impacts would be similar to those of the proposed project.

As with the project, localized construction emissions would exceed SCAQMD thresholds for fugitive dust and as such, would also be significant and unavoidable. In addition, construction vibration would exceed 87dBA at nearby sensitive receptors, and therefore, would also be significant and unavoidable. Other construction effects related to noise and traffic would be reduced to less-than-significant with Mitigation Measures **CON1** through **CON16**, similar to the proposed project.

Cultural Resources

Under Alternative 3, the existing structures on the site would be removed similar to the proposed project. However, the existing structures are not historical resources. Therefore, impacts related to historic resources would be less than significant. Impacts under Alternative 3 would be similar to those of the proposed project.

Geology and Soils

Alternative 3 would be located on the same site as the proposed project and thus subject to similar risks as the proposed project. Under Alternative 3, the risk for seismic hazards (i.e., fault rupture, ground shaking, and liquefaction), expansive soils, and erosion would exist. Similar to the proposed project, implementation of Mitigation Measures **GS1** through **GS5** would reduce impacts to less than significant. Therefore, impacts under Alternative 3 would be similar to those of the proposed project.

Greenhouse Gas

As indicated previously, Alternative 3 would result in decreased vehicle trips as compared to the proposed project. However, as with the proposed project, Alternative 3 would be designed as a mixed-use development that would achieve LEED Silver Certification. In addition, this alternative would be required to implement a TDM plan and other sustainability features. Greenhouse gas emissions for Alternative 3 are shown in **Table 5-19**. As shown, annual emissions would be less than the proposed project due to the decrease in daily vehicle trips, and would be less than the established significance threshold. Therefore, similar to the proposed project, regional and greenhouse gas emissions would be less-than-significant impact under Alternative 3. Impacts under Alternative 3 would be decreased as compared to the proposed project due to the decrease in greenhouse gas emissions.

Hazards and Hazardous Materials

Alternative 3 would result in the same types of land uses (residential, retail, and creative office/production). As with the proposed project, operation of these land uses would also involve the occasional use and storage of hazardous materials that could include limited quantities of lubricating products, paints, solvents, and custodial products (mainly cleaning supplies), pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. Use and transport of hazardous materials would be regulated by the County of Los Angeles Department of Environmental Health and the Cal/OSHA, and all hazardous materials would be required to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant similar to the proposed project.

TABLE 5-19: ALTERNATIVE 3 GREENHOUSE GAS EMISSIONS	
Source	Carbon Dioxide Equivalent (Metric Tons per Year)
EXISTING USES	
Mobile	386
General Electricity	157
Water Cycle Electricity	18
Natural Gas	263
Solid Waste Decomposition	170
Total Existing	994
PROPOSED USES	
Mobile	3,863
General Electricity	1,1140
Water Cycle Electricity	119
Natural Gas	1,055
Solid Waste Decomposition	1,018
Total Proposed	7,076
PROJECT EMISSIONS	
Total Net Operational Emissions	6,082
Construction Emissions Amortized /a/	84
Total Emissions	6,166
Regional Significance Threshold	10,000
Exceed Threshold?	No
/a/ The SCAQMD recommends accounting for construction emissions by averaging them over a 30-year project lifetime. SOURCE: TAHA, 2011.	

Under Alternative 3, asbestos and lead based paint could be uncovered during demolition of existing structures. However, to reduce the potential for exposure to asbestos or lead based paints, Mitigation Measures **HM1** and **HM2** would be required. Impacts would be less than significant with mitigation. Alternative 3 would have a similar site layout and street improvements as the proposed project and would introduce new traffic patterns. However, these new patterns would not conflict with emergency response and evacuation planning. Therefore, impacts would be less than significant. Impacts under Alternative 3 would be similar to the proposed project.

Hydrology and Water Quality

Alternative 3 would also require similar excavation as the proposed project for construction of a subterranean parking garage. Similar to the project, excavation further below the ground surface for foundation and other related work could potentially encounter groundwater. Therefore, Alternative 3 may also require temporary (construction) and/or permanent dewatering of groundwater on the project site. Temporary and/or permanent dewatering could have impacts related to groundwater water quality. Implementation of Mitigation Measure **HW1** would also apply and would mitigate impacts to less than significant.

Alternative 3 would include minor connections to the existing storm drain infrastructure. Similar to the proposed project, this alternative would include landscaping and as such, would not increase impervious surfaces. Furthermore, this alternative would be subject to stormwater runoff regulations and requirements to ensure that the existing stormdrain infrastructure would not be adversely affected. Therefore, Alternative 3 would not result in the need for new or expanded storm drains; impacts would be less than significant and similar to the proposed project.

Land Use

Alternative 3 proposes the same types of land uses (e.g., residential, retail, creative office) as the proposed project, although the amount of uses would be different. The proposed types of land uses are consistent with the LUCE vision for the Mixed Use Creative land use designation and would be compatible with the existing residential and light industrial uses in the project area. The addition of residential uses combined with neighborhood serving retail and creative office uses within 0.5 miles of the future Bergamot Expo Light Rail station would help to create a balanced and transit oriented community. Therefore, similar to the project, Alternative 3 would result in a less-than-significant impact to the division of an established community.

In addition, this alternative would be consistent with regional plans and policies as it would also result in a mixed use development within an urbanized area in proximity to future transit. Therefore, similar to the proposed project, Alternative 3 would be consistent with the Regional Comprehensive Plan, the Regional Transportation Plan, and the Growth Vision Report. With regard to local land use plans and regulations, the proposed FAR of 2.36 and maximum height of Alternative 3 (from 51 to 57 feet) would be consistent with the limitations set forth in the Mixed Use Creative district for Tier 3 projects (maximum height of 57 feet and FAR of 2.5) with additional community benefits. As with the proposed project, a Development Agreement that sets forth community benefits would be required for Alternative 3. The Development Agreement requires that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. Therefore, impacts related to land use consistency would be less than significant. Impacts under Alternative 3 would be similar to the proposed project.

Neighborhood Effects

Under Alternative 3, construction activities would also affect the surrounding neighborhood. Significant and unavoidable neighborhood effects related to operational traffic and construction air quality emissions and vibration would occur. Less than significant impacts would occur related to construction-related noise and shade and shadow. Neighborhood impacts under Alternative 3 would be similar to the proposed project.

Noise

Under Alternative 3, traffic would be less than the proposed project due to the decrease in commercial uses. Therefore, decreased traffic and roadway noise would occur. Since the proposed project's traffic did not result in mobile noise levels that would exceed the 5-dBA significance threshold, Alternative 3 similarly would not result in significant mobile noise levels. Therefore, mobile noise impacts would be less than significant. Impacts under Alternative 3 would be less than the proposed project.

In addition, Alternative 3 would result in similar on-site stationary noise sources (i.e., mechanical equipment, truck loading, parking activity, and recreational activity) as the project. Therefore, noise associated with on-site sources would also be similar to the project and would be less than significant. Furthermore, as with the proposed project, Alternative 3 would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. Similar to the proposed project, Alternative 3 would not result in perceptible groundborne vibration. Operational vibration impacts would be less than significant and similar to the proposed project.

Population and Housing

Table 5-20 shows the population growth under Alternative 3 and how this growth relates to the proposed project and projected growth in 2020 for the City of Santa Monica.

TABLE 5-20: ALTERNATIVE 3 – POPULATION AND HOUSING GENERATION						
	Alternative 3 Housing Units	Alternative 3 Population Generation	Proposed Project Housing Units	Proposed Project Population Generation	City of Santa Monica Population Projection	Alternative 3 % Projected Population Growth
POPULATION GROWTH (PERSONS)						
Total	486	831 /a/	393	672 /a/	10,843	7.6
/a/ Population generation is based on City of Santa Monica average household size of 1.71 persons per household. SOURCE: TAHA, 2011.						

Alternative 3 would result in a population of 831 residents, which is 159 greater (**Table 5-20**) than the proposed project. This would represent 7.6 percent of the City’s projected total population increase by the year 2020 and would be consistent with planned population growth for the City. Therefore, less-than-significant impacts are anticipated for population growth. Population growth impacts under Alternative 3 would be greater than the proposed project due to the increase in residential uses.

Alternative 3 would result in 93 additional housing units (**Table 5-20**) as compared to the proposed project. This increase would represent 33 percent of the total growth in housing units (1,473 units) anticipated for the City in 2020. While this growth would not exceed the City’s projections, it would be a substantial share of the total number of housing units anticipated within the City. Although this Alternative would increase the project’s share of total housing growth, impacts related to housing growth would remain less than significant. Impacts under Alternative 3 would be greater than the proposed project.

In addition, similar to the proposed project, Alternative 3 would result in the displacement of existing residents of the mobile homes. However, as with the proposed project, Alternative 3 would require a tenant relocation plan. In addition, this alternative would include a mix of rent-control, affordable, and market rate housing units on the project site, resulting in a net increase in housing. Therefore, impacts associated with the displacement of people and housing would be less than significant.

Public Services

Fire Protection. Alternative 3 would result in greater residential development than the proposed project, resulting in 159 additional residents. Under Alternative 3, the demand on services provided by the Santa Monica Fire Department would be increased when compared to the proposed project. As with the proposed project, SMFD would review site and building plans as well as the structures prior to issuance of Certificate of Occupancy in order to ensure that the required fire protection safety features, including building sprinklers and emergency access, are implemented. In addition, Alternative 3 would also provide the Pennsylvania Street roadway extension and New Road to increase the SMFD access options to the project site. Therefore, less-than-significant impacts related to fire protection services are anticipated for Alternative 3. Impacts under Alternative 3 would be greater than the proposed project due to the increase in residential population.

Police Protection. Alternative 3 would result in greater residential development than the proposed project, resulting in 159 additional residents. Under Alternative 3, the demand on services provided by the Santa Monica Police Department would be increased when compared to the proposed project. However, as required during the Development Agreement and project approval process, the applicant would be required to consult with the SMPD regarding crime prevention features appropriate for the design of Alternative 3 and subsequently, would be required to submit plot plans for review and comment. The plans would be required to incorporate design guidelines relative to security and semi-public and private spaces which may include, but not be limited to, access control to buildings, secured parking facilities, wall/fences with key systems, well-illuminated public and semi-public and private spaces, which may include access control to buildings, secured parking facilities, walls/fences with key systems, well-illuminated public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provisions of security guard patrol if needed. The applicant 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 SMPD. Any additional design features identified by the SMPD will be incorporated into the final design and to the satisfaction of SMPD, prior to issuance of a Certificate of Occupancy. As such, less-than-significant impacts related to police protection services are anticipated for Alternative 3. Impacts under Alternative 3 would be greater than the proposed project due to the increase in residential population.

Public Schools. Alternative 3 would result in greater residential development than the proposed project, resulting in 159 additional residents. As shown in **Table 5-21**, Alternative 3 would generate 15 additional students compared to the proposed project. Therefore, the demand on existing public schools would be slightly greater. As with the proposed project, this alternative would require the payment of school facility fees, as determined by the SMMUSD. Per Section 65996 of the California Government Code, compliance with Section 65995 is “deemed to provide full and complete school facilities mitigation”. Therefore, with payment of school facility fees, less-than-significant impacts related to public schools are anticipated for Alternative 3. Impacts under Alternative 3 would be greater than the proposed project, however, due to the increase in student generation.

TABLE 5-21: ESTIMATED STUDENT GENERATION UNDER ALTERNATIVE 3 COMPARED TO THE PROPOSED PROJECT					
Use	Quantity	Students Generated /a/			
		Elementary School /a/, /b/	Middle School /a/, /b/	High School /a/, /b/	Total Students
ALTERNATIVE 3					
Multi-family Housing	486 dwelling units	40	18	25	83
PROPOSED PROJECT					
Multi-family Housing	393 dwelling units	33	15	20	68
/a/ The residential SMMUSD student generation rate for elementary schools (K-5) is 0.083 students per dwelling unit, the residential SMMUSD student generation rate for middle schools (6-8) is .038 students per dwelling unit, and the residential SMMUSD student generation rate for high schools (9-12) is .051 students per dwelling unit.					
SOURCE: Santa Monica-Malibu Unified School District, <i>School Facility Fee Study</i> , June 9, 1997.					

Parks. Alternative 3 would result in greater residential development than the proposed project, resulting in 159 additional residents. Under Alternative 3, the demand on existing parks and recreation areas would increase compared to the proposed project. As discussed in Section 4.14 Public Services and Recreation, the City’s CCSD has determined that the existing City parks could accommodate the additional residents created by the proposed project. The population under Alternative 3 represents a 24 percent increase in population and would have greater impacts related to the demand on parks relative to the proposed project. Nonetheless, impacts would still be less than significant as this alternative would also provide on-site public and private open space.

Libraries. Alternative 3 would result in greater residential development than the proposed project, resulting in 159 additional residents. Under Alternative 3, the demand on existing libraries would be greater compared to the proposed project. As discussed in Section 4.14 Public Services, the SMPL determined that it would have adequate facilities to accommodate increased demand on library services from the proposed project. The population under Alternative 3 would have greater impacts related to demand on libraries relative to the proposed project. Nonetheless, impacts would still be less than significant.

Transportation and Traffic

The trip generation for Alternative 3 would be less than that of the proposed project during both of the analyzed peak periods as well as for daily trips. Under Approval Year Plus Project (Year 2011) conditions, this alternative is estimated to generate a net increase of 2,082 daily trips, a net increase of 127 trips during the AM peak hour, and a net increase of 146 trips during the PM peak hour as shown in **Table 5-22**. Compared to the proposed project, this alternative is projected to generate 12 percent fewer daily, 20 percent fewer AM peak hour, and 20 percent fewer PM peak hour trips. Since the residential component of the project was increased for this alternative, trips associated with the residential uses increased, while the number of trips associated with the creative office and retail uses decreased.

TABLE 5-22: ALTERNATIVE 3 – APPROVAL YEAR (2020) TRIP GENERATION ESATIMATES								
Land Use	Size	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
ALTERNATIVE 3								
Creative Office/Media Production	11.270 ksf	98	6	1	7	1	7	8
Condominium (1 bedroom)	270 du	864	11	46	57	40	22	62
Condominium (2 bedroom)	75 du	410	5	22	27	19	10	29
Apartment	141 du	451	6	24	40	21	11	32
Specialty Retail	17.027 ksf	504	14	9	23	15	19	34
<i>Total</i>		<i>2,327</i>	<i>42</i>	<i>102</i>	<i>144</i>	<i>96</i>	<i>69</i>	<i>165</i>
EXISTING USES TO BE REMOVED								
Mobile Homes	76 du	(245)	(3)	(14)	(17)	(12)	(7)	(19)
Net Incremental Trips		2,082	39	88	127	84	62	146
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the: Village Trailer Park Project</i> , October 2011.								

As shown in **Table 5-23**, under Cumulative Plus Project (Year 2020) conditions, Alternative 3 is estimated to generate a net increase of 1,992 daily trips, a net increase of 113 trips during the AM peak hour, and a net increase of 139 trips during the PM peak hour. Compared to the proposed project, this alternative is projected to generate 13 percent fewer daily, 22 percent fewer AM peak hour, and 18 percent fewer PM peak hour trips.

The total daily, AM and PM peak hour estimated trip generation of Alternative 3 would be less than that of the proposed project, but would not result in fewer significant impacts at intersections impacted by the proposed project under both Approval Year and Cumulative plus Project scenarios. Mitigation Measures **T1** through **T6** would also apply to this alternative. Similar to the proposed project, Alternative 3 would result in the same significant and unavoidable impacts at 11 intersections under the Approval Year Plus Project (Year 2011) conditions and at 10 intersections under the Cumulative Plus Project (Year 2020) conditions. Delay and V/C would be expected to improve slightly as a result of the decrease in trips in the AM and PM peak periods, compared to the trips generated by the proposed project.

TABLE 5-23: ALTERNATIVE 3 – CUMULATIVE YEAR (2020) TRIP GENERATION ESATIMATES								
Land Use	Size	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
ALTERNATIVE 3								
Creative Office/Media Production	11.270 ksf	97	6	1	7	1	7	8
Condominium (1 bedroom)	270 du	813	10	39	49	37	20	57
Condominium (2 bedroom)	75 du	387	4	20	24	18	9	27
Apartment	141 du	424	5	20	25	20	10	30
Specialty Retail	17.027 ksf	501	13	9	22	15	19	34
<i>Total</i>		<i>2,222</i>	<i>38</i>	<i>89</i>	<i>127</i>	<i>91</i>	<i>65</i>	<i>156</i>
EXISTING USES TO BE REMOVED								
Mobile Homes	76 du	(230)	(3)	(11)	(14)	(11)	(6)	(17)
Net Incremental Trips		1,992	35	78	113	80	59	139
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the: Village Trailer Park Project</i> , October 2011.								

Even with the reduction in trips, the project’s significant and unavoidable impacts on the residential street segments would not be avoided with this alternative under either Approval Year or Cumulative Year scenarios. As with the proposed project, this alternative would result in the same significant and unavoidable impacts on 6 street segments under the Approval Year Plus Project conditions and 5 street segments under the Cumulative Year Plus Project conditions.

Similarly, with the reduction in trips, traffic impacts related to the CMP would be less than significant since such impacts were less than significant with the proposed project.

Utilities and Services Systems

Water. Under Alternative 3, the total net water demand would be ~~54,521~~ 55,509 gpd, which is an increase of 2,923 gpd as compared to the proposed project (**Table 5-24**). Therefore, water demand impacts under Alternative 3 would be greater than under the proposed project. According to the City's 2010 UWMP, the City projects that it would supply 24,475 acre-feet per year of water during a normal water year or 24,015 acre-feet of water during a single dry year or multiple dry years in 2020.¹⁰ Alternative 3's net water usage would represent less than 0.11 percent of the City's projected total water supply in 2020. This would be an incremental increase of the water forecasted to be supplied in 2020, and thus, it is anticipated that City would have sufficient groundwater and imported water entitlements to serve Alternative 3 and impacts related to water supply would be less than significant under Alternative 3. Impacts under Alternative 3 would be greater than the proposed project due to the increased water demand.

TABLE 5-24: ESTIMATED WATER USAGE UNDER ALTERNATIVE 3				
Use	Quantity	Units	Water Usage Rate (gpd/unit)	Water Usage (gpd)
Residential	486	Dwelling units	124	60,264
Production/Creative Office	11,270	Square feet	0.1	1,127
Retail	17,027	Square Feet	0.15	2,554
Estimated Total Water Usage of Alternative 3				63,945
<i>Less Existing Water Usage</i>				<i>(9,424 8,436)</i>
Net Water Usage of Alternative 3				54,521 55,509
Net Water Usage of Proposed Project				51,598 52,586
Difference from Proposed Project				2,923
SOURCE: TAHA, 2011				

Wastewater. Under Alternative 3, the net wastewater generation would be approximately 57,745 gpd which is an increase by 2,568 gpd as compared to the proposed project (**Table 5-23**). Therefore, wastewater generation impacts under Alternative 3 would be greater than those under the proposed project. Based on the current remaining capacity (approximately 145 mgd) of the Hyperion Treatment Plant, the existing wastewater treatment system would have sufficient capacity to serve Alternative 3, and impacts related to wastewater would be less than significant under Alternative 3. In addition, similar to the proposed project, a sewer study to assess capacity of existing sewer lines would be required prior to the issuance of a building permit. Impacts under Alternative 3 would be greater than the proposed project due to the increased wastewater generation.

TABLE 5-25: ESTIMATED WASTEWATER GENERATION UNDER ALTERNATIVE 3				
Use	Quantity	Units	Wastewater Generation Rate (gpd/unit) /a/	Wastewater Generation (gpd)
Residential	486	Dwelling units	112	54,432
Production/Creative Office /b/	11,270	Square feet	0.09	1,014
Retail	17,027	Square Feet	0.135	2,299
Estimated Total Wastewater Generation of Alternative 3				57,745
<i>Less Existing Wastewater Generation</i>				<i>(8,612)</i>
Net Wastewater Generation of Alternative 3				49,133
Net Wastewater Generation of Proposed Project				46,565
Difference from Proposed Project				2,568
a/ Wastewater generation is estimated to be 90 percent of the water demand rate. /a/ Under Alternative 3, 11,270 square feet of commercial space could be used for either creative/media production office space or retail uses; therefore, the retail wastewater generation rate is used. The retail wastewater generation rate is 0.135 gpd, and the production office rate is 0.09 gpd. SOURCE: TAHA, 2011.				

¹⁰City of Santa Monica, 2010 Urban Water Management Plan, July 2011.

Solid Waste. Under Alternative 2, the net solid waste generation would be approximately 2,418 pounds per day or 0.99 tons per day, which is a decrease by 18 pounds per day or 0.01 ton per day, as compared to the proposed project (**Table 5-26**). Therefore, solid waste generation impacts under Alternative 3 would be greater than those under the proposed project. Less-than-significant impacts related to solid waste generation or conveyance are anticipated under Alternative 3. Impacts under Alternative 3 would be greater than the proposed project.

TABLE 5-26: ESTIMATED SOLID WASTE GENERATED UNDER ALTERNATIVE 3					
Use	Quantity	Units	Solid Waste Generation Rate	Solid Waste Generated (ppd) /a/	Solid Waste Generated (tons/day)
Residential	486	Dwelling units	4 pounds/dwelling unit/day	1,944	0.97
Production/ Creative Office	11,270	Square Feet	0.006 pounds/square feet/day	68	0.03
Retail	17,027	Square Feet	0.006 pounds/square feet/day	102	0.05
Total Solid Waste Generation of Alternative 3				2,114	1.05
Less Existing Solid Waste Generation of Existing Uses on Project Site				(304)	(0.15)
Net Solid Waste Generation of Alternative 3				2,418	1.20
Net Solid Waste Generation of the Proposed Project				1,970	0.99
Difference from Proposed Project				448	0.21
/a/: California Department of Resources Recycling and Recovery, <i>Estimated Solid Waste Generation Rates</i> , Available at: http://www.calrecycle.ca.gov/WASTECHAR/WasteGenRates/default.htm , December 13, 2010.					
SOURCE: TAHA, 2011.					

Electricity. As shown in **Table 5-27**, the estimated net electricity usage under Alternative 3 is approximately 2.68 GWh per year. The electricity usage under Alternative 3 would be approximately 0.622 GWh less per year compared to the proposed project and Alternative 3 would not require construction of new or expansion of existing electricity generating resources. Since electricity usage under Alternative 3 would be reduced compared to the proposed project, less-than-significant impacts related to electricity usage are anticipated under Alternative 3. Impacts under Alternative 3 would be less than the proposed project.

TABLE 5-27: ESTIMATED ELECTRICITY USAGE UNDER ALTERNATIVE 3				
Use	Quantity	Units	Electricity Usage Factor (kwh/sq ft/year) /a/	Electricity Use (Kwh/year)
Residential	486	Dwelling units	5,626.50	2,734,479
Production/Creative Office /b/	11,270	Square Feet	12.95	145,947
Retail	17,027	Square Feet	13.55	23,0716
Total Estimated Electricity Usage of Alternative 3				3,111,141
Less Existing Electricity Usage of Existing Uses on Project Site				(427,614)
Net Electricity Usage of Alternative 3				2,683,527
Net Electricity Usage of the Proposed Project				3,306,347
Difference from Proposed Project				(622,820)
/a/: South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i> , April 1993.				
/b/ Under Alternative 3, 11,270 square feet of commercial space could be used for either creative/media production office space or retail uses; therefore, the retail electricity generation rate is used. The retail electricity generation rate is 13.55 kwh/sq ft/year, and the production office rate is 12.95 kwh/sq ft/year.				
SOURCE: TAHA, 2011				

Natural Gas. As shown in **Table 5-28**, the estimated net natural gas usage under Alternative 3 is approximately 1.72 million cubic feet per month. The natural gas usage of Alternative 3 would be approximately 200,360 cubic feet more per month compared to the proposed project, although, Alternative 3 would not require construction of new or expansion of existing natural gas resources. SoCalGas provides approximately 533,968 million cubic feet of natural gas annually. The increase in natural gas consumption under Alternative 3 would represent less than one percent of the total natural gas supplied. Therefore, less-than-significant impacts related to natural gas usage are anticipated under Alternative 3. Impacts under Alternative 3 would be greater than the proposed project.

TABLE 5-28: ESTIMATED NATURAL GAS USAGE UNDER ALTERNATIVE 3				
Use	Quantity	Units	Natural Gas Use Factor (cubic feet/month) /b/	Natural Gas usage (cubic feet/month)
Residential /a/	486	Dwelling units	4,011.5	1,949,589
Production/Creative Office /c/	11,270	Square Feet	2.0	24,540
Retail	17,027	Square Feet	2.9	49,378
Total Estimated Natural Gas Usage of Alternative 3				2,021,507
Less Existing Natural Gas Usage of Existing Uses on Project Site				(304,874)
Net Natural Gas Usage of Alternative 3				1,716,633
Net Natural Gas Usage of the Proposed Project				1,516,273
Difference from Proposed Project				200,360
/a/ Assuming the residential land uses are all multi-family /b/South Coast Air Quality Management District, <i>CEQA Air Quality Handbook</i> , April 1993. /c/ Under Alternative 3, 11,270 square feet of commercial space could be used for either creative/media production office space or retail uses; therefore, the retail natural gas usage rate is used. The retail natural gas usage rate is 2.9 cubic feet/month, and the production office rate is 2.0 cubic feet/month SOURCE: TAHA, 2011				

Table 5-29 summarizes the utility impacts under Alternative 3 compared to the proposed project. Water demand, wastewater generation, solid waste generation and natural gas usage would be greater than the proposed project while electricity usage would be less than the proposed project.

TABLE 5-29: SUMMARY OF ALTERNATIVE 3 NET UTILITY DEMAND/GENERATION RATES COMPARED TO THE PROPOSED PROJECT				
Utility	Units	Alternative 3	Proposed Project	Difference Relative to Proposed Project
Water Demand	gallons per day	54,521	51,598	2,923
Wastewater Generation	gallons per day	49,133	45,937	2,568
Solid Waste Generation	pounds per day	2,418	1,970	448
Electricity	Kilowatt-hours per year	2,683,527	3,306,347	(622,820)
Natural Gas	cubic feet per month	1,716,633	1,516,273	200,360
SOURCE: TAHA, 2011.				

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

The No Project Alternative would have the least amount of impacts because there would be no construction or development on the project site. However, the proposed project would not meet the project objectives, including:

- Close the existing mobile home park pursuant to applicable California law and the City’s Rent Control Charter Amendment and land use designation for the Mixed Use Creative District;
- Provide a mix of jobs, neighborhood serving commercial uses and housing on the same site to reduce trips;
- Contribute to the affordable housing stock of the City by providing on-site affordable housing units for existing mobile home park residents and qualifying Santa Monica residents;
- Increase the diversity of the housing supply in the City by providing a mix of rent control, affordable, and market rate housing;
- Construct a sustainable project that will maximize energy efficiency and minimize vehicle trips;

- Enhance existing streetscapes by designing pedestrian-scale buildings, active ground floor uses, open space, and sidewalk improvements;
- Provide for the extension of Pennsylvania Avenue and the creation of a new road connecting Colorado Avenue with Pennsylvania Avenue, improving traffic circulation, reducing congestion, and providing pedestrian access through the project area and adjacent project areas to the proposed Bergamot Station;
- Maximize housing and job opportunities near the future Bergamot Station for the Exposition Light Rail Line, scheduled to open in 2015, located approximately 0.25 miles to the south of the project site;
- Attract and retain entertainment companies by providing creative office space with sufficiently sized floor plates and amenities; and
- Maximize the creation of good-paying jobs and revenue to the City by including creative office space.

Though environmentally superior, the No Project Alternative would not meet the project objectives.

A summary of the greater/lesser impacts associated with the two build alternatives relative to the proposed project are shown **Table 5-30**.

TABLE 5-30: SUMMARY OF GREATER/LESSER IMPACTS BETWEEN BUILD ALTERNATIVES AND THE PROPOSED PROJECT		
Alternative	Impacts Relative to Proposed Project	
	Greater Than	Less Than
(2) Reduced Residential/Increased Commercial	Air Quality Greenhouse Gas Noise Traffic Wastewater Generation Solid Waste Generation Electricity	Population Growth Housing Growth Police Protection Services Fire Protection Services Public Schools Parks Libraries Water Demand Natural Gas
(3) Increased Residential/Decreased Commercial	Population Growth Housing Growth Police Protection Services Fire Protection Services Public Schools Parks Libraries Water Demand Wastewater Generation Solid Waste Generation Natural Gas	Air Quality Greenhouse Gas Noise Traffic Electricity

SOURCE: TAHA, 2011.

Alternative 2 (Reduced Residential/Increased Commercial Alternative) would have lesser impacts related to population and housing growth, demand on public schools, parks, and libraries, and on water demand and natural gas usage, due to the reduction of residential units, and consequently, population. Electricity usage would increase, but would not constitute a significant impact. Intersection operations may worsen, but impacts are significant and unavoidable under the proposed project as well. In addition to the creation of a new significant impact, Alternative 2 would not fully achieve some of the project objectives, most notably adding to the entry-level housing stock. Similarly, as Alternative 2 would include fewer residential units than the proposed project, it would not maximize housing opportunities near the future Metro Exposition Line station.

Alternative 3 (Increased Residential/Decreased Commercial Alternative) would reduce impacts associated with electricity. In addition, the number of trips generated would be reduced. However, the same number of significant and unavoidable traffic impacts on intersections and street segments would occur. Housing and population would increase under Alternative 3, and consequently demand on public schools, parks, libraries, and water demand, as well as wastewater generation, solid waste generation, and natural gas usage would increase. None of these increases would be considered significant impacts. Alternative 3 would increase the housing stock in the City and this would be considered a beneficial impact.

Of the two build alternatives, Alternative 3 would be considered the environmentally superior alternative because it reduces trip generation slightly, and provides additional housing stock to the City of Santa Monica. Alternative 3 would achieve some of the project objectives in that it would add to the entry level housing stock in the City, maximizing housing near the future Metro Exposition Line, and co-locating jobs, neighborhood serving commercial and housing on the same site to reduce trips. However, Alternative 3 would decrease the amount of commercial and neighborhood serving retail, and therefore some of the project objectives would not be fully achieved. These include attracting and retaining entertainment companies by providing creative office space with sufficiently sized floor plates and amenities; and maximizing the creation of good-paying jobs and revenue to the City by including creative office space.

Subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative. This alternative would result approximately 486 residential units, consisting of 141 studios/one-bedroom apartment units, 270 one-bedroom condo units, and 75 two-bedroom units. As with the proposed project, this alternative would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units.

6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the State CEQA Guidelines requires that an EIR include a discussion of significant environmental effects of the proposed project, significant environmental effects which cannot be avoided if the proposed project is implemented, significant irreversible changes which would be involved in the proposed project should it be implemented, growth-inducing impacts of the proposed project, the mitigation measures proposed to minimize the significant effects, and alternatives to the proposed project. Cumulative impacts are discussed in Section 4.15, pursuant to Section 15130 of the CEQA Guidelines. Alternatives are analyzed in Chapter 5.0 of this document.

The following discussion will focus on a summary of significant environmental effects, growth-inducing impacts, and mitigation measures for the proposed project.

6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Table 2-1 Summary of Impacts and Mitigation Measures, contained in Chapter 2.0 Summary of this EIR, and Sections 4.1 through 4.16 of this EIR provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Implementation of the proposed project would result in the following significant and unavoidable project-related impacts:

Construction effects:

- Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied.
- Construction activity would generate vibration levels that exceed the established standards.
- Cumulative effects related to construction air quality and vibration.

Neighborhood effects:

- Localized construction emissions would exceed SCAQMD significance thresholds for fugitive dust (PM_{2.5} and PM₁₀) after mitigation is applied.
- The proposed project would increase neighborhood traffic to levels above City adopted thresholds on 5 of the 15 studied street segments (see below).
- Cumulative traffic effects

Traffic and Transportation:

- Increased traffic volumes at 11 intersections would result in significant and unavoidable impacts under existing plus project conditions. These include:
 - 20th Street/Olympic Boulevard (AM)
 - Yale Street/Broadway (PM)
 - Stewart Street/Colorado Avenue (AM)
 - Stanford Street/Colorado Avenue (PM)
 - Centinela Avenue/Broadway/Ohio Avenue (PM)
 - Centinela Avenue/Colorado Avenue/Idaho Avenue (PM)
 - Bundy Drive/Olympic Boulevard (PM)

- Bundy Drive/Pico Boulevard (PM)
 - Bundy Drive/I-10 Eastbound On-Ramp (AM and PM)
 - Centinela Avenue (west)/Olympic Boulevard (PM)
 - Centinela Avenue/I-10 Westbound Ramps (AM and PM)
- Increased traffic volumes at 11 intersections would result in significant and unavoidable impact under the future plus project conditions. These include:
 - 20th Street/Olympic Boulevard (AM)
 - Yale Street/Broadway (PM)
 - Stewart Street/Colorado Avenue (AM)
 - Stanford Street/Colorado Avenue (PM)
 - Centinela Avenue/Broadway/Ohio Avenue (PM)
 - Centinela Avenue/Colorado Avenue/Idaho Avenue (PM)
 - Bundy Drive/Olympic Boulevard (PM)
 - Bundy Drive/Pico Boulevard (PM)
 - Bundy Drive/I-10 Eastbound On-Ramp (AM and PM)
 - Centinela Avenue (west)/Olympic Boulevard (PM)
 - Centinela Avenue/I-10 Westbound Ramps (AM and PM)
 - The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the existing plus project conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the future plus project conditions. These include:
 - Yale Street north of Colorado Avenue
 - Stanford Street south of Pennsylvania Avenue
 - Pennsylvania Avenue east of Stanford Street
 - Nebraska Avenue west of Stanford Street
 - Nebraska Avenue east of Stanford Street

Other potentially significant impacts have been identified; however, all of these impacts would be reduced to less-than-significant levels with implementation of the mitigation measures identified in the respective impact analysis sections of this EIR.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;

- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that will be permanently and continually consumed by the proposed project's implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. In addition, construction activities related to the proposed project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment.

With respect to operation activities, compliance with all applicable building codes, as well as project mitigation measures or project requirements, would ensure that all natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the project site's reliance upon nonrenewable natural resources; however, even with implementation of conservation measures consumption of natural resources would generally increase with implementation of the proposed project.

In addition, a long-term increase in the demand for electrical and natural gas resources would occur. However, the proposed project would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts could also occur with new construction. In addition, new development associated with the proposed project will be constructed and operated in accordance with specifications contained in Title 24 CCR. Therefore, the use of energy on-site would occur in an efficient manner.

6.4 GROWTH INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental or of little significance to the environment. As analyzed in Section 4.13 Population and Housing, the proposed project would result in a less-than-significant impact related to population and housing.

The proposed project would not remove impediments to growth. The project site is located in a fully urbanized area that is surrounded by commercial, industrial and residential uses. The proposed project would incorporate new improvements, including some minor localized street improvements to accommodate access to the site, as well as water sewer connection improvements. These infrastructure improvements would serve the proposed uses and any excess capacity that may be provided by such improvements would not be to such a degree so as to induce or introduce additional growth in the area. Because the proposed project involves the redevelopment of an existing use in an urbanized area it would not require the extension of new infrastructure through undeveloped areas. The proposed project's demand for commercial goods and services would be met by existing retail, service and other resources already located within proximity to the project site. In conclusion, the proposed project would concentrate population growth in an infill development that already has existing infrastructure to handle population growth, which is consistent with the goals of the General Plan.

7.0 PERSONS AND SOURCES CONSULTED

7.1 PERSONS AND AGENCIES CONSULTED

City of Los Angeles Department of Public Works
Steve Fan, Plant Manager

City of Santa Monica Public Works Department, Water Resources Division
Myriam Cardenas, Water Treatment & Production Administrator

City of Santa Monica Public Works Department, Water Resources Division
Susan Lowell, P.E, Water Resources Engineer

City of Santa Monica Civil Engineering
Rick Valte, Watershed Program Manager

7.2 SOURCES CONSULTED

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8.0 INTRODUCTION TO THE FINAL EIR

8.1 PUBLIC REVIEW PROCESS

The Draft EIR was available for a 45-day public review period between September 29, 2011 and November 14, 2011. In addition, the public review period was extended to November 28, 2011. During this period, a total of 32 comment letters on the Draft EIR were received by the City.

8.2 CEQA REQUIREMENTS

The CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

- (a) The Draft EIR or a revision of the draft;
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

8.3 USE OF THE FINAL EIR

The Final EIR allows the public and the City of Santa Monica an opportunity to review the response to comments, revisions to the Draft EIR, and other components of the EIR, such as the Mitigation Monitoring and Reporting Program (MMRP), prior to the City's decision on the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

After completing the Final EIR, and before approving the project, the Lead Agency must first "certify" the Final EIR. As required by Section 15090 of the CEQA Guidelines, certification consists of three distinct but complementary findings:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- That the Final EIR reflects the Lead Agency's independent judgment and analysis.

The Final EIR and the findings will be submitted to City decision makers for consideration in connection with the proposed project.

CEQA "Findings of Fact" are adopted pursuant to Section 15091(a) of the CEQA Guidelines, which provides that if an EIR that has been certified for a project identifies one or more significant environmental effects, the Lead Agency decision-making body must make one or more of the following findings with respect to each significant effect identified in the Final EIR:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding, though references to supporting text in the EIR documentation is commonly used to satisfy that requirement. In addition, pursuant to Section 15091(d) of the CEQA Guidelines, the agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the MMRP.

Additionally, pursuant to Sections 15091(b) and 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing its reasons for supporting the approved action. This Statement of Overriding Considerations must be supported by substantial information in the record, which includes this Final EIR.

9.0 RESPONSE TO COMMENTS FROM PERSONS AND ORGANIZATIONS CONSULTED

The Final Environmental Impact Report (Final EIR) provides responses to all written comments received on the Draft EIR. Comments on the Draft EIR include issues raised by the public that warrant clarification or correction of certain statements in the Draft EIR. None of the corrections and additions constitutes significant new information or substantial project changes as defined by CEQA Guidelines Section 15088.5.

Each comment letter has been assigned a number. The body of each comment letter has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in Letter 1 is depicted as Comment 1-1, and so on. These numbered comments are included in their entirety, followed by the corresponding responses. Copies of the comment letters are included in Appendix H of this Final EIR. The following presents a list of all persons or organizations who submitted written comments on the Draft EIR:

Draft EIR Written Comments from Public Agencies

1. State of California
Department of Transportation
District 7, Regional Planning
Diana Watson, IGR/CEQA Branch Chief
100 Main Street, MS # 16
Los Angeles, CA 90012-3606
November 22, 2011
2. State of California
Native American Heritage Commission
Dave Singleton, Program Analyst
915 Capitol Mall, Room 364
Sacramento, CA 95814
October 20, 2011

Draft EIR Written Comments from Public

3. Brenda Barnes, Michael McKinsey and Peter Naughton
4. Brenda Barnes
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December 1, 2011
5. Margaret Bonanno
garamet@juno.com
November 11, 2011
6. Cosmo Bua
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808 4th Street, # 103
Santa Monica CA 90404
November 30, 2011

7. Kimberly Burke-Connors
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November 30, 2011
8. Jack Donner
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2930 Colorado Avenue, Spc. C11
Santa Monica, CA 90404
October 28, 2011
9. Kurt Gary
Kurtkraft
1618 Stanford Street, Unit B
Santa Monica, CA 90404
October 14, 2011
10. Dale Goldsmith
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Santa Monica, CA 90049
December 2, 2011
11. Ron Harari
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December 14, 2011
12. Marcia Harris
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October 14, 2011
13. Matthew Harrison
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14. Matthew Harrison
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15. Gregg Heacock
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December 2, 2011
16. Immediate Neighbors
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17. Zina Josephs
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18. Chris Krissa
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26. Diana Gordon
Santa Monica Coalition for a Livable City
December 2, 2011
27. Susanne Vaughn
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November 25, 2011

28. Jack Waddington
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29. Sabrina Venskus
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Los Angeles, CA 90017
December 2, 2011
30. Robert M. Shanteau, Ph.D., P.E.
Registered Traffic Engineer
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Seaside, CA 93955-4133
November 30, 2011
31. Brenda Barnes
dhsbrenda@gmail.com
March 6, 2012
32. Michael McKinsey, Brenda Barnes, and Peter Naughton
March 7, 2012

Letter 1

November 22, 2011

State of California
Department of Transportation
District 7, Regional Planning
Diana Watson, IGR/CEQA Branch Chief
100 Main Street, MS # 16
Los Angeles, CA 90012-3606

Comment 1-1

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above referenced project. The proposed project would involve the closure of the existing Village Trailer Park and development of a 399,581-square-foot mixed-use project with 393 residential units, 105,334 square feet of creative office space, and 11,710 square feet of neighborhood-serving retail.

Response 1-1

This comment is introductory in nature and reiterates the components of the project. No responses are necessary.

Comment 1-2

On page 4.15-39 of the Draft EIR prepared in October 2011, the project will generate 2,360 daily vehicle trips and 155 AM peak hour vehicle trips and 179 PM peak hour vehicle trips in the worse-case scenario (Table 4.15-15: Approval Year Plus Project (Year 2011) Conditions Trip Estimates).

Response 1-2

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. As stated in this comment and in the Draft EIR, under Approval Year Plus Project (Year 2011) conditions, the proposed project would generate a net new of 2,360 daily trips, including a net new of 155 weekday AM peak hour trips and 179 weekday PM peak hour trips. After implementation of mitigation measures, increased traffic volumes from the proposed project would result in significant and unavoidable impacts at 11 intersections under Approval Year (2011) Plus Project conditions. Under Cumulative Plus Project (Year 2020) conditions, the proposed project would generate a net new of 2,278 daily trips, including a net new of 144 weekday AM peak hour trips and 170 weekday PM peak hour trips. After implementation of mitigation measures, increased traffic volumes from the proposed project would result in significant and unavoidable impacts at 10 intersections under Cumulative Plus Project (Year 2020) conditions.

It should also be noted that subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative with slight decreases in the commercial square footage. Alternative 3 is described and analyzed in Section 5.0, Alternatives, of the Draft EIR. Under Approval Year Plus Project (Year 2011) conditions, Alternative 3 is estimated to generate a net increase of 2,082 daily trips, a net increase of 127 trips during the AM peak hours, and a net increase of 146 trips during the PM peak hours. Compared to the proposed project, this alternative is projected to generate 12 percent fewer daily, 20 percent fewer AM peak hour, and 20 percent fewer PM peak hour trips. Under Cumulative Plus Project (Year 2020) conditions, Alternative 3 is estimated to generate a net increase of 1,992 daily trips, a net increase of 113 trips during the AM peak hour, and a net increase of 139 trips during the PM peak hour. Compared

to the proposed project, this alternative is projected to generate 13 percent fewer daily, 22 percent fewer AM peak hour, and 18 percent fewer PM peak hour trips.

The total daily, AM and PM peak hour estimated trip generation of Alternative 3 would be less than that of the proposed project, but would not result in fewer significant impacts at intersections impacted by the proposed project under both Approval Year and Cumulative Plus Project scenarios. Mitigation Measures T1 through T6 would also apply to this alternative. Similar to the proposed project, Alternative 3 would result in the same significant and unavoidable impacts at 11 intersections under the Approval Year Plus Project (Year 2011) conditions and at 10 intersections under the Cumulative Plus Project (Year 2020) conditions. Even with the reduction in trips, the project's significant and unavoidable impacts on the residential street segments would not be avoided with Alternative 3 under either Approval Year or Cumulative Year scenarios. As with the proposed project, this alternative would result in the same significant and unavoidable impacts on six street segments under the Approval Year Plus Project conditions and five street segments under the Cumulative Year Plus Project conditions.

Comment 1-3

Currently, I-10 and I-405 are operating at Level of Service (LOS) F during the peak hours. Despite the Caltrans' letter dated June 28, 2010 stating that the mainline should be analyzed or Caltrans should be consulted for the analysis of the State facilities, the report did not include the mainline analysis.

Response 1-3

This commenter states that the traffic study did not include freeway mainline analysis. The Los Angeles County Congestion Management Program (CMP), requires that the CMP regional transportation impact analysis (TIA) methodology and criteria be used for the evaluation of project impacts on the regional freeway system for any project for which an environmental impact report is being prepared and states that "TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system" (Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program for Los Angeles County, Appendix D Guidelines for CMP Transportation Analysis, page D-1). The City of Santa Monica, the lead agency for the Village Trailer Park EIR, has adopted the CMP methodology and impact criteria for the purpose of evaluating project impacts on the regional transportation system in CEQA documents. As analyzed in the Traffic Study, the number of trips generated by the project does not meet the CMP threshold for mainline analysis.

Comment 1-4

When the LOS is F at the on and off ramps, a weaving analysis and queuing analysis are required to determine whether the traffic would worsen weaving problems or cause back up on to the freeway.

Response 1-4

California Department of Transportation (Caltrans) is requesting a weaving and queuing analysis for freeway segments most affected by project trips. After receipt of this letter, the City of Santa Monica met with Caltrans on and 12/20/2011 and 4/4/2012 to discuss Caltrans' request for a weaving and queuing analysis. As acknowledged by the City of Santa Monica and as identified in the Traffic Study for the project (Appendix F of the EIR), the Highway Capacity Manual (HCM) analysis of the on- or off-ramps intersections already shows failing or oversaturated conditions (LOS E and F). Furthermore, as observed in the field, traffic at the on- and off-ramps to the I-10 freeway result in backup conditions on the freeway. Mitigation measures were considered in the Traffic Study including signal phasing modifications and physical improvements to mitigate traffic impacts at the on- and off-ramp intersections. However, as discussed in the Traffic Study, many of the mitigation measures were deemed infeasible due to secondary impacts, such as the need to acquire private property for public right-of-way and/or elimination of sidewalks. Where feasible mitigation measures exist, these mitigation measures have been

identified in the Traffic Study. Based on follow-up discussions held with Caltrans, it was determined that a weaving and queuing analysis would not be necessary since the HCM analysis would result in substantively the same conclusion as the weaving and queuing analysis and no additional feasible mitigation measures are available to alleviate the failing or oversaturated conditions of the on- or off-ramps.

Comment 1-5

Caltrans has traffic concerns at the following locations:

- Location # 13, Cloverfield Blvd. & I-10 Westbound Off-Ramp
- Location # 14, Cloverfield Blvd. & I-10 Eastbound On-Ramp
- Location #34, Centinela Avenue/Santa Monica Boulevard (SR-02)
- Location # 42, Centinela Avenue/I-10 Westbound on/off Ramps
- Location # 50, Bundy Drive/I-10 Eastbound on-ramp
- Location #49, Bundy Drive/Pico Blvd. (Off Ramp to Northbound of Bundy Drive)

With project and cumulative traffic, location #13, #14 and #34 will be significantly impacted, and thus mitigation should be included in the report. With Location #42, Caltrans recommends installation of a second left turn lane on the off-ramp to alleviate any traffic back up on to the freeway. For mitigation at Location #50, Caltrans may consider widening of the on-ramp to allow for two mixed flow lanes and one HOV lane if a weaving analysis, on the I-10 Eastbound between Bundy Drive to I-405 Northbound Connector, is acceptable to Caltrans. At Location #49, since the LOS is F at the intersection, Caltrans is concerned that the traffic may back up to the freeway during the peak hours.

Response 1-5

For the Bundy Drive and I-10 Eastbound on-ramp, it was determined that the proposed project would result in a significant impact under both the Approval Year and Future Year conditions. The mitigation measure suggested by Caltrans to widen the on-ramp to allow for two mixed flow lanes and one HOV lane was considered in the Traffic Study. As discussed on page 121 of the Traffic Study, this mitigation measure would require encroachment into Caltrans' ROW and the removal of parking spaces along the west side of Bundy Drive. For these reasons, this mitigation measure was determined to be infeasible. Furthermore, even if encroachment into the Caltrans ROW and the removal of on-street parking spaces were found to be acceptable by Caltrans and LADOT, Caltrans has not adopted/approved this on-ramp improvement in its Capital Improvements Program or any other specifically approved plan. Moreover, there is no evidence that Caltrans has any statutory or other duty to construct the proposed mitigation measure improvement (*Cf. City of Marina v. CSU Board of Trustees* (2006) 39 Cal.4th 341,365), much less that it has made a definite commitment on when the improvement will take place. (*See Gray v County of Madera* (2008) 167 Cal.App.4th 1099.) Finally, there is no fair share formula to identify the project applicant's equitable, fair share contribution toward the implementation of this mitigation measure, much less an enforceable plan that ensures that payment of required mitigation fees are actually spent on this mitigation measure. *See also Tracy First v. City of Tracy* (2010) 177 Cal.App.4th 1. Therefore, this mitigation measure was deemed to be infeasible, and the impact is therefore considered significant and unavoidable.

Comment 1-6

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from the Department. Any modifications to State facilities must meet all mandatory design standard and specifications.

Response 1-6

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record. If work is performed within the State right-of-way, the project Applicant would obtain an encroachment permit from Caltrans.

Comment 1-7

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water.

Response 1-7

Stormwater run-off impacts are analyzed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. As discussed in this section, implementation of the proposed project would bring the project site in compliance with Chapter 7.10, *Urban Runoff Pollution Control*, of the Santa Monica Municipal Code (SMMC). This chapter mandates the implementation of an Urban Runoff Mitigation Plan to ensure that the proposed project would contain project-generated runoff on-site during a 0.75-inch storm event. The Urban Runoff Mitigation Plan identifies design elements to be included in the project that would infiltrate or treat project-generated runoff. The design elements must meet one or more of the following goals:

- 1) Maximize permeable areas to allow for more percolation of runoff into the ground;
- 2) Maximize the amount of runoff directed to permeable areas and/or maximize stormwater storage for reuse or infiltration; or
- 3) Remove pollutants through installation of treatment control BMPs.

Examples of design elements that could be incorporated into the project to achieve these goals include, but are not limited to: biofilters, swales, and green strips; orienting roof runoff to permeable areas; grading the site to divert runoff to permeable areas; and using cisterns or other retention structures to capture runoff for reuse. If such design measures are infeasible for a site, an urban runoff reduction fee may be paid by the Applicant.

Comment 1-8

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the Department. It is recommended that large size truck trips be limited to off-peak commute periods.

Response 1-8

A transportation permit for the use of oversized-transport vehicles on State highways Department will be requested of Caltrans, if necessary. The comment recommending that large size truck trips be limited to off-peak periods is noted for the record and will be forwarded to decision-makers for review and consideration.

Comment 1-9

In the spirit of mutual cooperation, we would like to invite the lead agency, City of Santa Monica to the Caltrans office to discuss traffic impact and fair share contributions towards planned freeway improvements. Please contact this office at your earliest convenience to schedule a meeting in the near future.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 111032AL.

Response 1-9

As indicated in Response 1-4, the City of Santa Monica met with Caltrans following receipt of this comment letter to discuss the issues raised. As discussed above, mitigation measures were considered in the Traffic Study including signal phasing modifications and physical improvements to mitigate traffic impacts at the on- and off-ramp intersections. However, as discussed in the Traffic Study, many of the mitigation measures were deemed infeasible due to secondary impacts, such as the need to acquire private property for public ROW and/or elimination of sidewalks. Where feasible mitigation measures exist, these mitigation measures have been identified in the Traffic Study. The City will continue to notify Caltrans of updates to this project and consult with Caltrans.

Letter 2

October 20, 2011

Native American Heritage Commission
Dave Singleton, Program Analyst
915 Capitol Mall, Room 364
Sacramento, CA 95814

Comment 2-1

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21 070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA - CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.'" In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted as follows: Native American cultural resources were not identified within the project area identified. However, the absence of archaeological resources does not preclude their existence. California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254(r). The purpose of this code is to protect such sites from vandalism, theft and destruction.

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and, the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Response 2-1

As discussed in the Cultural Resources section of the Initial Study prepared for the proposed project included in Appendix A of the Draft EIR, any traditional buried resources, which include archeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known burial sites have been identified within the project site or in the vicinity. Any discovery of such resources would be treated in accordance with federal, State and local guidelines for

disclosure, recovery, preservation, and curation, as appropriate. Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and Section 15064.5 of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the County coroner or medical examiner can determine whether the remains are those of a Native American.

Comment 2-2

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the Tribal Consultation requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

Furthermore, pursuant to CA Public Resources Code §5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq), 36 CFR Part 800.3(f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seq. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological *resources* during construction and mandate the *processes* to be followed in the event of an *accidental* discovery of any human remains in a project location other I than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Response 2-2

As discussed in Response 2-1 above, no known burial sites have been identified within the project site or in the vicinity. Any unanticipated discovery of cultural resources during construction activities would be treated in accordance with federal, State and local guidelines.

Comment 2-3

California Native American Contacts
Los Angeles County
October 20, 2011

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California Native American Contacts
Los Angeles County
October 20, 2011

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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 78050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting Native Americans with regard to cultural resources for the proposed SCH#2010061036; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Village Trailer Park Development Agreement Project to Close the park and construct a Mixed Use Development on the site; located in the City of Santa Monica; Los Angeles County, California

Response 2-3

As discussed in Response 2-1 above, no known burial sites have been identified within the project site or in the vicinity. Any unanticipated discovery of cultural resources during construction activities would be treated in accordance with federal, State and local guidelines.

Letter 3

January 6, 2012

Michael McKinsey
Brenda Barnes
Peter Naughton
406 Broadway, #332F
Santa Monica, CA 90404

Comment 3-1

Introduction

In *Vineyard Area Citizens for Responsible Growth Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, the Supreme Court of California reversed the trial court's and the Court of Appeal's approval by the County of Sacramento of a community plan for a large, mixed-use development project proposed by developers, as well as a specific plan for the first portion of that development. That project was thus at a far earlier and more lawful stage of development than is the current one before the City Council of Santa Monica, which proposes to allow development without a specific plan at all, and in violation of existing comprehensive zoning codes and specific plan for the subject area. Nonetheless, even when the County had been proceeding properly, it had proceeded unlawfully. The Supreme Court states about the Environmental Impact Report (EIR) the County used to justify approval of the project:

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account. (*Laurel Heights I*, supra, 47 Cal.3d at pp. 391-392.) For the EIR to serve these goals it must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. On the important issues of long-term water supply and impacts on migratory fish, the County's actions in the present case fell short of these standards, (40 Cal.4th at pp. 449-450, emphasis added.)

Even the most cursory review of the following comments on the instant Draft EIR, along with comments submitted by numerous other residents of the site proposed to be developed, and by their supporters such as community groups, will abundantly show the City has treated environmental review as, at best, "a set of technical hurdles for agencies and developers to overcome." The instant Draft EIR does not present information "in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed." It also does not give the public "an adequate opportunity to comment" on such a presentation of information.

Response 3-1

This comment provides a summary of a CEQA court case, *Vineyard Area Citizens for Responsible Growth Inc. v. City of Rancho Cordova*.

The comment states that the City Council of Santa Monica proposes to allow development without a specific plan and in violation of existing zoning code. As stated in the Draft EIR, the project would require processing of a Development Agreement. It should be noted that per Government Code Section 65867.5, a project approved by Development Agreement need not be in conformance with the existing zoning, but must only be consistent with the general plan (which includes the LUCE). A project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of

the general plan and not obstruct their attainment. A given project need not be in perfect conformity with each and every general plan policy. To be consistent, a project must be compatible with the objectives, policies, general land uses and programs specified in the general plan. [*Sequoiah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-719]. As analyzed in Section 4.10, Land Use and Planning of the Draft EIR, the proposed project would be consistent with the LUCE.

In addition, although the preparation of a Bergamot Area Plan is underway, the LUCE does not require that a specific plan be in place before proposed development is allowed.

The commenter also states an opinion that the Draft EIR is “instant” and does not present accurate information. The Draft EIR has been prepared in accordance with the requirements set forth in CEQA and the State CEQA Guidelines as well as the significance thresholds and methodologies set forth by the City of Santa Monica. The Draft EIR includes over 1,300 pages of text and information, supported by references and appendices. Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project.

Comment 3-2

In the areas of visual character/quality of the project site and area, scenic vistas, and scenic resources (p.75), and removal of mature trees (p.102), water quality standards or waste discharge requirement, cause substantial erosion or siltation on- or off-site, cause flooding on- or off-site, cause substantial polluted runoff, place housing or structures within a 100-year flood plain that would impede or redirect flood flows, or expose people or structures to significant risk involving flooding, it instead claims no EIR is required for this enormous proposed development (353,000 square feet plus a two-story subterranean garage) (Draft EIR, pp.) or, as in the case of water supply and quality (p.182), air quality (p.167) soil testing (p.137), groundwater testing, dewatering (p.183), soil erosion/liquefaction, seismically induced ground shaking (pp.137-140), and project construction and equipment staging (p.116), it puts off consideration of the information until the developers apply for building permits.

Response 3-2

The commenter states that the Draft EIR does not analyze visual character, scenic vistas, scenic resources, removal of mature trees, water quality standards, erosion, and flooding.

Section 15126.2 of the CEQA Guidelines states that an EIR shall identify and focus on the significant environmental effects of the project. Section 15128 further states that an EIR shall include a statement briefly indicating the reasons that various possible significant effects of a project were determined to not be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an initial study. The Initial Study provided in Appendix A of the Draft EIR provides an analysis of the project’s potential impacts related to visual character, scenic vistas, scenic resources, and flooding and determined that impacts would not occur or would be less than significant. Therefore, these issues were not discussed in further detail in the Draft EIR.

Removal of trees is addressed in Section 4.3, Biological Services, of the Draft EIR and water quality standards and erosion is addressed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. As determined in the Draft EIR, impacts would be less than significant with implementation of mitigation measures.

The commenter also states an opinion that the Draft EIR “puts off” consideration of information regarding water supply and quality, air quality, soil testing, groundwater testing, dewatering, soil erosion, seismic groundshaking, and project construction and equipment staging. With regard to the specific issues raised in this comment, please see Responses 3-3 through 3-50.

Comment 3-3

As to water supply, the EIR at issue in *Vineyard Area Citizens*, like the instant one, claimed no EIR on the issue was necessary because fewer than 500 residential units were proposed. The Supreme Court disagreed:

while the EIR adequately informed decision makers and the public of the County's plan for near-term provision of water to the development, it failed to do so as to the long-term provision and hence failed to disclose the impacts of providing the necessary supplies in the long term. While the EIR identifies the intended water sources in general terms, it does not clearly and coherently explain, using material properly stated or incorporated in the EIR, how the long-term demand is likely to be met with those sources, the environmental impacts of exploiting those sources, and how those impacts are to be mitigated.

Following are our comments of the various types of failure to proceed as required by law in this Draft EIR.

Response 3-3

The commenter cites the court's decision in *Vineyard Area Citizens for Responsible Growth Inc. v. City of Rancho Cordova*. No response is required. Responses to individual comments related to water supply are presented below.

Comment 3-4

Types of Failure to Proceed as Required by Law consisting of not following applicable law.

Standard of Appellate Court Review: De Novo.

1. Failure to Have Any Pre-Existing Legislative Framework Giving Stakeholders Constitutionally-Adequate Notice of their Rights and Duties in Circumstances that Could Result in Loss of their Home:

For some reason homeowners have not been able to find given in the Santa Monica General Plan, hereinafter called "LUCE", it calls what were in the Municipal Code up until that time called "zoning districts," just "districts." Santa Monica Municipal Code § 9.04.04.010, entitled "Establishment of districts," begins "The City of Santa Monica is divided into zoning districts of such number and character as are necessary to achieve compatibility of uses within each district and to implement the General Plan." [Emphasis added.] It concludes: "The R1, R2R, R2, R3, R4, RVC and R-MH Districts shall be considered residential districts. The BCD, C2, C3, C4, C5, C6, CM and CP Districts shall be considered commercial districts. The M1 District shall be considered an industrial district. The CC District shall be considered a public, institutional district."

No zoning district listed in any section of the Municipal Code is a mixed-use district. Neither is there any statutory authority whatsoever in any section of the Municipal Code implementing the General Plan (LUCE is two elements of a General Plan, the Land Use and Circulation Elements) for a "Creative District." It was "necessary" to list the ' zoning districts' listed in SMMC § 9.04.04.010 to "implement the General Plan." Since LUCE changed the General Plan, it is just as "necessary" to pass municipal code sections giving notice of what people's rights and duties are, to "implement" the new General Plan. The City has not done that, and yet is proceeding with considering a development agreement, so the City is not proceeding according to law.

In the LUCE, new types of uses described are termed just "districts," not "zoning districts," in conformity with the SMMC. This seems to have been to make citizens feel the LUCE was "user-friendly" or "just between us folks," not a law. Nonetheless, LUCE is part of a General Plan for the City. It has a legislative

function, which is to layout the general parameters for land use and circulation in parts of the City. It does not do that, as prior changes in some General Plans had, by overlaying new requirements only over other zoning districts, or parts of a zoning district, or combinations of several.

LUCE is just part of a General Plan, but the City Council has been treating it as though it were implemented in law already, in the Draft EIR, in discussions held in public, and in retorts made to these homeowners when they have complained at public hearings about what procedures were being followed. One problem therefore hereby raised as a separate failure to proceed as required by law, is that the Draft EIR and all actions by the City to date with regard to classifying the subject property as in the MUCD used in the LUCE, is that there is no statutory authority to assign any property, including but not limited to the subject one, to an MUCD. The General Plan has not been implemented in law the City Council can follow, as concerns MUCDs, or any of the other zoning districts, or just districts, referred to in the LUCE that are not included in SMMC § 9.04.04.010. Neither SMMC § 9.04.04.010 nor any other provision of law establishes MUCD as a zoning district of the City of Santa Monica to which a property can be assigned.

In fact, no provisions of SMMC have yet been adopted by the City even providing how provisions of the Planning Code applying to mixed use districts will be adopted. By contrast, SMMC § 9.04.04.040, entitled "Adoption of overlay districts," states, "Where a specifically delineated area within the City requires preparation of an overlay district designation, that district shall be adopted in the manner set forth in Part 9.04.20.16 of this Chapter." That part has many sections, one entitled "Interim Zoning." Part 9.04.20.16, similarly, applies to "Amendments of Comprehensive Land Use and Zoning Ordinance" and has many parts, one of which is "Interim Zoning." Given neither one of these parts of the Code has yet been followed, nor has any other part been followed to implement LUCE in the Municipal Code, there is no implementation of the LUCE part of a General Plan in any municipal code provisions, it is no wonder these homeowners have been astounded that actions have been taken without notice to them-and it is no wonder no one in the City's staff knew to give notice to them, since there are no implementing municipal code sections to tell them when to give notice.

Response 3-4

The commenter cites excerpts of the Santa Monica Zoning Code, specifically Section 9.04.04.010, and states that the current zoning code does not provide for a mixed-use district. The commenter confuses the terms "districts" as used in the LUCE and zoning districts.

As indicated on page 4.10-9 in Section 4.10, Land Use and Planning, of the Draft EIR, the LUCE was adopted in July 2010 through resolution. The LUCE establishes land use designations for the City of Santa Monica. For each land use designation, the LUCE sets forth development parameters. The LUCE Land Use Designation Map designates the project site as Mixed-Use Creative District. Amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals, and standards have not yet been adopted. The City is currently in the process of updating the Zoning Ordinance to reflect the LUCE, including rezoning of currently existing zone districts to be in conformance with the LUCE land use designations. Until the completion of the comprehensive Zoning Ordinance update, the project site's underlying zoning of R-MH will continue to be inconsistent with the site's land use designation of Mixed-Use Creative District.

Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2356 on April 26, 2011 establishing interim development procedures to implement the LUCE. As set forth in the staff report for the Interim Ordinance, the purpose of these interim procedures is to provide for standards and procedures to review development projects in a manner that will enable the fulfillment of LUCE goals and policies prior to the preparation and implementation of actions such as the Zoning Ordinance update. The Interim Ordinance presents interim zoning regulations and provides an alternate process by which development is reviewed and approved to ensure consistency

with the implementation of the LUCE. Specifically, the Interim Ordinance mandates that Tier 2 and Tier 3 development projects as well as Downtown projects over 32 feet in height be subject to a Development Agreement.

Per Government Code Section 65867.5, a development agreement is a legislative act that shall be approved by resolution or ordinance. Because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e., zoning standards) as long as they are consistent with the general plan and any applicable specific plan. As discussed in detail in Section 4.10, Land Use and Planning, of the Draft EIR, the proposed project is a Tier 3 project that would require processing of a development agreement. A development agreement requires that the proposed project make findings of consistency with the General Plan development standards and type and mix of allowable land uses for the project site. As analyzed in the Draft EIR, the proposed project's land uses, height, and FAR would be consistent with that allowed by the LUCE for Tier 3 projects in the Mixed-Use Creative District. Therefore, the proposed project would be consistent with the LUCE and would be in compliance with existing law. In addition, there is no legal requirement that the project site be rezoned or a specific plan be adopted before a development agreement for the project site may be approved.

Comment 3-5

These complaints made by these homeowners have included, and are repeated here for the record at this stage, that (a) no proper pre-existing procedure for making a discretionary zoning decision has been followed, so everything done has been done with failure to proceed as required by law; (b) rezoning occurred without adequate notice or hearings; (c) actions were taken such as entering into a "Memorandum of Understanding," which was later treated by the City as a decision to grant a development agreement having already been made back in 2007 without any notice at all to these homeowners, but which the City in 2011 treated as a decision that could lead to possible loss of their home, and which is also not referred to in any section of the SMMC having to do with homeowners and property owners, by contrast to vendors and providers of services, all of this without notice; (d) without notice as required for rezoning and for adoption of a specific plan for a new zoning district, adoption of a General Plan occurred-as to which these commenters were entitled to and given just newspaper notice as given to everyone in the City about adoption of new General Plan elements. However, then without the specific individual written notice to stakeholders required by law for rezoning property where a person lives and for adoption of a specific plan for a new zoning district where that property is located, that portion of a new General Plan was then misused by the City. Instead of being used as just a General Plan, the LUCE was turned into some kind of hybrid combination General Plan cum sub silentio municipal code section, cum even ad hoc delineation of a completely new type of zoning district, not even one of the general classification types given in SMMC § 9.04.04.010, which are limited to only residential, commercial, industrial, or public, institutional districts, and also cum delineation sub silentio of a new type of zoning district not included in the preexisting zoning districts of which the SMMC gave these homeowners notice; (e) without notice to these homeowners as required by both state and City law before any discretionary zoning decision is made that affects property where they live, hearings were held and a decision was made on granting discretionary zoning changes as part of discretionary development agreement approval for a separate property not the one where these homeowners reside; and (f) all of the above was done before preparing, circulating for comments, and adopting an EIR as required separately before each separate type of decision, which requirement was not satisfied by preparing and circulating just the EIR required for adoption of two new elements of a General Plan.

Response 3-5

Please see Response 3-4 for a discussion of the existing zoning for the project site. With regard to the commenter's statement that rezoning occurred without notice or hearings, it should be noted that the project site has not been rezoned. The LUCE Land Use Designation Map designates the project site as Mixed-Use Creative District, which allows for a mix of residential and commercial uses. The LUCE and

a required EIR was adopted and certified in July 2010 after an extensive six-year community engagement process that included dozens of community workshops and meetings. Prior to adoption, there were also seven Planning Commission public hearings and five City Council public hearings. In all cases, notice was given in accordance with applicable law and in a variety of ways including newspapers, postcards, and e-mail.

As stated above, the City is currently in the process of updating the Zoning Ordinance to reflect the LUCE's policies, goals, and objectives. Until the completion of the comprehensive Zoning Ordinance update, the project site's underlying zoning of R-MH will continue to be inconsistent with the site's land use designation of Mixed-Use Creative District. Further, the previous 1984 LUCE designated the project site as Special Office District, which encouraged office and supporting retail uses. The 2010 LUCE Policy D24.13, which permits recycling of the trailer park to other uses was carried forward from Policy 1.8.4 of the 1984 LUCE. Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2356 on April 26, 2011 establishing interim development procedures to implement the LUCE. The proposed project would be subject to a Development Agreement and, therefore, is required to make findings of consistency with the LUCE.

No decision to "grant a development agreement" occurred as a result of the MOU. The MOU provided a process for the submission and review of a development agreement application during which time the running of a pending Notice of Closure of the Village Trailer Park has been tolled. The MOU expressly reserved the City's police power to make decisions regarding approval or denial of the development agreement application. The comment regarding the MOU does not pertain to the environmental analysis of the Draft EIR, but nonetheless it is noted for the record and will be forwarded to the decision makers for review and consideration.

Comment 3-6

The subject property is now and always since 1995 has been zoned R-MH. SMMC § 9.04.04.010 states that is a residential district. Therefore, the proposed development in including uses other than residential ones violates the applicable zoning code section. Moreover, SMMC Part 9.04.08.42 R-MH, entitled Residential Mobile Home Park District explicitly prohibits any use in the zone other than listed uses, which include, some subject to performance standard permit or conditional use permit, only trailer court or mobile home park, small family day care homes, yard sales, limited to two per calendar year, for each dwelling unit, for a maximum of two days, large family day care homes, and child day care centers. SMMC § 9.04.08.42.050, entitled "Prohibited uses," explicitly and specifically prohibits, "Any use not specifically authorized." [Emphasis added.]

Draft EIR's claim at p. 193 that R-MH permitted uses "include, but are not limited to, mobile homes and small day care homes," is therefore not even correct in how it lists permitted uses. Mobilehomes are not uses in an R-MH zone. "Trailer court or mobile home park" is the applicable designation of permitted use. Far more crucially, the Draft EIR's claim that the uses are "not limited to" mobile home use is just ABJECTLY, PATENTLY, NECESSARILY INTENTIONALLY FALSE. SMMC § 9.04.08.42.050, quoted above, entitled "Prohibited uses," explicitly and specifically prohibits, "Any use not specifically authorized." [Emphasis added.] Uses in the zone where the subject property sits, therefore, are limited to those listed.

Response 3-6

As stated by the commenter and indicated in the Draft EIR, the project site is zoned R-MH. The commenter further cites the standards and regulations for the R-MH zone. Please see Responses 3-4 and 3-5 for a discussion of the existing zoning and land use designation for the project site

Under the 2010 LUCE, the project site is designated Mixed-Use Creative District, which allows for a mix of commercial and residential uses. As indicated on page 4.10-9 of the Draft EIR, the city's Zoning Ordinance has not yet been updated to reflect the 2010 LUCE polities, goals, and standards.

The commenter also purports that the Draft EIR's statement of "permitted uses within the R-MH zone include, but are not limited to mobile homes and small family day care homes" is false. The use of the phrase "not limited to" was intended to address other permitted uses allowed in the R-MH zone, namely yard sales. As noted by the commenter, the R-MH zone also allows large family day care homes with a performance standards permit as well as child day care centers with a conditional use permit. Nonetheless, the statement in the Draft EIR has been revised to match the text of the SMMC (please see Chapter 10.0, Corrections and Additions, of this Final EIR). This minor change does not alter the analysis or conclusions of the Draft EIR.

Comment 3-7

The Draft EIR claims also at p. 193 that an interim ordinance implementing LUCE in some unstated way affects the subject property. However, that ordinance is contained in full in Exhibit and applies not at all to R-MH zones, except Section 3(b) allows development agreements to be entered into violating existing height limits as discussed in sections 1 (m), (n), and (o) of the ordinance, and Section 3(d) allows ministerial approval of 100% Affordable Housing Projects "with 50 units or less in which one hundred percent (100%) of the housing units are deed-restricted or restricted by an agreement approved by the City for occupancy by households with incomes of eighty percent (80%) of median income or less."

The violations of the existing R-MH zoning ordinances in the proposed projects are not in any sense limited to height limits, contrary to the Draft EIR's claims at p. 201. THE USES PROPOSED ARE EXPLICITLY PROHIBITED, HAVING NOTHING WHATEVER TO DO WITH HEIGHT. The Interim Ordinance does not permit community benefits to substitute for any variation from existing zoning ordinances except height limits. Likewise, neither the description of these projects nor ministerial processing for an affordable housing project applies to the subject case. Moreover, even as to the zones to which the Interim Ordinance does apply, it provides for no exemption from existing zoning ordinances for uses prohibited by SMMC in any zone. Neither could it legally do so, since public hearings that were not held are required by law to change the comprehensive zoning ordinance.

Response 3-7

As previously stated in Response 3-4, the LUCE was adopted in July 2010 and designated the site with a land use designation of Mixed-Use Creative District. Amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals, and standards have not yet been adopted, and currently there are certain areas of conflict between the LUCE and the existing Zoning Ordinance. Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2356 at a City Council hearing on April 26, 2011 establishing interim development procedures. The Interim Ordinance presents interim zoning regulations and provides an alternate process by which development is reviewed and approved to ensure consistency with the implementation of the LUCE. Specifically, the Interim Ordinance mandates that Tier 2 and Tier 3 development projects as well as Downtown projects over 32 feet in height be subject to a Development Agreement.

As noted in the Draft EIR, since the project is a Tier 3 development project, a Development Agreement is required for the proposed project. Government Code Section 65867.5 states that a development agreement is a legislative act that shall be approved by resolution or ordinance. Because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e., zoning standards) as long as they are consistent with the general plan and any applicable specific plan. As discussed in detail in Section 4.10, Land Use and Planning, the proposed project is a Tier 3 project that would require

processing of a development agreement. The proposed project's land uses, height, and FAR would be consistent with that allowed by the LUCE for Tier 3 projects located in the Mixed-Use Creative District.

Comment 3-8

Neither does claimed compliance with the City's Housing Element in the General Plan, discussed at Draft EIR pp. 201-202, excuse having a municipal ordinance or ten or 100 giving pre-existing notice of the regulatory framework and each party's rights and duties in the circumstances, which requires prior hearings, adoption of a specific plan, no telling what kind of notice since no ordinances exist to tell us, and under general principles of due process of law, notice of the issues involved in advance and a meaningful opportunity to be heard.

Response 3-8

With regard to noticing requirements pursuant to CEQA, a Notice of Preparation (NOP) for an EIR was prepared for the proposed project and distributed on June 10, 2010 for agency and public review for a 30-day review period as required under CEQA Guidelines Section 15082). The NOP was distributed to the State Clearinghouse, responsible and trustee agencies, interested parties/organizations, and owners and occupants within 1,000 feet of the project site. After completion of the Draft EIR, a Notice of Completion/Notice of Availability was also sent to the aforementioned parties in addition to attendees of the scoping meeting, commenters on the NOP, and any other persons wishing to receive notice. The notice was also published on the City's website and in the local newspaper.

In conjunction with the CEQA process for certification of the EIR and in accordance with regulations, the City will also provide notice of public hearings to consider approval of the project (Planning Commission and City Council hearings).

Comment 3-9

Anticipating Responses to these Comments, commenters here must explicitly state that no other elements of a General Plan staff might choose to come up with will in any way correct the defects listed above. It is the regulatory implementation of the General Plan that is missing. The SMMC provides, as it must in compliance with constitutional rights to due process of law, that that regulatory implementation is "necessary." The Interim Ordinance repeals ordinances contrary to its provisions, but as applying to the subject property the only applicable provisions are those about height limits.

SMMC § 9.04.06.070, entitled "Compliance," reads in full as follows:

All City departments, officials, or public employees, vested with the duty or authority to issue licenses, permits, or certificates of occupancy where required by law, shall comply with the provisions of this Chapter. No permit or license for buildings, uses, or purposes shall be issued which would be in conflict with the provisions of this Chapter. Any permit or license issued in conflict with the provisions of this Chapter, shall be null and void. (Prior code § 9002.7) [Emphasis added.]

The Draft EIR's use of the MUCD zoning district as part of the regulatory framework in which the subject property is placed is therefore unlawful. Concomitant actions by the City since it approved the development agreement for property at Stewart and Colorado and these homeowners filed a claim are also all unlawful as applied to these commenters. These actions had involved the City approving that other agreement also without any of the required regulatory framework referred to here as to the subject property, in part on the pretext that work needed to get going on that other project in the then-recessionary period and could not wait for the "four or five years" it was anticipated it would be before a decision was made on the VTP application. However, then after the claim was filed, still without any required regulatory framework, the City sped up action on the subject EIR such that mere months later a decision was anticipated. All the speed ups-slow downs-no notice actions of the City are an unlawful shell game

trying to make these commenters be either too early or too late in everything they do, when there is no regulatory framework to give notice of what is required at all. Now you see it, now you don't, is unlawful. All actions so far by the City as to trying to take away homes at VTP are failures to proceed as required by law in the Santa Monica Comprehensive Land Use and Zoning Ordinances. See Exhibits 24 and 25.

Response 3-9

Please see Responses 3-4, 3-5, and 3-7 above. The regulatory implementation tool of the LUCE is Interim Ordinance 2356. Interim Ordinance 2356 mandates that Tier 2 and Tier 3 development projects as well as Downtown projects over 32 feet in height be subject to a Development Agreement.

As noted in the Draft EIR, since the project is a Tier 3 development project, a Development Agreement is required for the proposed project. Government Code Section 65867.5 states that development agreement is a legislative act that shall be approved by resolution or ordinance. Because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e., zoning standards) as long as they are consistent with the general plan and any applicable specific plan.

The commenter also discusses the approved project at 2834 Colorado Avenue. This comment does not pertain to the environmental analysis in the Draft EIR; however, the comment is noted for the record and will be forwarded to decision makers for review and consideration.

Comment 3-10

2. Drawing Self-Justifying District Boundaries that Actually Have No Historical or Geographical Basis.

Putting aside for purposes of discussion the fatal failures to proceed as required by law discussed above, the Draft EIR presents no evidence that the project site belongs in the Mixed-Use Creative land use designation in any other form from the one it presently has as a mobilehome park, as is necessary to achieve compatibility of uses within [the MUCD, if it existed], in the terms used in SMMC § 9.04.04.010 (Exhibit 23).¹ The Draft EIR attempts to label the Village Trailer Park as part of the "industrial core" of Santa Monica in its self-justifying attempt to pretend planning principles require moving a residential mobile home park that has been where it is for over 60 years- with uses other than residential surrounding it on three out of four sides and a street separating it from the only other residential uses in the neighborhood--out of the zoning classification it has had since 1995, R-MH, mobilehome park, to what the LUCE, calls Mixed-Use Creative District ("MUCD"). This latter is a hybrid zoning classification not heretofore in existence in Santa Monica, a combination of the C5 classification of properties on the south side of Colorado Avenue between 26-Street and Stewart Street, and a higher residential zone than heretofore existed in Santa Monica. The Draft EIR, however, fails because it presents no evidence that the project site, an existing functional mobilehome park, is located within that so called industrial core. (Draft EIR, p. 194)

The draft EIR provides no basis for its assertion that that "industrial core" extends from the I-10 freeway on the south to any boundary line it chooses. In this case, by choosing Colorado Avenue, instead of Santa

¹The MRL uses "mobile home" with no space in the middle of two words, as the spelling for what Santa Monica Municipal Code § 9.04.02.030.845, in the definition for "Trailer," calls a "mobile home," with a space between the two words. See, Exhibit 21. The MRL also defines a "trailer" differently from a "mobile home," and gives different rights to sell while leaving in place in the mobile home park where it is situated, to owners of the latter, with no right to sell in place for owners of trailers. However, under Santa Monica Rent Control, City Charter § , tenants of covered rental units have the same rights after rent control as they did before rent control. One of those rights , in the case of Village Trailer Park ("VTP" or "the Park") homeowners, was to sell both mobile homes and trailers, any house on any space in the Park. Therefore, for this reason and because the Municipal Code makes no distinction between the two types of manufactured house, in Santa Monica there is no distinction between a trailer and a mobilehome. For consistency throughout these Comments, "mobile home" as spelled in the MRL will be the spelling used, and that term will mean both "trailer" and "mobile home" as used in the MRL.

Monica Blvd. Or Olympic Blvd.--natural arterial boundaries (draft EIR p.249)--for any area so defined, the draft EIR defines the area in which VTP is located as not being inherently residential. It does so to suit its purpose of "justifying" eliminating its R-MH zoning. Putting aside also the unlawfulness of changing zoning in an EIR, the Draft EIR fails in describing how VTP fits within its neighborhood. This is not surprising, since like everything else in the Draft EIR, this description of how VTP allegedly fits in the "industrial core" of Santa Monica ending at the south side of Colorado Avenue shows not the slightest attempt to actually visit what it describes.

The Mixed-Use Creative designation in LUCE is one that purports to be related to building locations, types, and sizes, but, in effect, when applied to an existing residential use, is a move to indirectly address who might be able to live in this area, and what life style they might have. It is therefore exclusionary. The Draft EIR provides no evidence to justify a zoning change from non-subsidized low-cost housing to other uses.

Village Trailer Park is part of the primarily residential area bounded by Santa Monica Boulevard, the first natural northern boundary of any area seen as extending from the Regional Route, I-405, serving Santa Monica. Altering the existing zoning of RMH for Village Trailer Park is a technique to prevent the development and redevelopment of the type of housing the park currently provides. The draft EIR fails to present any evidence that its retention as a mobile home Residential zone would harm the existing character of the neighborhood.

In fact, any reasonable preexisting not self-justifying definition of the area in which VTP exists did not use the definition the Draft EIR uses. For instance, the 90404 zip code extends from 11th Street or Lincoln, depending on the west boundary chosen, east to Centinela, and from Pico Blvd. north to Wilshire Blvd. (USPS Map of Santa Monica zip codes 90404 and 90401, with most of all the remaining zip codes in Santa Monica: 90402, 90403, and 90405). The zip code therefore uses at the point where VTP is, the north and south boundaries of Wilshire and Pico Blvds. As far west as 11th Street, Colorado makes a difference, since at that point the zip code goes west to Lincoln rather than only to 11th Street, as it does north of that point. The point of 11- Street and Colorado is more than 18 blocks west of VTP. That Colorado makes any difference that far west is irrelevant to whether it can be called a boundary for any purpose at the point where VTP is. Accordingly, by the time one gets as far west as 11th Street and Colorado Avenue, the importance of being an exit off the 405 fades, since people are less likely to go that far on surface streets off the 405, and instead are likely to take the 10 and use Cloverfield or Lincoln to cut over.

The irrelevance of Colorado as a boundary except for the LUCE and Draft EIR self-serving purpose of trying to make a newly-defined area seem historical or natural, is also shown by how people get to VTP from all different directions. Colorado Avenue is a two-lane street with a center bidirectional turning lane at some points, a concrete median at others. While it goes from Ocean Avenue to Centinela Blvd., all the way E-W through the City, Colorado Avenue has never had the characteristics of a through street or a boundary. Pico, Olympic, Santa Monica and Wilshire all have these characteristics for different purposes, as is shown by their being called Boulevards whereas Colorado is an Avenue. This also is shown by all four of these being exits from the 405, whereas Colorado is not.

The irrelevance of Colorado Avenue as a boundary of anything is also shown by its virtually never being used a traveling through street. At the point where VTP is on Colorado Avenue, to get to that point on surface streets from a freeway when coming from the Valley or Hollywood, it is only seven (7) blocks west of the 405 on surface streets using the Santa Monica Blvd. exit, and then two (2) blocks south on Yale, or four (4) blocks south when using the Wilshire exit. One naturally takes one of the exits, depending on the traffic on the 405 in the direction one is traveling, and then takes main surface streets and cuts over to 2030 Colorado Avenue at the very last one to two blocks.

To get to 2930 Colorado Avenue from the 10 one would have to go to the 10 from the 405 and Santa Monica Blvd., which would mean going through one of the busiest interchanges in the world , and then take the Centinela or Cloverfield exit and come back seven (7) blocks north and then two (2) blocks west. That means the same distance on surface streets after taking up to a half hour extra on freeways.

When coming from the south, it is shorter to take the 10 and the Centinela or Cloverfield exit, but again, one stays on Centinela or Cloverfield and then cuts down on Colorado only west or east for the last few blocks. Locals might use Pico or Olympic and cut across from Cloverfield to Olympic using the industrial park angle of 26th Street as the sign on Cloverfield directs to get to 26th Street, but even then, one is on Stewart after Pennsylvania for less than a block, and then on Colorado for 500 feet. Again, Colorado is simply not a boundary.

When coming from the South on the 405, likewise, Colorado is not a natural boundary of anything. One naturally takes National on surface streets to Centinela (called Bundy at that point because of the Santa Monica Airport cutting off Centinela for a few blocks).

One simply never takes Colorado as a street to travel on as contrasted with a street to cut over to or from to get to some location actually on Colorado. One of the main reasons Colorado is not a main street is it changes names at the Santa Monica's city boundary at Centinela, and whether it is Nebraska or Ohio or what in West LA is impossible to remember. People take main streets- Olympic or Santa Monica, or if they are farther away, Pico or Wilshire. Then they cut over. Colorado never has been a natural boundary of anything until the Planning Department wanted to make a new district and started making up facts. Accordingly, until the LUCE and then this Draft EIR following its attempts to make this area into a separate district, no one in this district ever used the boundaries the Draft EIR now uses for any purpose. For instance, if a person such as Brenda Barnes living at VTP were giving directions to get to her house by car, she would give the general orientation first by saying it's on Colorado, which is between Olympic and Santa Monica Blvds., and it's between 26th and Centinela. If the person knows all those main streets, very little more is necessary for directions. If they don't know those main streets, then you have to expand to what they might know by saying, for instance, do you know where the Santa Monica Blvd. Exit off the 405 is?

As another way to see that Colorado is not the historical or natural boundary of "Santa Monica's industrial core," also notice how the boundary of the LUCE MUCD along Colorado stairsteps back to the South from Colorado toward Olympic virtually immediately as one proceeds from Stewart East toward Centinela. It is along Colorado until you get to Stanford, but actually the properties on the West side of Stanford at Colorado and going South are not what the LUCE calls MUCD uses at all. On the corner is the Westside Christian Church. South of it is an industrial two - story building. Then comes the portions of Village Trailer Park located on Stanford Street.²

South of that part of Village Trailer Park is a large compound that appears to be a live-in design or architecture two-story studio. It has a solid gate off Stanford into a drive-in courtyard surrounded by buildings, where numerous cars have always parked for the whole 25 years we have lived here.

South of that is a grassy area with palm trees, west of which is the gated entrance to the Southern California Gas Company's truck yard. South of the Gas Company's entrance and south of the design firm's office-house compound is an advertising-PR type firm. Some commercial company, we think Direct TV or some such, parks its trucks in the lot behind that building. South of there is some nondescript two-story

²This is obviously all that remains of what used to be two more entire rows of trailers called E and F coming off Colorado while the ones still located off Colorado are A, B, C and D. The reason it is obvious what is now at least part of land where the Church and the industrial building are used to be parts of Rows E and F of Village Trailer Park is that those two rows start at 9 and 10, respectively, and have a large space between them now used for very gale back yards, which clearly used to be a driveway between rows before Stanford Street was put in to give a side entrance to that part of the Park.

industrial building used by we know not whom, maybe two different companies, and then Time Warner Cable's business office is on the northwest corner of Stanford and Nebraska.

On the East side of Stanford at Colorado is the first stairstep back toward Olympic of the MUCD. That goes just to the alley half a block away. This area, starting just three parcels East of Stewart Street, is not included in the MUCD--even though the Draft EIR would have us believe Colorado Avenue has always been some natural boundary with the "industrial core" of Santa Monica--is residential, R-2. This South side of Colorado up to Berkeley Street is residential, R-2, left out of the MUCD.

South of the alley on the East side of Stanford is about a quarter of a block of two-story commercial shops. There is a nice commercial print shop there, and miscellaneous other commercial and office uses. South of that are one-story house-looking buildings, which may be used for housing or commercial, one cannot tell.

On the Southeast corner of Pennsylvania and Stanford and across the street from it to the South as well are one story buildings that seem to be industrial because although they have entrances from the street that could be commercial or creative studio entrances, they have tiny plaques or small signs identifying what business is there, and we have never seen people coming and going. Otherwise, though, there is nothing particularly "industrial" about these buildings. They could have been used for anything all this time as far as could be told from outside. They are not noisy or dirty or having lots of workers coming and going the way property people think of as a factory would be.

Then farther South on Stanford past Pennsylvania the East side of the street gets pretty "industrial". There are drills and saws and FedEx trucks and that kind of thing, and dumpsters in alleys always overflowing with cardboard boxes and next to buildings. The street stays that way for a block all the way to Nebraska, dirty and smelly quite a bit, but mixed in there is a film and photography business here and there, and down on Nebraska there are loads of creative types and artists, plus a small cafe and SCI-Arch.

On the other side of those buildings, the Olympic Blvd. North side, are two schools not mentioned in the Draft EIR as subject to pollution, noise, vibrations, and other impacts from the proposed project, much closer to us and much bigger schools, as SCI-Arch is, than the Lighthouse Christian School on the alley South of Santa Monica Blvd. on Yale, which is mentioned in the Draft EIR.

If you come back to Colorado Ave. then go South on Berkeley, you see the second stairstep of the MUCD, although the Draft EIR pretends Colorado Ave. always was the boundary of Santa Monica's "industrial core," trying to justify changing the use of Village Trailer Park from mobilehome park as it has been for 60 years, whatever was around it.³

At that point the current industrial zone the LUCE changes to MUCD goes only to the South side of Pennsylvania Avenue. At that point, other than the widening sliver on the South side of Nebraska as Olympic veers South, the industrial zone cum MUCD is only one block long. We are not so familiar with that part as we are the part closer to us, but we do know that just half a block East that one-block long zone becomes only half a block wide, to the alley between Berkeley and Franklin.

So much for Colorado being a natural boundary of the "industrial core" of Santa Monica since at that point in the middle of a N-S block the zone becomes completely residential all the way to Nebraska except for the South side of Nebraska from there for another block and a half East to the City limit at Centinela.

³In fact, we have heard from neighbors who lived here as children that the whole neighborhood was orange groves. Does that make Colorado Ave. the natural boundary of an agricultural district? For that matter, when we first moved to Santa Monica in 1980, or maybe shortly before that when we came here to the beach, all of the now-Water Garden land and land now covered with office buildings up to Broadway was housing. So where and when was there ever an "industrial core" extending to Colorado Avenue? It's only a matter of perspective, how far back history goes, but the historical importance of Colorado Avenue as a boundary appears to go all of three parcels East of Stewart Street and start in about January 2006.

Clearly what really happened here is a trailer park took up a whole City block at the edge of an industrial zone, as a buffer between it and the residential zone on two sides of it, but over the years encroachment was allowed into half of the residential block across the street, and part of the trailer park was sold and allowed to be used for church and other uses. Needless to say, with the exception of the architecture studio, and photography and film studios and the PR firm, which has probably been a zoning violation by being Industrial land used for office and residential use all these years, nothing listed here except Village Trailer Park fits in the MUCD. Village Trailer Park itself, however, could easily fit, if the City just notified people that now retail and creative art uses are allowed as well as residential uses.

Response 3-10

The proposed project does not propose to change the existing land use designation or zoning. As discussed in Responses 3-4 and 3-5, and in the Draft EIR, the LUCE was adopted in July 2010 and designates the site as Mixed-Use Creative District (see Figure 4.10-4 of the Draft EIR), a designation that allows for a mix of commercial and residential uses.

The commenter also states disagreement with the Draft EIR's description that the project site is located in the "industrial core". As noted above, the LUCE (not the Draft EIR for the project) created the Mixed-Use Creative District and defined its boundaries. The comment is noted for the record and will be forwarded to decision makers for review and consideration.

With regard to land use compatibility, Section 4.10, Land Use and Planning, analyzes the project's impacts with regard to land use compatibility. As discussed on page 4.10-10, the proposed project's mix of uses would be compatible with the existing residential and light industrial uses.

Comment 3-11

3. City giving its own property a completely unnatural gerrymandered boundary

Exhibit 14 shows on p.2 how Mountain View Mobilehome Park owned by the City was ridiculously gerrymandered to keep it residential and how a less ridiculous boundary makes it feasible for VTP to stay residential as it has been for 60 years while surrounded on three sides by other uses. Only drawing a jagged boundary that looks like shark's teeth in a cartoon could allow the MVMP to stay R-MH zoned adjacent to an industrial area on two sides and a residential area on two sides, at the same time the Draft EIR says it is infeasible to leave Village Trailer Park, surrounded as it has always been on two sides by on two sides by residential use, on one side by industrial use (the Gas Company truck parking yard) and on one side by some other use (changed by the other Development Agreements on Colorado and Stewart from Industrial to Mixed-Use Creative).

One amazing gerrymander line leaves Mountain View Mobilehome Park as it was before, zoned as R-MH, and another amazing gerrymander line claims to put VTP inside a natural boundary of Santa Monica's industrial core in spite of its being residential for over 60 years, while changing the surrounding zone from Industrial to mixed C5 and some unknown high residential use, then allowing condos for sale as is not allowed in C5.

Response 3-11

The commenter states an opinion that the City "gerrymandered" zoning boundaries for the project site and the Mountain View Mobilehome Park differently.

This comment does not pertain to the environmental analysis in the Draft EIR but is noted for the record.

As stated in Section 4.10, Land Use and Planning, of the Draft EIR, the LUCE designates the project site as Mixed-Use Creative District. Per the LUCE, the Mixed-Use Creative land use designation provides

the opportunity to balance creative arts jobs with a variety of housing and neighborhood-serving retail and services. These uses would take advantage of the future Bergamot Exposition Light Rail Station by bringing jobs and housing closer to high-frequency transit service. The LUCE was adopted in July 2010; however, amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals and standards have not yet been adopted, and currently there are certain areas of conflict between the LUCE and the existing Zoning Ordinance. Pending the completion of the comprehensive Zoning Ordinance update, the site remains as currently zoned R-MH.

Comment 3-12

4. Illegal Spot Zoning

LUCE p.2.6-2 has a map of Santa Monica's districts with 2930 Colorado in the Mixed-Use Creative District and with the Bergamot Transit Village ending on the west side of Stewart.

In the Draft EIR by contrast, the entire area is referred to as "close to the Bergamot Transit Station". In fact, in the Power Point presentation map then Planning Director Eileen Fogarty used to give a presentation to the California APA Conference entitled "Santa Monica's New General Plan" on November 3, 2010, at p.23 (copy attached as Exhibit), Ms. Fogarty put the Bergamot Transit Station at Cloverfield and Olympic, where it actually will be, and drew the circle for the "Transit Village" around that "new" station extending almost to Pico on the South and Santa Monica Blvd. on the north and well past Stewart on the East and 20th Street on the West.

On the other hand, on the very next page when discussing integrating land use with transportation, she moved the Bergamot station a good five to six blocks east, to Stewart and Olympic, and made the "Bergamot Transit Village" the entire area combining both what Luce actually designates as the Bergamot Transit Village and what LUCE calls the Mixed-Use Creative District. Only by combining the two and pretending the station would be five blocks east of where it actually will be, could she make any plausible argument that there was in Santa Monica's "New General Plan" any integration whatsoever of land use with transportation.

That she did so also reveals however, another failure to proceed as required by law in this Draft EIR as concerns LUCE, which is part of the General Plan. LUCE sets up a Mixed-Use Creative District, but then the City is putting art galleries and studios in the Industrial Conservation District instead, in a portion which is the entire area now called Bergamot Station, the area between the angled part of 26th Street between Cloverfield and Olympic on the West, and Stewart on the East, between Olympic on the North and Exposition on the South. That little sliver of land Luce puts in the Industrial Conservation area south of the Transit Village.

However, since that land, like the Mountain View Mobilehome Park, belongs to the City, and the City did not want to use it for what the district it is in allows, to keep its image up in the sophisticated world the City Council aims to be part of, suddenly "Industrial Conservation" became "Mixed-Use Creative." More correctly, since there does not seem to be any housing use planned there, the City made it just "Mixed-Use Creative Minus Housing" ("MUCDMH"). Or maybe it is Neighborhood Commercial Plus Creative ("NCPC"). Or maybe it is Bergamot Transit Village Adjacent or Annex, which either way would be BTVA.

The point is, as far as failure to proceed as required by law, the LUCE as the City is actually applying it is just illegal spot zoning. Whatever the City chooses to do, it draws a ridiculous boundary to allow, and claims that boundary is "natural" or "historical!!" or part of some "core." Actually, just looking at the ridiculous boundary line compared to streets is all it takes to see the boundary as what it is: gerrymandering to try to legitimize spot zoning. Then when even that simply cannot be done because two spot zones with the same use are geographically separated from each other, the City on its own land, where it does not need to give itself the same kind of justification it allegedly gives projects proposed by

others, just builds things that do not fit in the zone at all. Either way, the same illegal spot zoning occurs, and no pretense that any real planning took place to cause it can hide that reality.

Response 3-12

The commenter states an opinion that the boundaries of the Mixed-Use Creative District are incorrect. Please see Responses 3-4 and 3-5 above regarding zoning of the project site and its current land use designation. As discussed previously, the proposed project does not propose to change the existing land use designation or zoning. The City is currently in the process of updating the Zoning Ordinance to reflect the LUCE including rezoning of currently existing zone districts to be in conformance with the LUCE land use designations

Comment 3-13

5. The Draft EIR fails to proceed as required by law in that it concludes there is adequate law to approve the proposed project when there is no specific plan for the MUCD, as for the Bergamot Transit Village, so every project is not in conformity with a specific plan in conformity with the General Plan, supported by an EIR, as required by law.

Response 3-13

LUCE Interim Ordinance 2356 is the regulatory mechanism to implement the LUCE. As previously stated, the proposed project is subject to a Development Agreement as required by Interim Ordinance 2356. Per Government Code Section 65867.5, because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e., zoning standards) as long as they are consistent with the general plan and any applicable specific plan. As previously stated, the proposed project's land uses, density, and height would be consistent with LUCE development parameters.

Currently, no specific plans or area plans are in effect that would apply to the project site or the proposed project. The City of Santa Monica is currently in the process of preparing a Bergamot Area Plan, which would encompass both the Bergamot Transit Village and Mixed-Use Creative land use designations. The Area Plan would address area-wide issues such as land use, circulation, open space, urban form and scale, parking, community benefits, area-wide infrastructure, and coordinated implementation. The LUCE does not require that a specific plan or area plan be in place for a proposed project to proceed.

Comment 3-14

6. The Draft EIR fails to proceed as required by law in that LUCE does require the MUC District to be 50% housing and 50% commercial or office-studio use, so since the project at Stewart and Colorado, the first one in the District is 100% commercial, and is enormous, some 900,000 square feet, unless the second one between Village Trailer Park and that one is far more than 50% housing, the District will be largely commercial and disruptive of the R-2 zones all around it to the North for four (4) blocks and the R-1 for four (4) more blocks to the City's border at this point, and to the East R-2 for three (3) blocks to the city's border, In fact, given the size of the project the city approved at Colorado and Stewart, it is impossible to have 50% housing and 50% commercial in new projects in the MUCD unless all of both the project proposed at Roberts and the one at Village Trailer Park are housing, which would not make either one a mixed-use project. That is why we filed a claim against that project. At this point the only way to comply with law is not to approve a new project at Village Trailer Park, and to approve a solely housing project at Roberts, unless approval is refused by the court for that first project. Alternatively, the City could do a specific plan for the MUC District and indicate where housing is going to come from to cover the 50% requirement as to overly-commercial projects approved, and then pass municipal code ordinances to implement LUCE and that specific plan, then begin consideration of this proposed project again if it is still lawful.

Response 3-14

The LUCE does not require all individual development projects to provide 50 percent housing and 50 percent commercial uses. Rather, as stated on pages 2.1-45 and 2.1-46, the LUCE sets forth a targeted ratio of 50 percent residential to 50 percent nonresidential uses and no more than a 5 percent deviation in either direction for the Mixed-Use Creative land use designation as a whole. This ratio is intended to be a target for the whole district and not a regulatory mandate for individual development projects. Therefore, the proposed mix of uses is not unlawful.

It should also be noted that the approved project at Stewart and Colorado Avenue (2834 Colorado Studios - Lionsgate Project) consists of 192,000 square feet of commercial uses (not 900,000 square feet as stated by the commenter). Furthermore, subsequent to publication of the Draft EIR, the project applicant has announced their intention to pursue development of Alternative 3, which would increase the proposed residential component to approximately 92 percent of the proposed project. Implementation of Alternative 3 would balance out the approved commercial uses of 2834 Colorado Studios and help to achieve the Mixed-Use Creative land use designation's 50/50 ratio as targeted in the LUCE.

Comment 3-15

7. The proposed project does not comply with law in following the LUCE policy D-24.14 in determining the feasibility of preserving Village Trailer Park by creating a master plan for a multi-property development that will comply with all LUCE policies applicable to the MUCD.

The Draft EIR pretends at p.362 that the City does not have to follow this policy of the LUCE because: (i) too much development is sought in the proposed development to transfer to (ii) only two adjacent properties without exceeding the maximum 2.5 FAR in LUCE for the MUCD, and (iii) there is no TDR program yet to implement such a transfer.

Pretense (i) does not comply with law because what the developers seek they are not by definition entitled to unless LUCE is complied with, so what they seek cannot be an excuse not to make a multi-property master plan that preserves the Park as is.

Pretense (ii) does not comply with law because nothing in LUCE limits the multi-property master plan requirement for exploring the feasibility of retaining the Park as is, to exploring just two adjacent properties. After all, to try to avoid the correct charge that the city is illegally spot zoning, the City gerrymandered the entire MUCD in LUCE, and now in the Draft EIR tries to justify that while retaining its own mobilehome park and putting galleries and studios in an industrial conservation zone. LUCE put at least 30 parcels, and perhaps as many as 360, in the MUCD, depending on the size of the parcel, there being about 15 blocks in the District and 2-24 parcels in a block.

Pretense (iii) is the reason above all, that this Draft EIR does not comply with law as to the LUCE requirement that VTP be retained as it is if feasible, since it makes up everything that would be in a specific plan to do what it does. Therefore, it would be beyond ingenious to say it cannot save Village Trailer Park as it is as LUCE instructs it to do if that is feasible just because this proposed development is being considered unlawfully without a specific plan. If the Village Trailer Park cannot be retained as it is without the specific plan being completed, that is a sign the City is proceeding as not permitted to proceed by law, so is not proceeding as required to proceed.

Response 3-15

As discussed in Chapter 5.0, Alternatives, LUCE Policy D24.14 states the following: *“Explore means to sustain Village Trailer Park’s economic viability by incorporating it into a larger multi-property master plan, if feasible, or by the transfer of development rights that have as a goal, preserving existing housing as an integral part of a new mixed-use project.”* The Draft EIR further states that a multi-property master

plan that included the retention of the Village Trailer Park as a community benefit and transferring the development rights from Village Trailer Park to the two adjacent properties was considered. This alternative was deemed infeasible due to the following:

- A TDR program does not yet exist to implement such a transfer of development rights and therefore is totally dependent on the cooperation of individual property owners to participate in common ownership
- Adjacent property owners did not express an interest in participating in a transfer of development rights or in forming a single ownership entity
- The maximum height and floor area ratio (FAR) established in the LUCE cannot be exceeded and therefore, the LUCE cannot accommodate the amount of development rights that would be transferred from the Village Trailer Park property to the adjacent two properties

The commenter disagrees with the discussion above and states that the proposed project does not comply with law as it does not comply with the LUCE. As discussed in detail in Section 4.10, Land Use and Planning, of the Draft EIR, the proposed project is a Tier 3 project that would require processing of a development agreement. The proposed project's land uses, height, and FAR would be consistent with that allowed by the LUCE for Tier 3 projects located in the Mixed-Use Creative District. Therefore, the proposed project would be in compliance with the LUCE.

The commenter also contends that other parcels (besides the two adjacent parcels) in the Mixed-Use Creative district should have been considered in exploring the feasibility of a multi-property master plan. As previously discussed, a TDR program does not yet exist to allow a transfer of development rights. Therefore, even if other parcels were identified as available for development, such a development would also be dependent on the cooperation of separate property owners to participate in a highly speculative plan that would require the City to cooperate in making additional development feasible at an unidentified site to compensate for the purchase of development rights that would retain the Village Trailer park as a mobilehome park. No other property owners have expressed an interest in cooperating with the applicant in attempting to transfer development rights from the project site. In the absence of a TDR program and alternative transfer sites, further exploration of the transfer of development rights to receiving sites is too speculative to pursue and requires a degree of forecasting not required by CEQA.

As discussed above, an alternative to retain the Village Trailer Park on the project site was explored but ultimately was deemed infeasible. In addition, the LUCE does not require that a specific plan be in place before a development is proposed. Please refer to Response 3-4 regarding the proposed project's compliance with applicable law, including the LUCE.

Comment 3-16

8. The Draft EIR in trying to justify the proposed project does not comply with law in that there appears to be no Master Plan for Santa Monica in effect at this time complying with Chapter 9.24 of the Santa Monica Municipal Code, except as to Parks and Recreation, Land Use and Circulation (LUCE), Housing, and Urban Forest. These other than LUCE are mentioned on the Internet but not available to read. Therefore, the Draft EIR does not proceed as required by law, in that it appears at sometime since 1959 when Chapter 9.24 became effective, the City instead of operating pursuant to a Master Plan that at least considered conservation, a unified streets and highways plan, a public service and facilities plan, a public buildings plan, a community design plan, and additional plans and data (such as an air quality plan and a water quality and supply plan, perhaps, all of which the City is listed with the applicable state agencies as not having adopted).

Response 3-16

The adoption of a "Master Plan" as envisioned in 1950 with the adoption of the antiquated SMMC Chapter 24 is not a legal prerequisite for approval of development within the City. The City's General Plan and its constituent elements guide development within the City.

Comment 3-17

9. The Draft EIR does not comply with law in that the Development Agreement chapter of the Municipal Code, section 9.48.040, in compliance with State Law, Government Code s 65865 (a) requires a person entering into a development agreement with the City to have a legal or equitable interest in the the subject real property. We get tax bills with our rent increase notices every year showing Village Trailer Park, Inc. owns the Park, as can easily be verified on the Internet. If Village Trailer Park, LLC has an equitable interest in the property, the City should have proceeded as required by law to determine what that equitable interest is rather than calling VTP, LLC the "owner" of the property. Then when the City determined the applicant had only an equitable interest, it would have had the right to receive proof of what that interest was, and then it would know better, as we do, than to believe VTP, LLC's representative when he says "he" improved the Park during the last five years, which we know of our own personal knowledge is not true.

Response 3-17

This comment does not raise an issue that is relevant to the CEQA analysis. Nevertheless, for clarification purposes, Village Trailer Park, Inc. and Village Trailer Park, LLC jointly own the project site, as tenants-in-common. Village Trailer Park, LLC is the applicant for the proposed project. The applicant is not required to be the same person as the property owner.

Comment 3-18

As to the next section. discussing an enormous mostly commercial-film production and condominiums for sale proposed development to be plopped into an R-2 neighborhood (353,000 square feet plus a two-story subterranean garage) (Draft EIR, p. 182), the Draft EIR either claims matters are insignificant without adequate support for the claim, claims matters are significant but will be mitigated to less than significant. again without adequate support for the claim, or states matter are significant and not mitigatable, but indicates no community benefits related to the environmental impacts that must be demanded from the proposed developers to make up to the community for the Significant environmental impacts. CEQA's concern with these unlawful approaches is as it should be heightened because the Draft EIR 's reliance on this historical record without adequate evidence does not adequately characterize the long-term risk of going ahead with the development.

Response 3-18

The Draft EIR provides an accurate analysis of the proposed project's potential environmental impacts of the proposed project have been accurately analyzed and fully disclosed. The Draft EIR's conclusions are supported by referenced materials, appendices, and data. Impacts in the EIR were determined to be either less than significant, less than significant with mitigation, or significant and unavoidable based on substantial evidence in the record.

Pursuant to CEQA, the purpose of the Draft EIR is to analyze the significance of the physical environmental effects of the project. Community benefits are required to be provided as part of the Development Agreement for the proposed project and are not relevant to the CEQA analysis. Community and project benefits will be considered by the decision makers as part of the project approval process. Pursuant to CEQA, decision makers must find that the project's significant environmental effects

identified in the EIR have been avoided, or that unmitigated effects are outweighed by the project's benefits.

Comment 3-19

10. The Draft EIR does not proceed as required by law because it states it is not required to analyze whether there will be adequate water supply for the proposed project because there are not 500 residential units proposed (Draft EIR p.333), but *Vineyard Area Citizens v City of Rancho Cordova* (2007) 40 Cal. 4th 412.433 states a water supply EIR is required for every project subject to CEQA, not just residential ones with 500 or more units, pursuant to Water Code §§1091 0-10912 as amended in 2001. *Vineyard Area Citizens* states at 40 Cal. 4th 439. Government Code §66473-7 requires the general mandates for a water plan approval at the General Plan level must be replaced at the large project approval stage by "firm assurances" of an adequate future water supply to support the project and to allow the public to be able to discuss it, and the Draft EIR must identify not only the likely source of water to supply the project, but also adequately address the reasonably foreseeable impacts of supplying water to the project, for the next 20 years.

Response 3-19

The commenter's statement that the Draft EIR does not require analysis of adequate water supply for the proposed project is incorrect. As a matter of clarification, the proposed project is not subject to the requirement for preparation of a formal Water Supply Assessment because it does not meet the threshold. However, Section 4.16.1, Utilities & Service Systems of the Draft EIR does provide an analysis of the project's impacts on water supplies. As indicated in that section, the City's 2010 Urban Water Management Plan (UWMP) analyzes future water demand and water supplies through 2020. The 2010 UWMP accounted for future growth that would occur in the City, including growth that would occur with buildout of the LUCE. This growth includes future development projects such as the proposed project. The Draft EIR concluded that the project's water demand would constitute an incremental portion of the forecasted 2010 UWMP demand and therefore, impacts on water supply would be less than significant. Furthermore, it should be noted that the Water Supply Assessment prepared for the 2010 LUCE analyzed water demand in the City through the LUCE horizon year of 2030 and determined that forecasted buildout of the LUCE (which includes development of the project) would not have significant impact on water supplies.

As stated in *Vineyard Area Citizens vs. City of Rancho Cordova*, "CEQA, in our understanding, does not require a city or county, each time a new land use development comes up for approval, to reinvent the water planning wheel. Every urban water supplier is already required to prepare and periodically update an "urban water management plan," which must, inter alia, describe and project estimated past, present, and future water sources, supply and demand for at least 20 years into the future. (Wat. Code, §§10620-10631.) When an individual land use project requires CEQA evaluation, the urban water management plan's information and analysis may be incorporated in the water supply and demand assessment required by both the Water Code and CEQA "[i]f the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan." (Wat. Code §10910, subd. (c)(2).) Thus, the Water Code and the CEQA provision requiring compliance with it (Pub. Resources Code, §21151.9) contemplate that analysis in an individual project's CEQA evaluation may incorporate previous overall water planning projections, assuming the individual project's demand was included in the overall water plan."

The City's 2010 UWMP evaluated future water demand based on buildout of the LUCE. The proposed project is consistent with the LUCE growth projections and land use designation. Therefore, the project's water demand has been accounted for in the 2010 UWMP.

Comment 3-20

11. The Draft EIR does not proceed as required by law because it uses ridiculous and not even attempted to be justified estimates of current water use at VTP when in fact under the Rent Control Charter Amendment the owner of the property pays for all the water used here, so he could have provided proof of how much is used, and in fact the City owns the water supplier, so it could have checked its own records to see how much water is currently used at VTP. Then it subtracts that from an amount the project is expected to use of 61.022 gal/day, but that is not explained meaningfully so the public can discuss it either. Instead the Draft EIR at p.336 merely says the City has plenty of water from the Metropolitan Water District, does not say how much of the City is entitled to, how much is projected to be be [sic] needed for population increase in projects already approved or in daily increase in population due to the rail line coming to Santa Monica, or how much will be needed by all the other cities and other entities entitled to buy water from the MWD.

Response 3-20

In response to this comment, Section 4.16.1, Utilities & Service Systems, of the Draft EIR has been revised to utilize the project site's existing water usage rate of 111 gpd per dwelling unit rather than the City's average water usage water of 124 gpd per dwelling units. Please see Chapter 10.0, Corrections and Additions, of this Final EIR.

This revision does not materially change the conclusions in the Draft EIR. As stated in the Draft EIR, the City's 2010 UWMP analyzes future water demand and water supplies through 2020. The 2010 UWMP accounted for future growth that would occur in the City, including growth that would occur with forecasted buildout of the LUCE. This growth includes future development projects such as the proposed project. The Draft EIR concluded that the project's water demand would constitute an incremental portion of the forecasted 2010 UWMP demand and therefore, impacts on water supply would be less than significant. Furthermore, it should be noted that the Water Supply Assessment prepared for the 2010 LUCE analyzed water demand in the City through the LUCE horizon year of 2030 and determined that forecasted buildout of the LUCE (which includes development of the project) would not have significant impact on water supplies.

In addition, it should be noted that the City is currently preparing a Water Self Sufficiency Study to examine the City's water supply and to develop a plan to achieve 100 percent self-sufficiency on local water sources by 2020. The plan would outline ways to eliminate the City's reliance on imported water and achieve water self-sufficiency through a broad-based strategy to increase local water resources and reduce demand. The plan envisions maximizing the use and development of local groundwater resources at a sustainable level, increasing water conservation efforts, capturing and using rainwater and dry-weather runoff, reuse of graywater, exploring enhancements in water recycling efforts, and reuse of wastewater and other innovations. The analysis would lead to a sustainable water roadmap to self-sufficiency and serve as a guide with strategies the City will implement to become 100 percent reliant on local water resources.

Comment 3-21

12. The case cited above also requires the public be given information to be allowed to discuss whether or not what is said is true and actually discusses all the environmental impacts of supplying water to the project.

Response 3-21

Please see Responses 3-19 and 3-20, above regarding the Draft EIR's analysis of the project's potential impacts related to water supply. As discussed above, the Draft EIR provides a thorough discussion of the project's potential water supply impacts and determined that such impacts would be less than significant.

Comment 3-22

13. The Draft EIR fails to proceed as required by law on the matter of soil in that the City cannot suggest it has adequately informed the public so it can comment upon the City's analysis of the environmental effects of this project. If there were nothing else wrong with the DEIR, when there was no soil testing. This project involves two stories of subterranean excavation and tons of weight on the soil. For all we know from the DEIR, the water table may be 15 feet down, the soil may not be adequate to hold such weight, and there may be contamination that will cause further problems.

Response 3-22

The commenter states that the Draft EIR fails to inform the public of soil conditions on the project site since there was no soil testing conducted.

CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required. (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383). As a statute designed to ensure that information on environmental impacts is effectively communicated to decision makers and the public, CEQA requires that a lead agency “use its best efforts to find out and disclose all that it reasonably can” and that an EIR reflect “a good faith effort at full disclosure.” (CEQA Guidelines Sections 15144 and 15151).

While the Draft EIR does not include soil testing, geological/soil conditions and impacts are analyzed based on a thorough review of various technical documents and literature, including the California Geological Survey's Seismic Hazard Zone Reports, the City of Santa Monica's Safety Element, and the City of Santa Monica's Geological Hazards Map (see Section 4.6, Geology and Soils, of the Draft EIR). Geology and soil impacts were determined based on these known geological conditions of the site. As indicated in the Draft EIR, the proposed project would be required to comply with all applicable provisions of the Santa Monica Building Code. In addition, consistent with existing City requirements and as set forth in Mitigation Measure GS-1, the project Applicant would also be required to submit a site-specific Geotechnical Report at the time of final building plan check to ensure that the proposed project would be constructed to withstand geological and soil conditions. Specifically, Mitigation Measure GS-1 states the following:

GS1 At the time of final building plan check, a site-specific Geotechnical Report shall be submitted to the City of Santa Monica Building and Safety Division for review and approval. The Geotechnical Report shall be prepared in accordance with the City's *Guidelines for Geotechnical Reports* and at a minimum shall address: seismic hazards (fault management zone; groundshaking; liquefaction; subsidence, etc); hydrocollapse potential; and expansive soils. Information obtained from the Geotechnical Report shall be incorporated into the design and construction of the proposed project. The recommendations provided in the Geotechnical Report as well as Santa Monica Building Code requirements regarding foundation design, retaining wall design, excavations and shoring shall be fully implemented.

With implementation of the mitigation measure, impacts related to fault hazard management zone, seismic groundshaking, liquefaction, and unstable soils (including expansive soils) would be less than significant.

With regard to the groundwater table, on page 4.9-13 of the Draft EIR states that the historic high groundwater levels at the property adjacent to the west of the project site was on the order of 35 feet below grade surface (bgs). The floor of the proposed subterranean parking would be approximately 22 feet bgs.

Comment 3-23

On that last point, we know of our own personal knowledge that for the 15 years previous to 2000 when the owner was forced by a homeowner lawsuit to upgrade the sewer, there were outflows of raw human sewage onto this land at least once, often three times a year. No remediation of the soil has been undertaken since then. Therefore, contamination is a very real possibility. In any event, not even doing a soil test before publishing a Draft EIR for a project of the magnitude of the one proposed here is unconscionable.

Response 3-23

A Phase I Environmental Site Assessment was prepared for the project site and is included as **Appendix J** of this Final EIR. As indicated by the commenter and also on page 20 in the Phase I, the site is listed on the California Hazardous Material Incident Reporting System (CHMIRS) due to an accidental release of 50 gallons of sewage overflow from a damaged private lateral line in 2008. The City of Santa Monica is the administering agency. Cleanup was reportedly conducted by the responsible party. Based on the nature of release reported, the listing of the subject property on the database is not considered to represent a significant environmental concern. Furthermore, based on the Phase I, there is no evidence of soil contamination on the project site and soil testing would not be necessary.

The Phase I and associated information provided would not require recirculation of the Draft EIR, as it does not constitute significant new information and merely confirms information already stated in the Draft EIR.

Comment 3-24

14. The Draft EIR fails to proceed as required by law in that the lead agency has the burden of proof that every claim it makes is supported. but the Draft EIR repeatedly just claims items are not above some threshold without even telling where that threshold is given so the public can discuss whether it is the applicable threshold. It repeatedly does not give enough information for the public to be able to discuss whether or not its statements are correct. For most things a formula for which it provides no proof it is the correct one, or an e-mail from someone else that works for the City, is the most evidence for a claim. For some, there are just bald claims without the slightest attempt to present any support.

Response 3-24

Section 15064.7 of the CEQA Guidelines encourages, but does not require, a public agency to adopt significance thresholds and it does not forbid an agency to rely on standards developed for a particular project. The Draft EIR utilizes adopted significance thresholds where such thresholds have been formally adopted by ordinance, resolution, rule, or regulation by either the City of Santa Monica or other applicable agencies. Specifically, the Draft EIR utilizes the City's adopted significance thresholds for traffic and the SCAQMD's adopted significance thresholds for air quality (construction and operation). With regard to the remaining environmental issues, the Draft EIR relies on Appendix G of the CEQA Guidelines and other substantial evidence in the record as the criteria for determining whether or not an impact is significant.

The commenter also states an opinion that the Draft EIR does not provide enough information, proof, or support to determine whether or not its statements are correct. The analysis of environmental impacts presented in the Draft EIR is based on substantial evidence in the record, as presented in over 1,300 pages of text and information that is supported by references and appendices. Please see Responses 3-19 through 3-50 below regarding the adequacy of the Draft EIR's analysis of specific issue areas.

Comment 3-25

As to Air Quality, e.g, it says (pp. 91, 92, 94, 95,115,117) that many aspects of the proposed project will have significant environmental impacts and no feasible mitigation measures exist, but it does not say what kind of community benefits are going to be extracted from the developers to make up to the public for those impacts. Therefore, the public cannot intelligently discuss whether or not, first, the extent of the environmental impacts has been adequately discussed, or what other types and quantities of in this case, the various types of pollutants, have been estimated correctly given the computer models that were used, or whether other computer models or actual on-site testing of actual construction like the proposed construction should have been done instead, or the like.

The Draft EIR simply gives few if any facts. When it does give facts and links to the location of those facts, the public is able to show how false the claims made are, as we did above in section 1. The Draft EIR in the case of air pollutants does not tell what kind of receptor tests each pollutant, where the receptors are that test these pollutants, how they determine how much comes from which project, or anything else the public can intelligently discuss.

There simply is no analysis such as what amount of each of these pollutants causes asthma in the average 55-pound child, or anything else real. The most cynical of these non-supported claims as to air quality is the claim at p.113 that the SCAQMD says the only danger of a particular kind of pollutant is getting cancer after being exposed to it continuously for 70 years, so since this construction will not last 70 years, there is no significant impact.

First of all, to be able to discuss this claim intelligently, the public needs to know where the SCAQMD said that was to the only possible impact (in what document that can be checked, located where and unless there is a stated and rare reason why not, it should be in an identified attached exhibit on a stated page). Then we shall see what the credentials are of the SCAQMD official who would make such a claim. We are quite sure it never happened, just as the SMMC does not say uses in an R-MH zone are those listed but not limited to those, and in fact states the exact opposite, that all other uses if not specifically listed are prohibited.

Second, having had to already file a lawsuit against these proposed developers for not following laws applicable to us as they demolished trailers here (after apparently giving the information used at Draft EIR p.168 that no trailers would be demolished), we know we have to look into every single aspect of this proposed development ourselves to protect our health. The Draft EIR does not give us enough information to be able to do that.

This same lack of analysis and giving details so the public can intelligently discuss whether the impacts and possible mitigation have been properly supported is present regarding the following factors as well as air quality:

14(a): Mitigation of significant noise levels to sensitive users due to construction, by Mitigation Measures CON 10-15, p. 115. The Draft EIR just claims the mitigation measures will reduce the impacts to less than significant, with no proof from any source the public can check and intelligently discuss.

Response 3-25

The air quality analysis estimated criteria pollutant emissions generated during construction activity based on guidance provided by the South Coast Air Quality Management District (SCAQMD) in the *CEQA Air Quality Handbook* (1993). The SCAQMD has posted updates to the *Handbook* on their website, as necessary (<http://www.aqmd.gov/ceqa/hdbk.html>). As directed by the SCAQMD, air emissions were estimated using computer models (e.g., URBEMIS for construction emissions). The methodology and assumptions used in the construction analysis are presented starting on page 4.4-5 of the Draft EIR. The model output sheets have been provided in the Draft EIR Appendix C for verification.

The comment does not accurately characterize the air quality analysis. The Draft EIR identified two air quality impacts. One impact was related to regional construction emissions of volatile organic compounds (page 4.4-6). This impact was eliminated with Mitigation Measures CON1 through CON3 (page 4.4-8). The second impact was related to localized pollutant concentrations generated by construction activity (page 4.4-9). This impact could not be mitigated despite the implementation of Mitigation Measures CON4 through CON9 (page 4.4-10). These mitigation measures are feasible and will be implemented during the construction process. Under CEQA, mitigation measures are designed to reduce the level of identified impact. CEQA does not require the extraction of community benefits from developers to offset impacts identified in EIRs.

The air quality analysis provides the assumptions that were used to complete the analysis. For example, the construction assumptions are stated beginning on page 4.4-5 and the net daily trips used to estimate operational emissions are presented on page 4.2-12. In addition, modeling output files are provided in the Draft EIR Appendix C for verification. As stated above, the air quality analysis was completed in accordance with the SCAQMD *CEQA Air Quality Handbook* (<http://www.aqmd.gov/ceqa/hdbk.html>).

The SCAQMD has published related guidance in *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (August 2003). Page 9 of this report states that, “In order to protect public health, and in accordance with the recommendations of the State of California Office of Environmental Health Hazard Assessment (OEHHA), a 70-year lifetime exposure is assumed for all receptor locations except for off-site workers (i.e., receptor locations in commercial or industrial areas).” This guidance is designed for a long-term source of toxic air contaminants (TACs). An analysis can be completed for a short-term source of emissions, such as construction activity. However, based on regulatory guidance, the exposure period is still presented as it relates to a 70-year exposure period. This does not imply that only danger of a particular kind of pollutant is getting cancer after being exposed to it continuously for 70 years.

The SCAQMD has not published guidance for assessing the risk from construction projects. The California Air Pollution Control Officers Association (CAPCOA) has published *Health Risk Assessments for Proposed Land Use Projects* (July 2009). However, Page 2 of this document state that, “This guidance does not include how risk assessments for construction projects should be addressed in CEQA. As this is intended to be a ‘living document’, the risks near construction projects are expected to be included at a later time as the toxic emissions from construction activities are better quantified. State risk assessment policy is likely to change to reflect current science, and therefore this document will need modification as this occurs.”

Despite the absence of guidance, a screening-level construction health risk assessment (HRA) was completed. The analysis (Appendix L) considered exhaust emissions from haul trucks and on-site equipment. The truck and equipment emission rates developed for the air quality analysis were input into the AERMOD dispersion model to obtain annual exposure concentrations. AERMOD is a steady state Gaussian plume model for estimating ground level impacts from point, area, and volume sources in simple and complex terrain. The model offers additional flexibility by allowing the user to assign initial vertical and lateral dispersion parameters for stationary sources. Truck emissions were modeled based on the SCAQMD *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (August 2003). Idle emissions were treated as an area source with a five-meter release height. Construction equipment emissions were modeled based on guidance from the SCAQMD Localized Significance Methodology. Equipment emissions were input as an area source with a release height of five meters. AERMOD utilized surface meteorological and upper air data from the Downtown Los Angeles station.

The results of the HRA indicate that the maximum construction-related carcinogenic would be less than one person in one million. This maximum risk would occur adjacent and to the east of the project site.

The risk would be less than the ten persons in one million significance threshold used by the SCAQMD to assess operational health risk impacts.

Page 4.4-12 of the Draft EIR includes feasible mitigation measures designed to control construction noise. These mitigation measures would ensure that construction activity complies with the City's Noise Ordinance. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does not consider construction activities consistent with these timing limits to constitute significant environmental effects. Mitigation Measures CON10 through CON15 would control construction noise, and the impact was determined to be less than significant.

Comment 3-26

14(b): Visual character/quality of the project site and area, scenic vistas, and scenic resources (p.75): just bold statements without any support.

Response 3-26

Section 15126.2 of the CEQA Guidelines states that an EIR shall identify and focus on the significant environmental effects of the project. Section 15128 further states that "an EIR shall include a statement briefly indicating the reasons that various possible significant effects of a project were determined to not be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an initial study."

The Initial Study provided in Appendix A of the Draft EIR provides an analysis of the project's potential impacts related to visual character, scenic vistas, and scenic resources, and determined that impacts would not occur or would be less than significant. Specifically, as indicated in the Initial Study, there are no scenic vistas in the surrounding project area or scenic resources located on the project site. Therefore, the proposed project would not have an impact on scenic vistas or scenic resources. In addition, with regard to visual character, the proposed project would be subject to design review by the Architectural Review Board to ensure that impacts related to visual character/quality would be less than significant. Based on the analysis provided in the Initial Study, impact areas associated with visual character, scenic vistas, and scenic resources were determined to not be significant and therefore, were scoped out of the Draft EIR for further analysis.

Comment 3-27

14(c): Water quality standards or waste discharge requirement, cause substantial erosion or siltation on- or off-site, cause flooding on- or off-site, cause substantial polluted runoff, place housing or structures within a 100-year flood plain that would impede or redirect flood flows, or expose people or structures to significant risk involving flooding: The Draft EIR (p.183) re Hydrology and Water Quality states-"The addition of the proposed project would represent a negligible increase in the overall permeability of the site because the lot coverage, and, therefore, permeability, will remain nearly identical" . No evidence to support that assumption is presented.

Response 3-27

As discussed in the Initial Study provided in Appendix A of the Draft EIR, the project site is located in an urbanized portion of the City and is not within a 100-year flood hazard area. The proposed project would be built to Leadership in Energy and Environmental Design (LEED) standards and would include green and sustainable design elements. Implementation of the proposed project would also bring the project site in compliance with Chapter 7.10, *Urban Runoff Pollution Control*, of the SMMC. This chapter mandates the implementation of urban runoff pollution control measures to ensure that the proposed project would contain project-generated runoff on-site during a 0.75-inch storm event or pay an in-lieu fee. Design elements to be included in the project that would infiltrate or treat project-generated runoff may include

biofilters, swales, and green strips; orienting roof runoff to permeable areas; grading the site to divert runoff to permeable areas; and using cisterns or other retention structures to capture runoff for reuse. As a result, the addition of the proposed project would represent a negligible increase in the overall permeability of the site.

Comment 3-28

14(d): THE FAILURE OF THE DRAFT EIR TO ADEQUATELY PRESENT RELIABLE EVIDENCE ABOUT THE PROPOSED PROJECT'S ADVERSE EFFECTS ON GREENHOUSE GAS/CLIMATE CHANGE PREVENTS MEANINGFUL PUBLIC PARTICIPATION IN THE EVALUATION PROCESS.

The Draft EIR has not adequately dealt with the Proposed Project's Adverse Effects on Greenhouse Gas/Climate Change (Greenhouse Gas/Climate Change, and Air Quality Either Currently or as Required by Health & Safety C. §§38501 et seq., showing a 15% reduction in emissions over 2006 levels by 2020.

No evidence that SCAQMD was approached regarding the project. There is no evidence that the project related emissions specified in the Draft EIR are accurately identified, categorized or evaluated.

There is no information to explain how Project Consistency with Applicable Attorney General and OPR's Global Warming and Greenhouse Gas Reduction Measures would be achieved.

There is no evidence of how SCAQMD guidance was timely obtained or used in presenting any of the air quality data presented for the current year, and in particular for the output of Mobile source Green House Gas (GHG) emissions from URBEMIS2007. Consequently the data presented is unverified.

The Draft EIR states that the proposed project would result in 7,003 metric tons of CO₂e per year under the Cumulative Plus Project (Year 2020) Conditions. The Approval Year Plus Project (Year 2011) Conditions would result in 7,143 metric tons of CO₂e per year. No basis is given for how the reduction of CO₂e metric tonnage is achieved.

Appendix Table 4.7.2 blandly states that Regional Significance Thresholds have been complied with, and gives "TAHA, 2011" as the source for "accounting for construction emissions by averaging them over a 30-year project lifetime" in order to achieve this compliance. What TAHA, 2011 is or where it can be inspected to discuss if it applies and/or was improperly used is not given. That is its only effort to "explain" its compliance. The public is therefore deprived of the opportunity to discuss intelligently and influence decision-makers on whether this section was done correctly.

Response 3-28

State law does not require individual general development projects to demonstrate during the CEQA process that there would be a 15 percent reduction in greenhouse gas (GHG) over 2006 level by 2020. However, the City has recognized this as a Citywide goal and has established goals and policies aimed at reducing GHG emissions in the Sustainable City Plan and the Land Use and Circulation Element. Table 4.7-5 on page 4.7-17 of the Draft EIR demonstrates that the proposed project would be consistent with these plans. In addition, Table 4.7-2 on page 4.7-10 of the Draft EIR shows construction and operational GHG emissions and demonstrates that these emissions would not exceed the City's threshold of significance. The Draft EIR adequately addressed GHG emissions and further analysis is not necessary.

The SCAQMD was consulted before and after the air quality analysis was completed. A Notice of Preparation (NOP) for an EIR was prepared for the proposed project and distributed on June 10, 2010 for a 30-day review period. The SCAQMD responded with a formulaic comment letter with recommendations for assessing potential air quality impacts. Each of the SCAQMD concerns was

addressed in the Draft EIR. The SCAQMD has also sent a Notice of Availability that the Draft EIR was complete and available for public review. The SCAQMD did not provide comments on the completed Draft EIR.

The comment letter incorrectly states that there is no evidence that the project-related emissions specified in the Draft EIR are accurately identified, categorized or evaluated. Modeling output files and emission calculation sheets are provided in the Draft EIR Appendix C for verification.

The comment letter incorrectly implies that the proposed project must show consistency with each and every State Attorney General and the Governor's Office of Planning and Research (OPR) global warming and GHG reduction measures. The Attorney General's office has published *Addressing Climate Change at the Project Level* (January 6, 2010). This document states on page 1 that "As appropriate, the measures can be included as design features of a project, required as changes to the project, or imposed as mitigation (whether undertaken directly by the project proponent or funded by mitigation fees). The measures set forth in this package are examples; the list is not intended to be exhaustive. Moreover, the measures cited may not be appropriate for every project. The decision of whether to approve a project – as proposed or with required changes or mitigation – is for the local agency, exercising its informed judgment in compliance with the law and balancing a variety of public objectives." There is no requirement that these mitigation measures be implemented for all projects.

OPR has published *Examples of GHG Reduction Measures* (January 19, 2008). This document states on Page 1 that "The following are examples of measures that have been employed by some public agencies to reduce greenhouse gas emissions, either as general development policies or on a project-by-project basis. These are provided for illustrative purposes only." There is no requirement that these mitigation measures be implemented for all projects.

The Draft EIR comprehensively illustrates that the proposed project would be consistent with State and local GHG reduction goals and policies. Table 4.7-3 on page 4.7-12 shows consistency with the California Climate Action Team emissions reduction strategies, Table 4.7-4 on page 4.7-15 shows consistency with California Air Pollution Control Officers Association GHG reduction measures, and Table 4.7-5 on page 4.7-17 shows consistency with the City's Sustainable City Plan and LUCE.

The SCAQMD has convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In addition, the SCAQMD has not approved a GHG significance threshold for the development of non-SCAQMD projects.

As stated on page 4.7-9 of the Draft EIR, mobile source GHG emissions were estimated using the URBEMIS model. Modeling output files are provided in the Draft EIR Appendix C for verification.

The comment correctly notes that the Draft EIR estimates that the proposed project would result in 7,003 metric tons of CO₂e per year under the Cumulative Plus Project (Year 2020) Conditions and 7,143 metric tons of CO₂e per year under the Approval Year Plus Project (Year 2011) Conditions. The difference in emissions is due to the different years of analysis. The California Air Resource Board (CARB)- and SCAQMD-approved URBEMIS model takes into account the fact that the 2020 vehicle fleet will generate less GHG emissions per vehicle than the 2011 fleet due to increased engine efficiency and the implementation of regulations designed to reduce emissions.

Similar to the regional criteria pollutant analysis, construction GHG emissions were estimated using the URBEMIS model. The footnote in Table 4.7-2 on page 4.7-10 states that, “The SCAQMD recommends accounting for construction emissions by averaging them over a 30-year project lifetime.” This reference can be found in the *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (December 5, 2008) available at <http://www.aqmd.gov/hb/2008/December/081231a.htm>.

Comment 3-29

15. The same failure to proceed as required by law due to inability of the public to intelligently discuss an environmental impact with the information the Draft EIR presents is so regarding the many items put off until later, such as some time later a Construction Impact Mitigation Plan will be prepared. Vineyard Area Citizens states we are entitled to know the details of environmental impacts and discuss them, not just be told someone's opinion, or that sometime later something will be done.

Response 3-29

The commenter states an opinion that the Draft EIR defers analysis of impacts and deprives the public of the public to discuss such impacts. The commenter specifically cites the Construction Impact Mitigation Plan as deferred mitigation.

Section 4.4, Construction Effects (pp. 4.4-14) of the Draft EIR does provide a detailed analysis and disclosure of the project's construction impacts. As detailed therein, “*the storage of construction equipment may result in temporary closures may require the use of street parking and temporary closure of a portion of Colorado Avenue and/or Stanford Street.*” The Draft EIR further states that “*temporary closures would affect traffic flow and may cause traffic delays on Colorado Avenue and/or Stanford Street*” and construction activity would require the “*temporary closure of the sidewalks adjacent to the site...Construction truck trips would also be generated on roadway segments.... Construction site workers would also temporarily compete with other users for parking facilities and could reduce the available supply of public parking.*” Based on the analysis presented, the Draft EIR concludes that such impacts would be significant without mitigation. As such, the Draft EIR provides Mitigation Measure CON16 which would require the project applicant to prepare and implement a Construction Impact Mitigation Plan. The mitigation measure includes a number of performance standards that must be met in order to insure that the project impacts would be mitigated. Section 4.4 Construction Effects of the Draft EIR also provides additional mitigation measures to address construction-related air quality and noise impacts. Specifically, CON1 through CON15 provides specific mitigation measures that would be feasible and fully enforceable. Therefore, the Draft EIR did not improperly defer mitigation.

Comment 3-30

Finally, nailing down the Draft EIR as just "a set of technical hurdles for agencies and developers to overcome", the DEIR uses outdated and inapplicable computer models rather than real on-site work to conclude all the other categories of environmental impacts it covers present "insignificant" or "significant but not mitigatable" impacts that nonetheless should be overlooked so this project can be approved.

Response 3-30

The commenter states an opinion that the Draft EIR uses outdated and inapplicable computer models to conclude that environmental impacts are “insignificant” or “significant but mitigatable”.

It is unclear as to which “outdated and inapplicable computer models” that commenter is specifically referring to. Notwithstanding, the Draft EIR utilizes tools and models that are widely accepted in the industry to analyze project impacts pursuant to CEQA. For calculations of air pollutant emissions (both operation and construction), the Draft EIR utilizes URBEMIS20071 which was developed and accepted by the South Coast Air Quality Management District for analyzing air quality impacts. For calculations

of noise impacts, the Draft EIR utilizes the F Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5 Look-Up Program, which is a commonly used tool to analyze roadway noise impacts. In addition, the traffic analysis in the Draft EIR utilizes the City's Travel Demand Forecasting Model (TDFM). The TDFM was developed as part of the City's LUCE Update (2010). The TDFM forecasts future year 2020 (and year 2030) conditions for the City's transportation network in the form of volumes for daily, as well as AM, PM, and weekend peak hours. The model contains the major roadways within the City and considers walking, bicycling, parking, and transit. Unlike less sophisticated transportation models, the TDFM contains a number of enhancements that allow it to capture the effects of LUCE land use and policy initiatives on traffic congestion. The addition of the Exposition Light Rail line to the City in 2015 is also anticipated to influence mode split for people traveling to and from Santa Monica for both 2020 and 2030 future scenarios. The model also includes all identified related projects and street network changes, as relevant to the appropriate future year.

Comment 3-31

15(a): The same problem preventing the public from being able to discuss environmental impacts intelligently and decision-makers to know environmental impacts before they approve a development project, because the Draft EIR improperly puts off consideration of the information until the proposed developers apply for building permits, which of course would be long after the project was approved, is present in the Draft EIR in the case of water supply and quality (p.182).

Response 3-31

The commenter states an opinion that the Draft EIR defers analysis and information to after project approval.

Please see Responses 3-19 and 3-20 regarding the project's impacts on water supply. As indicated in the response, the project's water demand was accounted for in the 2010 UWMP. The 2010 UWMP identifies the future water supply sources to meet water demands of the City, inclusive of the project. Therefore, the Draft EIR does not defer consideration of information with regard to water supply.

Please see Response 3-26 regarding the project's impacts relative to water quality.

Comment 3-32

15(b): air quality (p.167)

Response 3-32

This comment pertains to air quality impacts associated with the release of hazardous materials from the demolition of the existing structures on-site: With implementation of the following mitigation measures impacts related to the demolition of the existing structures and trailers on the project site would be reduced to less than significant.

HM1 Prior to issuance of a demolition permit for the permanent structures on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.

HM2 Prior to issuance of a demolition permit for the permanent structures on the project site, lead-based paint testing shall be conducted for existing structures and trailers to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.

HM3 An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

Comment 3-33

15(c): soil testing (p.137): No soil testing results are presented

The Draft EIR, (p.183), states that there is a risk of groundwater recharge during and after construction on the site and presents no evidence to the contrary. In fact it admits that "Soil and groundwater testing to a minimum depth of 50 feet" are required to quantify that risk. The results of that testing are not included, nor is there even a clear statement that any were in fact done.

Response 3-33

The commenter states that the Draft EIR fails to inform the public of risk of groundwater recharge on the project site since there was no soil testing or groundwater testing conducted. Please see Response 3-34 below.

Comment 3-34

15(d): groundwater testing: No groundwater testing results are presented

The Draft EIR, (p.183), states that there is a risk of groundwater recharge during and after construction on the site and presents no evidence to the contrary. In fact it admits that "Soil and groundwater testing to a minimum depth of 50 feet" are required to quantify that risk. The results of that testing, or even any indication it occurred, are not presented in the Draft EIR.

Failure to present site specific evidence on potential substantial impacts on groundwater and water quality prevents a full understanding of the environmental consequences of this project, and deprives the public of meaningful participation in the evaluation of this proposal.

Response 3-34

Potential impacts related to groundwater recharge are analyzed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. As indicated therein, the project site is entirely impervious and does not offer opportunities for groundwater recharge. The proposed project would represent a negligible increase in the overall permeability of the site because the lot coverage and permeability of the site would remain similar. Overall effect on groundwater recharge would be minimal. Furthermore, the proposed project would be required to implement urban runoff pollution control measures pursuant to Chapter 7.10, *Urban Runoff Pollution Control*, of the SMMC. As a result, the proposed project would not substantially impact groundwater recharging capabilities.

With regard to the comment that the Draft EIR does not provide specific evidence on groundwater and water quality due to the absence of groundwater or soil testing, CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required. (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383) As a statute designed to ensure that information on environmental impacts is effectively communicated to decision-makers and the public, CEQA requires that a lead agency "use its best efforts to find out and disclose all that it reasonably can" and that an EIR reflect "a good faith effort at full disclosure." (CEQA Guidelines Sections 15144 and 15151)

Furthermore, groundwater testing would not change the conclusions in the Draft EIR, but rather would confirm and/or support the information that is already presented in the Draft EIR. The Draft EIR provides substantial evidence in the record regarding the potential for groundwater discharge impacts. Specifically,

the Draft EIR states that based on review of the Seismic Hazard Evaluation of the Beverly Hills Quadrangle (11198), the historic high groundwater level for the property adjacent to the west of the project site was on the order of 35 bgs. Notwithstanding that depth, the Draft EIR conservatively states that excavation further below the floor of the proposed subterranean parking garage (which would be approximately 22 feet bgs) could potentially encounter groundwater. Therefore, temporary and or permanent dewatering could be required and as such Mitigation Measure HW1 is proposed to mitigate potential impacts to less than significant.

Comment 3-35

15(e): dewatering (p.183)

Response 3-35

See Response 3-34 above.

Comment 3-36

15(f): soil erosion/liquefaction: No geotechnical engineering review re soil transport by wind and water is presented

No evidence that runoff or erosion would occur during construction is presented except to say "The proposed project would involve the full development of the site, including the construction of four buildings, a subterranean parking structure and the extension of a paved road.....impervious surfaces", and because .. "the project site is underlain with Hanford soils, which have low potential for erosion", (p 139) . No study of the soil composition of the site has been presented regarding the presence of Hanford soils.

Response 3-36

See Response 3-22 regarding liquefaction.

The commenter states that the Draft EIR should have included geotechnical engineering review regarding soil erosion and a study of the soil composition. CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required. (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383) As a statute designed to ensure that information on environmental impacts is effectively communicated to decision makers and the public, CEQA requires that a lead agency "use its best efforts to find out and disclose all that it reasonably can" and that an EIR reflect "a good faith effort at full disclosure." (CEQA Guidelines Sections 15144 and 15151)

While the Draft EIR does not include soil testing, geological/soil conditions and impacts are analyzed based on a thorough review of various technical documents and literature, including the California Geological Survey's Seismic Hazard Zone Reports, the City of Santa Monica's Safety Element, and the City of Santa Monica's Geological Hazards Map. Furthermore, a study of the soil composition of the site would not change the conclusions in the Draft EIR, but rather would confirm and/or support the information that is already presented in the Draft EIR. For construction sites within urbanized areas, erosion potential is generally dependent on the amount of soil exposed, amount of precipitation and/or runoff, and wind speed/strength. A study of the soil composition of the site would not provide significant additional or new information with regard to erosion potential.

Comment 3-37

15(g): seismically induced ground shaking (pp.137-140)

Response 3-37

Please see Response 3-22.

Comment 3-38

15(h): project construction and equipment staging (p.116):

Response 3-38

Please see Response 3-29. As stated therein, the Draft EIR provides Mitigation Measure CON16 which would require the project applicant to prepare and implement a Construction Impact Mitigation Plan. The mitigation measure includes a number of performance standards that must be met in order to insure that the project impacts would be mitigated.

Comment 3-39

THE FAILURE OF THE DRAFT EIR TO ADEQUATELY PRESENT RELIABLE EVIDENCE ABOUT THE PROPOSED PROJECT'S GENERATION OF CONSTRUCTION NOISE PREVENTS MEANINGFUL PUBLIC PARTICIPATION IN THE EVALUATION PROCESS

No evidence of Mitigation of Construction Noise is presented

The Draft EIR is fundamentally obfuscatory about the damage through noise pollution which this project is going to bring on this neighborhood

(i) The Draft EIR states that "the fact that residents of urban areas are used to temporary construction noise from time to time, the City does not consider construction activities consistent with certain timing limits to constitute significant environmental effects".(p.207).

(ii) No evidence of how Construction Noise Mitigation Measures CON11 through CON15 could be relied on to control construction noise levels which would be sourced on the site for a minimum period of 13 months.

(iii) On p 220 the Draft EIR states that "stationary source noise levels were calculated based on available technical data" without saying what that data was or how it was used.

(iv) On p 221 the Draft EIR says that Vibration levels were estimated based on information provided by the FTA through a source entitled *Transit Noise and Vibration Impact Assessment*, May 2006. without specifying how the assumptions relating to mass transit construction projects outlined in that publication apply to the redevelopment of a small inner urban site such as the Village Trailer Park and/or how they were modified to do so.

(v) No evidence is presented to support the statement that Mobile Source Noise Levels are at a "less-than-significant" level.

(vi) The FHWA TNM Version 2.5 Look-Up Tables used in building a model to predict mobile source noise levels has been discontinued and is not considered to be good practice in transportation planning.

(vii) The Draft EIR does not specify how California Department of Transportation *Technical Noise Supplement* was used to predict Ldn noise levels from mobile sources. The conclusion that " the proposed project would result in a less-than-significant impact related to mobile noise." (EIR p221) is unproven.

(viii) No effort is made to quantify the noise in the neighborhood from the likely construction at other development sites in the neighborhood, 2834 Colorado or at 2812 Colorado (Roberts Business Park).

Therefore no basis for a comprehensive view of the adequacy of Noise Mitigation Measures currently used in Santa Monica is presented.

The Draft EIR is therefore fundamentally flawed in its failure to present data on noise generation from the proposed project in a manner to permit meaningful participation by the public in evaluation of impact of this development.

Response 3-39

Page 4.4-12 of the Draft EIR includes feasible mitigation measures designed to control construction noise. These mitigation measures would ensure that construction activity complies with the City's Noise Ordinance. Given the fact that residents of urban areas are used to such temporary construction noise from time to time, the City does not consider construction activities consistent with these timing limits to constitute significant environmental effects. Mitigation Measures CON10 through CON15 would control construction noise, and the impact was determined to be less than significant. The City's construction noise standards are not variable based on the duration of construction activity. The standards are designed to construction noise on a daily level.

Stationary source noise levels were calculated based on available technical data. For example, truck loading noise levels were determined using data from the Caltrans *Technical Noise Supplement* (November 2009) and the Occupational Safety and Health Administration (page 4.12-11 of the Draft EIR). In addition, parking activity noise was estimated based on a series of noise readings completed at a parking structure (page 4.12-11 of the Draft EIR).

The comment correctly notes that the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment* (May 2006) guidelines were referenced to complete the operational noise analysis. The proposed project would not include significant operational on-site sources of vibration (e.g., industrial equipment). Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. As such, the FTA guidance was referenced regarding mobile source vibration levels. The FTA guidance indicates that rubber-tired vehicles rarely generate vibration levels that are perceptible at sensitive receptors, regardless of the distance from the source to the receptor (page 10-12 of the FTA guidance).

The comment incorrectly states that there is no evidence that mobile source noise would generate a less-than-significant impact. Page 4.12-9 of the Draft EIR states that a significant mobile source noise impact would result if roadway noise levels increase by 5 dBA or more when the ambient noise level is less than 60 dBA L_{dn} , 3 dBA or more when the ambient noise level is between 60 and 65 dBA L_{dn} , or 1.5 dBA or more when the ambient noise level is greater than 65 dBA L_{dn} . Project-related mobile source noise levels are shown in Tables 4.12-5 and 4.12-6 of the Draft EIR. As demonstrated, mobile source noise levels would not exceed the City's threshold of significance. The assumptions used to complete the mobile noise analysis are provided in the Draft EIR Appendix G for verification.

The comment correctly states that Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5 Lookup Tables were used to estimate mobile source noise. The FHWA has prohibited the use of the Lookup Tables to predict noise levels on federal or federal-aid projects because many practitioners were using the screening tables instead of the full TNM to assess highway projects. The reason why TNM was prohibited for federal highway projects is not valid for this local mixed-use project. Federally funded highway projects use the full TNM instead of the Lookup Tables because the full model allows adjustments to various assumptions important to highways. The Lookup Tables are still reasonable screening predictors of general roadway mobile source noise without having to make specific adjustment to the model.

Page 2-62 of the Caltrans *Technical Noise Supplement* demonstrates the relationship between L_{dn} and L_{eq} . As stated on page 4.12-9 of the Draft EIR, peak hour traffic was assumed to be ten percent of average

daily traffic with a 90/10 day/night traffic split. This results in an L_{dn} that is within 1.0 dBA of the peak hour L_{eq} .

The cumulative construction noise impact is presented on page 4.4-16 of the Draft EIR. As stated, construction activities for the proposed project may overlap with the construction of the two adjacent related projects to the west at 2848-2912 Colorado Avenue (Roberts Center project) and 2834 Colorado Avenue (Lionsgate project). Construction activity associated with these related projects is anticipated to include mitigation measures to ensure that construction noise would not exceed the City's Noise Ordinance standards. Implementation of these mitigation measures would ensure that cumulative noise levels are not significant. Therefore, the proposed project would not contribute to cumulative impact related to construction noise. However, the proposed project in conjunction with the two related projects would result in construction vibration which would exceed FTA vibration thresholds. Therefore, a significant and unavoidable cumulative impact related to construction vibration would occur.

Comment 3-40

15 (g): No geotechnical engineering review re liquefaction and/or seismic settling is presented.

Mitigation GS3 does not provide any information on how impacts related to liquefaction would be reduced to less than significant because the draft EIR provides no information on what the specific characteristics of the soil are. It says on page 137 -"According to the City of Santa Monica's Geologic Hazards map, the southwestern portion of the project site is located within an area that has "medium potential" for liquefaction, and the northeastern portion of the site is located within an area that has "high potential" for liquefaction. And then concludes "Nonetheless, a portion of the site is located in an area with a high liquefaction potential."(p.138).

The Draft EIR states (p 138) that, since Mitigation GS1 requires, 'At the time of final building plan check, a site-specific Geotechnical Report (shall) be submitted to the City of Santa Monica Building and Safety Division for review and approval ', such a submission "solves these problems". A report on analysis of site-specific soil samples to determine the site-specific liquefaction and seismic settlement potential thereon has to be provided for public review. Failure to do so prevents a full understanding of the environmental consequences of this project and deprives the public of an opportunity for meaningful participation in the evaluation process.

Response 3-40

The commenter states that the Draft EIR fails to inform the public of soil conditions on the project site with regard to liquefaction and/or seismic setting and does not provide specific information on how such impacts would be reduced to less than significant. Please see Response 3-22.

As indicated therein, the proposed project would be required to comply with all applicable provisions of the Santa Monica Building Code. In addition, consistent with existing City requirements and as set forth in Mitigation Measure GS-1, the project Applicant would also be required to submit a site-specific Geotechnical Report at the time of final building plan check to ensure that the proposed project would be constructed to withstand geological and soil conditions, including potential issues related to liquefaction and seismic settling.

As indicated by the courts, "a condition requiring compliance with regulations is a common and reasonable mitigation measure, and may be proper where it is reasonable to expect compliance" (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296). The Draft EIR proposes compliance with a regulatory scheme designed to ensure geologic safety. Although soil testing has not been conducted, the Draft EIR provides "adequate assurance that soil impacts will be mitigated through engineering methods known to be feasible and effective" (*Oakland Heritage Alliance v. City of Oakland* (2011), 195 Cal.App.4th 884).

Comment 3-41

16. The Draft EIR fails to proceed as required by law in that it also indicates no attempt by the City to obtain payment from the proposed developers for public facilities as permitted in Government Code §65864(c), nor does it discuss why it did not do so as to the many matters it admits the problems with specific types of environmental impacts could be significant, such as the property being in a Fault Hazard Management Zone (p.137), exceeding SCAQMD daily construction significant threshold emissions (p.206), and fugitive dust thresholds (p.111).

Response 3-41

The commenter cites Government Code Section 65864(c) which addresses development agreements and states that development agreements may include provisions “whereby applicants are reimbursed over time for financing public facilities”.

Per CEQA Guidelines Section 15064(c), the purpose of CEQA is to analyze the project’s physical changes in the environment. Whether or not the project applicant would provide payment for the financing of public facilities in the proposed development agreement is beyond the scope of CEQA and would not be relevant to the Draft EIR’s analysis of environmental impacts.

Furthermore, it should be noted that an analysis of the project’s environmental impacts on public facilities is provided in Section 4.14, Public Services, of the Draft EIR. The analysis concluded that the project’s impacts on public services would be less than significant.

As analyzed in Section 4.6, Geology and Soils, of the Draft EIR, impacts associated with the project site’s location within a Fault Hazard Management Zone would be less than significant with mitigation. Construction-related emissions for the proposed project, as determined in Section 4.2, Air Quality, would be significant and unavoidable. However, as stated above, CEQA does not require proposed development to pay for public facilities and no mitigation measure involving the construction of a public facility to address air quality impacts has been identified, much less found feasible, for this impact.

Comment 3-42

17. The Draft EIR fails to proceed as required by law in repeatedly deciding that "sensitive receptors would not be exposed to substantial pollutant concentrations," apparently thereby limiting where "sensitive receptors" are, to the schools it identifies (which as indicated in section 2 above, are not even all the schools in the neighborhood). The Draft EIR does this, e.g., at p.113 regarding diesel particulate matter. This problem is the same as to odors (Draft EIR p.95).

This limiting "sensitive receptors" to school children is contrary to the MOU entered into with the proposed developers in 2007 that they would build the building where all the current tenants of land for homes at the property were going to be given replacement apartments to rent while those current land tenants were allowed to stay on the property. Many of these people are "sensitive receptors," since they are elderly, have to use oxygen from tanks to breathe, have asthma, have resident children who have asthma, and/or are in danger because of advanced age, weakness, and/or living in polluted cities in America for decades, of becoming ill from being exposed to toxic air contaminants, e.g., diesel particulate matter.

Response 3-42

The Draft EIR does not limit sensitive receptors to school children. A comprehensive list of sensitive receptors, including residences, is listed on page 4.2-7 of the Draft EIR. Regarding construction activity, a health risk assessment is presented in Response 3-24. As shown, construction activity would not result in a significant health risk impact. Regarding operational activity and odors, the proposed project is a

typical urban infill project without substantial or unusual sources of toxic air contaminant emissions or odors (e.g., warehouse facility, industrial facility, or wastewater treatment plant).

In addition, page 4.2-15 of the Draft EIR provides an assessment of the CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005). This document provides guidance for locating new sensitive receptors (e.g., residences) near potential sources of TAC emissions. Relevant recommendations include avoid siting new sensitive land uses within 500 feet of a freeway, 300 feet of a dry cleaning operation that uses perchloroethylene, or 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). The project site is located approximately 2,250 feet from I-10, approximately 2,250 feet from the nearest dry cleaner (Courtyard Cleaners at 2501 Colorado Avenue), and approximately 3,000 feet from the nearest gas station (Wilshire 76 at 2601 Wilshire Boulevard). The proposed project would not locate new sensitive receptors near off-site TAC sources. Operational activity associated with the proposed project would not generate health risk or odor impacts.

Comment 3-43

18. The Draft EIR fails to proceed as required by law as to shadows to be cast onto adjacent properties (pp.75 & 76 & Fig.4.1-3). These admitted shadows it calls less than significant impacts of the proposed development because (a) the shadows would not be cast upon "shadow-sensitive uses", (b) for durations that exceed those identified in City thresholds.

No California case uses the term "shadow-sensitive areas," much less uses that term to say it is acceptable to shade some areas more than others. Neither is there any such term used in the SMMC or defined there. Where this came from the Draft EIR does not bother to say so the public can intelligently discuss whether that applies to where and how the Draft EIR is applying it.

Neither does any California case allow shading adjacent properties for some duration of time per day as an acceptable threshold. The Draft EIR, in any event, which has the burden of proof on all the issues, does not bother to cite the source so the public can intelligently discuss whether it applies as the Draft EIR uses it.

The California solar rights law does not allow a city to keep any resident from putting solar panels on his/her roof unless the City has a specific health and safety reason for doing so. One can only imagine how far a court would deem the City's finding particular roofs to be not "shadow-sensitive uses", from the necessary health and safety reason necessary for preventing installation of solar panels there. Neither is it difficult to conceive of the damages any of those owners of "shadow-insensitive roofs" will collect from the City for deciding on its own, in violation of the state law, that possibly well over a 10% loss of solar power generation ability is just fine, without a health and safety reason. 10% of a 12-hour day is 1.2 hrs. The charts listed in the Draft EIR have neighboring houses shaded over three (3) hours in some cases. Not shadow-sensitive, indeed! Violation of state law is not proceeding as required by law.

Response 3-43

The commenter questions the Draft EIR's use of the term "shadow sensitive uses" and how the term is defined.

CEQA case law states that a lead agency has discretion in determining whether impacts on the environment are significant so long as the analysis is supported by substantial evidence in the record. The SMMC and CEQA does not define the term "shadow-sensitive uses", Absent such a legal definition, Section 4.1 Aesthetics of the Draft EIR provides a discussion of how shadow sensitive uses are defined by the City. Specifically, page 4.1-2 states that , "facilities and operations that are typically considered sensitive to the effects of shading include solar collectors; nurseries, primarily outdoor-oriented retail uses, or routinely used outdoor spaces associated with recreational, institution or residential land uses.

These uses are considered sensitive because sunlight is important to function, physical comfort, and/or commerce.” This definition of shadow sensitive uses is generally consistent with that used by neighboring jurisdictions (e.g., City of Los Angeles).

The commenter further questions the use of the shadow thresholds in the Draft EIR. As previously stated, Section 15064.7 of the CEQA Guidelines encourages, but does not require, a public agency to adopt significance thresholds and it does not forbid an agency to rely on standards developed for a particular project. The Draft EIR utilizes adopted significance thresholds where such thresholds have been formally adopted by ordinance, resolution, rule, or regulation by either the City of Santa Monica or other applicable agencies. The shade/shadow thresholds provided in the Draft EIR are commonly used by the City of Santa Monica within all of its CEQA documents.

With regard to the commenter’s statements about solar roofs, neither the proposed project nor the City would preclude nearby property owners from the installation of solar panels. As indicated in the Draft EIR, solar collectors and panels are considered shadow-sensitive uses by the City. There are no currently no properties with existing solar panels that would be affected by the proposed project. CEQA requires that an EIR analyze a project’s impacts on the existing environment. It would be too speculative to assume that nearby properties would have solar panels installed sometime in the future that could be shaded by the project.

As analyzed Section 4.1, Aesthetics, shadow-sensitive uses would not be shaded for more than 4 hours between 9:00 a.m. and 3:00 p.m. during the summer or more than 3 hours between 9:00 a.m. and 3:00 p.m. during the winter. Therefore, shadow impacts were determined to be less than significant.

Comment 3-44

Types of Failure to Proceed as Required by Law consisting of failing to present substantial evidence that a particular impact is insignificant, or that mitigation is adequate to make it insignificant, or that if it is significant and cannot be mitigated, that community benefits discussed will be adequate to compensate the community for the significant impacts.

Response 3-44

The commenter states an opinion that the Draft EIR fails to present substantial evidence in making its determinations.

The analysis of environmental impacts presented in the Draft EIR is based on substantial evidence in the record, as presented in over 1,300 pages of text and information that is supported by references and appendices. Potential environmental impacts of the proposed project have been accurately analyzed and fully disclosed in the Draft EIR. Please see Responses 3-25 through 3-39 above regarding the adequacy of the Draft EIR’s analysis of specific issue areas.

Comment 3-45

Standard of Appellate Court Review: Substantial Evidence.

19. The Draft EIR fails to proceed as required by law as to the "several" mature trees it admits cannot be moved elsewhere and therefore will be destroyed if the proposed project is approved. The actual number-which no reasonable person would discount by using the word "several" as the Draft EIR does-is 110 (p. 99). SMMC § 9.04.02.030.860, defines "Tree" as follows:

A plant having at least one well-defined stem or trunk and normally attaining a mature height of at least fifteen feet, with an average mature spread of fifteen feet, and having a trunk that shall be kept clear of leaves and branches at least six feet above grade at maturity.

This does not, as the Draft EIR does at pp. 100-102, limit trees that must be considered trees, with the values to the environment listed and supported by source evidence in the Comments we submitted in June 2010, to those that are "not locally-protected resources." The Draft EIR finds this provision in the SMMC applying only to trees in City rights-of-way. Therefore, that provision makes those trees protected because they belong to the City, but that does not excuse an EIR's not discussing the environmental impacts of removing during development other mature trees and not being required to replace them all as mitigation. The rest of the discussion, likewise, seems to be limited to the City's Urban Forest plan, which is about street trees, not trees on property to be developed, which is what the Draft EIR is supposed to discuss, and the environmental impacts of losing 110 mature trees (p. 99).

In fact, discussing the environmental impacts of the loss of 110 mature trees when there is no local law requiring their replacement if development destroys them is a perfect example of exactly why the law requires an environmental impact report done by people who know how to discuss environmental impacts and do so, and why the law requires that City to consider those impacts before a decision to allow a development is made. This is contrasted to people who present mere words to rubber-stamp the very agency like the City of Santa Monica that has already made up its mind to approve a development and does not want to have to even discuss alternatives. If there is a law prohibiting whatever the matter is, as discussed in Sections 1 through 18 above and the City has not followed the law, that is the kind of failure to proceed as required by law that will be reversed by the Court without considering what the evidence of environmental impacts were. The kind involved here is the kind where there is no law that has been violated except CEQA itself. Therefore, the standard of review is whether the lead agency had substantial evidence to conclude as it did.

Here, there is no evidence the loss of 110 trees will not impact the environment significantly by loss of rain absorption, carbon sequestration, soil erosion control, flood control, oxygen creation, carbon dioxide absorption, providing shade, providing a place for wildlife and children to climb, and on and on. By failing to discuss any of these, the Draft EIR fails to proceed as required by CEQA.

Response 3-45

The commenter states that the Draft EIR does not provide a discussion of the environmental impacts associated with the loss of mature trees on the project site and does not identify a precise number of the trees to be removed.

As stated in Section 4.3, Biological Resources, of the Draft EIR, the majority of the trees currently on the site would be removed as part of the proposed project. Some trees may be preserved on the project site and/or relocated on-site or offsite. It is unknown at this time as to which specific trees would be removed since such specific landscaping details would not be determined until the design review process, which occurs after project approval. Nonetheless, the SMMC does not regulate trees on private property; therefore, removal of trees on property would not conflict with local policies or ordinances and as such, impacts related to this issue would be less than significant.

With regard to other environmental impacts related to the loss of mature trees, neither the SCAQMD, nor any other State air district, has provided guidance for assessing the air quality impacts of tree removal from an urban area. It is accurate that large-scale deforestation or urban tree removal may degrade air quality conditions. However, it is not anticipated that the removal of approximately 107 urban trees from a small area of City land (i.e., less than four acres) would significantly impact local air quality conditions. If the trees were to remain on-site, they may marginally improve local air quality by absorbing small amounts of pollution. The estimate of operational air quality emissions does not include a reduction of emissions associated with existing trees on the project site. This resulted in a conservative analysis that gave the greatest and worst-case incremental increase in air emissions to compare to the SCAQMD thresholds of significance. Even under these worst-case conditions, regional operational emissions would be less than significant.

Regarding carbon sequestration, trees sequester carbon during the growth process. The United States Environmental Protection Agency (USEPA) has stated that mature forests will not sequester additional carbon after the trees have fully grown (<http://www.epa.gov/sequestration/faq.html>). The project site contains fully mature trees. Removing the trees will neither release additional carbon into the atmosphere nor prevent future carbon sequestration.

Comment 3-46

20. Failure to proceed as required by law in using Conflicting data about what is going to be demolished and therefore not considering all the environmental impacts of the proposed development.

The Traffic Study, (Appendices, p. 212), says that the project entails the demolition of 76 mobile homes. "The site is currently occupied by approximately 76 rent controlled mobile homes. The proposed project would demolish the existing mobile homes." However, the Draft EIR says that "no mobile homes are going to be demolished"(p.168). In fact, in 2006 when the proposed developers gave notice of eviction, the City's files show they gave it to 109 families. The Rent Control Board's files show there were 109 trailers here in 1979 when registration was first required. There were therefore 109 trailers on the site at any relevant time, and any that have been demolished or will be demolished will be demolished as a result of the development. The MOU entered into by the City in 2007 recognizes these trailers are mostly too old to legally be moved under state law, and therefore to develop something else on the property will require demolition on-site. Such demolition's environmental impacts therefore have to be evaluated as part of the Draft EIR.

To find otherwise would make no more sense than to say moving contaminated soil to excavate is not a result of development. It simply is.

We submit the reason the developers are giving the City the wrong information that the trailers will not be demolished for the development, and why we had to file a lawsuit against them to get them to get the trailers inspected for asbestos, lead-based paint, formaldehyde, and mold, is that the presence of these substances in sometimes 60-year old trailers is well-known and substantial. Most of them cause no impact until the trailer is disturbed by demolition. However, once development causes them to be disturbed, the impacts are highly significant. For instance, papers turned over in our lawsuit against the proposed developers showed 6 out of 10 trailers demolished in a certain time period had significant levels of asbestos in them, and at least one had lead-based paint. Those environmental impacts have to be discussed.

Response 3-46

The MOU did not specifically address trailer age and or procedures for removal or demolition of trailers at the park. However, in response to this comment, page 4.8-9 of Section 4.8, Hazards and Hazardous Materials, of the Draft EIR has been revised to state the following:

Construction activities would include demolition of the existing permanent buildings on the project site (~~no trailers are proposed to be demolished~~), excavation, building construction, utilities/infrastructure improvements, paving and landscaping. ~~The proposed would include the demolition of the existing one story office building on site (no trailers are proposed to be demolished).~~ In addition, any trailers that have not been relocated and/or moved from the site prior to the issuance of a demolition permit for the permanent buildings would be demolished on-site. It is likely that asbestos and lead-based paint are present in buildings and trailers constructed prior to 1978. According to the Los Angeles County Assessor's Office, the office structure on-site was built in 1950. In addition, the trailers on the property were manufactured prior to 1978. Given that the project site includes a building and trailers~~one building~~ predating 1978, it is reasonable to assume that these materials are present and could be encountered during demolition. Therefore, without mitigation, the proposed project would potentially result in significant impacts related to the accidental release of hazardous materials.

Mitigation Measures:

- HM1** Prior to issuance of a demolition permit for the permanent structures on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.
- HM2** Prior to issuance of a demolition permit for the permanent structures on the project site, lead-based paint testing shall be conducted for existing ~~permanent~~ structures and trailers to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.
- HM3** An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

With mitigation measures, impacts associated with the accidental release of hazardous materials from the demolition of the existing buildings and any trailers on-site would be reduced to less than significant.

The above revisions are indicated in Chapter 10.0, Corrections and Additions, of this Final EIR. These revisions constitute minor corrections to the analysis. There are no new significant impacts associated with the project that have not already been identified as part of the Draft EIR.

Comment 3-47

21. Failure to proceed as required by law in Inaccurately describing existing buildings to be demolished on the site.

The Draft EIR shows a "View of the office on the proposed site" Figure 4.10-1 (p. 187) and Fig 4.1-1 (on page 71). The photograph referred to as Fig. 4.1-1 shows a building which is not in fact the office, but a building opposite the office, North of trailer space B-1, which building has been boarded up since the resident manager who lived there got ill from mold infestation there.

In fact the building shown in the photograph (Fig 4.1-1) (and described in the caption as "the office") is not mentioned as being on the site at all in the description of the site. The Draft EIR (pA1) describes the existing site as follows:

"Existing Site characteristics: The existing buildings (sic) on-site are one-story. The only permanent structure is the office located at the entrance of the mobile home park, which is one-story and built in a typical mid-century modern style with low-slung buildings, distinct lines and large slanted windows. The adjacent pool is surrounded by a chain link fence. The remaining uses on-site are mobile homes in various styles and conditions, as well as surface parking".

Not only does the above not mention the former resident manager's residence building photographed in Fig.4.1-1, (which the caption calls the "office,"), it also ignores another building on site, the Laundry Room in Row C.

The Tree Inventory (!) Appendix D, (Draft EIR Vol.2 p.196) is the only time the Draft EIR gets the number of existing on-site structures correct, which seems to indicate only the arborist, who put tags on most of the trees, actually came to the site. Even then it incorrectly labels the three buildings it shows in TREE INVENTORY as, "Office", "Manager", and "Laundry", and so fails to mention that the building called "Office" in this inventory also contains a community room, a community library and two bathrooms with showers.

The importance of getting what is on the site correct when discussing environmental impacts of demolishing them is obvious, but particularly when one building left out is one known to be infested with mold and others include a laundry room and two bathrooms, which are likely to be infested with mold if one building on the site is, and all the buildings are mid-Century buildings, again, as with demolishing trailers, the Draft EIR has eliminated discussion of significant environmental impacts caused by development. CEQA requires discussion of them all. Failure to mention demolition of the community room, a community library and a row of showers for use by tenants, and presenting false data to conceal the existence of several mid-century buildings on the site, also deprives the public of the opportunity for meaningful participation in evaluation of this proposal.

Response 3-47

The commenter's statements about the existing buildings on the project site to be demolished are noted. Per the comment, the Draft EIR has been revised to indicate that the project site is occupied with an office, manager's residence, and laundry facility (see Chapter 10.0, Corrections and Additions, of this Final EIR). This minor change does not alter the analysis or conclusions of the Draft EIR.

Comment 3-48

22. Failure to proceed as required by law in presenting traffic information and increased trips to be generated by the proposed project, in that inadequacies in the model used are not admitted to in the Draft EIR so the public can have a meaningful opportunity to discuss the results intelligently and influence decision-makers not to approve the proposed project, in that the trip generation computer model guidelines and disclaimers specifically state its validity with various types of mixed uses has not been validated and it should be checked with on-site traffic counts and not used by anyone but expert traffic engineers, whose participation is not indicated in the Draft EIR. Nonetheless, the Draft EIR fails to indicate any on-site traffic counts were done, which is particularly important since rush-hour traffic is the key determinate of whether there is significant impact of additional trips caused by the proposed project, and evidence of comments by Los Angeles County Metropolitan Transportation Authority is omitted, in particular that a Traffic Impact Analysis (TIA) as required by the State of California Congestion Management Program TIA Guidelines was ever even discussed with that agency, let alone attempted.

Traffic data used in the Draft EIR is out of date. It is therefore unreliable as to the assessment of the impact of the proposed project on current traffic conditions.

Traffic counts we have done in the current year show that the traffic data presented in the Draft EIR intersection operation analysis does not accurately reflect the traffic impacts of the proposed development.

The data used throughout the Traffic Study for the Draft EIR was collected in 2007 for the majority of the intersections included as being within the traffic zone of influence of the proposed project. (Draft EIR p.252) The Santa Monica City TRAFFIX data base is based on traffic counts done in 2007.

No new traffic counts were undertaken as the basis for any of the trip generation assertions made by the Draft EIR.

Traffic counts for the Traffic Study for the Draft EIR were done in the fall of 2008 for the intersections at Centinela Avenue & Exposition Boulevard, Bundy Drive & Wilshire Boulevard, Bundy Drive & Santa Monica Boulevard, Bundy Drive & Olympic Boulevard and Bundy Drive & I-10 Eastbound On-Ramp.

So called "existing traffic" (Draft EIR p. 216) information on conditions at the intersections at Yale Street & Colorado Avenue, Stewart Street & Pennsylvania Avenue, and Centinela Avenue & Nebraska Avenue, is almost three years old with a traffic count done in January 2009 as its source. No attempt to add in the additional trips already determined for the project approved at Colorado and Stewart was made, nor was

there any attempt shown to add the effects of the projects approved since January 2009 closer to the beach from the subject property and therefore sure to have commuter traffic impacting these intersections.

Response 3-48

The commenter expresses concern regarding count data, trip rates, on-site counts, existing conditions impact analysis, and qualifications of the preparer of the traffic study. This response attempts to address all these concerns.

The traffic study conducted for this project was performed by Fehr & Peers, a professional transportation planning and engineering firm with over two decades of experience, and developed in accordance with the City of Santa Monica Traffic Study Guidelines and in close communication with City Transportation Management Division (TMD) and City Planning staff. All traffic studies are developed using the City's most recent baseline counts and augmented with new counts at locations not contained in the City's traffic count database. No impact analysis was conducted on pure 2007 counts. As stated on page 35 of the Traffic Study, "estimates of Year 2011 traffic growth were developed for the study area to forecast Approval Year conditions without the project. These projected traffic volumes, referred to as Approval Year No Project projections, represent the conditions expected during the project's approval year and provide the baseline for the Approval Year plus Project traffic impact analysis." Therefore, the Approval Year impact analysis includes expected growth from new development occupied between the count dates and the project's expected approval year. The following text, also on page 35 of the Traffic Study, describes how these forecasts were developed:

"Approval Year (Year 2011) No Project forecasts are the traffic conditions expected at the project approval year. This baseline uses 2007 intersection turning movement counts obtained from the City of Santa Monica's most recent TRAFFIX database that are adjusted to reflect Approval Year (Year 2011) conditions. The following adjustments were made to the TRAFFIX database:

1. Added cumulative development projects with a certificate of occupancy between the 2007 counts and the date of the project's NOP (June 2010); (the list of projects can be found in Appendix D of the Traffic Study)
2. Modified intersection signals and geometries with street system improvements constructed between the 2007 counts and the date of the project's NOP (June 2010); and
3. Applied an ambient growth rate of 0.8 percent per year from the date of the project's NOP to expected project approval year (2011) resulting in ambient growth of 0.8 percent."

Trip generation for the project was developed using City-approved trip generation rates. These rates were developed for the City of Santa Monica as part of development of the travel demand forecasting model for the City's LUCE update adopted in 2010, and were calibrated to Santa Monica traffic conditions. Thus, the traffic impact analysis conducted for the Approval Year scenario uses a baseline that is consistent with existing traffic conditions and project trip rates calibrated to local conditions.

In response to the final comment, all reasonably foreseeable projects in and around the City of Santa Monica that would have the potential to affect future baseline traffic volumes at study intersection were included in Appendix D of the traffic study.

No on-site traffic counts were conducted because the existing use is a trailer park and trip generation for that use was assumed to be apartment with one car whose rate is from the 2020 from Santa Monica Travel Demand Forecasting Model (Area Type 1), with Expo reduction. On-site traffic counts for future uses cannot be conducted because the future uses do not exist.

Comment 3-49

At crucially important intersections no criteria to determine a significant traffic impact were defined.

For the below mentioned intersections, no criteria to determine a significant traffic impact were defined. Instead, these intersections were treated as though they were signalized, and the impact analyzes were conducted as if they were signalized intersections, which none is. (Draft EIR vol II p. 299). Therefore the proposed feasibility of mitigation of traffic impact has no proper basis. These intersections are:

- Yale Street & Colorado Avenue
- Stewart Street & Pennsylvania Avenue
- Stanford Street (west) & Colorado Avenue
- Stanford Street (east) & Colorado Avenue
- Centinela Avenue & Pennsylvania Avenue/Iowa Avenue

Response 3-49

The commenter states that “at crucially important intersections no criteria to determine a significant traffic impact were defined”, however the commenter does not state what they think that would mean with regards to the traffic impact analysis. It is correct that the City of Santa Monica Traffic Study Guidelines does not have defined criteria to determine a significant impact at minor street stop-controlled intersections. However, significant impacts were assessed at these locations. In order to determine significant impacts for these locations, Fehr & Peers developed significance criteria in cooperation with the City. For purposes of this analysis, the intersections were treated as though they were signalized, and the impact analyses were conducted according to the criteria outlined above for signalized intersections. The impact criteria applied was based on the intersection’s worst approach level of service. For example, if the unsignalized worst approach operates at LOS F, the project-related impact would be considered significant if the project would increase the V/C by greater than 0.005 while being treated as signalized.

The feasibility of mitigation at these intersections is based on its location and whether signalization could result in additional secondary impacts in the adjoining residential neighborhood by inducing more traffic to use nearby streets.

Comment 3-50

No data is presented to show how the traffic mitigation measures proposed would be compatible with the social, economic and neighborhood character of the primarily residential area in which the project is sited.

Notwithstanding that the Draft EIR does not adequately establish how the use of the City of Santa Monica TRAFFIX database would show that any mitigation measure proposed would fully mitigate project-related traffic impact in the neighborhood, the traffic mitigation measures proposed are not compatible with the social, economic and neighborhood character of the primarily residential area in which the project is sited. This failure to present information on how the mitigation measures would be compatible with the primarily residential character of the area in which the site is located prevents meaningful public participation in the evaluation process.

Response 3-50

The commenter states that the Draft EIR does not provide data to show how the proposed traffic mitigation measures would be compatible with the social, economic, and neighborhood character of the area.

Pursuant to CEQA Guidelines Section 15064(e), economic and social impacts of a project are not to be treated as “significant” impacts on the physical environment, as defined. To the extent that there is a

direct or indirect causal connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is “significant.”

Section 4.15, Transportation and Traffic, of the Draft EIR provides a list of the traffic mitigation measures for the proposed project: Mitigation Measures T1 through T6. With the exception of Mitigation Measure T1, all of the traffic mitigation measures are signal phasing improvements and would not have a physical impact on the environment. Mitigation Measure T1 would require some restriping and peak period parking restricting signage. These improvements proposed as part of Mitigation Measure T1 would occur within existing City right of way and would not result in off-site neighborhood character impacts.

No changes to the Draft EIR are necessary to address this comment.

Comment 3-51

The Draft EIR does not provide reliable trip generation data to as the basis for estimating the traffic impacts of the project on the neighborhood.

Trip Generation does not take into account the project site location bordering on a Trip Generation Area Type 1 (Draft EIR vol II p 915).

Although the Travel Demand Forecasting Model used in the study purports to be based on a relationship between travel and the built environment, the disclaimer information on it states it is unreliable in providing information on the behavior of pass by trips, a crucial element in measuring the traffic impact of the proposed project.

No Current Origin Destination (O-D) data is provided. No information on what trip production rates from the zonal socio-economic estimates of the LUCE were incorporated in the traffic study. What assumptions underlying the City of Santa Monica's Travel Demand Forecasting Model were used in the traffic study have not been specified. In particular the following information has not been provided:

- (a) What definition was used for trip rates by trip chaining?
- (b) How do the trip rates by trip purpose compare with those for other urban areas with similar characteristics (and what were the areas so deemed)? Were person or vehicle trip rates used? How do the rates compare with earlier rates for this area?
- (c) How do the mean trip lengths by trip purpose compare with those from other areas in Santa Monica with similar characteristics (and what were the areas so deemed)? Are the Home-based Work mean trip lengths the longest and the Home Based-Other mean trip lengths the shortest?
- (d) How do the Trip Length Frequency Distributions by trip purpose compare with other areas in Santa Monica with similar characteristics?

Response 3-51

This comment has many parts, including assertions that the:

- Draft EIR does not provide reliable trip generation data
- Santa Monica TDFM is unreliable in accounting for pass-by trips
- The traffic study does not incorporate “information on what trip production rates from the zonal socio-economic estimates of the LUCE” and does not specify what assumptions from the Santa Monica TDFM were used in the traffic study
- The traffic study omits information on trip chaining, trip rates, and trip lengths.

The comments related to project trip rates and trip generation can be answered with content from the traffic study itself and the *Santa Monica Travel Demand Forecasting Model Report* (Fehr & Peers, October 2011) which is a technical memorandum summarizing the methodology and rates is included in Appendix E of the Traffic Study.

The trip rates used in this study were developed as part of the Santa Monica TDFM development for a variety of land use types and have been approved by the City. As part of the model development, these “existing” trip generation rates were initially based on residential trip generation surveys, the Southern California Association of Governments (SCAG) regional model, the San Diego Association of Governments’ (SANDAG) trip generation survey, recently calibrated models in similar areas, and Trip Generation, 8th Edition (Institute of Transportation Engineers [ITE], 2008). The rates were then modified to account for local conditions based on counts, production-to-attraction balancing, and the difference between ITE and model land use definitions. The existing Santa Monica trip generation rates are unique to the Santa Monica model, and they are ultimately based on the results of model calibration and validation. Two sets of rates were developed. The first includes areas of the City in Downtown Santa Monica and the Special Office District, which are determined to have lower trip generation rates through calibration and validation of the Santa Monica TDFM (reflecting characteristics such as higher built environment density, numerous transit lines, and a greater share of pedestrian trips). The second rate includes the remainder of the City.

As part of the development of the TDFM, existing calibrated Santa Monica trip generation rates were modified to reflect the effectiveness of the TDM/trip reduction strategies envisioned in the LUCE. Different levels of trip reduction effectiveness were estimated for different areas of the City. Separate trip reductions were also developed for projects within a half-mile of the proposed future Expo Phase 2 Light Rail stations. Village Trailer Park is included in Area Type 1 due to its location within the Special Office District.

The questions and comments on the Santa Monica TDFM are broad in scope. The easiest way to respond to model related questions is to direct the commenter to the Santa Monica LUCE Model Development Report (Fehr & Peers, December 2009). This report is included in Appendix M of Draft EIR. The purpose of the report was to introduce the Travel Demand Forecasting (TDF) model built for Santa Monica’s LUCE update. The report describes the model development process in general, and how this process was applied to develop the City of Santa Monica model, including the sources of data used to develop key model inputs. It answers key questions such as:

What is a TDF model

- How is a TDF model useful
- How do we know if the TDF model is accurate
- Is the City of Santa Monica TDF model consistent with standard practices?
- How can the TDF model be used

These answers and the report’s accompanying detailed explanation of model inputs, model calibration (including productions and attractions), and model validation should help the commenter better understand how TDF models work and how a model unique to Santa Monica was developed.

Comment 3-52

The Draft EIR does not specify how the use of the City of Santa Monica TRAFFIX database from 2007 could determine that any mitigation measure proposed would fully mitigate project-related impacts. Neither does it specify how the use of the City of Santa Monica TRAFFIX database would show that any mitigation measure proposed would fully mitigate project-related traffic impact in the neighborhood in construction year 2012.

The Draft EIR merely states that traffic impacts would be mitigated. There is no evidence of how that would happen, how that was deduced from any data, or even what specific data was used to make that deduction. Conclusions of the traffic study that mitigation measures proposed for any intersection studied would reduce project impacts to below significant levels do not provide the basis for meaningful public participation in the evaluation of the project.

For all these reasons the traffic impact conclusions of the Draft EIR are presented in a way that deprives the public of meaningful participation in a decision on what traffic impacts of the proposed project on the neighborhood could/should, or cannot be, mitigated.

Response 3-52

The commenter states that the EIR does not present data necessary to ascertain how traffic impacts would be mitigated. The traffic impact study prepared for the study tested all mitigation measures and the resulting level of service improvements showing those impacts mitigated to levels below significance are included in Tables 9A, 9B, 10A, and 10B of the Traffic Study. Supporting worksheets are provided in the Traffic Study Appendix. Thus, all necessary data showing how feasible mitigations would fully mitigate project related traffic impacts have been included in the EIR.

Comment 3-53

23. The Draft EIR fails to proceed as required by law in ignoring the comments of those of us who commented upon the Notice of Intent in July 2010. In particular, the factors of environmental injustice and unlawfulness of this project under the Rent Control Law were simply ignored.

Response 3-53

The commenter states that the Draft EIR does not address comments received on the Notice of Intent for the project.

It is assumed that the commenter is referring to the Notice of Preparation of the Draft EIR for the proposed project. The Draft EIR does address and consider the comments received on the Notice of Preparation as well as comments received during the public scoping meeting. Environmental impact issues that were raised by commenters were fully addressed within the Draft EIR. Please see Appendix H of the Final EIR for copies of the comment letters.

With regard to the commenter's statement that the Draft EIR does not consider the Rent Control Law, page 4.13-9 of Section 4.13, Population and Housing, does address the project's compliance with the Rent Control Law. Specifically the Draft EIR states the following:

"According to the Santa Monica City Charter Article 1803(t) ("Rent Control Law"), a removal permit from the Rent Control Board is required for the removal of affordable, rent-controlled units. The proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Of these, at least 15 percent (or 16 units) must be at rents affordable by persons of low income. The proposed project would include 52 units that would be deed restricted as affordable housing. The proposed project would result in a net increase in housing. Therefore, the proposed project would not displace substantial number of housing; impacts would be less than significant."

Notwithstanding, a more detailed discussion of the City's Rent Control Law has been added to the Regulatory Framework section of the Draft EIR as well as the impact analysis of Section 4.13. Please see Chapter 10.0, Corrections and Additions, of the Final EIR for the text of these revisions.

Please see Response 3-54 below, regarding the comment pertaining to environmental justice.

Comment 3-54

None of our comments of categories needed to be covered, made in response to the notice of preparation of a Draft EIR, have been included in the draft EIR. Primary among these is Environmental Injustice.

THE DRAFT EIR OMITTS ANY DISCUSSION OF WHAT ENVIRONMENTAL INJUSTICES THE PROJECT REPRESENTS AND SO PREVENTS MEANINGFUL PUBLIC PARTICIPATION IN THE EVALUATION PROCESS

Environmental injustice occurs whenever an inequitable distribution of the environmental burdens of pollution and high density development fall on particular demographics or geographic areas. In this instance root causes of such environmental injustices include unresponsive and unaccountable Santa Monica City government policies and regulation, and the lack of resources and political power in the community where Village Trailer Park is located. The decision to rezone Village Trailer is being touted as "compatible with LUCE goals." The way the first two projects to be considered under the LUCE addition to the General Plan have been handled shows LUCE's phraseology of goals and policies was merely a cloak under which a combination of business-focused zoning and secret tax regulatory control targets would meet.

Meeting these undisclosed targets is apparently the dominant consideration in the hybrid "Mixed-Use Creative" land use category. Nothing else would explain ignoring at least 11 levels of insanity and illegality in approving this project, discussed above. The LUCE itself as the City Council is interpreting it makes no effort to protect neighborhoods whenever their destruction would yield a greater tax revenue base for the city. This is in spite of the fact that LUCE states a primary goal of "preserving existing neighborhoods," thereby having lulled residents of VTP into thinking, of course, that their neighborhood, the 3.85 acre Park where they lived, which had existed for 60 years at the time, would certainly be preserved. The Council's twisting of these very goals, by deciding in advance to make areas other than this one less commercial, have pushed demand for commercial uses into this one. No evidence is presented in the Draft EIR to show that the destruction of Village Trailer Park was necessary to uphold proper planning of the City of Santa Monica.

The Draft EIR does not refute the analysis given in our Comments to the Notice that the Draft EIR would be prepared (Appendix A, pp.3-7) that the area in which VTP is located has the highest presence of minority and low-income populations, seniors, and women of any area of the City, so burdening it with over development when other less so areas are not so burdened must be justified. Even a preliminary environmental justice analysis evaluates each alternative to determine whether there is a potential for disproportionately high and adverse effects on minority or low-income, senior, and/or women populations when compared to populations in the study area that are not so highly concentrated in these suspect groups. By failing to do ANY analysis, the Draft EIR fails to provide the public ANY meaningful public participation in the evaluation process as to whether environmental injustice is justified in this case. In fact, by ignoring the issue completely, the Draft EIR shows it has not responded to the comments made before its preparation, but instead has treated the EIR process as just "a set of technical hurdles for agencies and developers to overcome." *Vineyard Area Citizens v. City of Rancho Cordova* (supra), 40 Cal.4th at pp. 449.

Response 3-54

CEQA does not does not require the analysis of environmental justice impacts and so does not provide specific significance criteria for environmental justice impacts. Pursuant to CEQA Guidelines Section 15064(e), economic and social impacts of a project are not to be treated as "significant" impacts on the physical environment, as defined. CEQA focuses primarily on identifying and disclosing potential significant impacts to the physical environment. To the extent that there is a connection between a change

in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is “significant.” Consequently, no CEQA significance determinations have been made for the analysis of environmental justice impacts.

Population and housing displacement impacts are relevant CEQA issues to the extent that displacement would result in physical changes to the environment, (i.e., necessitate the construction of replacement housing elsewhere).

As stated in Section 4.13, Population and Housing, of the Draft EIR, the proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Therefore, the proposed project would not displace substantial number of housing; impacts would be less than significant. With regard to the displacement of people, as stated in Section 4.13, Population and Housing, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project’s relocation plan. Upon implementation of the relocation provisions which would be enforced through the Development Agreement, population displacement impacts would be less than significant.

Comment 3-55

Neither is our proposed category of illegality of the project included in the DEIR, which in our comments we stated needed to be included as part of our Item 6: *"The EIR Must Discuss the Environment Impacts of the Proposed Project's Illegality Being Hidden from the Residents by the City and the City's Conspiring with the Developers to Try to Transform the Illegal Development into a Legal One (Neighborhood Effects, Population and Housing, and Land Use and Planning)"* [Emphasis added.]

Instead, the Draft EIR glosses over the fact that 109 rental spaces for mobilehomes owned by residents (or rented out to tenants by homeowners) are and have been since 1979-27 years before this proposed development was proposed to the City--covered by rent control at the site. There is no precedent whatsoever in any law for any city or county in California or any other state EVER eliminating 109 housing spaces, where people own their own homes and are covered by rent control provisions in the jurisdiction's charter to not have that rent of \$300-500 per month raised except with the Rent Control Board's permission, when the owner of the land proves under pre-existing standards that it is not making a fair return on the land.

Neither is there any precedent in any state for renters of land with the right under rent control not to be evicted except for good cause, to have their right to rent the land for \$300-500 per month converted into a mere right to rent a 325 square foot single resident occupancy apartment for \$1400 a month on a month-to-month or some other lease basis.

Finally, there is no precedent in any real estate appraisal law applying in any context- eminent domain, disaster relief, or whatever- that would make an obligation for relocating homeowners such as the proposed developers have under state and local law, into just the obligation to pay what renters would receive. This proposed development's effects on existing homeowners at the site has not been taken into account in the Draft EIR at all, except with "let 'em eat cake" discounting words. The facts of the magnitude of the problem have not been confronted in the Draft EIR at all.

Response 3-55

The commenter states that the proposed project constitutes an illegal development and that the Draft EIR does not discuss the illegality.

The City of Santa Monica serves as the lead agency under CEQA for the project and the Village Trailer Park, LLC is the Project applicant. Per the requirements contained in Section 21082.1 of the CEQA Statute and Guidelines, the City of Santa Monica in its capacity as the lead agency is required to independently review and analyze the Draft EIR, circulate a Draft EIR that reflects its independent judgment, and as part of the certification of the Draft EIR, find that the Draft EIR reflects the independent judgment of the Lead Agency.

The project applicant has applied to close the mobilehome park and convert it to another use pursuant to the State's mobilehome closure law at Government Code Section 65863.7 and Santa Monica City Charter Article 1803(t)(2)(ii). As stated in the Draft EIR, according to the Santa Monica City Charter Article 1803(t) ("Rent Control Law"), a removal permit from the Rent Control Board is required for removal of the rent-controlled mobile home spaces. Such permit will require a one-for-one replacement of the current rent-controlled units, 15 percent of which must be made available at rents affordable to persons of low income. The proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. The Development Agreement for the proposed project would require that this commitment for replacement of the rent-controlled units be recorded against title to the property and under state law would be binding on future property owners. Therefore, if approved, the proposed project would be in compliance with state and local law.

Comment 3-56

Conclusion

The magnitude of defects in the Draft EIR discussed above mean this Draft EIR must be completely reworked and recirculated. The cases all say an adequate period to comment must be given, not just the 45-day minimum. Given the magnitude of the project to be covered by this Draft EIR and the major change the proposed project represents from purely residential use for over 60 years and now unblighted status, so no clear justification for any change, to unrepresented density and mixed uses never combined in this City before, far more than 45 days should have been given in the first place, and with the major reworking that must take place, more than that minimum should be allowed in fairness to the public when the major changes that must be made are made.

In addition to the inadequacies of the Draft EIR, more time should be given for two other reasons. One is that we are threatened with loss of 109 rent-controlled home spaces, as to which the state law considers us homeowners. Nothing in the Draft EIR considers us anything but renters or adequately covers the impact of the proposed development on us as homeowners. That means it is contemplated that 109 families, many of whom do not have the money to hire professional environmental law attorneys, will lose homes they own without adequate time to object to the bases being given for that loss.

Response 3-56

The commenter states an opinion that the Draft EIR has "defects" and should be recirculated. The specific comments made by the commenter on the Draft EIR's inadequacies are individually responded to above. CEQA requires a lead agency to re-circulate an EIR when significant new information is added to the EIR following public review but before certification (Public Resources Code Section 21092.1). Section 15088.5 of the CEQA Guidelines clarify that new information is significant if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project" including, for example, "a disclosure showing that ... [a] new significant environmental impact would result from the project." The Draft EIR has been prepared in accordance with CEQA requirements and the significance thresholds and methodologies set forth by the City of Santa Monica. Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed. In addition, where feasible, mitigation measures have been proposed to reduce the significant environmental impacts of the proposed project. As noted in the

responses above, there are no new significant impacts associated with the project that have not already been identified as part of the Draft EIR. As such, recirculation of the Draft EIR would not be necessary.

With regard to the commenter's statement that the Draft EIR should be circulated for longer than the 45-day period minimum, the California Code of Regulations, Section 15105(a), provides that "the public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse." The Draft EIR comment period was extended from the required 45-day review period by an additional four days from October 14, 2011 to December 2, 2011, for a total comment period of 49 days.

Comment 3-57

The second additional reason is that since this Draft EIR was circulated, Mr. Luzzatto has begun demolishing and relocating trailers at the property. The Draft EIR says no trailers will be demolished as part of the development (p. 168). His demolishing them now is what, if it is not part of the development? It certainly is not anything any of us requested or want. He started doing this just when the Landmarks Commission was on the verge of voting, as it then did vote soon after, to investigate the landmark status of this property. Destroying old trailers in that time period is akin to destroying evidence in a lawsuit. Then one of us filed a lawsuit trying to stop it, and he had the size of the crew increased fivefold and working all day Saturday to finish doing it before she could get a TRO. She therefore is now seeking damages for the improper, unpermitted, improperly noticed demolition and destruction of old building materials involved in disturbing trailers from their sites. Another neighbor has written protesting that we are living in a ghost town, where no one would choose to live.

Response 3-57

The commenter states that the project applicant has demolished trailers at the property unlawfully. This comment does not pertain to the environmental analysis in the Draft EIR. The demolition of the trailers on the project site was a ministerial act and not subject to CEQA.

The City's Building and Safety Division issued ministerial permits (i.e., non-discretionary) for utility disconnection at specified lots during the preparation of this Final EIR. Removal of the actual trailers, which are personal properties, is not governed by the Building Code and, as such, their removal did not require a permit from the City and Municipal regulations of material recycling, soil, waterways, air and plant protection are not enforced by the City. Pursuant to Section 21080 of the Public Resources Code, CEQA does not apply to, "Ministerial projects proposed to be carried out or approved by public agencies." Section 15268 of the CEQA Guidelines goes on to further define "Ministerial Projects" as follows:

- (a) Ministerial projects are exempt from the requirements of CEQA. The determination of what is "ministerial" can most appropriately be made by the particular public agency involved based upon its analysis of its own laws, and each public agency should make such determination either as part of its implementing regulations or on a case-by-case basis.
- (b) In the absence of any discretionary provision contained in the local ordinance or other law establishing the requirements for the permit, license, or other entitlement for use, the following actions shall be presumed to be ministerial:
 - 1) Issuance of building permits.
 - 2) Issuance of business licenses.
 - 3) Approval of final subdivision maps.
 - 4) Approval on individual utility service connections and disconnections.

The City issued ministerial permits for utility disconnection because local law does not regulate the removal of personal property. The removal of trailers by their owner was a functionally independent ministerial project and, therefore CEQA did not apply to the previous removal of the trailers. See also Response 3-46.

As was mentioned by the commenter, subsequent to circulation of the Draft EIR, an application to designate the property as a City Landmark was received by the Landmarks Commission. As part of the Landmark application process, two historic assessments that evaluated eligibility for City landmark status were prepared for the project site in February 2012. The *Village Trailer Park Historic Resource Assessment* was prepared by Chattel Architecture Planning and Preservation, Inc. According to this report's findings, the property is ineligible for listing locally as a Santa Monica Landmark, in the California Register of Historical Resources and in the National Register of Historic Places.

Additionally, a City Landmark Assessment Report was prepared for the Village Trailer Park by ICF International. According to this report, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4) On February 13, 2012, the Landmarks Commission held a public hearing to discuss and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission ultimately voted to not designate the property. As was previously determined in the Draft EIR, impacts on historic resources would be less than significant. The Landmarks Report and associated information has been included as Appendix I of this Final EIR and is noted in Chapter 10.0, Corrections and Additions, of this Final EIR.

Comment 3-58

Given (1) these wrongful acts, and (2) the concomitant wrongful failure of the Draft EIR to consider environmental impacts of demolition of trailers as part of environmental impacts of the proposed development, as well as all the other defects discussed herein, including what must have been intentional misrepresentation of the contents of the fatally-defective City law, the Draft EIR also must be recirculated. Part of what makes this so crucial is the fact that 109 trailers were here in 2006 when the developers served the first notice that they were going to close this Park and leave the land empty, and in order to do that some number very near 109 trailers would have to be demolished because the 2007 staff report on the MOU states most here cannot be moved under state law.

Response 3-58

Please see Response 3-56 regarding recirculation of the Draft EIR, and Response 3-57 regarding trailer removals as a functionally independent action subject only to a ministerial utility disconnection permit from the City. This comment is noted for the administrative record and will be forwarded to the decision makers for review and consideration.

Comment 3-59

Another aspect is papers the developers filed in the lawsuit state 6 out of 10 trailers they demolished on a certain set of days had significant levels of asbestos in them. No tests were done for lead-based paint, mold, or formaldehyde, when we know all of those toxins are in trailers and buildings at this site.

A table summary of these comments except as to failure to discuss Environmental Injustice and Project Illegality follows and is attached. Exhibits are submitted concurrently under separate cover.

Response 3-59

A Phase I Environmental Site Assessment Report was prepared for the Village Trailer Park by Partner Engineering and Science Inc. in February 2012. The report concluded that due to the age of the t property buildings, there is a potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP)

are present. Overall, all suspect ACMs and painted surfaces were observed in good condition and do not pose a health and safety concern to the occupants of the project site at this time. Due to the age of the buildings on-site, there is a potential that ACMs and/or LBP are present.

Section 4.8, Hazards and Hazardous Materials, of the Draft EIR provides a discussion of asbestos, LBP, and other hazards. Page 4.8-9 of Section 4.8, Hazards and Hazardous Materials, of the Draft EIR and Mitigation Measure HM2 has been revised to reflect the potential for ACMs and LBP to be present in the existing trailers. In addition, the following mitigation measure has been added to reduce potential asbestos-removal impacts:

HM-3 An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

With mitigation measures, impacts associated with the accidental release of hazardous materials from the demolition of the office building and any trailers on-site would be reduced to less than significant. Please see Chapter 10.0, Corrections and Additions, of the Final EIR, for these revisions.

Please see Response 3-54, above, regarding environmental justice, Response 3-55 regarding the legality of the proposed project, and Response 3-57 regarding previous trailer removals.

Letter 4

December 1, 2011

Brenda Barnes
dhsbrenda@gmail.com

Comment 4-1

This confirms our telephone conversation this morning in which I informed you I had voluminous materials arriving after your office closes at 5 p.m. tomorrow, but I thought I might be able to get enough of it in, along with my other comments on VTP DEIR, merely to supplement it later, if someone would be at the counter at 5:30 p.m. We were entitled to take until the latter time according to the notice we received. I told you I was relying on the legal provision that if something is due when a governmental office is not open, the person with the deadline (in this case us) has until the end of the business day the first time the office is open to submit the material subject to the deadline (Civil Code sec. 11). You, however, kindly informed me that the City has a policy of accepting late submissions of comments on EIRs. (I must say this is appropriate, since the document we are commenting on is 1352 pages long, we are knowledgeable and up-to-speed residents affected by it but not profession environmental lawyers, and we have had 45 days since it was released to comment upon it. For that reason, just to be clear and fair to everyone who might want to comment further but not get a copy of this, I would suggest everyone be given another 45 days to continue the work we all--speaking for myself, but I'm sure others had the same experience--cut short because of the deadline.)

Therefore, I will submit whatever compilation I am able to submit by 12/5/11 of the 5,000 pages on traffic surveys I told you was too long for the consultant to send by e-mail with the program he has, and obviously too expensive to fax, so it was being delivered. Thereafter, relying on what you told me was existing City policy of accepting late comments anyway, I will submit supplements going into greater detail and/or covering topics I am unable to cover in the time before then.

Thank you for your courtesy.

Response 4-1

California Code of Regulations, Section 15105(a), provides that “the public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse.” The Draft EIR comment period was extended from the required 45-day review period by an additional four days from October 14, 2011 to December 2, 2011, for a total comment period of 49 days.

Please see Comment Letters 3 and Comment Letter 31 for responses to the late comments submitted by this commenter.

It should be also noted that the public will also have continued opportunities to provide input at each of the public hearings that will be held by the City of Santa Monica on the project.

Letter 5

November 11, 2011

Margaret Bonanno
garamet@juno.com

Comment 5-1

Thank you for giving the residents of the neighborhood surrounding the Village Trailer Park an opportunity to express our views about its future.

I am one such resident. I came here from New York eleven years ago and thought my little studio at the corner of Berkeley and Colorado was a little piece of paradise. As the number of corporate offices along Colorado Avenue has grown, I have watched the traffic increase to the point where the westbound lane is an endless caravan of creeping cars over almost three hours every morning, and the eastbound is equally clogged every evening.

The owners of the VTP want to add to that congestion.

They want to add more overpriced condos to a neighborhood already replete with overpriced condos...in a depressed real estate market where the existing condos can sit unsold for a year or more.

They want to add a "retail space" (read "strip mall") to a neighborhood that already provides more than enough retail outlets (and will, with the repurposing of the Roberts Business Park, add even more).

Response 5-1

This comment states opposition to the proposed project. This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2, above, for a discussion of the proposed project's operational traffic impacts.

Comment 5-2

As an aside, here are just some of the stores within a half-mile radius of the VTP:

- Ralph's
- Albertson's
- Smart & Final
- 7Eleven
- CVS (2 stores)
- Numerous independent groceries and pharmacies
- (3) Starbucks
- Numerous hair and nail salons
- Numerous dry cleaners
- A laundromat
- Countless restaurants, from formal to take-out
- Fast food outlets, including iHop, McDonald's, Carl's, (2) Subway, etc.
- And so on

If there's anything this neighborhood doesn't need, it's more retail...and, of course, the traffic that goes with it.

Response 5-2

This comment states opposition to the retail component of the proposed project and the trips that would be generated. This comment is noted for the record and will be forwarded to decision-makers for review and consideration.

As discussed in Section 4.10, Land Use and Planning, of the Draft EIR, the project site currently has a LUCE land use designation of "Mixed-Use Creative". Within the Mixed-Use Creative District, the LUCE encourages the combination of studio-related uses (such as film and music production) with affordable, workforce and market rate housing and ground floor, active, local-serving retail. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2, above, for a discussion of the proposed project's operational traffic impacts.

Comment 5-3

Oh, and not incidentally, the owners of the VTP want to dispossess over one hundred low-income residents from their homes, and then gut and destroy those homes, bulldoze hundreds of trees, decimate wildlife habitat, and lay waste to what should be considered a landmark to Santa Monica's history.

Yes, I know, it's their property, and they're apparently under the impression that they can do whatever they want with it, given how at the start of this saga five and a half years ago they sent an eviction notice to the VTP residents telling them that they had six months to leave...without first filing a request with the City allowing them to repurpose the property.

You're aware of the amount of suffering that cavalier eviction notice caused among the residents, including the two suicides, so I won't reiterate it here. What mystifies me is that this debacle has been allowed to endure for *five and a half years* without someone stepping up and saying, "Enough. You can't treat Santa Monicans - even low-income residents - this way and get away with it."

I know how much time and effort the City has put into trying to find a reasonable solution to the VTP problem. The very fact that you're soliciting letters like this one speaks volumes about your dedication. And I wish there were some way you could tell Mr. Luzzato *et al.* that while they can get away with terrorizing low-income seniors elsewhere in the county, they can't do that here.

I'm also aware that several years ago the City took possession of the Mountain View mobile home park, and turned it into a showplace. If only there were some way the City could do the same for the VTP!

Response 5-3

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Please see Section 4.13, Population and Housing, of the Draft EIR for an analysis of the proposed project's impacts with regard to housing and population displacement and Section 4.3, Biological Resources, of the Draft EIR for an analysis of the proposed project's impacts on biological resources (including trees and wildlife habitat).

Please see Response 6-7 for a discussion regarding the City of Santa Monica Landmark Commission's vote on the project's site eligibility for landmark status.

Comment 5-4

Because we know the game being played here. Mr. Luzzato intends to keep dragging this along until enough residents give up in despair and abandon their homes. Then he'll present himself to the City Council to make another speech about how hard he's trying to accommodate everyone, but he can't keep losing revenue. He'll neglect to mention that no homes have been allowed into the park since he took ownership over a decade ago. The plan is attrition, until he gets his own way.

Summing up:

1. Neighborhood with more than enough retail space and way too much traffic will have more retail and traffic added with the repurposing of Roberts Business Park, and Luzzato *et al.* want still more.
2. Neighborhood replete with overpriced condos that are not moving in the current market will, if Luzzato *et al.* get there way, have even more overpriced condos...bigger footprint, more cars, destruction of century-old trees and rare raptor habitat, etc.
3. One hundred low-income residents of the VTP will be displaced and given the not-so-subtle message that money talks.

Will the 1% win? Will the City of Santa Monica reaffirm its commitment to all of its residents or just placate one?

Response 5-4

This comment provides a summary of the points raised by the commenter. Please see Responses 5-1 through 5-3 for responses to individual comments.

Letter 6

November 30, 2011

Cosmo Bua
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808 4th Street # 103
Santa Monica CA 90404

Comment 6-1

Village Trailer Park Draft EIR is Inaccurate. Choose the "No Project Alternative"

Response 6-1

This comment states an opinion that the Draft EIR is inaccurate and recommends that the decision-makers choose the No Project Alternative. The Draft EIR has been prepared in accordance with CEQA requirements and the significance thresholds and methodologies set forth by the City of Santa Monica. The Draft EIR includes over 1,300 pages of text and information, supported by references and appendices. Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project.

The commenter's intention to pursue development of the No Project Alternative is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 6-2

Biological Resources

The document refers to, "Several mature trees to be removed", but:

- There are actually Hundreds of mature trees which will be destroyed for this project,
- 89 of the trees listed in the EIR's included arborist report are evaluated by her as being in "A" condition (the highest rating) - Of those 89 A-condition trees, more than three out of four [3/4] are listed as of "High" value (the highest rating)
- Our city is supposed to be committed to increasing canopy, especially in this and other low-canopy level areas in Santa Monica.

Response 6-2

As discussed in Section 4.3, Biological Resources, of the Draft EIR, there are 107 trees within the project site and three trees that are located on the property line between the project site and adjacent property to the west. The tree survey prepared for the project site (see Appendix D of the Draft EIR) states that there are 27 different trees species on site, only one of which is a California native specimen (coast redwood). Judging from the period the park was built (1950's) and the species of trees and their location (sometimes immediately adjacent to structures vs. planned design) the majority of the trees, in all likelihood, are either volunteer specimens, shrub plantings, or house plants that were placed out-of-doors years ago. These seedlings, shrubs and house plants have developed into trees and constitute a large part of the tree canopy at the site. The majority of the trees currently on the site would be removed as part of the proposed project. Some trees may be preserved on the project site and/or relocated on-site or off-site.

None of the trees on-site are locally-protected Landmark trees. Protection, replacement, and/or the removal of trees within the City of Santa Monica right-of-way would be conducted in accordance with the City's Tree Code and the City's Urban Forest Master Plan. The City of Santa Monica has no municipal code requirements related to the protection and/or preservation of trees on private property.

It should be noted that the proposed project would implement a landscaping plan that would provide for the planting of new trees. These new trees would help offset the loss of the existing trees.

Comment 6-3

According to this Draft EIR, this project is "consistent with ... a new state-wide goal of planting five million new trees in urban areas by 2020."

- Of course *planting any number of trees is consistent with this goal* when the planting is seen in deceptive isolation from any removed trees.

- It isn't possible for the developer to plant enough trees within the open space of this project to begin to make up for all those removed, let alone to be "consistent" with this state wide goal. Certainly, they will not be required to plant hundreds of trees elsewhere.

- Also, the current VTP trees are mature and diverse – many well over 50 years old – it will be decades before those few (by comparison) trees which are planted provide significant environmental benefits.

Response 6-3

As stated in Section 4.4, Biological Resources, of the Draft EIR, the City of Santa Monica has no municipal code requirements related to the protection and/or preservation of trees on private property. Some of the trees may be preserved on the project site and/or relocated on-site or off-site.

Protection, replacement, and/or the removal of trees within the City of Santa Monica right-of-way would be conducted in accordance with the City's Tree Code and the City's Urban Forest Master Plan.

Furthermore, it should be noted that the proposed project would implement a landscaping plan that would provide for the planting of new trees. These new trees would help offset the loss of the existing trees.

Comment 6-4

As regards migratory birds (*and other wildlife*) affected by the destruction of the hundreds of trees to be destroyed

- The proposed mitigation is absurdly limited; nests will be looked out for only for the one nesting season while the trees are being destroyed. What about the perpetual and forever loss of these extensive nesting grounds when all the trees are removed in this area of Santa Monica where there is such a low canopy level.

Response 6-4

As stated in Section 4.4, Biological Resources, of the Draft EIR, no urban wildlife or nesting activity was observed during the site visit. Some of the trees that would be removed may be used for nesting by migratory birds. Although the loss of the existing on-site trees for potential migratory birds is not critical to the survival of these species, tree removal could possibly impact nesting sites for other bird species including some birds which are considered possible prey species for raptors.

Mitigation Measure BR-1 included in Section 3.4, Biological Resources, of the Draft EIR and below will reduce impacts related to nesting birds.

BR1 Prior to removal, trees on the project site will be inspected for bird nests by a qualified biologist. Inspection of the trees shall occur prior to the typical breeding/nesting season (March 1st through August 30th). If nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established, within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has failed. If no nesting is observed, trees to be removed from within the project site shall be netted to prevent birds from inhabiting the trees prior to removal and construction.

As stated in the mitigation measure, trees on the site will be inspected prior to the commencement of the breeding/nesting season. If nesting is observed, a buffer area will be recommended by a biologist to ensure that no disturbance or intrusion is allowed until the young have fledged or left the nest. Implementation of this mitigation measure would result in less than significant impacts to nesting birds.

Furthermore, it should be noted that the proposed project would implement a landscaping plan that would provide for the planting of new trees. These new trees would help offset the canopy loss that would occur with the proposed project's removal of existing trees.

Comment 6-5

Land Use

The Draft EIR states that this project, "would not divide an established community".

- This is a plainly false assertion. It is ridiculous and unsupportable. Members of the community that comprises VTP have come forward repeatedly, protesting precisely that what they most fear is losing this community which functions in many ways to support them and to allow them to support others. They, in fact, have a community which many other Santa Monica residents can only envy.

- Further, a number of the Village Trailer Park Community residents are in the final decades of their lives. It cannot be overstated how negative and significant an environmental and cultural change this extreme disruption will be for them in particular. Their way of life was built over many years- their truly caring neighbors, the safety and support they feel, and actually have - will many take years to rebuild elsewhere, if that is even possible for many of them in their lifetimes.

Response 6-5

Per CEQA, the purpose of an EIR is to analyze the significance of the physical environmental effects of the project. Accordingly, the EIR provides an analysis of the proposed project's potential to *physically* divide an established community. As analyzed in Section 4.10, Land Use and Planning, of the Draft EIR, the proposed project would not introduce any new uses to the area that do not already exist and therefore, would not divide an established community. The addition of residential uses combined with neighborhood serving retail and creative office uses would help to create a balanced community. The surrounding land uses consist primarily of light-industrial uses and begin to transition to residential uses to the north across Colorado Avenue. The proposed mix of uses is consistent with the LUCE vision for the Mixed-Use Creative land use designation and would be compatible with the existing residential and light industrial uses.

The proposed project would include the extension of Pennsylvania Avenue and a new north-south road that would provide access from Colorado Avenue to the Pennsylvania Avenue extension. These proposed connections would help establish a neighborhood-scale street grid that would improve the pedestrian,

bicycle, and vehicular connectivity of surrounding land uses and would not divide any existing communities. Therefore, the proposed project would result in a less than significant impact with regard to the division of an established community.

With regard to population displacement impacts, as stated in Section 4.13, Population and Housing, of the EIR, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Therefore, the proposed project would not displace substantial number of people, necessitating the construction of replacement housing elsewhere. Upon implementation of the relocation provisions of the development agreement, population displacement impacts would be less than significant.

Comment6-6

Regulatory Setting

The current zoning of the VTP properties is "Residential Mobile Home Park District" (R-MH)

- This permits primarily mobile homes and small family day care. *According to this Draft EIR, this "project includes several components that are not consistent with ... R-MH zone".*
- The property owner has no legal entitlement to break this zoning. The interests of the City of Santa Monica are very obviously in retaining this residential community and it's numerous environmental and cultural benefits which spread out well beyond it's borders, rather than allowing this over development.
- I do not believe it is true that, "The LUCE establishes a land use designation for the project site as "Mixed-Use Creative". *That may be the designation for the entire area, but as stated above - this is not the zoning for these parcels.*

Response 6-6

As stated in Section 4.10, Land Use and Planning, of the Draft EIR, the proposed project would include land uses that are not consistent with the very limited types of uses in the R-MH zone; however, the proposed Development Agreement establishes that the proposed project only needs to be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. Per Government Code Section 65867.5, a development agreement is a legislative act that shall be approved by resolution or ordinance. Because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e., zoning standards) as long as they are consistent with the general plan and any applicable specific plan.

As shown in Figure 4.10-4 in Section 4.10, Land Use and Planning, of the Draft EIR, the project site currently has a LUCE land use designation of "Mixed-Use Creative" which encourages the combination of studio-related uses (such as film and music production) with affordable, workforce and market rate housing and ground floor, active, local-serving retail. As discussed in detail in the Draft EIR, the proposed project is a Tier 3 project that would require processing of a development agreement. The proposed project's land uses, height, and FAR would be consistent with that allowed by the LUCE for Tier 3 projects in the Mixed-Use Creative District. Therefore, the proposed project would be consistent with the LUCE and would be in compliance with existing law.

Comment 6-7

Cultural Resources

The VTP is "not historically significant... it's loss will not result in significant impacts to historical resources."

- This has yet to be determined. The Landmarks Commission has decided to review the VTP for a possible designation.

- Therefore, as this Draft EIR itself states, " Construction of the proposed project could cause a substantial adverse change in significance of a historical resource" - Like totally destroying it.

Response 6-7

Subsequent to circulation of the Draft EIR, an application to designate the property as a City Landmark was received by the Landmarks Commission. As part of the Landmark application process, two historic assessments that evaluated eligibility for City landmark status were prepared for the project site in February 2012. The Village Trailer Park Historic Resource Assessment was prepared by Chattel Architecture Planning and Preservation, Inc. According to this report's findings, the property is ineligible for listing locally as a Santa Monica Landmark, in the California Register of Historical Resources and in the National Register of Historic Places. Additionally, a City Landmark Assessment Report was prepared for the Village Trailer Park by ICF International. According to this report, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4):

On February 13, 2012, the Landmarks Commission held a public hearing to discuss the two reports and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission voted to not designate the property. As was previously determined in the Draft EIR, impacts on historic resources would be less than significant. The Landmarks Report and associated information has been included as Appendix I of this Final EIR, and a discussion of this information has been added to Section 4.5, Cultural Resources. Please see Chapter 10.0, Corrections and Additions, of this Final EIR for these revisions.

Comment 6-8

Air Quality

"The proposed project would not contribute to a cumulatively considerable impact related to operational air quality."

- Of course it would. The removal of hundreds of mature trees with their beneficial air quality effects will lower the air quality permanently. This is true because:

Response 6-8

The air quality analysis was completed in accordance with guidance provided by the SCAQMD. The SCAQMD requires emissions to be estimated for construction and operational activity. The SCAQMD, nor any other State air district, have provided guidance for assessing the air quality impacts of tree removal from an urban area. It is accurate that large-scale deforestation or urban tree removal may degrade air quality conditions. However, it is not anticipated that the removal of approximately 107 urban trees from a small area of City land (i.e., less than four acres) would significantly impact local air quality conditions. If the trees were to remain on-site, they may marginally improve local air quality

by absorbing small amounts of pollution. The estimate of operational air quality emissions does not include a reduction of emissions associated with existing trees on the project site. This resulted in a conservative analysis that gave the greatest and worst-case incremental increase in air emissions to compare to the SCAQMD thresholds of significance. Even under these worst-case conditions, regional operational emissions would be less than significant.

Comment 6-9

- There will fewer trees on the site in perpetuity- It will take decades for these new trees to begin to benefit the area, and that benefit will always be less
- The much more intensive use of the property will always generate more air pollution

Response 6-9

Please see Response to 6-8, above, for a discussion of the proposed project's impacts on trees.

Comment 6-10

Population and Housing

The proposed project will "displace 109 mobile home lots" ... "No net loss"

- This is untrue both in qualitative and quantitative terms, because:

Those displaced are losing more than a "unit". A renter is also guaranteed the maintenance (the full use, etc...) of the property as it was when they rented it. The contract requires the context be provided as originally agreed to. Replacement units in a big box of a building are not equivalent to homes in a healthy forest.

The replacement units are unlikely to be at the same costs to which residents of this community are accustomed and entitled, and no other equivalent units exist in Santa Monica.

Response 6-10

As stated in Section 4.13, Population and Housing, of the Draft EIR, the proposed project would include a mix of rent-control, affordable, and market rate housing units on the project site. This would include the development of 166 apartment units (of which 109 would be rent-controlled, 52 would be deed restricted as affordable housing, and 57 would be market rate) and 227 market rate condominiums. The proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Of these, at least 15 percent (16 units) must be at rents affordable by persons of low income. The proposed project would include 52 units that would be deed restricted as affordable housing. Therefore, the proposed project would not displace substantial numbers of housing and would not necessitate the construction of replacement housing elsewhere; impacts would be less than significant.

The Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Therefore, the proposed project would not displace substantial number of people, necessitating the construction of replacement

housing elsewhere. Upon implementation of the relocation provisions of the development Agreement, population displacement impacts would be less than significant.

It should be noted that subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative, which is described and analyzed in Chapter 5.0, Alternatives, of the Draft EIR. This alternative would result approximately 486 residential units, consisting of 141 studios/one-bedroom apartment units, 270 one-bedroom condo units, and 75 two-bedroom units. As with the proposed project, this alternative would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units.

Comment 6-11

Water Usage

The "proposed water increased usage is less than significant".

- How is this even remotely possible with a project which will transform the property into a so much denser occupation of several types.

Response 6-11

As analyzed in Section 4.16.1, Utilities and Service Systems, of the Draft EIR the proposed project would result in a water demand of approximately 61,022 gpd. When accounting for the removal of the existing trailers on the site, the net increase in water usage of the proposed project is approximately 51,598 gpd of water. The proposed project's net water usage would represent approximately less than 0.1 percent of the City's projected total water supply in 2020 during a normal water year and single dry/multiple dry years. This would be an incremental increase of the water forecasted to be supplied in 2020, and thus, it is anticipated that City would have sufficient groundwater and imported water entitlements to serve the proposed project.

In addition, it should be noted that the project's net water demand of 51,598 gpd is conservative since it does not account for water use reductions that would occur from implementation of the project's water conservation measures that are required to comply with the City's Green Building Ordinance and to achieve a LEED rating. Thus, project water demand would likely be less than the calculated net increase of 51,598 gpd. In addition, the City has indicated that it would be able to supply water to the proposed project.⁴ Therefore, the proposed project would not result in an increase in water demand that would strain available supply.

As previously stated, subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative, which is described and analyzed in Chapter 5.0, Alternatives, of the Draft EIR. Under Alternative 3, the total net water demand would be 54,521 gpd, which is an increase of 2,923 gpd as compared to the proposed project. Therefore, water demand impacts under Alternative 3 would be greater than under the proposed project. According to the City's 2010 UWMP, the City projects that it would supply 24,475 acre-feet per year of water during a normal water year or 24,015 acre-feet of water during a single dry year or multiple dry years in 2020. Alternative 3's net water usage would represent less than 0.11 percent of the City's projected total water supply in 2020. This would be an incremental increase of the water forecasted to be supplied in 2020, and thus, it is anticipated that City would have

⁴City of Santa Monica Public Works Department – Water Resources, Susan Lowell, P.E., written correspondence, September 21, 2010.

sufficient groundwater and imported water entitlements to serve Alternative 3 and impacts related to water supply would be less than significant under Alternative 3.

Comment 6-12

The No Project Alternative

While development cannot be prevented, I do not believe there is anything in the law that requires our city to overrule our zoning (Residential Mobile Home Park District), our environmental interests, our common sense, and our humanity to accommodate this project. The "no project alternative" allows "What would be reasonably expected to occur (on the site) in the foreseeable future if the project were not approved, ...".

Perhaps the property owner could put resources into improving the VTP and make money that way - for example by replacing the mature trees that have been removed over the years and generally sprucing up those areas of the park which have not been kept up, adding free wi-fi, and electric car charging stations, etc. Perhaps he could add a small family day care facility as the current zoning allows. New residents could be attracted into the now empty capacity.

Response 6-12

Please see Response 3-4, above, for discussion of the project's consistency with existing zoning. As stated in the response, the proposed project would be implemented through a Development Agreement which requires that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site.

The commenter's support of the No Project Alternative is noted. The comment suggesting improvements be made to the existing mobile home development instead of development of the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 7

November 30, 2011

Kimberly Burke-Connors
Kim.Burke-connors@us.initiative.com

Comment 7-1

My name is Kim and I live in Santa Monica quite close to where the Village Trailer Park is located. I wanted to voice my concern on this new project. I'm extremely worried about many factors in building this new complex but most importantly the air quality conditions and traffic this new project/development will create for all the Santa Monica residents living close to the area. It is scary enough that Los Angeles is the 4th worst city in the entire country when it comes to the quality of air and now to add something like this...I think it is very bad idea.

Thanks very much for your time Jing.

Response 7-1

The commenter's concern is noted and will be forwarded to the decision-makers for their consideration.

The proposed project's operational and construction impacts on air quality are analyzed in Section 4.2, Air Quality and Section 4.4, Construction Effects, of the EIR respectively. The air quality analyses were completed in accordance with guidance provided by the SCAQMD in the CEQA Air Quality Handbook and updates to the Handbook. The SCAQMD was consulted before and after the air quality analysis was completed. The air quality analysis of operational impacts considered all sources of air pollution, including additional traffic. As determined in Section 4.2, Air Quality, long-term operational emissions associated with the proposed project would not result in a significant regional or localized impact based on thresholds established by SCAQMD. As analyzed in Section 4.4, Construction Effects, localized construction-related emissions would exceed SCAQMD thresholds even with mitigation. Therefore, construction of the proposed project would result in a significant and unavoidable impact related to localized air emissions.

Section 4.15, Transportation and Traffic, of the Draft EIR provides an analysis of the proposed project's traffic impacts. Please also refer to Response 1-2, above, for a discussion of the proposed project's operational traffic impacts.

Comment 7-2

I'm hoping that I, along with many others, have voiced their concerns to you and that the city will truly look at this project and take into consideration that this will most definitely affect its residents in a negative way. I am proud to live in Santa Monica and love this city but do not agree with this new development being built and hope this project does not get approved. Again, this will have a severely negative impact on many folks in the surrounding area not to mention health complications I am sure. If this development gets the green light which would be very disappointing to many, I will be requesting more information and contacting a lawyer in case I develop any sort of asthma or health problem living so close to this development area. Just another thing the city has to be aware of and think about. Please help to be an advocate for your residents and please let me know what I can do to stop this process moving forward.

Response 7-2

The commenter's concern and opposition to this project is noted and will be forwarded to the decision-makers for their consideration.

Letter 8

October 28, 2011

Jack Donner
Village Trailer Park
2930 Colorado Avenue, Spc. C11
Santa Monica, CA 90404

Comment 8-1

First, thank you for your work which, I'm sure must be very stressful at times, not only for you but for all the city personnel there. You all have shown care and respect towards our city's citizens, particularly its elders and seniors.

Speaking of which, I am an elder, 83 years of age, who has lived in the Village Trailer park since 1985. I am also a licensed psychotherapist (trained since 1970, licensed in 1986 in California, license # 22155) and can attest with earned credibility as to the damage done, again, especially to the elders who live in the park by the behavior and actions of Mr. Luzzatto et al. in their efforts to close the park and develop it for commercial gain.

The fear, stress and confusion their behavior - which I shall cite below - has generally taken a terrible toll on our lives, well-being and health. Upon first receiving their notice of closure, in 2006, two people committed suicide, one of whom, Mr. John Stiles, told another resident, and I believe put in a note, his intention to kill himself. "I have nowhere to go," he said. The other victim was a Mr. Holovsky. I have no idea if he made his intention known.

This was the extreme reaction to the notice, and it seems to me that these men may have been especially emotionally vulnerable, which does not excuse the heinousness of the event.

That 2006 notice seemed to have been illegal, not having the approval of the city, and was apparently a device to scare the residents and drive them out of the park which, in at least these two cases, was achieved to a dire, and I would say criminal if not immoral, degree.

And the general level of suffering by the residents was great. Their sense of security and peace of mind was shattered. The dream of having one's own place, however humble our mobile homes may seem, our pride in the homes and generally beautiful personal and protected environments (gardens, patios, privacy and peace) we have created was shattered. In many cases our general health suffered.

At first Mr. Luzzatto said he would build Section 8 apartments facing Stanford Street for which a certain number of us could have priority. The apartments proposed were to be small, often with less square footage than some of our homes. Once furnished they would have been seriously cramped, perhaps sterile entities unfit and unsafe (going up from the proposed parking basement to the apartments alone would have been hard for many elders, as opposed to being able to park their cars very close to their homes on the same level). The rental of these apartments, Section 8 or not, would have placed an additional hardship on many of our elders.

Response 8-1

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 8-2

Speaking of cars, your letter cites an additional 778 parking spots for the proposed commercial and residential habitues of the proposed development. At times during the day and evening, traffic as it is now is unbearable with regard to time, pollution and safety. Imagine how the traffic of so many more cars, trucks and other vehicles coming and going would add to the assault to the environment! Many in the entire neighborhood are strongly opposed to this development on this basis alone.

I am sure the city has heard from such neighbors.

Response 8-2

Section 4.15, Transportation and Traffic, of the Draft EIR provides an analysis of the proposed project's traffic impacts. Please also refer to Response 1-2 for discussion of the proposed project's operational traffic impacts.

The proposed project's operational impacts on air quality are analyzed in Section 4.2 Air Quality of the EIR. The air quality analysis of operational impacts considered all sources of air pollution, including additional traffic. As analyzed in Section 4.2 Air Quality, long-term operational emissions associated with the proposed project would not result in a significant regional or localized impact based on thresholds established by SCAQMD. Therefore, operational impacts on air quality would be less than significant.

The commenter's concerns are noted for the record and will be forwarded to decision-makers for review and consideration.

Comment 8-3

When I talk to the residents and at our meetings it is clear to me that they are living in a constant state of anxiety and confusion, which has an appalling effect on our general health. Because of the many years of my counseling experience and applying the process to myself, I am fairly stable psycho-emotionally, and even *I* feel the stress daily. I have at least one counseling session a week just to keep at bay the stress from this matter from worsening my diabetes and hypertension.

In his letter to the editor of the *Santa Monica Patch* of July 22, 2011 ([http://santamonica.patch.com/\(topics/Kevin+McKeown\)](http://santamonica.patch.com/(topics/Kevin+McKeown))), Santa Monica Councilman McKeown stated, "Now is the time our council must live up to last summer's commitment. If the approval of the Lionsgate project as currently proposed means the subsequent eviction of our long-term neighbors in the nearby Village Trailer Park, we must pause and seek a better plan. Evicting the powerless is not the Santa Monica way."

This is an aware and sensitive person. Allow me to explore his statement a bit further. Who are these "powerless" people to whom he is referring? The residents of the park are people who have lived lives that have contributed talents and intelligence to the benefit of their communities for many years, many in Santa Monica, who have lived hopes and dreams, who have given of their energy and love to family, to friends, and in general to the people of Santa Monica, who have found that peace, safety and pride I talked of earlier in this place we call the Village Trailer Park, at a financial level they can afford.

They do not deserve to be ushered out of such personal circumstances as I have described because they are "old," are not wealthy, and live for the most part on fixed incomes. They do not deserve to be pawns manipulated for the benefit of the pockets of already wealthy people who wish to add, unnecessarily I might say, to their fortunes. With undoubtedly many exceptions, the class of landlords and property owners in general has a pattern that is voracious in their relationship to their tenants (necessitating a policy of rent control to put a check on "greed" - the "Occupy" movement is just beginning to grow

worldwide - but the infection of greed, born out of fear, has been with humanity since perhaps all the way back). They may be otherwise good people, but we do not see goodness in their business habits.

If we must leave the park, where, indeed, do we go? Does the city have the resources to house all of us in a manner comparable to that which we have now, both in the spirit and affordable level we have now? Some spots at the Mountain View mobile home park have been discussed, a place (and I hasten to thank the city for at least providing such a resource) next to a pollution-belching freeway, and on top of (I have been given to understand) a methane field. Is that what these people deserve?

Luzzatto et al. followed up on the first closure notice with a second such notice in March of 2007. Did that action have the city's blessing? It multiplied the distress exponentially for many of us.

Luzzatto et al. refuse to fill up the vacant spaces when owners move out or move away, and then they claim that the park loses revenue.

Response 8-3

Please see Response 6-10, above, for a detailed discussion of the proposed project's impacts related to population displacement.

Comment 8-4

The homes Luzzatto et al. have taken over are currently being physically destroyed, spreading debris and pollution into the immediate environment. Many elders have complained about ill health effects from this. It is my understanding that some of the homes being tom apart contain asbestos. This is not to mention the noise pollution.

Response 8-4

A Phase I Environmental Site Assessment Report was prepared for the Village Trailer Park by Partner Engineering and Science Inc. in February 2012. The report concluded that due to the age of the property buildings, there is a potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. Overall, all suspect ACMs and painted surfaces were observed in good condition and do not pose a health and safety concern to the occupants of the project site at this time. Due to the age of the buildings on-site, there is a potential that ACMs and/or LBP are present.

Page 4.8-9 of Section 4.8, Hazards and Hazardous Materials, of the Draft EIR and Mitigation Measure HM2 has been revised to reflect the potential for ACMs and LBP to be present in the existing trailers. In addition, the following mitigation measure has been added to reduce potential asbestos-removal impacts:

HM-3: An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

With mitigation measures, impacts associated with the accidental release of hazardous materials from the demolition of permanent structures and trailers on-site would be reduced to less than significant.

The Phase I has been included as Appendix J of this Final EIR, and the associated revisions have been noted in Chapter 10.0, Corrections and Additions, of this Final EIR.

Comment 8-5

Recently Luzzatto et al. threatened to cut down our trees (without any regard or consultation with the park's residents), but I believe the "Tree Savers" association stepped in to help put a stop to that. The Village Trailer Park has many friends in Santa Monica.

On the topic of trees, I believe the Village Trailer Park has the greatest number of trees per square footage in our city. It is practically a reserve for wildlife: hawks and other bird life, raccoons, squirrels, cats (who are cherished and taken care of by the home owners), and who knows what other critters. Humans and wildlife existing together; this is part of the charm of the park, which has long been enjoyed not only by the residents but by neighbors and many Santa Monicans. This is an enjoyment that far exceeds that of the behemoths (some are indeed beautifully designed) that line so much of Colorado Avenue.

(When I first moved into the park, I felt as though I had landed in a blessed haven, a refuge from the busy hustle of city life, yet smack in the middle of a delightful, sensible and available charming city. It felt like a reward for my life efforts. What city would want to destroy such an asset?)

Response 8-5

Please see Responses 6-2 and 6-4 for a discussion of the proposed project's impacts on biological resources (including trees and wildlife habitat).

Comment 8-5

The park has come to the attention, I understand, of the Landmarks Commission as being historically important for Santa Monica. It has long been rumored that the park was built as a temporary residence for tourists, but I think it is documented that the park was established as a residence for the work force employed by some of the well known airplane factories in the 1950s.

What city wants or needs to replace its history with another commercial enterprise?

Response 8-5

Please see Response 6-7 for a discussion regarding the City of Santa Monica Landmark Commission's vote on the project's site eligibility for landmark status.

Comment 8-6

It is strongly rumored that one of the attorneys in Luzzatto's entourage has made it a deliberate business to travel the length of California seeking to close down mobile home parks for developers.

Luzzatto wears a smile and claims compassion for our elders, yet plows ahead incessantly with his actions and "plan."

Are these behaviors that fit what Mr. McKeown described as "the Santa Monica way?"

In business, in all walks of life, we find hurtful people, but those who hurt and exploit vulnerable elders are especially abusive and oppressive. I would think, I would hope that Luzzatto et al., a group that could be described this way, would not knowingly be awarded the opportunity to make fortunes and enjoy the status of power through the suffering of decent, worthwhile, innocent, "powerless" souls by our honest, fair and caring city.

Thank you for taking the time to read and consider this offering.

Response 8-6

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 9

October 14, 2011

Kurt Gary
Kurtkraft
1618 Stanford Street Unit B
Santa Monica, CA 90404

Comment 9-1

I have a business at 1618 Stanford St. This project would affect me directly with increased traffic. Traffic in Santa Monica is becoming unbearable and this would only add to the problem. I do most of my travels in Santa Monica via bicycle to avoid some of the traffic. This project will add to the sewage load and solid waste for the city by its sheer size. How could this possibly be a good idea for Santa Monica except as added revenue it surely will not increase quality of life.

Response 9-1

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Topics addressed include intersection impacts, neighborhood street segment impacts, site access and circulation, and the Congestion Management Plan (CMP). Please also refer to Response 1-2 for a discussion of the proposed project's operational traffic impacts.

Section 4.16.4, Utilities and Service Systems, of the Draft EIR provides an analysis of the proposed project's impacts associated with solid waste. As analyzed, operation of the proposed project would generate approximately 1.15 tons of solid waste per day or a net increase of one ton of solid waste per day. Currently, the total permitted daily intake at the landfills serving the City of Santa Monica is 56,000 tons per day. Estimated proposed project solid waste generation represents less than one percent of the maximum daily intake volume of the Class III landfills currently serving the City of Santa Monica. Therefore, these landfills are anticipated to have sufficient permitted daily capacity to receive solid waste generated by the proposed project. However, it should be noted that only five of these landfills have lifespans that would allow them to operate at the time of the proposed project build out in 2017: the Frank R. Bowerman Sanitary Landfill, Lancaster Landfill, Olinda Alpha Sanitary Landfill, Simi Valley Landfill & Recycling Center, and the Sunshine City/County Landfill. The total maximum daily intake capacity of these five landfills is 36,800 tons. The proposed project solid waste generation would represent less than one percent of the maximum daily intake capacity at these five landfills. In addition, it should be noted that the generation rates do not account for recycling and/or reuse measures that would occur. As a result, the proposed project's actual disposal at landfills would be less than the estimated 1.15 tons of solid waste per day. Therefore, impacts would be considered less than significant.

Section 4.16.2, Utilities and Service Systems, of the Draft EIR provides an analysis of the proposed project's impacts associated increased generation of wastewater. As analyzed, the proposed project would generate a total of 55,077 gpd of wastewater. When accounting for removal of the existing uses, the net wastewater generation of the proposed project is 46,565 gpd. However, this would not exceed the capacity of existing wastewater infrastructure, nor would it require the construction of new, or expansion of existing, wastewater treatment facilities or conveyance systems that could cause significant environmental effects. Impacts would be less than significant. Please see Section 4.16.2, Utilities and Service Systems, for further discussion.

As previously stated, subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial

Alternative, which is described and analyzed in Chapter 5.0, Alternatives of the Draft EIR. Please see Chapter 10.0, Corrections and Additions, for minor revisions to the solid waste generation analysis for Alternative 3. Under Alternative 3, the net solid waste generation would be approximately 2,418 pounds per day or 0.99 tons per day. Therefore, solid waste generation impacts under Alternative 3 would be greater than those under the proposed project but would also be less than significant. Additionally, the net wastewater generation for Alternative 3 would be approximately 57,745 gpd which is an increase of 2,568 gpd as compared to the proposed project. Therefore, wastewater generation impacts under Alternative 3 would be greater than those under the proposed project. Based on the current remaining capacity (approximately 145 mgd) of the Hyperion Treatment Plant, the existing wastewater treatment system would have sufficient capacity to serve Alternative 3, and impacts related to wastewater would be less than significant under Alternative 3. In addition, similar to the proposed project, a sewer study to assess capacity of existing sewer lines would be required prior to the issuance of a building permit. Impacts under Alternative 3 would be greater than the proposed project due to the increased wastewater generation.

Letter 10

December 2, 2011

Dale Goldsmith
Armbruster Goldsmith & Delvac LLP
11611 San Vicente Boulevard, Suite 900
Santa Monica, CA 90049

Comment 10-1

As you know, we represent Village Trailer Park, LLC, the applicant in the above-referenced matter. On behalf of our client, we commend the Planning Department and its consultant team for preparing a very comprehensive and accurate Draft Environmental Impact Report ("Draft: EIR").

Response 10-1

This comment is introductory in nature. No responses to this comment are necessary.

Comment 10-2

We note that the Draft EIR discusses a reduced density alternative to the proposed project. We request that the Final EIR include additional information regarding the potential environmental impacts of this alternative so that the public and the City decision-makers will have the most complete information possible to evaluate the proposed project.

Thank you for your consideration.

Response 10-2

Chapter 5.0, Alternatives, of the Draft EIR, pages 5-4 through 5-5, does provide a discussion of a reduced project alternative. As discussed in therein, this alternative was considered but rejected due to this alternative's failure to meet project's objectives to the same extent as the proposed project. In addition, the financial feasibility analysis provided by the project applicant determined that this alternative was financially infeasible.

It should be further noted that subsequent to publication of the Draft EIR, the Southern California Association of Governments adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) on April 4, 2012. Pursuant to Chapter 4.2, Implementation of the Sustainable Communities Strategy, of CEQA (Public Resources Code Section 21155 et seq.), the proposed project is considered a Transit Priority Project. Specifically, the proposed project meets all of the criteria for a transit priority project:

- Consistent with SCS.
- At least 50 percent residential use.
- A minimum density of 20 dwelling units per acre.
- Located within ½ mile of major transit stop or high-quality transit corridor in the RTP.

Per Public Resources Code Section 21155.2(c), as a transit priority project, the proposed project qualifies for CEQA streamlining under Public Resources Code Section 21159.28. Based on these statutory provisions of CEQA and SCAG guidance (see Appendix N of this Final EIR), an EIR for a transit priority project:

- Shall not treat as cumulatively considerable cumulative effects that were adequately addressed and mitigated in prior EIRs.
- Shall not be required to reference, describe, discuss (1) growth-inducing impacts or (2) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network.
- Shall not be required to analyze off-site alternatives to the TPP.
- Shall not be required to reference, describe, or discuss reduced density alternative to address effects of car and light-duty truck trips generated by project.

Therefore, under the newly adopted SCS, the EIR for the Village Trailer Park project need not discuss the reduced density alternative.

Nonetheless, in response to this comment, this alternative has been analyzed in greater detail. This analysis has been included as Appendix K of this Final EIR. The inclusion of this analysis is for information purposes only and is not required to complete this EIR in compliance with CEQA, as set forth in Chapter 4.2 of CEQA. See *Santa Barbara County Flower & Nursery Growers Assn. v. County of Santa Barbara* (2004) 121 Cal.App.4th 864.

Letter 11

December 14, 2011

Ron Harari
The Luzzatto Company, Inc
2444 Wilshire Boulevard, Suite 320
Santa Monica, CA 90403

Comment 11-1

A couple of comments regarding the DEIR:

In section 3.3.1 – Existing Development and Uses The second sentence of the second paragraph states “The only permanent structure is the office located at the entrance of the mobile home park, which is one-story and built in a typical mid-century modern style with low-slung buildings, distinct lines and large slanted windows.” The first part of this statement is inaccurate as there is a manager’s residency and laundry facility which are both permanent.

Response 11-1

The Draft EIR has been revised to indicate that the project site is occupied with an office, manager’s residence, and laundry facility (see Chapter 10.0, Corrections and Additions, of this Final EIR). This minor change does not alter the analysis or conclusions of the Draft EIR.

Comment 11-2

Secondly, we may want to mention impacts from removing the existing trailers which could include asbestos exposure, etc

Response 11-2

Please see Response 8-4 for a discussion of the findings of the Phase I Environmental Site Assessment prepared for the project site and revisions to the Draft EIR to address the potential impacts from asbestos.

Letter 12

October 14, 2011

Marcia Harris
Mrharris35@verizon.net

Comment 12-1

I browsed through the online Draft EIR and thought that many of my fears were covered and mitigated by your department's careful planning.

I would like to see something that would help mitigate the traffic. Adding over 700 parking spaces appears to mean that the people living in the condos and apartments will use only some of the parking (don't we already have many, many unoccupied offices in Santa Monica? I recommend traffic lights on Colorado & Stanford, as well as Centinela & Pennsylvania. These intersections are already heavily impacted by current traffic with frequent minor accidents. Since I live at 1636 Franklin St., I will hopefully enjoy the commercial facilities available. However, traffic in this little corner of Santa Monica is already fierce: we have a large private high school 2 blocks south, the college annex on Stewart, the new lite rail, etc. I'm sure you are aware of all of these. I would welcome comments from any planner that would like to attempt to leave my home and drive in any direction during rush hour as it is now. I'm sure you have some ideas for making this work. Please let me know. Thanks. Marcia Harris

Response 12-1

The commenter is requesting a traffic signal at Colorado Avenue and Stanford Street and Centinela Avenue and Pennsylvania Avenue. The comment is noted however neither intersection would meet signal warrants under future plus project conditions (Appendix O) and neighborhood cut-through mitigation measures are already in place at Colorado Avenue and Stanford Street to prevent PM peak period intrusion. Signalization could result in additional secondary impacts in the adjoining residential neighborhood by inducing more traffic to use these streets.

Letter 13

October 17, 2011

Matthew Harrison
matthewharrison10@verizon.net

Comment 13-1

Received your notice re Village Trailer Park development. Thank you.

As a 16 year SM resident, we suggest requiring the developer to place \$4 million (or more) in escrow specifically for the Yale street stop of the planned Wilshire Blvd. subway line. Perhaps you already have a provision like this. If so it could be helpful to explain this responsible commitment to real community development in further notices.

Putting in 778 parking spaces is detrimental and short-sighted, in our humble opinion. An auto-centric plan does not seem like a good future for Santa Monica.

Response 13-1

As stated in Chapter 3.0, Project Description, of the Draft EIR, the proposed project would be subject to a Development Agreement that would set forth community benefits to be provided by the project applicant. While this entitlement process is ongoing, community benefits could include an investment in transit/transportation improvements. This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 14

November 28, 2011

Matthew Harrison
matthewharrison10@verizon.net

Comment 14-1

Seasons Greetings. I hope you and your family had a wonderful Thanksgiving.

As my wife, small child (11 months) and I live in close proximity to the proposed Village Trailer Park Development we thought we'd send a note.

As the developer is proposing 166 apartments (plus 227 condos) with parking for 778 automobiles, might we humbly suggest that before proceeding the developer be required to deposit several million dollars to a fund set aside for the building of the proposed Wilshire Avenue subway line.

To our family, bringing this many automobiles into the neighborhood seems irresponsible without a real commitment to below-surface rail transit. I'm sure you and your office have already thought of this. Thank you for listening and for doing such a great job. We really appreciate it. Have a Merry Christmas.

Response 14-1

Please see Response 13-1, above, with regard to potential community benefits to be provided by the project Applicant. As stated in the response, community benefits in the Development Agreement for the proposed project could include an investment in transit/transportation improvements. This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 15

December 2, 2011

Gregg Heacock
logicconex@roadrunner.com
1528 Yale Street #4

Comment 15-1

Living almost directly across the street from Village Trailer Park, I have had the benefit of directly experiencing it as a community benefit. Any Environmental Impact Report should consider the effect of a unique environment both on the neighborhood surrounding it and on the residents who are part of it. I do not believe adequate attention has been given to either in terms of the first part of the Village Trailer Park Project--that is, demolishing the Village Trailer Park and displacing those who presently reside there.

Communities develop over time and sometimes through shared adversity. No other community in Santa Monica has the characteristics of Village Trailer Park. It is worthy of being studied for its sociological importance, just as certain ethnographic communities in various locals have been studied. When we are looking at creating a Wise & Healthy Aging Village, it seems quite neglectful not to explore this Village as it fits this model. Not to assess the health benefits of living in this community is not to assess adequately the environmental impact of getting rid of this community and the structures of support inherent within it.

Response 15-1

In accordance with Section 15121 of the State CEQA Guidelines, the purpose of an EIR is to serve as an informational document that:

....will inform public agencies decision-makers and the public generally of the significant environmental effects if a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

The Draft EIR has been prepared as a Project EIR, pursuant to Section 15161 of the CEQA Guidelines. A project EIR is appropriate for a specific development project. As stated in the CEQA Guidelines:

This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

Pursuant to CEQA Guidelines Section 15064(e), economic and social impacts of a project are not to be treated as “significant” impacts on the physical environment, as defined. To the extent that there is a connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is “significant.”

Please see Response 6-10, above, for a discussion of the proposed project’s population and housing displacement impacts.

Comment 15-2

I have read that the California Mobilehome Residency Law requires preparation of a tenant impact report, including preparation of a relocation plan. In the report submitted to the Mayor and the City Council on

November 22nd, I see the following: "Staff and the relocation consultant have provided information regarding available affordable housing resources to all residents." I do not see where that satisfies the requirement for a tenant impact report, nor do I think it sufficient to prepare either the residents of the park or the city for the repercussions possible in trying to relocate people who have purchased trailers with the understanding that they could get a fair return on their investment if they ever had to move. If statements by residents, regarding the information provided by Marc Luzzatto before they made such purchases are true, he did not fairly represent the true situation, especially when at least one person claims to have purchased a trailer only to find out three weeks later that the park was destined to close.

As well, I do not see any reference to people requesting to come into the park. Dennis Shay, the general manager of the park, told me that he gets calls every week from owners of vintage trailers wishing to become part of this community. The fact that this community could grow and that what pertains to this environment might be shared with others seeking affordable housing in Santa Monica has not been explored.

Response 15-2

This comment is not a specific comment on the environmental analysis in the Draft EIR. However, it is noted for the record and will be forwarded to the decision-makers for their consideration. It should be noted that the tenant impact report and relocation plan is currently underway and is separate from the CEQA process.

As stated in Section 3.0, Project Description, of the Draft EIR, the Development Agreement between the City and the developer would be informed by a tenant impact report, as required by California law, and would include a relocation plan for existing Village Trailer Park residents, which must be approved by the City Council. Relocation options would include the opportunity to relocate to the nearby City-owned Mountain View Mobile Home Park or the rent controlled apartment units on the project site. Additional relocation options for the remaining Village Trailer Park residents would also be identified as part of the Development Agreement process.

Comment 15-3

Further, to equate planting new trees to replace those that would be torn down or moved in order to accommodate the new buildings planned shows little understanding of the value that this piece of has as part of our urban forest. I walk my dog through the park because there is no other natural environment like it in all of Santa Monica. Even with some of the trailers demolished, the greenery still provides comfort for those who live there. It also supports a migratory bird population that has diminished over the years in various parts of Santa Monica where new development has taken place.

Response 15-3

Please see Responses 6-2, 6-3 and 6-4, above, for a discussion of the proposed project's impacts on trees and migratory birds.

Comment 15-4

I also see this plan as inconsistent with the LUCE. In providing the other people developing projects in that area with potential scenarios, I do not believe an earnest effort has been made. Let me suggest a scenario that one of the developers found most interesting. The people living around the area known as the Mixed-Use Creative District want more green space and, if this is to be a walkable city, they will need a public library to serve the elderly and the young who are moving into affordable housing nearby. The Museum of Broadcast Communications would find this an excellent location for its video library,

including Desilu Productions, which filmed *The Long, Long Trailer* with Desi Arnes and Lucille Ball. Placed near the Lionsgate Building and the Village Trailer Park and serving as an adjunct to a new branch location for the Santa Monica Public Library, we have the opportunity of mixing several cultures. This is much more interesting than what is presently planned.

Also, locating a composting facility on the grounds and developing a community garden resource center in that area would serve our community well. This could be a site that people would come to our city to see. As it now stands, the building pictured to front on Colorado looks like those that run along Wilshire. This is not what our community wants or needs.

Response 15-4

See Responses 6-5 and 6-6, above, for a discussion of the site's LUCE designation and which uses are encouraged in this designation.

The commenter's opinion regarding a museum as well as a composting facility and garden resource facility is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 15-5

Besides this, the plan now calls for dormitory-sized housing at high rents, much like what we see along Olympic near 20th. What is the benefit of such projects except for the developers, themselves? Also, a path for emergency vehicles does not need to be another street. Building an extension near Yale could increase traffic on my street, traffic we worked hard to keep down over the years. Such a road also would eliminate the green space we so desperately need in that area. Besides, it seems contradictory to say that building roads will reduce the number of cars on our streets.

Response 15-5

The commenter's opposition to the project and its extension of Pennsylvania Avenue is noted for the record and will be forwarded to decision-makers for review and consideration. It should be noted that the LUCE calls for circulation and access improvements in the Mixed-Use Creative District through the extension of new roadways and pedestrian pathways. The proposed extension of Pennsylvania Avenue fulfills LUCE goals and policies that aim to establish a neighborhood-scale street grid that would improve the pedestrian, bicycle, and vehicular connectivity of surrounding land uses.

Comment 15-6

The LUCE calls for the preservation of communities. The present zoning calls for a mobile home park. We, the neighbors, favor responsible development that brings true benefit to our area. The plans set forth in this Draft EIR do not fit the needs of this area. Instead, they create problems on top of the problems we already face. Worse, they remove a cultural and natural environment that cannot be replaced.

Response 15-6

Please see Response 6-6, above, for a discussion of consistency with the surrounding area, including consistency with zoning and land use designations. See Response 6-7, above for a discussion regarding the recent decision of the Landmarks Commission and Response 6-4, above, for a discussion of the proposed project's impacts on trees.

Letter 16

November 28, 2011

Immediate Neighbors

Comment 16-1

WE, THE UNDERSIGNED IMMEDIATE NEIGHBORS OF THIS PROJECT OBJECT COMPLETELY AND ABSOLUTELY TO THESE MASSIVE RESIDENTIAL DEVELOPMENTS THAT ARE BEING PLANNED FOR THIS PART OF SANTA MONICA. THE INFRASTRUCTURE IS ALREADY INADEQUATE AND OVERBURDENED, AND AT 5PM ON ANY WEEKDAY IT IS IMPOSSIBLE TO MOVE AROUND DUE TO THE EXCESSIVE CONGESTION FILLING OUR MAIN STREETS.

Response 16-1

This comment states opposition to the proposed project and is not a specific comment on the environmental analysis in the Draft EIR. However, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2 for a discussion of the proposed project's operational traffic impacts.

With regard to infrastructure, Section 4.16 Utilities and Service Systems of the Draft EIR provides analyses of the proposed project's impacts on water, wastewater, solid waste, and energy infrastructure. As analyzed therein, impacts would be less than significant.

Comment 16-2

WE ARE ALSO OPPOSED TO THE ADDITION OF NEW STREETS AND THE EXTENSION OF PENNSYLVANIA AVENUE TO STEWART STREET, AS THIS WILL BRING THE CONGESTION RIGHT INTO OUR NEIGHBORHOOD STREETS AS WELL.

Response 16-2

The commenter's opposition to the proposed extension of Pennsylvania Avenue and the New Road is noted for the record and will be forwarded to decision-makers for review and consideration. It should be noted that the LUCE calls for circulation improvements in the Mixed-Use Creative District through the extension of new roadways and pedestrian pathways. The proposed extension of Pennsylvania Avenue and the New Road would break up the existing large City blocks and improve circulation and access, consistent with the LUCE.

Comment 16-3

WE ARE IN FIRM OPPOSITION TO GETTING RID OF THE TRAILER PARK, THE PRESENT OWNERS SHOULD NOT HAVE BOUGHT IT UNLESS THEY WERE WILLING TO MAINTAIN IT AS A TRAILER PARK, AND THE LIVES OF COUNTLESS PEOPLE SHOULD NOT BE DESTROYED BECAUSE OF THEIR GREED.

Response 16-3

The commenter's opposition to the closure of the existing mobile home park is noted for the record and will be forwarded to decision-makers for review and consideration.

Chapter 5.0, Alternatives, of the Draft EIR provides a discussion of the No Project Alternative under which the existing Village Trailer Park would remain and no development would occur. As stated in the Draft EIR, this alternative would not meet the project objectives. In addition, the Draft EIR discusses an Alternative to Retain the Village Trailer Park whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was considered but rejected as it was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards.

Letter 17

December 2, 2011

Zina Josephs
Friends of Sunset Park
ZinaJosephs@aol.com

Comment 17-1

The FOSP Board recommends adoption of Alternative 1 -- No Project Alternative. Village Trailer Park is an irreplaceable neighborhood that provides affordable home ownership opportunities for low income residents. This neighborhood has existed since 1950. It should be preserved.

Response 17-1

This commenter's support of the No Project Alternative is noted for the record and will be forwarded to the decision-makers for their consideration.

Chapter 5.0, Alternatives, of the Draft EIR provides a discussion of the No Project Alternative under which the existing Village Trailer Park would remain and no development would occur. As stated in the Draft EIR, this alternative would not meet the project objectives. In addition, the Draft EIR discusses an Alternative to Retain the Village Trailer Park whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was considered but rejected as it was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards.

Comment 17-2

We further request that the Final EIR include cumulative impacts from all current development projects in the area (listed below), as well as additional options for Alternative 1 -- No Project Alternative -- such as possible land swaps with the city.

Response 17-2

Cumulative impacts have been analyzed in each of the environmental issue areas of the Draft EIR. The cumulative analyses takes into account all known past, present, and future development projects which are listed in Table 3-3 of the Draft EIR. Please refer to the respective issue areas within Chapter 4.0 Environmental Impact Analysis, for discussions of these impacts.

Please see Response 17-1 above regarding analysis of the No Project Alternative and the Alternative to Retain Village Trailer Park.

Comment 17-3

Air Quality -- Air quality impacts under the No Project Alternative would be less than the proposed project. Removing the existing mature trees and shrubs under the proposed project would have a negative effect on air quality.

Response 17-3

As noted in this comment and analyzed in Chapter 5.0, Alternative, of the Draft EIR, under the No Project Alternative, there would not be a source of new operational emissions associated with new development, including stationary source and vehicular emissions. Mobile and stationary source emissions would remain as they currently are and would not exceed SCAQMD regional or localized thresholds. Therefore, impacts under the No Project Alternative would be less than the proposed project. Please see Chapter 5.0, Alternatives, of the Draft EIR for further discussion.

With regard to the proposed project's operation impacts on air quality, the air quality analysis provided in Section 4.2, Air Quality, of the Draft EIR concluded that impacts on air quality would be less than significant. The air quality analysis was completed in accordance with guidance provided by the SCAQMD in the CEQA Air Quality Handbook (1993).

The air quality analysis was completed in accordance with guidance provided by the SCAQMD. The SCAQMD requires emissions to be estimated for construction and operational activity. The SCAQMD, nor any other State air district, have provided guidance for assessing the air quality impacts of tree removal from an urban area. It is accurate that large-scale deforestation or urban tree removal may degrade air quality conditions. However, it is not anticipated that the removal of approximately 107 urban trees from a small area of City land (i.e., less than four acres) would significantly impact local air quality conditions. If the trees were to remain on-site, they may marginally improve local air quality by absorbing small amounts of pollution. The estimate of operational air quality emissions does not include a reduction of emissions associated with existing trees on the project site. This resulted in a conservative analysis that gave the greatest and worst-case incremental increase in air emissions to compare to the SCAQMD thresholds of significance. Even under these worst-case conditions, regional operational emissions would be less than significant.

The comment regarding Alternative 1 is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 17-4

Biological Resources -- Under the proposed project, more than 100 mature trees would be destroyed, along with shrubs and flowering plants. 89 of the trees listed in the arborist's report were evaluated as being in "A" condition (the highest rating). Of those 89, more than 75% were listed as being of "high" value (the highest rating). The goal of the Urban Master Plan and the often discussed "city as arboretum" is to increase canopy, especially in low-canopy areas of the city. Under the No Project Alternative, no trees would be removed or disturbed, and existing bird nesting sites would not be disturbed, so impacts would be less than the proposed project.

Response 17-4

Please see Response 6-2, above, for a discussion of the proposed project's impacts on trees.

As noted in this comment, the No Project Alternative would not result in the removal of trees and/or potential disturbance of bird nesting site. As such, impacts on biological resources would be less than the proposed project. Please see Chapter 5.0, Alternatives, of the Draft EIR for further discussion.

Comment 17-5

Cultural Resources --According to the Draft EIR, "Under the No Project Alternative....the existing uses on the project site would remain unchanged and no impacts related to historic...resources would occur. Therefore, impacts under the No Project Alternative would be less than the proposed project."

On October 10, 2011, the Landmarks Commission agenda item 11-C was "Discussion on the potential historic significance of the Village Trailer Park located at 2930 Colorado Avenue." The minutes from that meeting show that "Commissioner Genser made a motion to ask staff to provide more information about the Village Trailer Park, addressing the issues discussed during this meeting. Commissioner Lehrer seconded the motion. A roll call was held for the motion and was approved by the following vote: A YES: Bach, Fresco, Genser, Kaplan, Lehrer, Shari, Chair Berley" -- this issue has not yet been resolved.

Response 17-5

Please see Response 6-7, above, for a discussion regarding the subsequent decision that the Landmarks Commission made regarding the project site.

Comment 17-6

Hydrology and Water Quality – Under the No Project Alternative, no new structures or uses would be proposed that would result in either the depletion of groundwater supplies or an increase in the amount of impervious surfaces.

Response 17-6

As noted in this comment, the No Project Alternative would not result in new structures or uses and would not result in impacts related to hydrology and water quality. As such, impacts on hydrology and water quality would be less than the proposed project. Please see Chapter 5.0, Alternatives, of the Draft EIR for further discussion.

Comment 17-7

Land Use --Under the No Project Alternative, "Existing uses on-site would remain. The existing mobile homes and their tenants (sic) would not be displaced." In other words, the No Project Alternative would result in "neighborhood preservation," one of the primary goals of the LUCE.

Response 17-7

Under the No Project Alternative, no construction activities would occur and no new structures or uses would be proposed that would modify existing land use relationships. The existing boundaries and land use composition of the project site would remain and no impacts related to land use and planning would occur. However, it should be noted that the No Project Alternative would not be consistent with the LUCE policies (D24.1 and D24.4) to create a mix of creative arts uses, neighborhood-serving retail and services, and residential types in proximity to the Bergamot Station of the Exposition Light Rail line. In addition, this alternative would not create the new Pennsylvania Avenue extension, which would enhance circulation and access in the area as called for in the LUCE.

Comment 17-8

Most, if not all, of the Village Trailer Park own their mobile homes and rent their spaces.

According to manta.com, "Village Trailer Park in Santa Monica, CA is a private company categorized under Mobile Homes-Parks and Communities. Our records show it was established in 1950 and incorporated in California. Current estimates show this company has an annual revenue of \$500,000 to \$1 million and employs a staff of approximately 1 to 4." <http://www.manta.com/c/mmyl7vk/village-trailer-park>

The Village Trailer Park utilities were upgraded a few years ago. With proper care, all 109 spaces could easily be filled and the neighborhood could flourish.

Response 17-8

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration. Specific responses to comments made on the environmental analysis are included in subsequent responses.

Comment 17-9

Neighborhood Effects -- Significant and unmitigatable neighborhood traffic impacts would not occur with the No Project Alternative.

Response 17-9

As noted in this comment, the No Project Alternative would not result in significant and unavoidable neighborhood traffic impacts. Please see Section 5.0, Alternatives, of the Draft EIR for further discussion.

Comment 17-10

Other concerns about the proposed project:

A. The proposed project includes 393 residential units, with 227 market-rate condos -- including 108 lofts, 83 one bedroom units, and 36 two-bedroom units. How is the city to develop family neighborhoods with such a preponderance of lofts and one-bedroom units? 84% of the market rate units in the proposed project will only house one or two people.

Of the apartments, there would be 73 studio units (38 affordable) and 93 one-bedroom units (14 affordable). Again, these would house only one or two people.

In contrast, the existing spaces at Village Trailer Park pads are 22 feet wide and 30 to 40 feet deep, large enough for double-wide mobile homes. Double-wide mobile homes can include 2 bedrooms and large living rooms, enough space for at least 4 residents. 109 double-wide mobile homes could house 109 families, i.e., 436 residents.

Response 17-10

This comment expresses concern about the housing unit type proposed and is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

As previously stated, subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative, which is described and analyzed in Chapter 5.0, Alternatives, of the Draft EIR. This alternative would result approximately 486 residential units, consisting of 141 studios/one-bedroom apartment units, 270 one-bedroom condo units, and 75 two-bedroom units.

Comment 17-11

Section 2.3 discusses "significant and unavoidable" impacts in the neighborhood, with increased traffic volumes in intersections and on neighborhood street segments. Section 2.21 describes 2,360 net new daily car trips, with "significant and unavoidable" impacts. Current daily trips are estimated at 245, one-tenth of the traffic to be generated by the proposed project.

Response 17-11

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. As stated in this comment and in the Draft EIR, existing uses on the project site are estimated to generate 245 daily trips, including 17 weekday AM peak hour trips and 19 weekday PM peak hour trips.

Under Approval Year Plus Project (Year 2011) conditions, the proposed project would generate a net new of 2,360 daily trips, including a net new of 155 weekday AM peak hour trips and 179 weekday PM peak hour trips. After implementation of mitigation measures, increased traffic volumes from the proposed project would result in significant and unavoidable impacts at 11 intersections under Approval Year (2011) Plus Project conditions. Under Cumulative Plus Project (Year 2020) conditions, the proposed project would generate a net new of 2,278 daily trips, including a net new of 144 weekday AM peak hour trips and 170 weekday PM peak hour trips. After implementation of mitigation measures, increased traffic volumes from the proposed project would result in significant and unavoidable impacts at 10 intersections under Cumulative Plus Project (Year 2020) conditions.

As previously stated, subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative, which is described and analyzed in Section 5.0 Alternatives of the Draft EIR. Under Approval Year Plus Project (Year 2011) conditions, Alternative 3 is estimated to generate a net increase of 2,082 daily trips, a net increase of 127 trips during the weekday AM peak hour, and a net increase of 146 trips during the weekday PM peak hour. Compared to the proposed project, this alternative is projected to generate 12 percent fewer daily, 20 percent fewer AM peak hour, and 20 percent fewer PM peak hour trips. Under Cumulative Plus Project (Year 2020) conditions, Alternative 3 is estimated to generate a net increase of 1,992 daily trips, a net increase of 113 trips during the AM peak hour, and a net increase of 139 trips during the PM peak hour. Compared to the proposed project, this alternative is projected to generate 13 percent fewer daily, 22 percent fewer AM peak hour, and 18 percent fewer PM peak hour trips.

The total daily, weekday AM and PM peak hour estimated trip generation of Alternative 3 would be less than that of the proposed project, but would not result in fewer significant impacts at intersections impacted by the proposed project under both Approval Year and Cumulative Plus Project scenarios. Mitigation Measures T1 through T6 would also apply to this alternative. Similar to the proposed project, Alternative 3 would result in the same significant and unavoidable impacts at 11 intersections under the Approval Year Plus Project (Year 2011) conditions and at 10 intersections under the Cumulative Plus Project (Year 2020) conditions.

Even with the reduction in trips, the project's significant and unavoidable impacts on the residential street segments would not be avoided with Alternative 3 under either Approval Year or Cumulative Year scenarios. As with the proposed project, this alternative would result in the same significant and unavoidable impacts on 6 street segments under the Approval Year Plus Project conditions and 5 street segments under the Cumulative Year Plus Project conditions.

Comment 17-12

Section 4.3 discusses biological resources – Village Trailer Park currently has 107 trees and a variety of ornamental shrubs and flowers. The trees consist of 27 species, including 27 jacarandas, 17 Brazilian pepper trees, 16 weeping figs, and 1 coast redwood tree that is not considered "viable for relocation." Section 4.3-7 states that "The majority of the trees currently on the site would be removed."

"No nesting activity was observed during the time of the tree survey," but VTP residents saw a hawk nest and hatched out fledglings earlier this year. Unfortunately, residents say that tree trimmers hired by the VTP owner trimmed off the tree branch that held the nest.

The existing trees "could be used by migratory birds such as northern mockingbird, Anna's hummingbird, house finch, and snowy plover."

Response 17-12

Please see Responses 6-2 and 6-4 for a discussion of the proposed project's impacts on trees and nesting birds.

Comment 17-13

Section 4.10-3 states that one of the LUCE goals is to "preserve and enhance neighborhoods." It's difficult to see how destroying the Village Trailer Park preserves this neighborhood, which has existed since 1950.

Section 4.10-9 discusses zoning. Village Trailer Park is zoned R-MH -- it is a "Residential Mobile Home Park District" which was created by an earlier City Council. The current City Council is under no obligation to either change the zoning or grant a variance.

Response 17-13

Please see Responses 6-5 and 6-6, above, for a discussion of the LUCE designation and the proposed project's consistency with LUCE goals. As stated in Response 6-5, above, the proposed mix of uses is consistent with the LUCE vision for the Mixed-Use Creative land use designation and would be compatible with the existing residential and light industrial uses.

With regard to the commenter's statement regarding rezoning, it should be corrected that the proposed project is not requesting a zone change or variance. Please refer to Response 3-4 regarding the project's consistency with the zoning code and the LUCE.

Comment 17-14

Section 4.10-17 states that, "The proposed project would provide 52 affordable housing units." Currently, Village Trailer Park residents own their mobile homes and rent their spaces. The space rental is covered by the city's Rent Control ordinance. If the residents are displaced from their mobile homes, they will have to pay much higher rents for a "studio" apartment. They will no longer be homeowners.

Response 17-14

Please see Response 6-10, above, for a discussion of the proposed project's population displacement impacts.

Comment 17-15

Section 4.10-18 discusses "Cumulative Impacts, "including 2834 Colorado Avenue (192,000 sq ft -- Colorado Creative Studio Project/Lionsgate) and 2848-2912 Colorado Avenue (300,000 sq ft -- Roberts Business Center).

But it does not include the potential cumulative impacts from the following:

- Agencys (153,000 sq ft at 1800 Stewart)
- Bergamot Transit Village (957,000 sq ft on Olympic between 26th and Stewart)
- New Roads School (117,000 sq ft expansion at 3131 Olympic)
- Paseo Nebraska (356,000 sq ft at 3025 Olympic, 1820 Berkeley, and 3020-3060 Nebraska)
- SMC Academy of Entertainment & Technology (48,750 sq ft expansion at 1660 Stewart)

Including Village Trailer Park's 399,581 sq ft, this adds up to 2,031,331 sq ft of development in that one small area. It's ironic that the Santa Monica Planning Department sent a comment to the City of Los Angeles expressing concern about Santa Monica traffic impacts from the proposed Bundy Village and Medical Park, which was 1.3 million sq ft and located very close to the Expo Line, and yet all of these projects in the Bergamot Area seem to be moving forward as if the cumulative traffic impacts will not be a problem for Santa Monica residents.

The Final EIR for the Village Trailer Park should include the estimates for the cumulative environmental impacts from all the projects listed above, especially traffic. And no further projects in the Bergamot Area should be approved before the Bergamot Area Master Plan, for which the city accepted more than \$600,000 from the federal government, is completed.

Response 17-15

As described in Section 4.15, Transportation and Traffic, of the Draft EIR, the City of Santa Monica's Travel Demand Forecast Model (TDFM) was used to project cumulative base (Year 2020) traffic volumes. The Cumulative Base (Year 2020) Conditions traffic volumes take into account the expected changes in traffic over existing conditions up to the year 2020, including the following:

1. Traffic generated by specific development projects located in the City of Santa Monica and neighboring areas of the City of Los Angeles expected to be constructed by Year 2020 using trip generation rates calibrated for use in the Santa Monica TDFM
2. Capacity enhancements and in some cases, traffic shifts due to planned street modifications, such as changed related to the future Exposition Phase II Light Rail Line
3. Trip reductions by 2020 resulting from transportation and land use policies in the 2010 LUCE
4. Interaction between land uses that produce vehicle trips and land uses that attract vehicle trips
5. The effect of traffic congestion on route choice
6. Projected increases in regional traffic traveling through the City

Therefore, analysis of the proposed project's traffic impacts under Cumulative Plus Project (Year 2020) conditions does take into account the related projects referenced by the commenter. These related projects are also identified in Table 3-3 of the Draft EIR and have been taken account in the cumulative analyses of other issue areas where necessary.

The commenter's statement that no further project in the Bergamot Area should be approved before the completion of the Bergamot Area Master Plan is noted for the record and will be forwarded to decision-makers for consideration.

Comment 17-16

Section 4.13-4 discusses population density in terms of housing units per square mile. LA County has 861 housing units per square mile. Santa Monica has 6,134 housing units per square mile. Why is the city considering approval of 4- story buildings to further increase density?

Section 4.13-9 states that "These rent-controlled housing units would be replaced...so not net loss of rent controlled housing occurs." This ignores that fact that the current units are owned, and only the spaces are rented. There used to be 109 rent-controlled spaces at Village Trailer Park. Is the VTP owner planning to build 109 rent-controlled apartments?

In addition, only 16 new units are proposed to be at rents affordable to persons of low income, while 52 units would be deed-restricted as "affordable housing." Where is the definition of "affordable housing"?

Section 4.13-10 states that "Population displacement impacts would be less than significant." That statement would probably be of cold comfort to the VTP resident who was persuaded to move out, ended up living in his vehicle, and died of exposure. The VTP owner is now in the process of emptying out the trailer park and requiring residents who leave to sign confidentiality agreements.

The significance of the "displacement impacts" is a matter of opinion. Moving from a mobile home with lots of windows and cross-ventilation, surrounded by trees and shrubs and flowers, into a concrete box with windows/light only on one side, would have quite a significant impact on anyone, let alone an elderly and/or ill person.

Response 17-16

As analyzed in Section 4.13, Population and Housing, of the Draft EIR, the population and housing growth due to the proposed project would comprise less than one percent of the County of Los Angeles 2020 SCAG population and housing growth projections, and approximately 11 and 13 percent of the WCCOG Subregion 2020 SCAG population and housing growth projections, respectively. The project's 393 housing units would not exceed the 2020 LUCE population and housing growth projections for the City of Santa Monica, comprising approximately 6.2 percent of the projected population growth and 27 percent of the projected housing growth. Therefore, the proposed project would not result in a population increase that exceeds City estimates. Population and housing growth impacts would be less than significant.

Section 9.04.02.030.025 of the SMMC defines Affordable Housing as "Housing in which one hundred percent of the dwelling units are deed-restricted or restricted by an agreement approved by the City for occupancy by low or moderate income households. Such projects may also include non-residential uses, as long as such uses do not exceed thirty-three percent of the floor area of the total project." Per the comment this definition has been added to the Final EIR. Please see Chapter 10.0, Corrections and Additions.

Please see Response 6-10, above, for a discussion of the proposed project's impacts with regard to the proposed project's provision of affordable and rent-controlled housing as well as a discussion of impacts associated with population and housing displacement.

Comment 17-17

Traffic impacts – It's estimated that the following intersections will be rated at D, E, or F (on a scale of A to F, where A indicates the shortest delay in crossing an intersection, and F indicates the longest) in the year 2020 if the proposed project is approved:

20th and Wilshire,
20th and Santa Monica Blvd.,
20th and Olympic,
23rd and Ocean Park Blvd.,
Cloverfield and Santa Monica Blvd.,
Cloverfield and Colorado,
Cloverfield and Olympic,
Cloverfield and the I-10 westbound off-ramp,
Cloverfield and the I-10 eastbound on-ramp,
Cloverfield and Ocean Park Blvd.,
26th and Wilshire,
26th and Colorado Avenue,
26th and Olympic,
Yale and Broadway,
Stewart and Olympic,
Stanford and Colorado,
Centinela and Santa Monica Blvd.,
Centinela and Broadway,
Centinela and Colorado,
Centinela and Pennsylvania,
Centinela and the I-10 westbound ramps,
Bundy and Olympic,
Bundy and Pico,
Bundy and the I-10 eastbound on-ramp,
Bundy and Ocean Park Blvd.,
Barrington and Olympic.

Response 17-17

Section 4.5, Transportation and Traffic, of the Draft EIR discusses the proposed project's traffic impacts.

Using approval year (Year 2011) traffic conditions as the baseline to conduct impact analysis, the project would result in significant traffic impacts at 13 of the 56 study intersections. Thirteen intersections would be impacted under City of Santa Monica significance criteria during at least one of the analyzed peak hours:

4. 20th Street/Olympic Boulevard (AM peak hour)
8. 23rd Street/Ocean Park Boulevard (AM and PM peak hours)
9. Cloverfield Boulevard/Santa Monica Boulevard (AM peak hour)
24. Yale Street/Broadway (PM peak hour)
26. Stewart Street/Colorado Avenue (AM peak hour)
28. Stewart Street/Olympic Boulevard (PM peak hour)

32. Stanford Street/Colorado Avenue (PM peak hour)
35. Centinela Avenue/Broadway/Ohio Avenue (PM peak hour)
36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour)
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours)
48. Bundy Drive/Olympic Boulevard (PM peak hour)
49. Bundy Drive/Pico Boulevard (PM peak hour)
50. Bundy Drive/I-10 Eastbound On-Ramp (AM peak hour)

Six intersections, wholly or partially located in the City of Los Angeles, would be impacted under City of Los Angeles significance criteria during at least one of the analyzed peak hours:

36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM peak hour)*
39. Centinela Avenue (west)/Olympic Boulevard (PM peak hour)
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM peak hours)*
48. Bundy Drive/Olympic Boulevard (PM peak hour)*
49. Bundy Drive/Pico Boulevard (PM peak hour)*
50. Bundy Drive/ I-10 Eastbound On-Ramp (AM and PM peak hour)*

Of the six intersections that are impacted under the City of Los Angeles significance criteria, five intersections (as indicated above with an *) are also impacted under the City of Santa Monica significance criteria. Therefore, under the approval year plus project conditions, the proposed project would result in significant traffic impacts at a total of 14 study intersections under both significance criteria.

Mitigation Measures T1 and T4 would mitigate the impacts at the four identified intersections to less than significant levels based on the City of Santa Monica significance criteria. However, Mitigation Measure T4 must be approved by LADOT and therefore, the impact will be considered significant and unavoidable. As indicated in the Traffic Study, there are no feasible mitigation measures to fully mitigate the six significantly impacted intersections wholly or partially in the City of Los Angeles. Impacts to the following 11 of intersections would be significant and unavoidable:

4. 20th Street/Olympic Boulevard (AM)
24. Yale Street/Broadway (PM)
26. Stewart Street/Colorado Avenue (AM)
32. Stanford Street/Colorado Avenue (PM)
35. Centinela Avenue/Broadway/Ohio Avenue (PM)
36. Centinela Avenue/Colorado Avenue/Idaho Avenue (PM) [*also impacted under City of Los Angeles criteria*]
39. Centinela Avenue (west)/Olympic Boulevard (PM) [*impacted under City of Los Angeles criteria only*]
42. Centinela Avenue/I-10 Westbound Ramps (AM and PM) [*impacted under City of Los Angeles criteria only*]
48. Bundy Drive/Olympic Boulevard (PM) [*also impacted under City of Los Angeles criteria*]
49. Bundy Drive/Pico Boulevard (PM) [*also impacted under City of Los Angeles criteria*]
50. Bundy Drive/I-10 Eastbound On-Ramp (AM and PM) [*also impacted under City of Los Angeles criteria*]

Additional mitigation measures to reduce significant impact on intersections were considered. However, as discussed in further detail in the Traffic Study (Appendix F to the Draft EIR), these measures are rejected since they would require the taking of public or private property for public right of way in order to implement the proposed physical mitigations. These measures could negatively impact the built environment and existing pedestrian network, and there were rejected.

Comment 17-17

Again, the Board of Directors of Friends of Sunset Park recommends adoption of Alternative 1 -- No Project Alternative.

Village Trailer Park is an irreplaceable neighborhood that provides affordable home ownership opportunities for low income residents. This neighborhood has existed since 1950. It should be preserved.

Response 17-18

The commenter's support for the No Project Alternative is noted for the record and will be forwarded to the decision-makers for their consideration. Please refer to Response 17-1, above, for a discussion of the No Project Alternative and the Alternative to Retain the Village Trailer Park.

Comment 17-19

We further request that the Final EIR include cumulative impacts from all current development projects in the area (listed above), as well as additional options for Alternative 1 -- No Project Alternative -- such as possible land swaps with the city.

Response 17-19

Please see Response 17-2, above, for a discussion regarding analysis of cumulative projects and the No Project Alternative.

Letter 18

November 26, 2011

Chris Krissa
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1518 Harvard Street #4
Santa Monica, Ca 90404

Comment 18-1

I am strongly against this development.

Response 18-1

This comment states opposition to the proposed project and is not a specific comment on the environmental analysis in the Draft EIR. However, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 18-2

1. Those people are Santa Monica residents. They should be allowed to live there instead of being moved so someone can make more money.

Response 18-2

As part of the implementation of the proposed project, the existing 76 mobile homes would be displaced. Therefore, existing Village Trailer Park residents would need to be relocated. The Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. As indicated in Section 4.13, Population and Housing, of the Draft EIR, upon implementation of the relocation provisions of the Development Agreement, population displacement impacts would be less than significant.

Comment 18-3

2. The traffic in this town is terrible and getting worse. Coming into Santa Monica in the morning rush and leaving Santa Monica in the afternoon rush is often TERRIBLE. It has taken me as much as 45 minutes to go 2 miles down Santa Monica or Olympic Blvds toward the 405 in the afternoon.

Response 18-3

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Topics addressed include intersection impacts, neighborhood street segment impacts, site access and circulation, and the Congestion Management Plan (CMP). Please see Response 1-2 for a discussion of the proposed project's operational traffic impacts.

Comment 18-4

Inviting more people to live here and all the support services for them DETERIORATE THE QUALITY OF LIFE FOR ALL OF US, except the developers who want this project. The saying, “you can’t stop progress” had to be coined by a developer. Progress is not thousand of people losing hundreds of hours in traffic. Some cities have a building ban, and that is what SM should have. The City needs more than some nice benches and trees on Santa Monica Blvd to make it livable. Many good things have been done, but this is not for the benefit of anyone living heres lifestyle, and that should be a huge concern, in my opinion.

Response 18-4

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 19

November 26, 2011

David Latham
thedl@verizon.net
2930 Colorado Avenue, D20
Santa Monica, Ca 90404

Comment 19-1

Hi Jing,

Below, with 3 supporting pictures attached, my comments for the VTP DEIR. Regrets for having these only in jpg and pdf formats, and presume you know to open with 'windows picture' and 'adobe reader', respectively.

Thanks for arranging this deadline extension. In context of all that is now going on*, gathering these response comments got more complicated for me this time, especially in the last few days.

[*Not to sound too 'sky is falling', but such as these: the continuing Republican Leadership power seeking dishonesties and wallet harming abuses of its followers and everyone; the gathering next great financial threat, chaos this time from Europe; and, of course, this latest up tick toward more greatly harmful shifts in the climate with this newest more intense return of the Santa Ana winds.] David

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12-1-11-

Jing Yeo, Special Projects Manager
City Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90401
310 458-3380 fax
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Re: Village Trailer Park Development Agreement Project Draft EIR

Dear Jing,

Thank you for this latest broad scope impact report. Kudos to you and all involved. Your data working efforts to assemble all this, I imagine, has made for some very long days.

In general...

Overall, if continued, this development will have greatly harmful impacts upon this east end of Santa Monica, much as was suggested with comment on earlier proposed development agreements [those involving the 'Papermate' (1681 26th St.) , the Robert's (2848 2912 Colorado Ave.) , and the Walter's (2834 Colorado Ave.) properties].

In particular, many of the comments e-ed to Bruce Leach [1 4 10], critiquing the 2834 Colorado Avenue property DEIR, are equally relevant here.

Response 19-1

Environmental impacts associated with the development of the proposed project as well as cumulative impacts have been analyzed in each of the environmental issue areas of the Draft EIR. The cumulative analyses takes into account all known past, present, and future development projects, which are listed in Table 3-3 of the Draft EIR. Please refer to the respective issue areas within Chapter 4.0, Environmental Impact Analysis, for discussions of these impacts.

Comment 19-2

As a group, by seeking to densely build up these small acreages beyond any reasonable use limit, these overly ambitious plans fly in the face of wise design logic for this City. While understandable that architects and developers often even appropriately seek to maximize what a property might allow as possible, from this City's viewpoint, a more comprehensive palette of considerations must be brought to its land use planning efforts; neighborhoods affect one another and myopic design can lead to out of sync construction problems (and others).

Response 19-2

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 19-3

There are a number of reasons this VTP DA is unconscionably [and I think, also actionably] inappropriate and should be abandoned; in these times and in this City, the out of scale building intention in this plan, by itself, gives reason enough for it to be rejected.

Disappointing then, that this DEIR did not similarly conclude more critically. Too, I'm puzzled about several of the working premises used in arriving at some of its impact conclusions.

Response 19-3

The commenter's opinion that the proposed project is out of scale is noted for the record and will be forwarded to decision-makers for review and consideration.

As discussed in detail in Section 4.10, Land Use and Planning, the proposed project's height and FAR would be consistent with that allowed by the LUCE for Tier 3 projects located in the Mixed-Use Creative District.

Comment 19-4

Without yet a complete and specific 20 year General Plan update (to supersede that adopted in 1984), with which both the majority of residents and the Council are in full accord, it is my view that development considerations such as this one (and the others above noted) may find no remedy for the unnecessarily 'hands tied' disadvantaged way in which it presently must now suffer being progressed.

Processes for property zoning and title deeding seem the foundational guiding tools by which a City manages land uses, and such seem also the principal anchors it has to keep clarity, as it on going strives to find a best balance in efforts juggling appropriateness of development inputs against the broad community planning and timetables with which it is charged.

As others have suggested, it seems less efficient, more dissension inviting, and perhaps even more attracting of opportunistic abuse, to continue with and not stop this present seeming 'cart before horse' manner of planning until the mentioned General Plan updating can be completed.

Response 19-4

The LUCE of the General Plan was recently updated in 2010. Other elements of the General Plan have been periodically updated (Noise Element – 1992, Open Space Element – 2001, Historic Preservation Element – 2002, and Housing Element – 2008). As analyzed in Section 4.10, Land Use and Planning, of the Draft EIR, the proposed project would be implemented through a development agreement which requires that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. Please see Response 3-4 for a discussion regarding the project's consistency with the LUCE and the Zoning Code.

Comment 19-5

All that said, with regard to the impact assertions offered in this DEIR document, I concur with many. Following is comment about some with which I take issue:

Regarding 4.15 Transportation & traffic...

From p.4.15 77, 'There are no feasible mitigation measures to reduce the significant impact related to neighborhood traffic...The proposed project would result in a significant and unavoidable impact related to neighborhood traffic'. For many needing drive on these Santa Monica streets, not a new, or surprising revelation.

What does surprise me, though after some 81 painstakingly filled study pages in this DEIR bring confirmation that there will indeed be an irremediable traffic flow problem, despite what jiggering of routes may be attempted should this project proceed is that few seem yet to make connection or care? that building beyond reasonable use limits on properties is some say significantly causative of traffic problems such as ours. Repeatedly said, 'the higher and denser we build, the more will come the traffic'.

Around Olympic and Bundy, are some neighborhoods having even higher and denser buildings than are much found in Santa Monica. Recently, I was told our City government had had some part in slowing down further congesting growth in that nearby LA area (?) Encouraging. Until recent years, such sensitivity to the problematic consequences of too grand building [i.e., traffic, etc.], was also as thoughtfully applied to development proposals within these tightly packed 8+ square City by the sea miles.

Response 19-5

Section 4.15, Transportation and Traffic, of the Draft EIR provides an analysis of the proposed project's operational traffic impacts. The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) Conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) Conditions. As noted by the commenter, no feasible mitigation measures are available. Therefore, the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.

This comment is noted for the record and will be forwarded to decision-makers for review and consideration.

Comment 19-6

Anticipate, after this development, daily trips in the 'thousands' on these east end tiny SM streets, this DEIR makes note of. And we already have a traffic/parking problem. Projecting this consequence, yet still advocating for such development? Puzzling. Illogical.

Independent of all the other impact estimations in this report, that this project would increase snarl, further loss of residents' time, fuel, patience, and such with yet more environmentally insane traffic congesting is, again, cause enough to quash the project.

Each year, I become more convinced that residents and government here dare not much longer ignore the need to turn back land development/resource use policies to better accord those practiced several decades back. Recall 32 35' building height limits, unsullied as they earlier were by shell game 'benefits' planning 'help'? Failure to get back to said City space appropriate, genuinely environment/sustainability needs sensitive planning practice, and the quality of life ahead in Santa Monica will almost surely decline further in multiple ways, for residents and visitors alike.

Response 19-6

Please refer to Response 1-2 for a discussion of the proposed project's operational traffic impacts.

This comment is noted for the record and will be forwarded to the decision-makers for consideration.

Comment 19-7

Regarding 4.13 Population and Housing...

Another section with conclusions I found simplistic, at best. A bit 'missing the forest for the trees' [or, destroyed trees for the new too tiny apartments], I think. To, at very great time/money/resource expense, destroy this 108 home capacity, historically irreplaceable, for low income affordable housing functioning business resource, and replace it to net but ~284 more, much smaller, less affordable [and many say less desirable] condo/apartment homes, leads me most to think again about selfish motive.

It seems a senseless and ludicrously incorrect statement to conclude [p. 4.13 8] that, post development, resident population on this 2+ acres would then be ~672, providing a number ostensibly 'within population and housing growth projections' expectations [whatever use that estimation, even if accurate, might be], so that therefore 'this [growth] impact would be less than significant'.

A significant portion [~25+] of the Park's trailer homes were actively, by ownership, for at times questionable cause, removed over these last 20 years [while it continued to gainfully 'do the Park business', having no apparent financial need concern as it had trailers hauled off or destroyed]. Resident peak population over those years (and earlier) likely never exceeded ~200 230 [108 trailer sites, nominally ~1000 sq', including for vehicle space, per site, and typically 2 persons per home]. To also plan to add more persons [beyond those estimated 672 residents] to work at and serve customers at the many business sites also to be built on the grounds, would surely make for a generally much noisier and more crowded feeling new community arrangement; and that so, to also bring arguably important vehicular movement problem impact to the grounds with that much greater people population (it's only 2+ acres, right?).

Simply fanciful, and inclining me to think, "Fine. If the business persons proposing this development all intend to live on site should it be built, maybe I will need to revise my view about just what constitutes 'reasonable' living accommodation these days."

Response 19-7

Please see Responses 6-2 and 6-3 above, for a discussion of the proposed project's impacts on trees. Please also refer to Response 17-16 for a discussion of the proposed project's population and growth impacts and Response 6-10 for a discussion of the proposed project's impacts related to population and housing displacement.

Comment 19-8

Regarding 4.5 Cultural Resources...

'Short sighted', 'bureaucratically shackled', 'unimaginative', come to mind reading this section.

While interesting reading in this DEIR some of the several centuries back history of our City, I was reminded of the fun of travel and the zing being in 'different' places, especially places with rich pasts. Museums, archaeological digs, and such, of course, can help a bit with that kind of re visiting history type aim.

Certainly with many exceptions, but America generally has not had all that much interest in preserving for long the icons of its history. Somewhat understandable I guess, since we're still a relatively young country. So, here, with this trailer Park museum worthy property, the City has opportunity to make sure it doesn't needlessly shoot itself in the 'visitor foot' (so to \$peak) by removing yet another piece of it colorful past.

Many good old cars have made it to museums. I know of no museums for vintage trailers such as these. Too, I know of no other business viable, and living community enclaves in Santa Monica where I can go to also feel a bit of what trailer home life was like here in the '40's and '50's. Too, all but 2 of such old trailer park neighborhoods are now gone from our City [there once were many more when this was more orange groves than buildings and roads], and the other one has had whatever touch of history it once possessed destroyed by short sighted recent inclusion of ill fitting modern manufactured 'mobile' homes]. As well, all over this Nation now, with developers seeking to condo develop out of existence other classic trailer park properties, old style trailers are now a much endangered vehicle species...Mayhaps we need to remind ourselves that we've already built over a great many of our earlier historic marker sites with this seeming modern trend to just keep building as if there is no limit needed and as if that practice would not threaten a valued way of life; and to also note that, in that inattentive over building process, our now more often 'clogged' roadway 'arteries' seem now to even be threatening in ways the very health of life here. Where indeed has the Route 66 questing for resting at an open, sunny, breezy clime gone?...

As time passes, old structures and records of those who came before can become fascinating [even cherish worthy (like this Park)]. Once gone though, history too quickly buries even much memory of what was. Preserving enough of what was around before we were, so that re experiencing (even a little) some of that past in a living, felt way (beyond books, movies, etc.), is more and more a rare benefit to have.

That this VTP is in a number of ways very valuable*, beyond even what living history it offers, makes it, in these now more crowded times and spaces, all the more worthy a site to be preserved.

[*An active business, a rare affordable housing resource and, importantly as well, perhaps a model base for what yet could, with future thinking management and some old with new restoration efforts, be returned again to its decades back trailer/plant life/wartime look. Also, if again lovingly managed and revitalized, this compact community property could be a 'new' member of what even more of Santa Monica's east end could easily become, but for this seeming mad rush to instead sterilize and grid it with too great a density of cubicle hived block, shadow casting, character challenged structures. In mind of Santa Monica's already vehicle serving, over-crowded general situation and what is soon enough coming again with marketplace/social discord/environmental change survival challenges might it not be wise now to think a bit more broadly, and to entertain some yet untried space use options here? About such as: Some strategic street conversions, perhaps in part to accommodate creation of an arboretum cum substantial public garden cum walking park; some really progressive, land appropriate cottage business facility constructions; similarly, some good building to re charge the City's challenged light manufacturing resource; and, though in more desirable form than so far has seemed offered, to also add to said new neighborhood some of those facilities in service of education/creative arts endeavors much talked of in Expo line type conversations. Overall, some new, open, properly scaled structures to upgrade &/or ally with what already is; to perhaps somewhat get to that modern business/public use refreshed Santa Monica community already talked of some in planning.] ...Sorry...a bit carried away there...

But, agreed, in considering the National Registry [p. 4.5 4], yes, having a basis for seeking preservation is important. Not everything can be kept for all time. Without parameters, nothing would ever be destroyed or replaced.

However, as above pled, it does not seem time yet for this Park community to be so summarily dispensed with. Santa Monica, but for choosing to, here has an opportunity to blaze some new 'land marking law' ground. By recognizing that some places, not so much by their singular building 'parts', but by the 'entirety of their being' are preservation desirable; in this case, the look and feel of the park enclave, and not just each of its trailers, is what such broad brush dedicating would accomplish.

Like all neighborhoods, this little one feels 'different'; in a nice, 1950's way. Add to that that this affordable/business viable setting is also all but primed for trend setting*, and letting go of it seems all the more silly.

[*Recall 'small is beautiful' from the 70's? Personally, I feel sooner or later many of us some already will be seeking to find ways to make our lives drastically more practical, economically workable, and surroundings respectful. Eventually, at or very close to home facilities to husband and cycle water, to grow food, and to generate home+ usable power will become much more common, and daily living actions toward more self sufficiency maybe even de rigueur circumstance for our communities. The practical impetus is already here to facilitate that shift, and the threat of consequence if we don't so change ways is already growing too. This low scale 'old homes' trailer site is almost ideal for such lifestyle enhancing project making. And a perfect place to be modeling it for other neighborhoods as well.] A bit more on preserving what we have. Recently, I noticed the re assembly of part of that old Quonset hut*, now put back near where it earlier lived, looking lonely crowded against a new large apartment building at Lincoln and Broadway. Without some research, I can only now marvel some at what 'historically neat' may have gone on there and around it before that neighborhood was decades back transformed. Made me a touch sad seeing it sitting there so out of context by its lonesome. Nice seeing it, but melancholy making. A seeming half measure restoration; pro forma, if you will, and but a 'sort of ' preserving. There has been some earlier talk of maybe similarly seeking to 'at least' save a few of the neater old trailers in the VTP, so that the grand east end SM building intention might then perhaps proceed more smoothly. I can only here caution, in context of this quonset hut preserving, that tokenizing savings, memory placards and the like, are really of so much less worth than the 'real thing' is. Pictures may be worth a 1000 words, but they're still but shadow of what they try to capture, right?

{*Maybe it could now be decked out inside depicting the era, and also put to some use as a second Santa Monica historic memorabilia site?} When keepsakes are lost they are often lost forever. To note the key word so at play in these impact discussions, when gone, nothing can 'mitigate' that loss. So, in the end and as always, and as with this Park matter, what should we consider truly 'significant' and what 'not'?

Response 19-8

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Section 4.5, Cultural Resources, of the Draft EIR provides an analysis of the proposed project's impacts related to historic resources. Please also refer to Response 6-7 for a discussion of the recent Landmarks Commission decision regarding the historic significance of the project site. As analyzed in the Draft EIR and based on the recent Landmark's Commission decision, the existing structures are not historically significant, and therefore, loss of the existing structures would not result in significant impacts to historical resources. Impacts related to historical resources would be less than significant.

Comment 19-9

Regarding 4.10 Land Use and Planning [Neighborhood effects]...

In ~1989 Council I think, quite wisely chose to designate the Village Trailer Park property R MH, already then seemingly aware of growing need to preserve remaining stock of such smaller scaled, genuinely low income affordable abodes.

Suffice it to say then, that I am, after reading quite a bit of this section, quite disappointed.

Despite having apparently not yet completed update of the Zoning Ordinance, the LUCE [charged with that update task] nevertheless still seems to permit this business enterprise autonomous opportunity to dictate zoning change to the City!

So far, in reading about Park retention options, I've only heard about financial aspects in discussion. Nothing about legal right and justice. If my understandings to this point are accurate, I find this, to say the least, both troubling and trust testing.

That in mind, the assertion in this section that 'impacts would be less than significant' and discounting the whole neighborhood dividing matter as red herring that certainly now feels most specious a claim.

Loss by theft of home, residency right, and assets is most certainly impacting.

Response 19-9

Please refer to Response 3-4, above, for a discussion of the proposed project's consistency with existing zoning and the LUCE. As discussed, the LUCE was adopted in July 2010 and designated the site with a land use designation of Mixed-Use Creative District. Amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals, and standards have not yet been adopted, and currently there are certain areas of conflict between the LUCE and the existing Zoning Ordinance. Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2356 at a City Council hearing on April 26, 2011 establishing interim development procedures. Specifically, the Interim Ordinance mandates that Tier 2 and Tier 3 development projects as well as Downtown projects over 32 feet in height be subject to a Development Agreement. As noted in the Draft EIR, since the project is a Tier 3 development project, a Development Agreement is required for the proposed project. Per the Development Agreement, the proposed project need only be consistent with the general plan.

Comment 19-10

Regarding 4.1 Aesthetics...

Interesting, where this section pulled my thoughts...

Also, as with reading again in many of these impact assessing sections, it was hard here not wondering just what others were thinking in putting some of these summarizing assertions together. It is again in my view simply incorrect to suggest [p.4.11 7] that 'Aesthetic...impacts to neighborhoods [by this development] would be less than significant with [or without] mitigation'.

One need only walk around the Park and then around many of Santa Monica's buildings of comparable size to those planned with this development to realize how very incorrect it is to make such claims about 'acceptable City thresholds', 'minimal impact', and the like. Should this large scale development proceed, with regard to shadow and light availability, neighborhood warmth, and regarding desirable air flow, continued presence of birds, etc., the pleasure of being on or living in this treed/trailer home community (or even in this neighborhood) will be very much harmed by instead of trailer retention, choosing to array the property with the much higher structures intended.

Much more importantly though and, I think related to this critique of the proposed construction, so place it here is this concern:

Along with the affects [shadow, light, air, heat, and the like] which positioning, size, shape, etc. of buildings can influence, an equally important 'aesthetic' aspect of place and property involves the earlier mentioned 'mood' and 'feeling' influences our surrounds also bring. Whether in the Park, this neighborhood [or elsewhere, really], stimuli from the 'aesthetic' offerings of the time and space, structures and things, people and activities, etc. are ever at play in us (whether aware of that or not, I think).

Too, our hour by hour feelings state changes, depending on just where we are, what we're doing, who with, etc. etc. Over time, it seems arguable that our overall attitudes and capabilities, and some would say even our health, can be [or is?] affected by where we often are, and what we frequently are doing.

That said, in terms of just how desirable a place feels to be [i.e., trailer home vs larger, squarer, from nature more segregated building, for sake of this dialogue], would seem to depend at least in part on our 'aesthetic faculties' and the impact on them our surrounds are bringing. Certainly, we more or less choose the City in which we want to live, and as best we can we also choose to nurture our 'aesthetic sensibilities' by what we generally seek to be 'doing' in our living. In context of what life circumstances permit us in this realm of 'choosing' [i.e., locale and activity], among the several recent development DA's noted in this writing, I don't recall seeing any study in the EIR efforts dealing with the manner in which or the degree to which property changing development actions, &/or difficulties with finding/keeping place of residency which feels suitable and life bouying, may have impact, for good or ill, on residents' personal lives. [And, it should be noted here, also to whatever degree perhaps upon Park ownership/staff, and City personnel.]

Further about this, a neighbor recently wondered more specifically about just how much the sustaining stresses of this long drawn out closure settling matter might be affecting residents; and about just how much less content (perhaps 'aesthetic sensibilities' challenged) they might be feeling, what with it being now a years into and still on hold circumstance situation.

No doubt a more complicated [and sensitive] impact assessing to tackle than many in such EIR considerations, but perhaps one which warrants some attention. Especially so, perhaps, with this 'development' arena being such a convoluted, time consuming one.

Response 19-10

Section 4.1, Aesthetics, of the Draft EIR analyzes the proposed project's potential impacts associated with shadows and light and glare.

As described therein, shadows cast by the proposed project would not shade shadow-sensitive uses for durations that exceed those identified in City thresholds. Shadow impacts during the summer and winter would be less than significant.

With regard to light and glare impacts, project lighting would be required to comply with Section 9.04.10.02.270 of the SMMC, which requires that all outdoor lighting associated with commercial uses be shielded and directed away from the surrounding uses to limit light spillover. Further, the proposed project would be subject to design review by the City's Architectural Review Board. The Architectural Review Board ensures that new uses are compatible with their surroundings, and therefore, do not include materials that could create new sources of substantial glare that would adversely affect daytime views. Therefore, the proposed project would not create a new source of substantial light and glare; impacts would be less than significant.

Comment 19-11

Regarding 5.0 Alternatives...

No DEIR impact study statements here to comment on, but I did want to make note that, in reading the concluding 3 point remarks about why an 'Alternative to Retain the Village Trailer Park' was 'deemed infeasible' [p. 5 4], these struck me as both bit platitudinous, and confusing.

Certain that there is still desire for further useful dialogue about ways to save the Park, resolve the business aims of the owner, and the property usage/development aims of the City as well. These 3 comments, however, seem more to cloud, than to suggest direction where such conversations might usefully next head.

Quite contrary to the implied direction the City seems now heading about Park retention [ref. those discussions at Council, on 11 8 11], I am still convinced that, with appropriate intention and attention by it, way still exists whereby the Park community could well be saved to enjoy yet 60 more years as part of Santa Monica's blessings to this beach area.

Response 19-11

As indicated by the commenter, Chapter 5.0, Alternatives, of the Draft EIR discusses an Alternative to Retain the Village Trailer Park whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was considered but rejected as it was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards. This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 19-12

To close then, a few comments about the nature of trailer home ownership, this closure matter, and this Park:

It seems that the owning of mobile homes on rented property is becoming a rarer business arrangement.

Similarly, the holding of a 'triangular'* legal arrangement for residency with said 'own home but rent site space until electing to re sell' situation also is perhaps a less common circumstance.

[*Namely, with property owner, homeowners, and the City all having legal rights and responsibilities bearing on residency matters.]

For sure, as we're all now experiencing, such a 3 party contracting can present some thorny problems and dilemmas.

As said, this is now a rarer property asset in this City. Now almost iconic land, both because of the now fading reality and memory of old style mobile home living everywhere, and because this trailer park body remains as one of the last present day close by ways to experience that alternative mode of living much as it was here during the lead up to WWII and in the recovery decades after it.

Rare as well for its business value to the City, with its offering of a genuinely affordable, easily accessible, compact & environmentally friendly, business viable homeownership site for seniors, young families, and singles of limited means.

For me and many I know, there is simply no other sane course but to keep, and for the sake of history, community, and business, to revitalize this little home site in the east end.

Response 19-12

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 20

October 20, 2011

Beatrice and Lisa Lenex
1527 Yale Street #2
Santa Monica, CA 90404

Comment 20-1

Please be advised we are totally opposed to the destruction and closure of the nearby trailer park (2930 Colorado). We have enough issues ever since the nearby Water Park, Yahoo and MTV enterprises were brought into our once peaceful area.

Response 20-1

This comment expresses opposition to the project and is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 20-2

We do not understand how the city continues to over develop areas once deemed as peaceful residential areas. We have an influx of traffic and lack of parking as it is, on our street alone (which is just around the corner from the trailer park area) due to what developers have been allowed to do. Please do not allow the destruction of the residential park for any high rise residential and business developments.

Response 20-2

This comment expressing opposition to closure of the existing trailer park is noted for the record and will be forwarded to the decision-makers for their consideration.

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2 for a discussion of the proposed project's operational traffic impacts.

With regard to parking, the proposed project would provide a two-level, 778-space subterranean parking garage would be provided under the proposed development. In addition, on-street public parking spaces would be provided along New Road on the western boundary of the site and along the new Pennsylvania Avenue extension. It should be noted that parking is not considered an impact requiring evaluation under CEQA. In 2010, the State revised the CEQA Guidelines and determined that parking adequacy should be deleted from CEQA analysis in part as a result of the decision in *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656. In that case, the court distinguished the social impact of inadequate parking from actual adverse environmental impacts. In particular, that court explained:

[T]here is no statutory or case authority requiring an EIR to identify specific measures to provide additional parking spaces in order to meet an anticipated shortfall in parking availability. The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality is.

Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. An EIR need only address the secondary physical impacts that could be triggered by a social impact.” As such, parking is not analyzed in the Draft EIR.

Comment 20-3

The developers do not live in our area and it appears our city only cares about increased tax revenues new developments can bring. You should care more about life long residents in the community and their future issues of displacement. In addition we don't need increased lack of good air quality and increased noise these proposed developments will bring to our area.

Response 20-3

As analyzed in Section 4.4, Construction Effects, of the Draft EIR, the proposed project would result in short-term construction-related air quality and vibration impacts. Long-term (operational) air quality, noise, and vibration impacts would be less than significant (please see Section 4.2, Air Quality and Section 4.12, Noise, of the Draft EIR). The commentor's air quality and noise concerns are noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 20-4

Your time and consideration towards prevention of any additional negative impacts being brought to our neighborhood by developers would be appreciated. Think how you would feel suddenly being displaced from your home of many years just because the city thinks its good revenue. It isn't always about money. People are what count.

Response 20-4

Please see Response 6-10, above, for a discussion of impacts related to displacement of existing residents. This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 21

November 28, 2011

Rose and Rob Levy
Rosie@aol.com
1556 Harvard Street
Santa Monica, CA 90404

Comment 21-1

WE ARE OPPOSED TO THE TRAILER PARK DEVELOPMENT

Response 21-1

This comment expresses opposition to the proposed project and is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 22

November 27, 2011

Ralph Meyer
2930 Colorado Avenue C-1
Santa Monica, CA 90404-3697

Comment 22-1

Thank you for your notice about the Village Trailer Park. Enclosed is letter to the City Council.

Response 22-1

This comment is introductory in nature. Individual comments and their responses are provided further below.

Comment 22-2

Open Letter to the Santa Monica City Council

There is gridlock on the streets in Santa Monica, with frustrated drivers cursing and honking at each other. In the early evening, drivers queue up for blocks on their way to the 405 to commute to affordable housing. Parking is at a premium with drivers going around in circles hoping to find a vacant space. Despite this overcrowding, the City Council keeps approving highrise developments that increase Santa Monica's traffic woes, diminishing the quality of life in our city.

Response 22-2

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2 for a discussion of the proposed project's operational traffic impacts.

With regard to parking, the proposed project would provide a two-level, 778-space subterranean parking garage would be provided under the proposed development. In addition, on-street public parking spaces would be provided along New Road on the western boundary of the site and along the new Pennsylvania Avenue extension. It should be noted that parking is not considered an impact requiring evaluation under CEQA.

In 2010, the State revised the CEQA Guidelines and determined that parking adequacy should be deleted from CEQA analysis in part as a result of the decision in *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656. In that case, the court distinguished the social impact of inadequate parking from actual adverse environmental impacts. In particular, that court explained:

[T]here is no statutory or case authority requiring an EIR to identify specific measures to provide additional parking spaces in order to meet an anticipated shortfall in parking availability. The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality is.

Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. An EIR need only address the secondary physical impacts that could be triggered by a social impact.” As such, parking is not analyzed in the Draft EIR.

Comment 22-3

A gross example of overdevelopment would be the proposed zoning change of the historic VILLAGE TRAILER PARK, from Mobile Home Park to Commercial. The homes in the park are owned by individual residents who purchased their homes from a previous owner, and only pay rent for their space. Seizing these privately owned homes, to destroy the park and replace it with yet another high-rise, would be a violation of the Bill of Rights (Amendment IV).

Response 22-3

Please see Response 6-10, above, for a discussion of the proposed project’s impacts related to population displacement.

Comment 22-4

There is a solution that would benefit everyone. The vacant spaces in the park can be rented (mobile home owners pay rent, similar to the maintenance fee paid by condo owners). Doubledecker mobile homes with parking underneath the homes, to conserve space, would hugely increase revenue for the landowner but without capital outlay on his part. He could then use the capital in another real state venture that would not involve the destruction of the VTP. The zoning would remain the same.

Response 22-4

This is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

It should also be corrected that the proposed project does not include a zone change of the project site. Please refer to Response 3-4, above, for a discussion of the existing zoning on the project site.

Letter 23

November 27, 2011

David Murray
mvalenciab@aol.com

Comment 23-1

Please do not close the park.

Response 23-1

This comment expresses opposition to the closure of the existing mobile home park and is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Chapter 5.0, Alternatives, of the Draft EIR, provides a discussion of the No Project Alternative under which the existing Village Trailer Park would remain and no development would occur. As stated in the Draft EIR, this alternative would not meet the project objectives. In addition, the Draft EIR discusses an Alternative to Retain the Village Trailer Park whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was considered but rejected as it was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and FAR standards.

Letter 24

October 16, 2011

Linda Piera-Avila
lindap_a@verizon.net

Comment 24-1

I received the notice of the availability of the Draft EIR for the Village Trailer Park Development Agreement.

Although I have not read through the document yet, the summary statement contained in your letter gives me great pause.

Response 24-1

This comment is introductory in nature. No responses to this comment are necessary.

Comment 24-2

"The Draft EIR determined that implementation of the proposed project will result in the following significant and unavoidable impacts: Construction Effects (Air Quality and Noise); Transportation and Traffic"

Why is the unavoidable displacement of residents currently living in Village Trailer Park not mentioned? I would think this would come under the heading of "Neighborhood Effects." Are the residents' rights being given the same weight as the developer's rights?

Response 24-2

As stated in this comment and analyzed in the Draft EIR, the proposed project would result in significant and unavoidable impacts related to construction air quality, construction vibration, and operational traffic. Please see Section 4.4, Construction Effects, and Section 4.15, Transportation and Traffic, of the Draft EIR for a detailed discussion of these impacts.

Impacts related to population displacement are analyzed in Section 4.13, Population and Housing, of the Draft EIR. Please also refer to Response 6-10, above, for a discussion of the proposed project's impacts related to population displacement. As stated, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Upon implementation of the relocation provisions of the Development Agreement, population displacement impacts would be less than significant.

Comment 24-3

Also, another unavoidable impact I foresee is the destruction of many large well established trees that contribute to the canopy coverage in the part of the city that has the least percentage of canopy coverage. This would come under "Biological Resources" and "Greenhouse Gas Effects" since large trees like that mitigate the amount of greenhouse gases.

Why is the loss of this significant amount of canopy coverage not mentioned as an unavoidable impact?

Response 24-3

Please see Responses 6-2 and 6-3, above, for a discussion of the proposed project's impacts on trees.

Letter 25

November 27, 2011

Vida Razinia
VIDA2001@aol.net
1517 Yale Street
Santa Monica, CA 90404

Comment 25-1

Please be advised that my family and I have been residents of Santa Monica for the past thirty years. We have witnessed enormous growth as well as development in the college streets area.

We believe that closure of the existing Village Trailer Park and development of such a huge project with 393 residential units and 105,334 square feet of office space will greatly impact the traffic, transportation and the air quality and noise of this neighborhood in a negative way. This area is already too congested as it is.

We strongly OPPOSE this project.

Response 25-1

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2 for a discussion of the proposed project's operational traffic impacts.

Section 4.4, Construction Effects, of the Draft EIR concluded that the proposed project would result in short-term construction air quality and vibration impacts.

The commentor's air quality, noise, and traffic concerns and opposition to the proposed project are noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 26

December 2, 2011

Diana Gordon
Santa Monica Coalition for a Livable City

Comment 26-1

The Village Trailer Park (“VTP”) is an irreplaceable neighborhood with historic roots that enables affordable homes for low-income residents. Our City can never replicate this neighborhood so it is important that any EIR accurately and completely analyze the significant impacts on this neighborhood and its residents and the loss to the City as a whole if the VTP is demolished.

Response 26-1

The Draft EIR has been prepared in accordance with CEQA requirements and the significance thresholds and methodologies set forth by the City of Santa Monica. The Draft EIR includes over 1,300 pages of text and information, supported by references and appendices. Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project.

Section 4.10, Land Use and Planning, of the Draft EIR provides an analysis of the proposed project’s impacts to the surrounding area and compatibility with zoning and land use designations. As analyzed in the Draft EIR, the proposed project would not divide an established community and land use impacts associated with the proposed project would be less than significant.

Section 4.5, Cultural Resources, of the Draft EIR provides an analysis of the proposed project’s impacts related to historic resources. Please also refer to Response 6-7 for a discussion of the recent Landmarks Commission decision regarding the historic significance of the project site. As analyzed in the Draft EIR and based on the Landmark’s Commission decision subsequent to the Draft EIR, the existing structures are not historically significant, and therefore, loss of the existing structures would not result in significant impacts to historical resources. Impacts related to historical resources would be less than significant.

Comment 26-2

The Santa Monica Coalition for a Livable City (“SMCLC”) notes the following deficiencies in the DEIR for the VTP that should be rectified in the final EIR:

- 1) In addition to the “No Project Alternative,” the final EIR should include identification of vacant land owned by the City that could be subject of a land swap with the developer for this project (and all other options that do not require the loss of this neighborhood and displacement of its residents).

Response 26-2

In accordance with CEQA Guidelines Section 15126.6, the intent of the Draft EIR alternatives analysis is to avoid or substantially lessen the significant impacts of the proposed project. In accordance with CEQA, a range of reasonable alternatives was considered in the Draft EIR analysis. These alternatives included a No Project Alternative as well as two additional alternatives intended to feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant impacts of the Project. As provided in CEQA Guidelines Section 15126.6, an EIR is not required to consider every conceivable alternative to a project.

With regard to the commenter's opinion that the City should consider a land swap with the developer, it should be noted that such an alternative would require interested parties. The City Council explored such an idea in recent hearings but ultimately determined to not move forward.

As discussed in detail in Section 4.13, Population and Housing, of the Draft EIR, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include plan for relocation of existing Village Trailer Park residents. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Therefore, the proposed project would not displace substantial number of people, necessitating the construction of replacement housing elsewhere. Upon implementation of the relocation provisions of the development agreement, population displacement impacts would be less than significant. As significant impacts associated with population displacement would not result from the proposed project, an alternative that retains the Village Trailer Park is not warranted.

Notwithstanding, Chapter 5.0, Alternatives, of the Draft EIR does provide a discussion of an Alternative to Retain the Village Trailer Park, whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was considered but rejected as it was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards.

Comment 26-3

2) The finding of "no historical impact" is premature given that the City's Landmarks Commission is currently reviewing the post World War II history of the property to determine its historical significance. The FEIR should also conduct a full and proper review of the property's historical significance, not conclude, without a basis that there is none.

Response 26-3

Please see Response 6-7, above, for a discussion of the Landmarks Commission decision regarding the historical significance of the Village Trailer Park. As was mentioned by the commenter, subsequent to circulation of the Draft EIR, an application to designate the property as a City Landmark was received by the Landmarks Commission. As part of the Landmark application process, two historic assessments that evaluated eligibility for City landmark status were prepared for the project site in February 2012. The Village Trailer Park Historic Resource Assessment was prepared by Chattel Architecture Planning and Preservation, Inc. According to this report's findings, the property is ineligible for listing locally as a Santa Monica Landmark, in the California Register of Historical Resources and in the National Register of Historic Places. Additionally, a City Landmark Assessment Report was prepared for the Village Trailer Park by ICF International. According to this report, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4).

On February 13, 2012, the Landmarks Commission held a public hearing to discuss and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission ultimately voted to not designate the property. As was previously determined in the Draft EIR, impacts on historic resources would be less than significant. The Landmarks Report and associated information has been included as Appendix I and is noted in Chapter 10.0, Corrections and Additions, of this Final EIR.

Comment 26-4

3) Residents who own the trailers at the VTP have been incorrectly described as tenants in the DEIR apparently on the basis that they rent the spaces for their homes. For example, under the No Project Alternative, the DEIR states: "Existing uses on-site would remain. The existing mobile homes and their tenants would not be displaced." But the majority of the residents of the VTP are not tenants who occupy fungible rental housing; they are mobile homeowners who lease their spaces. Moreover, these residents may not be able to relocate their homes because of the age of their trailers or other requirements so they would no longer be homeowners if the project were to be approved.

Response 26-4

As discussed in detail in Section 4.13, Population and Housing, of the Draft EIR, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Therefore, the proposed project would not displace substantial number of people, necessitating the construction of replacement housing elsewhere. Upon implementation of the relocation provisions of the development agreement, population displacement impacts would be less than significant.

Comment 26-5

4) The FEIR should discuss whether the proposed project of primarily loft and one-bedroom units as well as the studio and affordable housing units meet the housing needs of the city or the family neighborhood needs of the area in which the property is located under LUCE.

Response 26-5

The City's Housing Element update coincided with the LUCE update, resulting in the coordination of the issues of community growth, land use, housing, transportation, and community design. While the vision and provisional goals for the LUCE include the goals of providing housing to meet the community's future needs, the size and mix of housing units are not prescribed in either the Housing Element or the LUCE.

It should be noted that subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative, which is described and analyzed in Chapter 5.0, Alternatives, of the Draft EIR. This alternative would result approximately 486 residential units, consisting of 141 studios/one-bedroom apartment units, 270 one-bedroom condo units, and 75 two-bedroom units. As with the proposed project, this alternative would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units.

Comment 26-6

5) The FEIR should discuss whether the elimination of the VTP in its entirety is at odds with the LUCE goal to "preserve and enhance neighborhoods" and whether there is a reasonable alternative short of "no project" that would enable the neighborhood to remain intact.

Response 26-6

Section 4.10, Land Use and Planning, of the Draft EIR provides a discussion of the proposed project's consistency with the LUCE. As analyzed therein, the proposed project would be substantially consistent with the LUCE. Please also refer to Response 17-12, above, for a discussion of consistency with LUCE goals.

As required by CEQA, Chapter 5.0, Alternatives, of the Draft EIR provides an analysis of a No Project Alternative. As stated in the Draft EIR, the No Project Alternative would not meet the project objectives.

Comment 26-7

6) The DEIR does not include the cumulative traffic and other environmental impacts all of the known projects in the surrounding area as required by CEQA. Section 4.10-18 "Cumulative Impacts," includes only 2834 Colorado Avenue (192,000 sq. ft. -- Colorado Creative Studio Project/Lionsgate) and 2848-2912 Colorado Avenue (300,000 sq. ft. -- Roberts Business Center). This section does not include, as it must, the potential cumulative impacts from the following projects proposed or pending:

- a) Agensys (153,000 sq. ft. at 1800 Stewart);
- b) Bergamot Transit Village (770,000 sq. ft. on Olympic between 26th and Stewart);
- c) New Roads School (117,000 sq. ft. expansion at 3131 Olympic);
- d) Paseo Nebraska (356,000 sq. ft. at 3025 Olympic, 1820 Berkeley, and 3020-3060 Nebraska); and
- e) SMC Academy of Entertainment & Technology (48,750 sq. ft. expansion at 1660 Stewart).

Including Village Trailer Park's 399,581 sq. ft., this adds up to over 2,000,000 sq. ft. of development in immediate vicinity. Therefore, all of the circulation impacts currently projected in the DEIR must be revised to reflect these other projects, including but not limited to the following intersections:

20th and Wilshire,
20th and Santa Monica Blvd.,
20th and Olympic,
23rd and Ocean Park Blvd.,
Cloverfield and Santa Monica Blvd.,
Cloverfield and Colorado,
Cloverfield and Olympic,
Cloverfield and the I-10 westbound off-ramp,
Cloverfield and the I-10 eastbound on-ramp,
Cloverfield and Ocean Park Blvd.,
26th and Wilshire,
26th and Colorado Avenue,
26th and Olympic,
Yale and Broadway,
Stewart and Olympic,
Stanford and Colorado,
Centinela and Santa Monica Blvd.,
Centinela and Broadway,
Centinela and Colorado,
Centinela and Pennsylvania,
Centinela and the I-10 westbound ramps,
Bundy and Olympic,
Bundy and Pico,
Bundy and the I-10 eastbound on-ramp,
Bundy and Ocean Park Blvd.,
Barrington and Olympic.

Response 26-7

Please see Response 17-15, above, for a discussion regarding cumulative analysis in the Draft EIR. As stated therein, analysis of the proposed project's traffic impacts under Cumulative Plus Project (Year 2020) conditions does take into account the related projects referenced by the commenter. These related projects are also identified in Table 3-3 of the Draft EIR and have also been taken account in the cumulative analyses of other issue areas where applicable.

Comment 26-8

7) The Land-use discussion in the DEIR fails to address the significance of the lack of an Area Plan for the development of the entire 140 acres of which this project is but one part. Although the City has accepted a grant of over \$600,000 from the federal government to prepare the Bergamot Area Master Plan, no such plan currently exists.

Response 26-8

Please see Response 3-13, which states that currently, no specific plans or area plans are in effect that would apply to the project site or the proposed project.

Per the commenter's request, a discussion about the current preparation of the Bergamot Area Plan has been added to Section 4.10, Land Use and Planning, of the Draft EIR. Please see Section 10.0, Corrections and Additions, for the text of this revision.

Comment 26-9

8) The conclusion in the DEIR that there is no net loss of rent controlled housing as the result of the project is simply wrong. The DEIR is confusing the rental of spaces with the ownership of homes. The VTP residents own their homes, they rent the spaces on which their homes reside. That doesn't make them "tenants" for purposes of replacement housing. So both Section 4.10-17, which states that, "The proposed project would provide 52 affordable housing units" and Section 4.13-9, which states (as to the VTP residents) "These rent-controlled housing units would be replaced...so no net loss of rent controlled housing occurs" is incorrect. There would be a loss of 109 homes assuming full trailer home occupancy followed by the construction of only 52 affordable housing rental units.

Response 26-9

Please see Response 6-10, above, for a discussion of the proposed project's impacts related to housing and population displacement.

Letter 27

November 25, 2011

Susanne Vaughn
Susanne.vaughn@verizon.net

Comment 27-1

Thank you for the opportunity to comment on developments in our area, in this case the Village Trailer Park on Colorado between Stewart and Stanford Streets.

While I am all for upgrading the neighborhood and am pleased with the developments of the past 25 years, I have two concerns. The first is for people displaced by the development, and the second is regarding traffic.

Response 27-1

Section 4.13, Population and Housing, of the EIR provides an analysis of the proposed project's impacts with regard to population displacement. As stated therein, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents. Upon implementation of the relocation provisions of the development agreement, population displacement impacts would be less than significant. Please also refer to Response 6-10, above, for a detailed discussion of the proposed project's impacts related to population displacement.

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2, above, for a discussion of the proposed project's operational traffic impacts.

Comment 27-2

DISPLACED PEOPLE

I want to know that the people who have lived at this location for many years will be adequately compensated for the loss of their homes, so that they can afford to continue to live in Santa Monica should they choose to do so.

Response 27-2

Please see Response 6-10, above, for a detailed discussion of the proposed project's impacts related to population displacement.

Comment 27-3

TRAFFIC

We live at 1517 Stanford Street, so are directly affected by the numerous plans for development in this area. While I work out of my home and can choose my hours of travel, thus do not add to the traffic congestion that so plagues our town, when I do have to travel at peak hours, the congestion makes a 10 minute trip become a one hour ordeal. A cross town travel to Beverly Hills becomes a 1-1/2 to 2 hour event, and I can't even imagine the nightmare that is getting to the Valley, Santa Clarita or Orange County from Santa Monica. Every major and minor east/west artery is blocked and the north/south ones aren't

that much better! The worst of rush hour extends from 4PM to 8PM, so even those who have modified their schedules to avoid traffic have to start much earlier or later to have a hope of moderate traffic. Unless these new projects can limit their hiring to people who live within walking distance (obviously not their first criteria) or rapid transit does in fact go through AND prove to be used by a large majority of commuters to Santa Monica, I am opposed to any further development on the Westside. Gridlock has taken over this corner of the world and solving the existing crisis must take priority over all other considerations!

Response 27-3

Section 4.15, Transportation and Traffic, of the Draft EIR evaluates the operational traffic impacts associated with the proposed project. Please refer to Response 1-2, above, for a discussion of the proposed project's operational traffic impacts.

Letter 28

October 15, 2011

Jack Waddington
2930 Colorado Avenue #B16
Santa Monica, CA 90404-3697

Comment28-1

If, as you state you are merely continuing with a process to evaluate the environmental impact report, why are you assuming that this is a done deal. PLEASE, PLEASE STUDY THE IMPACT REPORT BEFORE ASSUMING THAT VILLAGE TRAILER PARK HAS TO CLOSE.

Response 28-1

Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed in the Draft EIR. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project.

As required by CEQA, the Final EIR will be reviewed and considered by the decision-makers in deciding whether or not to approve the proposed project.

Comment 28-2

First off: the impact on 51 residents of the park, mostly senior citizens', will be enormous. The Park owners/investors, deliberately ran the place down such that they could claim it was not a profitable venture to the city council. Not true.

Response 28-2

This comment states that the closure of the Village Trailer Park would have detrimental effects on elderly residents who live there. This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Please see Response 6-10, above, for a discussion of the proposed project's impacts related to population displacement.

Comment 28-3

Second: the proposed developments of condos on this very, very scenic site will be an UGLY sight, not enhancing Colorado Avenue in the slightest. Does Santa Monica NEED another 'white elephant' that will be putting 51 low income residents that already have homes, out on the streets. I ask you to look no further than the "Occupy Wall Street" if you wish to read the future.

Response 28-3

As discussed in the Initial Study (Appendix A to the Draft EIR), the proposed project would not result in significant impacts on visual character/quality of the project site. Further, the proposed project would be subject to architectural review by the City to ensure high visual quality.

Please see Response 6-10, above, for a discussion of the proposed project's impacts related to population displacement.

This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment 28-4

Third: Why give preference, re section eight vouchers, pushing aside Santa Monica residents who have been in line waiting years to get these vouchers, since we here in Village Trailer Park: (I repeat), already have homes. It seems Mr. Lassatto and company are attempting to appear benevolent when in fact this is a city matter.

Response 28-4

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Please see Response 6-10, above, for a discussion of the proposed project's impacts related to population displacement.

Comment 28-5

Fourth: The arrogance of Sebastian Perez when he came to the Park and occupied OUR recreation room and asked me when I might be leaving so he could conduct his business in private. If he wishes to come again and have privacy I suggest he rents the managers office, NOT OUR SPACE. The sheer arrogance of Mr. Perez was unbelievable and warrants an apology.

Response 28-5

This comment expresses a personal opinion about an individual. This comment is not a specific comment on the environmental analysis in the Draft EIR. No responses are necessary.

Comment 28-6

Fifth: This property is zoned as a trailer, mobile home park. We don't need more spin from greedy speculators/investors. Their time is over as evidenced by US citizens and anger over Wall Street speculators and hedge fund managers.

Response 28-6

This comment is not a specific comment on the environmental analysis in the Draft EIR; however, it is noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 29

December 2, 2011

Sabrina Venskus
Venskus & Associates
1055 Wilshire Boulevard Suite 1660
Los Angeles, CA 90017

Comment 29-1

The following comments on the Draft Environmental Impact Report ("DEIR") for the Village Trailer Park are submitted by Venskus & Associates, P.C., on behalf of our clients, residents of the Village Trailer Park. Village Trailer Park (VTP) is an historic trailer park dating to the 1950s and is one of only two remaining affordable homeownership parks in the entire City. VTP is an in-tact, irreplaceable, close-knit, safe and truly affordable neighborhood providing home ownership in Santa Monica for elderly and low income persons. (Please refer to the color photographs of VTP at exhibit 3, attached.)

This rare housing stock should be preserved, despite the applicant's desire to make a substantial profit by redeveloping VTP into yet another mixed use project, of which the City has literally dozens.

Response 29-1

Please refer to Response 6-7, above, regarding the project sites potential eligibility as a historic resource. As discussed in the response, subsequent to circulation of the Draft EIR, an application to designate the property as a City Landmark was received by the Landmarks Commission. On February 13, 2012, the Landmarks Commission held a public hearing to discuss and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission ultimately voted to not designate the property. As was previously determined in the Draft EIR, impacts on historic resources would be less than significant.

With regard to affordable housing, as stated in Section 4.13, Population and Housing, of the Draft EIR, the proposed project would include a mix of rent-control, affordable, and market rate housing units on the project site. This would include the development of 166 apartment units (of which 109 would be rent-controlled, 52 would be deed restricted as affordable housing, and 57 would be market rate) and 227 market rate condominiums. The proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Of these, at least 15 percent (or 16 units) must be at rents affordable by persons of low income. The proposed project would exceed that requirement by including 52 units that would be deed restricted as affordable housing. Therefore, the proposed project would not displace substantial numbers of housing and would not necessitate the construction of replacement housing elsewhere; impacts would be less than significant.

It should be noted that subsequent to circulation of the Draft EIR, the project Applicant submitted a letter announcing their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative, which is described and analyzed in Chapter 5.0, Alternatives, of the Draft EIR. This alternative would result approximately 486 residential units, consisting of 141 studios/one-bedroom apartment units, 270 one-bedroom condo units, and 75 two-bedroom units. As with the proposed project, this alternative would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units.

The commenter's statement that the trailer park should be preserved is noted for the record and will be forwarded to decision-makers for consideration.

Comment 29-2

OVERVIEW

Regrettably, the Draft EIR (DEIR") is insufficient in arguably the most important areas. Some sections of the DEIR seem to be written as an attempt to approximate "pro forma" compliance with CEQA. Yet, the DEIR does not comply with CEQA in several ways. As such, it must be revised and recirculated to conform to CEQA's requirements.

Response 29-2

The commenter states an opinion that the Draft EIR is insufficient and should be recirculated. The specific comments made by the commenter on the Draft EIR are individually responded to below. CEQA requires a lead agency to re-circulate an EIR when significant new information is added to the EIR following public review but before certification (Public Resources Code Section 21092.1). Section 15088.5 of the CEQA Guidelines clarify that new information is significant if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project" including, for example, "a disclosure showing that ... [a] new significant environmental impact would result from the project."

The Draft EIR has been prepared in accordance with CEQA requirements and the significance thresholds and methodologies set forth by the City of Santa Monica. Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed in the Draft EIR. Analysis of each environmental issue area is supported by substantial evidence to justify the findings of impacts associated with the proposed project for each of the following environmental issues. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project. As noted in the responses below, there are no new significant impacts associated with the project that have not already been identified as part of the Draft EIR. As such, recirculation of the Draft EIR would not be necessary.

Comment 29-3

As will be discussed in detail below, critical information, impact analysis and mitigation measures are either unduly buried in an Appendix or deferred to other non-CEQA documents not attached to the DEIR for public review, such as the Development Agreement, Tenant Impact Report and Tenant Relocation Plan. As such, many parts of the DEIR contain nothing more than bare conclusions. When a draft EIR is so fundamentally flawed that public comment is in effect meaningless, as it is here, recirculation is required pursuant to CEQA Guidelines 15088.5(a)(4). (*Mountain Lion Assn. v. California Fish and Game Com.* (1989) 214 Cal. App.3d 1043; *Cadiz Land Co. v. Rail Cycle* (4th Dist. 2000) 83 Cal. App.4th 74, 96; *Save Our Peninsula Comm. v. Monterey County Bd. Of Supervisors* (6th Dist. 2001) 87 Cal. App.4th 99, 134.)

Response 29-3

The Draft EIR includes over 1,300 pages of text and information, supported by references and appendices. Potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project. With the exception of the City's standard mitigation measures addressing archaeological and paleontological resources, feasible mitigation measures are clearly identified in the body of the Draft EIR within the corresponding EIR sections. Traffic mitigation measures that were determined to be infeasible are discussed in Appendix F, Traffic Study, of the Draft EIR. These measures are not included in the body of the Draft EIR as they were determined to be infeasible and as such were rejected.

As discussed in Chapter 3.0, Project Description, of the Draft EIR the proposed project requires processing of a Development Agreement. The Development Agreement is not a mitigation measure of the proposed project, but rather the primary discretionary entitlement required to be approved for the proposed project to proceed. As discussed in the Draft EIR, the proposed project cannot be implemented without a Development Agreement. The Development Agreement entitlement process, which is separate from and informed by the CEQA process, is on-going and final details of the agreement, if approved, have yet to be determined by the decision maker. Thus, like other discretionary permits, the actual Development Agreement document is not required to be included as an attachment to the Draft EIR. Instead, the analysis in the EIR informs the decision makers of the environmental consequences of the proposed project and fully discloses the extent to which the project complies with regulations that are currently applicable to the project site. In doing so, the Draft EIR contains a detailed discussion of the mitigation measures that could be made conditions of the Development Agreement and the manner in which the project would be regulated per the Development Agreement. Furthermore, inclusion of the Development Agreement would not provide any substantial new information or mitigation measures for the proposed project that are required by CEQA. All of the required CEQA analyses and mitigation measures for the proposed project are contained in the Draft EIR. Thus, the potential CEQA impacts of the proposed project are fully accounted for in the Draft EIR.

In addition, the Tenant Impact Report and the Tenant Relocation Plan are required by the State's mobilehome closure law at Government Code Section 65863.7. These documents are not required by CEQA and do not address, create or disclose potential impacts on the physical environment.

Comment 29-4

In several impact areas the DEIR inappropriately refers the reader to the Initial Study attached in the Technical Appendices for the analysis on that impact area. For example, in the case of cultural resources, the DEIR discloses significant impacts may result to archeological resources, and then proposes mitigation, yet the mitigation is not discussed in the DEIR but rather buried in the Technical Appendix. (DEIR 4.5-8; Technical Appendix A.) While CEQA does permit some information to be incorporated by reference, CEQA Guidelines 15150(f) specifically limits this incorporation "for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." Here the DEIR is referring to information located in the "Technical" Appendices as a substitute for analysis that is required by CEQA as fundamental part of an EIR.

Response 29-4

Section 15126.2 of the CEQA Guidelines states that an EIR shall identify and focus on the significant environmental effects of the project. Section 15128 further states: "An EIR shall include a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an initial study."

Nothing in CEQA or the CEQA Guidelines preclude a lead agency from scoping out environmental issue areas through an Initial Study. As determined in the Initial Study provided in Appendix A of the Draft EIR, implementation of the City's standard mitigation measures would mitigate potential impacts to archaeological and paleontological resources. Therefore, per Section 15126.2 of the CEQA Guidelines, impacts associated with these environmental issue areas were not addressed within the Draft EIR.

Comment 29-5

Moreover, there are several places in the DEIR that refer to and rely on outside documents not included with the DEIR nor provided to the public, but which supply critical pieces of information on the proposed project's impacts and mitigation measures. The DEIR's reliance on the Development Agreement ("DA"), for information on how the Project will be consistent with several LUCE and General Plan requirements violates CEQA's requirement to adequately describe environmental impacts. The city has stated that the DA will not be available for the public to review until after the close of the comment period on the DEIR which precludes the public's ability to review and comment upon, among other things, land use impacts. Another example is in the Population and Housing section, where the DEIR concludes that impacts to the existing VTP residents will be less than significant based on details to be "revealed" later in the Tenant Relocation Plan and Tenant Impact Report as part of the DA. (DEIR 4.13-10). CEQA requires that these details be included in the DEIR and not deferred for later where they are effectively insulated from public review; recirculation is again warranted in these circumstances. (*Mountain Lion Assn. v. California Fish and Game Com.* (1989) 214 Cal. App.3d 1043, 1052).

Response 29-5

Please see Response 29-3, above.

Comment 29-6

Finally, one of the most glaring defects warranting recirculation is the DEIR's wholly inadequate selection and discussion of alternatives. CEQA section 15126.6 mandates that lithe [DEIR's] discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." Here, besides the legally required No Project alternative, the DEIR analyzes only two project alternatives, which are essentially two permutations of the proposed project. Both incorporate the same 4 and 5 story footprint, require the same infrastructure improvements, and result in the same significant impacts, as the proposed project – the only differing aspect of the three is the ratio of residential to commercial space proposed. The DEIR lacks a discussion of any reduced-density alternative or an alternative that contemplates preservation of some of VTP, which contravenes the agreement between the applicant and the City as set forth in the 2007 Memorandum of Understanding ("MOU").

In sum, we respectfully request the City revise and recirculate the DEIR in the manner discussed herein.

Response 29-6

In accordance with CEQA Guidelines Section 15126.6, the intent of the Draft EIR alternatives analysis is to avoid or substantially lessen the significant impacts of the proposed project. In accordance with CEQA, a range of reasonable alternatives was considered and analyzed in Chapter 5.0, Alternatives, of the Draft EIR. Specifically, the Draft EIR provides a complete analysis of a No Project Alternative as well as two additional alternatives intended to feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant impacts of the project. As provided in CEQA Guidelines Section 15126.6, an EIR is not required to consider every conceivable alternative to a project.

Please see Response 10-2 with regard to the Reduced Project Alternative. As discussed therein, Chapter 5.0, Alternatives, of the Draft EIR also provides a discussion of alternatives considered and rejected. These alternatives include the Reduced Project Alternative, an alternative that represents a 30 percent reduction in the proposed project to reduce impacts at one of the significantly impacted intersections. As discussed in the Draft EIR, this alternative would consist approximately 73,700 square

feet of creative office, 158 condominium units, 116 apartments, and 8,200 square feet of retail. The Draft EIR concluded that the Reduced Project Alternative would not achieve the project's objectives and, as evidenced by the financial feasibility analysis provided by the project applicant and peer reviewed by the City's consultant, it was determined that this alternative was financially infeasible. Therefore, as explained in the Draft EIR, this alternative was eliminated from further consideration. It should be further noted that subsequent to publication of the Draft EIR, SCAG adopted the 2012-2035 RTP/SCS on April 4, 2012. Pursuant to Chapter 4.2, Implementation of the Sustainable Communities Strategy, of CEQA (Public Resources Code Section 21155 et seq.), the proposed project is considered a Transit Priority Project. Per Public Resources Code Section 21155.2(c), as a transit priority project, the proposed project qualifies for CEQA streamlining under Public Resources Code Section 21159.28. Based on these statutory provisions of CEQA and SCAG guidance (see Appendix N of this Final EIR), an EIR for a transit priority project:

- Shall not treat as cumulatively considerable cumulative effects that were adequately addressed and mitigated in prior EIRs.
- Shall not be required to reference, describe, discuss (1) growth-inducing impacts or (2) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network.
- Shall not be required to analyze off-site alternatives to the TPP.
- Shall not be required to reference, describe, or discuss reduced density alternative to address effects of car and light-duty truck trips generated by project.

Therefore, under the newly adopted SCS, the EIR for the Village Trailer Park project need not discuss the reduced density alternative. Notwithstanding, in response to this comment, an analysis of this alternative has been provided as Appendix K of this Final EIR. The inclusion of this analysis is for information purposes only and is not required to complete this EIR in compliance with CEQA, as set forth in Chapter 4.2 of CEQA. See *Santa Barbara County Flower & Nursery Growers Assn. v. County of Santa Barbara* (2004) 121 Cal.App.4th 864.

In addition, the Draft EIR discusses an Alternative to Retain the Village Trailer Park whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards. See also Response 3-15, above, which discusses the speculative nature of an alternative that would contemplate transfer of development rights.

Finally, the 2007 MOU between the applicant and the City provided for the tolling of the Notice of Closure of the mobilehome park and a protocol for consideration of the proposed project after preparation of a project EIR. The MOU recognized that compliance with CEQA required the EIR to consider a reasonable range of alternatives, but did not predict or mandate the form of that analysis in advance. In fact, both of the alternatives mentioned in the MOU have been analyzed in this EIR. The no project alternative contemplates the preservation of the mobilehome park; the Reduced Project Alternative is discussed in the Draft EIR and further analyzed in Appendix K of this Final EIR.

Comment 29-7

MITIGATION DISCUSSION DEFICIENCIES

Public Resources Code Section 21002 requires agencies to adopt feasible mitigation measures (or feasible environmentally superior alternatives) in order to substantially lessen or avoid otherwise significant adverse environmental consequences. (Pub. Res. Code §§ 21002, 20181, subd. (a); Guidelines §§ 15002,

subds. (a)(3), 15021, subds. (a)(2), 15091, subd. (a)(1).) In furtherance of this mandate, CEQA Guidelines § 15084 requires an EIR discuss mitigation measures to minimize significant effects of the proposed project. The Guidelines provide that "An EIR shall describe feasible measures which could minimize significant adverse impacts..." (Guidelines, § 15126.4 (a)(1).) Further, "[f]ormulation of mitigation measures should not be deferred until some future time." (Ibid., at subd. (a)(1)(B).) Additionally, mitigation measures "must be fully enforceable through permit conditions, agreements, or other legally-binding agreements." (Ibid., at subd. (a)(2).)

The DEIR fails to follow these mandates in several respects. First, mitigation measures (either considered or rejected or deemed infeasible) should be discussed in a draft EIR for the purposes of providing the public and agencies to comment on their efficacy and feasibility. (See Guidelines, §15084.) Here, the proposed project is primarily reliant on the draft Development Agreement⁵ between the City and the project proponent. However, whenever the DA is referenced in the DEIR, there is little to no analysis of its contents. The DEIR refers to the Development Agreement's terms, yet fails to either discuss these terms or include the proposed DA in its Appendices.⁶ In fact, there is no indication inside the DEIR of where reviewers may find the Development Agreement.

Response 29-7

The commenter confuses the Development Agreement with the analysis of environmental impacts, mitigation measures and alternatives to the proposed project provided in this EIR. Please see Response 29-3, above, for a discussion of the Development Agreement. As stated therein, the Development Agreement is not a mitigation measure of the proposed project, but rather the primary discretionary entitlement required to be approved for the proposed project to proceed. Feasible mitigation measures identified in the Draft EIR would be conditions of the Development Agreement. The proposed project cannot proceed without a Development Agreement. The Development Agreement process is ongoing and final details of the agreement have yet to be determined. There is no requirement that the Development Agreement be made part of or distributed with the Draft EIR. It will be subject to public notice, availability and hearing as part of the consideration of the project by the City's Planning Commission and City Council.

The actual Development Agreement document is not required since the analysis in this EIR fully discloses the potential environmental effects of the proposed project, measures to mitigate such effects, and alternatives to the project as required by CEQA. In addition, the Draft EIR contains a detailed discussion of the manner in which the project would be regulated per the Development Agreement. Furthermore, inclusion of the Development Agreement would not provide any substantial new information or mitigation measures for the proposed project that are required by CEQA. All of the required CEQA analyses and mitigation measures for the proposed project are contained in the Draft EIR. Thus, the potential CEQA impacts of the proposed project are fully accounted for in the Draft EIR and recirculation of the Draft EIR is not necessary.

Comment 29-8

Second, the DEIR improperly defers the discussion of some project impacts and mitigation measures until a future time. (See *Defend the Bay v City of Irvine* (2004) 119 Cal.App.4th 1261, 1275.) For example, the DEIR states that "relocation options include the opportunity to relocate to the nearby City-owned Mountain View Mobile Home Park. Additional relocation options for the remaining Village Trailer Park

⁵The proposed project is a "Tier 3" project that requires the processing of a Development Agreement in order to obtain the developer's increase in height to 57 feet.

⁶In this respect the DEIR cannot be said to adequately describe the project nor "adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project." (*City of Santee v. County of San Diego* (1989) 214 Cal. App. 3d 1438, 1454-55.)

residents would also be identified as part of the Development Agreement process." (DEIR, at p. 3-21; 2-2.) But the DEIR does not disclose these relocation options nor potential impacts therefrom.

Response 29-8

As stated above, the proposed project requires processing of a Development Agreement. The Development Agreement is not a mitigation measure of the proposed project, but rather the primary discretionary entitlement required to be approved for the proposed project to proceed. The tenant impact report and relocation plan referenced in the Project Description are separate requirements of the state mobilehome closure laws, and not CEQA mitigation measures. In addition to relocation to the City-owned Mountain View Mobilehome Park, the Draft EIR also identifies relocation to the replacement rent controlled, affordable housing to be developed as part of the proposed project as an alternative option. The potential impacts to Population and Housing from the relocation of existing Village Trailer Park residents is discussed in Section 4.13 of the Draft EIR. The requirement to provide relocation options to the existing residents would be enforced through the Development Agreement.

Comment 29-9

Finally, the DEIR does not include a mitigation monitoring and reporting program required by Guidelines Section 15097 and Public Resources Code Section 21081.6, subd. (a)(1). While CEQA may not directly mandate this plan be included in the DEIR, the DEIR should include it because the related monitoring mechanisms may be difficult to distinguish from the measures themselves. Moreover, the inclusion of the reporting or monitoring program in the DEIR would also allow the public to comment on its adequacy or efficacy.

Response 29-9

CEQA Guidelines Section 15097 and Public Resources Code Section 21081.6 do not require that a Draft EIR include a mitigation monitoring and reporting program (MMRP). As stated in CEQA Guidelines Section 15097, a MMRP is required when an agency has made the findings pursuant to CEQA Guidelines Section 15091 in conjunction with approving a project. Including a MMRP within the Draft EIR is not a requirement of CEQA and would be considered premature. Rather, the Draft EIR identifies a number of feasible mitigation measures to reduce the impacts of the project and the Final EIR provided herein includes the MMRP. The mitigation measures within the MMRP takes into account public comments received on the Draft EIR.

Comment 29-10

AESTHETICS ANALYSIS DEFICIENCIES

The DEIR fails to provide an adequate analysis of aesthetic impacts, instead referring the reader to the Initial Study which concludes the proposed project "would not result in significant impacts on visual character/quality of the project site and area, scenic vistas, and scenic resources. Therefore, these issues will not be discussed further." (DEIR 4.1-7) Neither the Initial Study nor the DEIR itself provides the required discussion.

Response 29-10

Section 15126.2 of the CEQA Guidelines states that an EIR shall identify and focus on the significant environmental effects of the project. Section 15128 further states: "An EIR shall include a statement briefly indicating the reasons that various possible significant effects of a project were determined to not

be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an initial study." The EIR complies with these CEQA Guidelines.

The Initial Study provided in Appendix A of the Draft EIR provides an analysis of the project's potential impacts related to visual character, scenic vistas, and scenic resources, and determined that impacts would not occur or would be less than significant. As stated in the Initial Study, the project site is not part of a scenic vista, nor is it close enough to a scenic vista (i.e., ocean or mountain view) that the proposed project would obstruct scenic views. Therefore, no impact to scenic vistas would occur. In addition, no trees of significant aesthetic value (e.g., Landmark trees), rock outcroppings, historic buildings or other scenic resources are located on the project site. Therefore, no impacts to scenic resources would occur. With regard to visual character, the Initial Study states that while the proposed buildings would be five stories in height and taller than the existing uses on the site, they would not degrade the existing visual character or quality of the project site or its surroundings. The project site is surrounded with uses similar to those proposed and would not contrast with the existing surrounding uses. Further, the proposed project would be subject to architectural review by the City to ensure high visual quality. Therefore, impacts related to visual character would be less than significant.

Based on the above discussion in the Initial Study, impacts associated with these issues were determined to not be significant and not discussed in further detail in the Draft EIR.

Comment 29-11

In addition, the DEIR distorts the environmental baseline on this issue and fails to address potentially significant aesthetic impacts resulting from the project.

The DEIR apparently attempts to downplay the massive upscale represented by the proposed project, stating: "Surrounding land uses includes a church and light industrial uses to the east along Colorado Boulevard, light industrial uses to the west on the adjacent site, multi-family units to the north across Stanford Street and the Gas Company service yard to the south. Existing development in the project vicinity ranges generally from two to five stories in height." However, the entire 19 acre block contains *only one structure over two stories high*. The remaining buildings are one or two stories high.

Response 29-11

As discussed in Section 4.1, Aesthetics, of the Draft EIR, the multi-family residences in the immediately vicinity of the project site are generally two-stories in height, and the single-family residential buildings are typically one-story in height. However, there are taller buildings in the vicinity of the propose project. The five-story building, referenced in the comment and the Draft EIR, is located at the southwest corner of intersection of Colorado Avenue and Stewart Street, and there are additional buildings, five stories in height or greater, further west along Colorado Avenue. The proposed project would vary from four to five stories in height and, at its maximum, would be 57 feet tall. As noted in the Draft EIR, the proposed project would be subject to design review by the City's Architectural Review Board to ensure high visual quality and compatibility with surrounding land uses.

Comment 29-12

In addition, the proposed project site contains one of the largest mature mixed species tree plantings spaces in the city, yet this fact was not addressed in the DEIR. Moreover, the DEIR's Tree Assessment (See DEIR, Vol. II, Technical Appendix D) omits mention of a whole row of trees (36 total, mixed species, fully mature) along the property line with adjacent building to the West. As just another example of the tree assessment's mischaracterization of the baseline tree conditions is its discussion about the coast redwood, identified as number 26, that "this young tree exhibits good vigor but will likely languish as it

ages they can only survive with abundant irrigation." However, this redwood is one of the oldest trees in the park and is reported to be over 100 years old. As these facts comprise the baseline for determining impact to trees and aesthetics, they should be incorporated into the DEIR's analysis of impacts.

Response 29-12

As discussed in Section 4.3, Biological Resources, of the Draft EIR, the tree survey prepared for the project site (see Appendix D of the Draft EIR) identifies 107 trees within the project site and three trees that are located on the property line between the project site and adjacent property to the west. The row of trees to the west, as referenced by the commenter, is located within the property to the west and not within the project site.

As stated in the tree survey, the coast redwood, as the only California native species on the site, was considered to be of medium value. Coast redwoods are indigenous to the Pacific Coast, extending south from the California/Oregon border to Monterey County, where growing conditions are typified by cool coastal air and fog. When grown outside of their native range, they can only survive with abundant irrigation. In southern California they usually display only marginal health. This young tree still exhibits good vigor but will likely languish as it ages. Because of its location immediately adjacent to a large jacaranda, where its roots are likely intermixed with the jacaranda, it was not considered a viable specimen for relocation.

It should be further noted that City of Santa Monica has no municipal code requirements related to the protection and/or preservation of trees on private property. Therefore, removal of private trees is not considered a significant impact under CEQA.

Comment 29-13

The DEIR, which does not itself analyze this issue, refers to its Technical Appendix A, which in turn appears to brush off the 3 to 4 story building height increase, containing nothing more than this conclusory statement: "While the proposed buildings would be five stories in height and as such would be taller than the existing uses on the site, they would not degrade the existing visual character or quality of the project site or its surroundings." (Appendix A, p. 14.) The DEIR should be revised to contain a CEQA-compliant discussion of how the Project's profound scale and mass as compared to the surrounding low density neighborhood complies with City's land use policies such as LU1.5, LU13.2 and LU15.2.

Appendix G to the State CEQA Guidelines (Title 14 of the Government Code) provides that a project could have significant environmental impacts to aesthetics if a project would "substantially degrade the existing visual character or quality of the site and its surroundings."

In determining whether an impact is significant, the DEIR must consider the current character of the neighborhood, which is comprised of small, single-family dwellings and surrounding low density uses. It is likely, then, that the proposed project may result in a significant aesthetic impact because the project would substantially degrade the existing visual character of the site by introducing a massive increase in building height and remove mature mixed species tree canopies. While the DEIR cites to the significance thresholds in Appendix G (DEIR at p. 4.1-6), the DEIR fails to provide an analysis of how it arrives at the conclusion that a series of "big box" buildings would not degrade the existing visual character or quality of the project site or its surroundings.

Response 29-13

With regard to visual character, the Initial Study states that while the proposed buildings would be five stories in height and taller than the existing uses on the site, they would not degrade the existing visual character or quality of the project site or its surroundings. The project site is surrounded with uses similar to those proposed and would not contrast with the existing surrounding uses. Further, the proposed project would be subject to architectural review by the City to ensure high visual quality. Therefore, impacts related to visual character would be less than significant.

Comment 29-14

POPULATION AND HOUSING IMPACTS ANALYSIS DEFICIENCIES

Although 109 truly affordable mobile home spaces would be removed from the City's housing stock by the proposed project, the DEIR concludes that these impacts are insignificant and do not require mitigation. (DEIR 4.13-9). The DEIR in large part relies upon the reasoning that the 109 mobile homes will be replaced on a one to one ratio with 109 rent controlled units, 52 of which would be deed restricted affordable housing and the other 57 market rate. (DEIR 4.13-9). However, the proffered new rent controlled apartments are not sufficient replacement of lost VTP housing, since VTP residents OWN their homes. LUCE policy 3.3-4 seeks to "ensure economic diversity in the community by making home ownership for low income people a reality." Instead, the proposed project actually displaces residents from home ownership. This important distinction should be addressed when re-evaluating the potential significance of population and housing impacts and appropriate mitigation measures or feasible alternatives. (See Exhibits - City Rent Control Board reports.)

Response 29-14

As stated in Section 4.13, Population and Housing, of the Draft EIR, the project site is developed with 109 mobilehomes on mobilehome spaces. While some VTP residents may own their trailers or mobilehomes, they rent the lot spaces from the Park owner. All of the 109 spaces are rent-controlled housing. Although there are 109 spaces at the project site, approximately 59 of them are currently occupied by trailers. The remaining mobile home lots are vacant.

As stated in the Draft EIR, the proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Therefore, the proposed project would not displace substantial number of housing; impacts would be less than significant. With regard to the displacement of people, as stated in Section 4.13, Population and Housing, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Upon implementation of the relocation provisions which would be enforced through the Development Agreement, population displacement impacts would be less than significant.

It should also be noted that the focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the physical environment. Accordingly, CEQA Guidelines Section 15064(e), economic and social impacts of a project are not to be treated as "significant" impacts on the physical environment, as defined. To the extent that there is a direct or indirect causal connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is "significant." Population and

housing displacement impacts are relevant CEQA issues to the extent that displacement would result in physical changes to the environment, (i.e., necessitate the construction of replacement housing elsewhere). As such, home ownership is considered a social issue that is not relevant to CEQA.

As to LUCE Policy consistency, the LUCE recognizes that the project site is a mobilehome park and that the park owner may close the park in compliance with state law and the City's Rent Control Charter Amendment. *See Keh v. Walters* (1997) 55 Cal.App.4th 1522, 1533. LUCE Policy D.24.13 specifically provides for the recycling of the Village Trailer Park "...to other uses that are consistent with the MUCD and in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks."

Comment 29-15

Currently 76 residents live at VTP and would need to be relocated. (DEIR 4.13-10). However, nowhere in the DEIR does it state these units will be offered to the 76 displaced residents on a one to one basis. In fact it is unclear exactly what will happen to these residents. Again, as throughout this DEIR it states that this "detail" will be included in the Development Agreement, which is supposed to include a tenant impact report and plan for relocation. (DEIR 4.13-10). Without this information, it is unclear how the DEIR arrived at the conclusion that population displacement impacts would be insignificant.

Response 29-15

Please see Response 29-14, above, for a discussion of the tenant impact report and population displacement impacts.

Comment 29-16

TRAFFIC IMPACTS ANALYSIS DEFICIENCIES

Please see letter and attachments from Robert Shanteau, Ph.D., P.E., regarding comments specific to the DEIR's traffic analysis, attached as Exhibit 7 to this comment letter.

Response 29-16

This comment references an additional attached comment letter. Please refer to Comment Letter 30 for responses to those comments.

Comment 29-17

LAND USE IMPACTS ANALYSIS DEFICIENCIES

CEQA requires that an EIR discuss "any inconsistencies between the proposed project and the applicable general plans and regional plans." (Guidelines, § 15125, subd. (d).) Any conflict between the project and an applicable land use plan constitutes a significant impact if it is related to a change in the physical environment or the policy at issue was adopted for the purpose of avoiding or mitigating an environmental effect. (Guidelines, Appendix G; See also, e.g., *The Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903.) The DEIR claims that the "proposed Development Agreement between the City and the project applicant may establish the type and mix of allowable land uses so long as they are consistent with the LUCE." (DEIR, at p. 3-5.) Even assuming *arguendo* this statement is

accurate (that the DA cures the inconsistency⁷ with the R-MH zone,) the proposed project must still comply with applicable plans. The DEIR concludes that project-related land use impacts are insignificant because the project is consistent with applicable plans, such as the General Plan and LUCE. (DEIR at p. 2.5 and Table 2.2.) However, this is not the case and the DEIR fails to discuss the obvious inconsistencies.

The proposed project is inconsistent with the LUCE because it:

- Fails to "preserve" the neighborhood - in fact it destroys it, eliminating an established community and replacing it with massive big box structures containing high density uses;
- Fails to reduce traffic trips and instead increases traffic by 986%
- Fails to reduce greenhouse gas emissions to meet state and local GHG goals and instead significantly increases GHG emissions

These policies are designed to avoid or mitigate negative environmental effects. Therefore, the proposed project's inconsistencies with the LUCE in this regard constitute a significant impact which should be addressed in a revised DEIR.

Additionally, instead of addressing inconsistencies with the LUCE, the DEIR relies entirely on the DA to summarily conclude impacts would be insignificant: "the proposed project would be subject to a Development Agreement to ensure consistency with the LUCE. Therefore, the proposed project would not conflict with land use plans or regulations; impacts would be less than significant." (DEIR, at p. 4.10-17.) This does not suffice for CEQA compliance purposes.

Response 29-17

Please refer to Responses 3-4, 3-5, and 6-6 for a discussion of the Development Agreement and the zoning code. As stated therein, per Government Code Section 65867.5, a development agreement is a legislative act that shall be approved by resolution or ordinance. Because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e., zoning standards) as long as they are consistent with the general plan and any applicable specific plan.

The policies and objectives provided in the General Plan are meant to guide and influence future development in the City. CEQA does not require that a given project need be in perfect conformity with each and every policy and objective in the general plan (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704). Rather, a proposed project need only to be compatible with the objectives, policies, general land uses and programs specified in the general plan. Decision makers have the authority to consider both the benefits and consequences of a project in deciding whether to grant the requested approvals. The policy consistency analysis is a key component that informs this decision-making process.

The Draft EIR analysis of the proposed project's consistency with land use plans and policies does not default to the fact that a Development Agreement is required for project approval as suggested by the

⁷The DEIR's position on land use consistency is as follows: The project includes land uses that are not consistent with the very limited types of uses in the RMH zone; however, the proposed Development Agreement (DA) establishes that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. Figure 4.10-5 shows the zoning designations for the project site and surrounding area. (DEIR 4.10-9) The project site has a zoning designation of Residential Mobile Home Park District (R-MH). According to Section 9.04.08.06.010 of the Santa Monica Municipal Code (SMMC), permitted uses within the R-MH zone include, but are not limited to, mobile homes and small family day care homes. All of the uses in the proposed project, including multi-family housing, retail uses, and office uses, are not consistent with the R-MH zone. However, as previously stated, amendments to the City's Zoning Ordinance that reflect the 2010 LUCE's policies, goals and standards have not yet been adopted. The proposed project would be implemented through a Development Agreement which requires that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. (DEIR 4.10-18.)

commenter. As shown in Table 4.10-3 of the Draft EIR the proposed project would conform with the goals, objectives, and policies of the LUCE. Furthermore, as stated in Response 29-14, LUCE Policy D.24.13 provides for the conversion of the Village Trailer Park to another use and Draft EIR Section 4.7 presents substantial evidence that GHG emissions are not significant; With regards to the assertion that the project fails to reduce traffic trips, there is no question that new development will induce new vehicle trips when compared to the existing uses on site. Even in the most transit friendly and walkable cities such as New York, London, and Paris many trips generated by new development will be by automobile. However, by providing a mix of uses in a pedestrian, bicycle, and transit friendly environment, the project will generate fewer vehicle trips than if it was located in a suburban or exurban location with access solely or almost entirely by automobile. Further, the City of Santa Monica's trip reduction goals are citywide, understanding that individual new development will generate vehicle trips. The Santa Monica LUCE adopted in July 2010 provides a framework for integrating land use and transportation to reduce vehicle trips; encourage walking, bicycling and transit use; and create active, pedestrian-oriented neighborhoods. The LUCE proposes the creation of a complete multi-modal transportation system which builds upon the City's investment in transit and the opportunity offered by the coming of the Expo Light Rail line. The LUCE focuses future development into transit-oriented areas, such as where the project site is situated, and along transit corridors. The LUCE establishes the goal of achieving no net new evening peak period vehicle trips generated citywide within Santa Monica, with the intent to invest in the transportation system to substantially reduce vehicle trips generated by new development and to offset new vehicle trips with reductions elsewhere in the circulation system, such as for existing development. The no net new evening peak period goal is not a requirement to be applied on a project-by-project basis. Rather, the goal envisions reducing vehicle trips for existing and future uses on a citywide basis through land use and transportation policies and implementation programs set forth by the LUCE. The trip generation estimates for the project incorporate trip reduction measures assuming that the project implements effective transportation demand management (TDM) strategies in accordance with Santa Monica LUCE policies.

Therefore, impacts associated with consistency with the LUCE would be less than significant.

Comment 29-18

Some inconsistencies between the proposed project and land use plans are obvious. For example, regarding Objective 1 of the Regional Comprehensive Plan, which states: "Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities," the DEIR concludes that the project is consistent because "The proposed project involves a mixed-use development with multi-family residential units in an urbanized area served by existing infrastructure and facilities." (DEIR, Table 4.10-2.) Yet one of the project objectives is to create new roads to accommodate the project.

Response 29-18

The proposed project would be served by existing infrastructure. It should be noted that the LUCE calls for circulation improvements in the Mixed-Use Creative District through the extension of new roadways and pedestrian pathways. The proposed extension of Pennsylvania Avenue and the New Road would break up the existing large City blocks and improve circulation and access, consistent with the LUCE.

Comment 29-19

As another example, the DEIR claims that the project is consistent with General Plan Policy LU 10.2 by implying that the project promotes a reduction of GHG emissions when the opposite is true. (DEIR, at p. 4.10-15.)

Response 29-19

As analyzed in the Draft EIR, the proposed project is a mixed-use development within an urbanized area in proximity to transit. In addition, the proposed project intends to achieve LEED certification under the USGBC. As the proposed project is consistent with applicable GHG plans and policies, the proposed project would promote a reduction of GHG emissions.

Comment 29-20

The project arguably cannot, as the DEIR asserts, be consistent with Policy 1.2 of the Housing Element which states that projects should encourage the development of housing in nonresidential zones when in fact this project arguably does the opposite by introducing commercial use into an area strictly zoned for residential use (R-MH). (DEIR, at p. 4.10-16.)

Response 29-20

The proposed project's introduction of commercial uses on the project site is permitted by local law. As discussed in Section 4.10, Land Use and Planning, of the Draft EIR and Responses 3-4 and 3-5 above, the project site has a land use designation of Mixed-Use Creative District and is zoned R-MH. Within the Mixed-Use Creative District, the LUCE encourages the combination of studio-related uses (such as film and music production) with affordable, workforce and market rate housing and ground floor, active, local-serving retail. The proposed project's mix of land uses would be consistent with the land uses encouraged by the LUCE.

In addition, Housing Element Policy 1.2 states, "Encourage and provide incentives for the development of housing in nonresidential zones and transit-oriented development." The proposed project is consistent with this policy in that the project is a mixed-use project that is approximately 93% residential consisting of 486 residential units and 26,280 sf of commercial space. The project site also has ready access to transit as it is located within a half-mile of several bus stops and the future Olympic/26th Expo Light Rail station.

Finally, the commenter wrongly assumes that policy consistency is governed by the strict limitations of the R-MH zone district. As stated in the Draft EIR, the LUCE was adopted in July 2010. Amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals, and standards have not yet been adopted. The City is currently in the process of updating the Zoning Ordinance to reflect the LUCE, including rezoning of currently existing zone districts to be in conformance with the LUCE land use designations. Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2356 on April 26, 2011 establishing interim development procedures to implement the LUCE. As set forth in the staff report for the Interim Ordinance, the purpose of these interim procedures is to provide for standards and procedures to review development projects in a manner that will enable the fulfillment of LUCE goals and policies prior to the preparation and implementation of actions such as the Zoning Ordinance update. The Interim Ordinance presents interim zoning regulations and provides an alternate process by which development is reviewed and approved to ensure consistency with the implementation of the LUCE.

Comment 29-21

Finally, the DEIR is defective for failing to include a discussion of the proposed community benefits. Because the project is a Tier 3 project, the applicant must provide "community benefits." The LUCE identifies five priority categories of community benefits: Trip Reduction and Traffic Management; Affordable and Workforce Housing; Community Physical Improvements; Social and Cultural Facilities; and Historic Preservation. The DEIR refers to the DA for a description of community benefits: "As

required by the LUCE, the proposed Development Agreement would provide community benefits. Therefore, the proposed project would be consistent with the LUCE." (DEIR, at p. 4.10-17.) This does not suffice for a discussion of necessary community benefits. Moreover, as addressed above, even if the DA's description of community benefits was adequate (which it is not), because the DA is missing from the DEIR, the information is not provided at all.

Response 29-21

As discussed in Section 3.0, Project Description, of the Draft EIR the proposed project requires processing of a Development Agreement. The Development Agreement is not a mitigation measure of the proposed project, but rather the primary discretionary entitlement required to be approved for the proposed project to proceed. As discussed in the Draft EIR, the proposed project cannot be implemented without a Development Agreement. The Development Agreement entitlement process, which is separate from and informed by the CEQA process, is on-going and final details of the agreement, if approved, have yet to be determined by the decision maker. As required by the LUCE, the Development Agreement would provide for the provision of community benefits.

The project description analyzed in the Draft EIR contains the most prominent community physical improvements of the project, identified as a community benefit required by a LUCE Tier 3 project. These include the dedication and improvement of the New Road and the Pennsylvania Avenue extension. The analysis in the EIR informs the decision makers of the environmental consequences of the proposed project and fully discloses the extent to which the project complies with regulations that are currently applicable to the project site. Other community benefits that may arise in the processing of the development agreement through required public hearings before the Planning Commission and City Council may involve exactions and fees, participation in Transportation Demand Management strategies, and, among other things, bicycle parking and storage. Furthermore, inclusion of community benefits that are not physical improvements with the potential to create environmental impact would not provide any substantial new information or mitigation measures for the proposed project that are required by CEQA. All of the required CEQA analyses and mitigation measures for the proposed project are contained in the Draft EIR. Thus, the potential CEQA impacts of the proposed project are fully accounted for in the Draft EIR. To the extent that other community benefits not analyzed in the Draft EIR are identified at the public hearings and made part of the development agreement, the EIR will be subject to recirculation to the extent that these newly identified components would result in physical environmental impacts and would trigger recirculation pursuant to CEQA Guideline 15088.5.

Comment 29-22

CLIMATE CHANGE ANALYSIS DEFICIENCIES

In order to meet state and local objectives, we must *reverse* the trend of climate change and reduce greenhouse gas emissions to a small fraction of the present levels. The Project as proposed will adversely affect the city's and state's ability to reverse current trends of global warming and, as addressed below, will result in a significant increase in GHG emissions. The DEIR inexplicably applies the most relaxed GHG threshold and erroneously concludes that the proposed project's impacts are insignificant. As a result of the DEIR's faulty and insufficient analysis, the DEIR fails to provide full disclosure of GHG impacts and enforceable mitigation.

Response 29-22

Although the project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. As discussed below, the proposed project would result in a less than significant GHG impact and, therefore, mitigation measures would not

be required. Please refer to Response 3-23, below, for a discussion of the GHG analysis in the Draft EIR and the application of the GHG threshold.

Comment 29-23

The DEIR states that the proposed project will add 7,077 metric tons per year of carbon dioxide equivalent GHGs. (DEIR 4.7-10.) It then concludes that project impacts would not be significant. (DEIR 4.7-9.) This conclusion is erroneous because the Proposed Project's GHG emissions are significant under every potential threshold of significance except the one inexplicably utilized in the DEIR.

Potential thresholds of significance for GHG emissions under CAPCOA (California Air Pollution Control Officers Association), CARB (California Air Resources Board), the State OPR (Office of Planning and Research) and air district resources include (a) a numerical standard; (b) zero threshold (i.e., any additional emission is significant); (c) percentage reduction from business as usual; and (d) the project would conflict or interfere with GHG reduction plans. In this case, a zero threshold should have been applied because any additional emission is significant in order to meet the goals set out in AB 32 and the Santa Monica Sustainable City Plan. Contrary to the conclusions in the DEIR, the proposed project's impacts are significant under all non-numerical thresholds:

-Zero Threshold: the Proposed Project is adding GHGs, so it exceeds the zero threshold.

-Percentage reduction from business as usual: the Proposed Project does not reduce its contribution by 30% of business as usual (to meet AB 32 goals).

-Conflict with GHG reduction plans: the Proposed Project would interfere with the GHG reduction plans in that it would increase GHG load, especially when combined with the two large-scale related projects to the west.

The Santa Monica Sustainable City Plan set a Citywide target for reducing GHG emissions down to 785,649 metric tons of CO₂ by 2015, which is 15 percent below 1990 levels, or a reduction of 16.6 percent below the 2007 inventory of CO₂. (Santa Monica Sustainable City Plan, at p.8; DEIR, at p. 4.7-4.) Moreover, the goal of AB 32 is to reduce statewide emissions to 1990 levels by 2020, a 15% decrease from current levels, and 30% reduction from 2020 levels on current trajectory. The long-term goal of AB 32 is to provide a further reduction of 80% from 1990 levels by 2050. Thus, to achieve these goals, *any addition of GHGs should be considered significant* and mitigation required. In fact, a number of lead agencies have explicitly determined that any increase in GHG above existing levels is a significant impact under CEQA because the legislature has determined that California's current greenhouse gas baseline is so high that it requires significant reductions, and any additional emissions will exacerbate existing conditions. Thus, any source, even a small one, would be considered significant.

Yet, in a confusing statement the DEIR inexplicably rejects the use of a zero emission threshold, citing to CEQA Guidelines, Section 15130 (a), and stating: "the CEQA Guidelines also recognize that there may be a point where a project's contribution, although above zero, would not be a considerable contribution to the cumulative impact." (DEIR 4.7-8) However, this Guideline does not specifically address GHG emissions, nor does it provide any basis as to why, in this context, a zero emission threshold is inappropriate. In fact, Section 15130 merely states that, "where an agency is examining a project with an incremental effect that it is not cumulatively considerable, a lead agency need not consider that effect significant..."

Here, the DEIR lacks any analysis to justify its conclusion to reject a zero emissions threshold given the backdrop of AB32 and the Santa Monica Sustainable City Plan targets to reduce GHG emissions down from its current level emissions of 941,625 to its goal of 785,649 by 2015. Thus, the DEIR fails to

adequately describe why the proposed project's added GHG emissions are not considered a significant impact.

Moreover, the DEIR inexplicably adopts a 10,000 metric ton per year threshold of significance to downplay its GHG emissions. The DEIR simply states:

[A]nother potential threshold would be the 10,000 metric tons standard used by the Market Advisory Committee for inclusion in a GHG Cap and Trade System in California. A 10,000 metric ton significance threshold would correspond to the GHG emissions of approximately 550 residential units, 400,000 square feet of office space, 120,000 square feet of retail, and 70,000 square feet of supermarket space. This threshold would capture roughly half of new residential or commercial development.

(DEIR 4.7-8)

The DEIR then discusses a few other numerical thresholds recommended by CAPCOA and mysteriously concludes that they are "too conservative" or rather "too low" for development in the South Coast Air Basin. No analysis or evidence is provided to support this statement or the rejection of these thresholds. The DEIR goes on to seemingly choose the "least" conservative threshold simply by process of elimination, stating:

For this reason, the most conservative (i.e., lowest) thresholds, suggested by CAPCOA, would not be appropriate for the proposed project given that it is located in a community that is highly urbanized. Similarly, the 900-ton threshold was also determined to be too conservative for general development in the South Coast Air Basin. Consequently, the threshold of 10,000 metric tons CO₂e is used as a quantitative benchmark for significance.

(DEIR 4.7-9)

Thus, there is no reason listed in the DEIR to sustain the use of the 10,000 ton threshold other than the fact that it is not as "conservative" as the other emission thresholds. This type of roughshod approach to impact analysis is a significant defect in the DEIR which results in a failure to fully disclose the Project's impacts related to climate change.

Response 29-23

The 2012 CEQA Guidelines do not establish a threshold of significance for GHG impacts; instead lead agencies have the discretion to establish significance thresholds for their respective jurisdictions. A lead agency may look to thresholds developed by other public agencies or other expert entities, such as CAPCOA, so long as the threshold chosen is supported by substantial evidence.

As discussed in the Draft EIR, the City of Santa Monica and SCAQMD do not have adopted GHG thresholds. Therefore, guidance documents from other agencies were evaluated for determining an appropriate significance threshold.

As discussed in the Draft EIR, CAPCOA identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggested making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. As noted in the Draft EIR, the use of a zero threshold would require all discretionary projects to achieve a 33 percent reduction from projected "business-as-usual" emissions to be considered less than significant. In a presentation given by the SCAQMD, the agency notes that the application of a zero threshold would require that all discretionary projects subject to CEQA prepare EIRs instead of negative declarations and notice of exemption as there may not be meaningful mitigation for small projects.

CAPCOA's suggested quantitative thresholds are generally more applicable to development on sites at the periphery of metropolitan areas, also known as "greenfield" sites, where there would be an increase in vehicle miles traveled (VMT) and associated GHG emissions than to infill development, which would generally reduce regional VMT and associated emissions. As the City of Santa Monica is generally built out, most commercial development within the City is infill or redevelopment and would be expected to generally reduce VMT and reliance on the drive-alone automobile use as compared to further suburban growth at the periphery of the region. A reduction in vehicle use and vehicle miles traveled can result in a reduction in fuel consumption and in air pollutant emissions, including GHG emissions. Recent research indicates that infill development reduces VMT and associated air pollutant emissions, as compared to greenfield sites. For example, a 1999 simulation study conducted for the USEPA, comparing infill development to greenfield development, found that infill development results in substantially fewer VMT per capita (39 percent to 52 percent) and generates fewer emissions of most air pollutants and greenhouse gases.

For this reason, the most conservative (i.e., lowest) thresholds, suggested by CAPCOA, would not be appropriate for the proposed project given that it is located in a community that is highly urbanized. Similarly, the 900-ton threshold was also determined to be too conservative for general development in the South Coast Air Basin. Consequently, the threshold of 10,000 metric tons CO₂e is used as a quantitative benchmark for significance.

While the City of Santa Monica has not officially adopted this threshold, it has used it repeatedly in preparing its CEQA documents. This methodology is supported by substantial evidence and is based on the available technical and regulatory guidance. Furthermore, as stated in the Draft EIR, in addition to the quantitative thresholds, the project's consistency with GHG plans is considered to determine whether a the project's GHG impacts would be significant.

Regarding the quantitative emissions threshold, GHG emissions for the project were calculated for on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span. As shown in Table 4.7-2 of the Draft EIR, the proposed project would result in 7,003 metric tons of CO₂e per year under the Cumulative Plus Project (Year 2020) Conditions. The Approval Year Plus Project (Year 2011) Conditions would result in 7,143 metric tons of CO₂e per year. Estimated GHG emissions would be less than the 10,000 metric tons of CO₂e per year quantitative significance threshold. Therefore, the proposed project would not exceed significance thresholds for greenhouse gas emissions. Impacts would be less than significant.

Regarding consistency with adopted plans and policies, the proposed project intends to achieve LEED certification under the US Green Building Council. Specifically, the project intends to pursue LEED Silver Certification for New Buildings and Major Renovations. LEED Scorecards provide an initial benchmark identifying which points could potentially be incorporated into the proposed project. Refinement of specific features will be developed as the project moves further along in the design and entitlements processes and a specific LEED path is determined for the residential component. Regardless of the path determined, the proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality. In addition, Tables 4.7-3 and 4.7-4 of the Draft EIR show that the proposed project would be consistent with direction/measures provided by CAPCOA and the Climate Action Team. Table 4.7-6 shows that the proposed project would be consistent with the City's Sustainable City Plan, the LUCE, and the Green Building Ordinance. Therefore, the proposed project would be consistent with GHG reduction policies. Impacts would be less than significant.

Comment 29-24

ALTERNATIVES ANALYSIS DEFICIENCIES

An EIR must consider a reasonable range of feasible alternatives. (CEQA Guidelines, § 15126.6, subd. (a).) Those alternatives must permit a "reasoned choice" for the decision makers. (CEQA Guidelines, §15126.6, subd. (f).) "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." (CEQA Guidelines, § 15126.6, subd. (a).) The DEIR fails to follow these directives.

The range of alternatives analyzed in the DEIR is woefully inadequate. CEQA § 15126.6 mandates that "the [DEIR's] discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The DEIR discloses that the Project will have significant and unavoidable impacts from construction emissions and vibration, neighborhood effects, transportation and traffic and corresponding cumulative impacts.

The DEIR does not evaluate a range of alternatives that would permit a reasoned choice, because the only project alternatives presented with discussion are permutations of the same proposed project.

The DEIR analyzes just three alternatives to the Project: 1) the legally required "no project"; 2) reduced residential/ increased commercial; and 3) increased residential/reduced commercial. With the exception of the "no project" alternative, all of the alternatives retain the exact same density, height, and FAR as the proposed project. And, most notably, none of them would substantially decrease the proposed project's significant environmental impacts - in fact, Alternative 2 would result in an increase in some significant impacts.

The DEIR's selection of alternatives defies CEQA Guidelines section 15126.6 9(f), which requires that alternatives be limited to those that would avoid or substantially lessen any of the significant effects of the project." Although the DEIR alleges that Alternative 3 will decrease the proposed project's impacts to transportation and traffic, the impacts still remain significant and unavoidable. (DEIR 5-11).

Despite the fact that the proposed project would result in significant and unavoidable traffic impacts at 11 intersections under the Approval Year (Year 2011) plus project conditions, (DEIR, 5-4), the DEIR fails to consider a range of alternatives which would meet most of the basic project objectives while avoiding or reducing significant impacts. Instead, the DEIR considers only one reduced density project alternative that would substantially reduce the Project's significant traffic and transportation impacts, and then improperly rejects it from full discussion and consideration, citing the following inadequate reasons:

- 1) does not maximize housing and job opportunities near the future Bergamot Station for the Exposition Light Rail Line to the same extent as the project;
- 2) a reduction in creative office would make it be difficult to meet the project objective to attract and retain entertainment companies by providing creative office space with sufficiently sized floor plates and amenities; and
- 3) fails to achieve the objective to maximize the creation of good-paying jobs and revenue to the City by including creative office space to the same extent as the project. (DEIR, 5-4, 5-5)

The DEIR's explanation for failing to analyze the only project alternative presented that would substantially reduce the proposed project's significant impacts lack merit. There is no explanation as to why a reduced density project would not meet most of the project objectives. CEQA does permit the

exclusion of a project alternative that could lessen a significant environmental impact simply because it does not satisfy everyone of the applicant's project objectives. In this case, the reasons identified in the DEIR are even less credible because the DEIR only states that a reduced density alternative doesn't satisfy the listed objectives to the "same extent as the Project." (DEIR 5-5) As discussed above, CEQA Guidelines 15126.6 does not require that each alternative meet every one of the stated project objectives.

Response 29-24

Please see Response 29-6, above, regarding the analysis of alternatives. As stated in the response, the Draft EIR provides a complete analysis of a No Project Alternative as well as two additional alternatives intended to feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant impacts of the project. As provided in CEQA Guidelines Section 15126.6, an EIR is not required to consider every conceivable alternative to a project.

Chapter 5.0, Alternatives, of the Draft EIR also provides a discussion of alternatives considered and rejected. These alternatives include the Reduced Project Alternative, an alternative that represents a 30 percent reduction in the proposed project which would reduce traffic impacts at one of the significantly impacted intersections. The Draft EIR concluded this alternative would not adequately and feasibly achieve the project's objectives. Therefore, the alternative was eliminated from further consideration. As stated above in Response 29-6, in response to this comment, an analysis of this Reduced Project Alternative has been provided as Appendix K of this Final EIR.

Comment 29-25

Additionally, the DEIR sets up a straw man to justify rejection of the "retain VTP" alternative by suggesting that the project applicant has existing "development rights." (DEIR 5-4). This is belied by the Zoning Code, the Zoning Map, and the MOU. The project applicant has no "development rights" above and beyond what is allowed by the zoning, unless and until the City agrees to confer additional development rights thereupon. Thus, the premise upon which the DEIR's rejection is based is fallacious, as evident by this passage, "transferring the development rights from VTP to the two adjacent properties was considered" but rejected because, in part "the maximum height and floor area ratio established in the LUCE cannot be exceeded and therefore, the LUCE cannot accommodate the amount of development rights that would be transferred from the Village Trailer Park property to the adjacent two properties." The DEIR should be revised to accurately reflect the baseline conditions in terms of the applicant's current development rights, as reflected by the parcel's current zoning, and then revise the analysis of this alternative.

Response 29-25

As indicated on page 4.10-9 in Section 4.10, Land Use and Planning, of the Draft EIR, the LUCE was adopted in July 2010 through resolution. The LUCE establishes land use designations for the City of Santa Monica. For each land use designation, the LUCE sets forth development parameters. The LUCE Land Use Designation Map designates the project site as Mixed-Use Creative District. Amendments to the City's Zoning Ordinance that reflect the LUCE's policies, goals, and standards have not yet been adopted. The City is currently in the process of updating the Zoning Ordinance to reflect the LUCE, including rezoning of currently existing zone districts to be in conformance with the LUCE land use designations. Until the completion of the comprehensive Zoning Ordinance update, the project site's underlying zoning of R-MH will continue to be inconsistent with the site's land use designation of Mixed-Use Creative District.

Pending the completion of the comprehensive Zoning Ordinance update, the City of Santa Monica adopted Interim Ordinance 2356 at a City Council hearing on April 26, 2011 establishing interim development procedures. As set forth in the staff report for the Interim Ordinance, the purpose of these interim procedures is to provide for standards and procedures to review development projects in a manner

that will enable the fulfillment of LUCE goals and policies prior to the preparation and implementation of actions such as the Zoning Ordinance update. The Interim Ordinance presents interim zoning regulations and provides an alternate process by which development is reviewed and approved to ensure consistency with the implementation of the LUCE. Specifically, the Interim Ordinance mandates that Tier 2 and Tier 3 development projects as well as Downtown projects over 32 feet in height be subject to a Development Agreement. As discussed in detail in Section 4.10, Land Use and Planning, of the Draft EIR, the proposed project is a Tier 3 project that would require processing of a development agreement.

Per Government Code Section 65867.5, a development agreement is a legislative act that shall be approved by resolution or ordinance. Because development agreements are themselves ordinances, they may supersede existing land use regulations (i.e. zoning standards) as long as they are consistent with the general plan and any applicable specific plan. A development agreement requires that the proposed project make findings of consistency with the General Plan development standards and type and mix of allowable land uses for the project site. As analyzed in the Draft EIR, the proposed project's land uses, height, and FAR would be consistent with that allowed by the LUCE for Tier 3 projects in the Mixed-Use Creative District.

Therefore, the applicable development parameters for the proposed project set forth in the LUCE, not the Zoning Code as purported by the commenter. Therefore, the Draft EIR does provide an accurate description of the land use regulatory framework and the discussion of the Retain Village Trailer Park Alternative is correct. No revisions to the Draft EIR are necessary in response to this comment. The proposed project would be consistent with the LUCE and would be in compliance with existing law.

Furthermore, CEQA Guidelines Section 15126.6 states that the intent of the Draft EIR alternatives analysis is to avoid or substantially lessen the significant impacts of the proposed project. As analyzed in the Draft EIR and discussed in Response 29-14, above, significant impacts associated with population displacement would not result from the proposed project. Notwithstanding, Section 5.0, Alternatives, of the Draft EIR does provide a discussion of an Alternative to Retain the Village Trailer Park, whereby development would occur as part of a multi-property master plan and the existing mobile home park would remain. This alternative was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards.

Finally, the commenter misperceives the basis for the determination of development rights in the absence of an adopted TDR program. The transfer of development rights from the project site to another property requires the voluntary participation and cooperation of all of the property owners involved, who must negotiate determination of the value of the rights to be purchased and transferred from the Village Trailer Park site so that new project site development would include preservation of the existing mobilehome park. Under the LUCE and the Interim Zoning Ordinance, landowners may rely on LUCE land use designations to identify the value of restrictions on development as part of their private negotiations.

Comment 29-26

With this woefully inadequate range of alternatives the decision makers and the public are deprived of any meaningful consideration of a range of environmentally superior project alternatives. Indeed, as far back as 2007, the project applicant signed a Memorandum of Understanding with the City agreeing that this DEIR would fully vet and discuss a reasonable range of reduced density alternatives as well as options to facilitate the preservation of VTP. Thus, the DEIR should be revised and recirculated with a full discussion and analysis of the following project alternatives:

- 1) A resident owned mobile home park subdivision (See Exhibit 5, attached: MOU, page 2, para. 2).'

2) Balance of mixed use and retention of a portion of VTP. Such an alternative could contemplate a portion of the mobile home park remaining which would reduce population and housing impacts, as well as traffic impacts, yet still provide some “creative space” apartment units and pedestrian amenities. In addition to analyzing this alternative in its own right, this alternative should *additionally* be analyzed in the context of a revised /I Alternative to Retain the Village Trailer Park" wherein the transfer of the project applicant's desired" development rights" for a portion of the trailer park that would be left in-tact could be achieved under the LUCE's FAR and height limitations.

3) City acquisition of VTP from landowner, either through a willing seller arrangement or by eminent domain. (See Exhibit 6, attached: November 22, 2011 report).

Response 29-26

As stated in Response 29-14, above, CEQA Guidelines Section 15126.6 states that the intent of the Draft EIR alternatives analysis is to avoid or substantially lessen the significant impacts of the proposed project. As analyzed in the Draft EIR and discussed in Response 29-6, above, significant impacts associated with population displacement would not result from the proposed project. Further, the LUCE recognizes that the project site is a mobilehome park and that the park owner may close the park in compliance with state law and the City's Rent Control Charter Amendment. See *Keh v. Walters* (1997) 55 Cal.App.4th 1522, 1533. LUCE Policy D.24.13 specifically provides for the recycling of the Village Trailer Park "...to other uses that are consistent with the MUCD and in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks."

Notwithstanding, Chapter 5.0, Alternatives, of the Draft EIR does provide a discussion of the No Project Alternative, where the proposed project would not be developed and the existing mobile home park would remain. In addition, a discussion is provided of an Alternative to Retain the Village Trailer Park, whereby development would occur as multi-property master plan and the existing mobile home park would remain. This alternative was deemed infeasible due to the absence of a transfer of development rights program, lack of interest from adjacent property owners, and the fact that the transfer of development rights from the project site to the adjacent properties would exceed the LUCE's maximum height and floor area ratio standards.

The commenter states that the Draft EIR should include an analysis of a resident owned mobile home park subdivision alternative. Such an alternative is a procedural variation of the No Project Alternative, which is already analyzed in the Draft EIR. An alternative of a resident owned mobile home park subdivision would be identical in terms of CEQA to the No Project Alternative, whereby the proposed project would not be developed and the existing mobile home park would remain. As such, analysis of such an alternative within the Draft EIR would be identical to the analysis of the No Project Alternative. Therefore, the inclusion of this alternative within the Draft EIR would not provide additional information and was determined to not be necessary. As concluded in the Draft EIR, the No Project Alternative would not achieve any of the project objectives.

With regard to the commenter's statement that the Draft EIR should include a discussion of an alternative where the mobile home trailer park would remain and a mixed-use project would be developed. Such an alternative would represent a substantial reduction in the proposed project. As already analyzed in the Draft EIR (see discussion regarding the Reduced Project Alternative), a 30 percent reduction in the proposed project would be financially infeasible. Therefore, an alternative where the mobile home trailer park would remain and a mixed-use project would be developed would similarly be infeasible. Therefore, the inclusion of this alternative within the Draft EIR would not provide additional information and was determined to not be necessary.

The commenter also states that the Draft EIR should include an alternative where the City would acquire the existing mobile home park. Similarly to the commenter's first suggested alternative, this alternative is

a procedural variation of the No Project Alternative, which is already analyzed in the Draft EIR. An alternative where the City would acquire the existing mobile home park would be identical in terms of CEQA to the No Project Alternative, whereby the proposed project would not be developed and the existing mobile home park would remain. As such, analysis of such an alternative within the Draft EIR would be identical to the analysis of the No Project Alternative. Therefore, the inclusion of this alternative within the Draft EIR would not provide additional information and was determined to not be necessary.

None of the comments provide a technical basis warranting recirculation of the Draft EIR pursuant to Section 15088.5 of the CEQA Guidelines.

Comment 29-27

CONCLUSION

We respectfully request the City revise the DEIR to cure the defects addressed above and recirculate for another 45-day public review period.

Response 29-27

None of the comments provided within this comment letter and other comment letters received provide a technical basis warranting recirculation of the Draft EIR pursuant to Section 15088.5 of the CEQA Guidelines.

As stated in the responses above, potential environmental impacts of the proposed project have been comprehensively analyzed and fully disclosed in the Draft EIR. Analysis of each environmental issue area is supported by substantial evidence to justify the findings of impacts associated with the proposed project for each of the following environmental issues. In addition, where feasible, mitigation measures have been proposed to reduce the environmental impacts of the proposed project. As noted in the responses above, there are no new significant impacts associated with the project that have not already been identified as part of the Draft EIR. None of the revisions to the Draft EIR set forth in Chapter 10.0, Corrections and Additions, constitute significant new information. As such, recirculation of the Draft EIR would not be necessary.

Letter 30

November 30, 2011

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Comment 30-1

At your request, I have reviewed the *Draft Traffic Study for the Village Trailer Park Project* dated October 2011 (Traffic Study) and the associated *Draft Environmental Impact Report* dated October 2011 (DEIR). In summary, the Traffic Study and DEIR contain numerous errors, including the failure to identify several significant traffic impacts altogether as well as underestimate the magnitude of several other significant traffic impacts. I conclude that at minimum, a supplemental traffic impact study will be necessary to accurately identify and evaluate the true the traffic impacts related to the project.

Response 30-1

This comment is introductory in nature and states that traffic analysis conducted for the proposed project is flawed. Responses to the commenter's more detailed comments are responded to below. This is the comment letter referenced in Comment 29-1.

Comment 30-2

1. Traffic Study not signed and sealed by a Professional Engineer

The Draft Traffic Study for the Village Trailer Park Project dated October 2011 and prepared by Fehr & Peers does not indicate that it was prepared by a Professional Engineer.

It is standard practice in California as well as other states for engineering reports to be signed and sealed by the engineer in responsible charge of their preparation.

Page 3 of the ITE Proposed Recommended Practice for Transportation Impact Analyses for Site Development (excerpt attached) states:

Site transportation impact studies should be prepared under the supervision of a qualified and experienced transportation professional who has specific training in traffic and transportation engineering and planning and several years of experience related to preparing transportation studies for existing or proposed developments. The ability to forecast and analyze transportation needs both for developments and for transportation systems is essential. All transportation operations and design work should be completed under the supervision of a qualified and experienced professional in conformance with state or local professional requirements. Some jurisdictions require that the transportation impact study report be signed and sealed by a registered professional engineer. (Proposed Recommended Practice for Transportation Impact Analyses for Site Development, Institute of Transportation Engineers, 2005)

Response 30-2

The commenter states that the traffic study is not signed and sealed by a Professional Engineer. Fehr & Peers has been conducting traffic impact studies for over 27 years since its inception in 1985. The City of Santa Monica engages qualified transportation planning/traffic engineering firms to conduct traffic studies for environmental documents in the City but does not require that traffic impact studies be signed and sealed by a registered professional engineer. The traffic study in question, as well as all other traffic

studies performed by Fehr & Peers for the City of Santa Monica and other jurisdictions, is prepared by qualified and experienced transportation professionals.

Comment 30-3

2. Traffic Study fails to recognize that Caltrans should have been consulted

The enclosed Caltrans publication entitled Guide for the Preparation of Traffic Impact Studies, December 2002 (Caltrans Guide) is not on the list of sources consulted in either the Traffic Study or the DEIR. (Note that the Traffic Study is actually a Traffic Impact Study.) The Caltrans Guide states on page 1, "The intent of this guide is to provide a starting point and a consistent basis in which Caltrans evaluates traffic impacts to State highway facilities Caltrans reviews federal, State, and local agency development projects, and land use change proposals for their potential impact to State highway facilities."

On page 2, the Caltrans Guide adds that a Traffic Impact Study (TIS) is needed when a project generates I to 49 peak hour trips assigned to a State highway facility if one of several conditions is met, including, "Affected State highway facilities [are] experiencing significant delay; unstable or forced traffic flow conditions (LOS 'E' or 'F')." (LOS stands for Level of Service.)

On page 90, the Traffic Study identifies 19 intersections that are projected to operate at deficient LOS during at least one of the analyzed peak hours. Among those intersections are two at interchanges with 1-10. This indicates that Caltrans should have at least been consulted about whether a review was necessary.

Response 30-3

The commenter states that the traffic study fails to recognize that Caltrans should have been consulted. Based on a comment letter received on the Draft EIR, the City of Santa Monica and Fehr & Peers met with Caltrans to address their concerns. Please see Response 1-3 for a discussion regarding analysis on state highways and consultation with Caltrans.

Comment 30-4

3. Caltrans was not consulted in the preparation of the Traffic Study

On page 2 the Caltrans Guide states, "Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended before commencing work on the study to establish the appropriate scope." There is no evidence that Caltrans was consulted during the preparation of the Traffic Study.

Response 30-4

The commenter states that Caltrans was not consulted in the preparation of the Traffic Study. Based on a comment letter received on the Draft EIR, the City of Santa Monica and Fehr & Peers met with Caltrans to address their concerns. Please see Response 1-3 for a discussion regarding analysis on state highways and consultation with Caltrans.

Comment 30-5

4. Traffic Study fails to follow Caltrans guidance

As noted above, Caltrans requires that a TIS for a project that impacts a State highway follow the procedures in the Caltrans Guide.

Many procedures in the Caltrans Guide, however, are not followed in the Traffic Study, in particular the traffic impact analysis methodology. On page 2 the Caltrans Guide states, "Measures of effectiveness for

level of service definitions [are] located in the most recent version of the Highway Capacity Manual, Transportation Research Board, National Research Council." As described in the next point, the Traffic Study instead uses an outdated traffic impact analysis methodology for intersections in the City of Los Angeles.

Response 30-5

Please see Response 1-3 for a discussion regarding use of Caltrans methodology.

Comment 30-6

5. Traffic Study uses an outdated traffic impact analysis methodology for intersections either

On page 4.15-5, the DEIR states, "The City of Los Angeles Department of Transportation (LADOT) uses a different methodology, the Critical Movement Analysis (CMA) method (Transportation Research Board, 1980), for signalized intersection capacity analysis. The signalized intersections under a shared jurisdiction between the City of Santa Monica and the City of Los Angeles and those intersections wholly under the jurisdiction of the City of Los Angeles have been analyzed using the CMA methodology."

Critical Movement Analysis is based on a document called *Transportation Research Circular 212: Interim Materials on Highway Capacity*, 1980. Circular 212 used volume to capacity ratio (V/C) as a simplified method of analyzing traffic signal operation. Fundamental deficiencies in the CMA method (listed below) were recognized at the national level in 1985 when Circular 212 was superseded by the *Highway Capacity Manual* (HCM). The HCM has been modified and refined so that today it is a quite sophisticated method of analyzing signal operations and has been incorporated into several computer packages for use in performing traffic impact studies. Several such packages are listed on page 5 of the Caltrans Guide.

Shortly after its introduction in 1985, the HCM method was accepted by most traffic engineers in the United States for analyzing issues related to highway capacity, including traffic signals. The Caltrans Guide, for instance, includes the following definition, "'Level of service' as defined in the latest edition of the Highway Capacity Manual, Transportation Research Board, National Research Council." And, as noted in the DEIR, the City of Santa Monica also uses the HCM method to determine LOS. At its most basic level, the HCM uses control delay per vehicle (i.e., delay caused by the signal) as the measure of effectiveness of signal operation. The advantages of using the HCM method over the CMA method include:

- a) CMA addresses only V/C ratio and does not address delay, congestion, queues, signal timing, signal phasing, or signal coordination
- b) CMA treats the highway network as a bunch of individual intersections instead of as the system it is
- c) CMA allows only changes in the number of lanes or lane configuration as mitigations and does not allow for changes in signal timing, signal phasing, or coordination patterns as mitigation
- d) CMA does not address pedestrians

These failures of the CMA method lead in turn to the Traffic Study not identifying accurately the impacts caused by a proposed project for intersections located within the City of Los Angeles. The DEIR should be revised to include a new, revised Traffic Study that uses the HCM methodology for intersections located within the City of Los Angeles; so that an accurate picture of traffic impacts can be provided to the public and decision makers.

Response 30-6

The commenter states that the traffic study uses an outdated traffic impact analysis methodology for intersections either under and shared jurisdiction between the City of Santa Monica and the City of Los

Angeles or located entirely within the City of Los Angeles. The Traffic Study was prepared in accordance with the City of Santa Monica Traffic Study Guidelines, which requires analysis of all study intersections using HCM methodology. Intersections shared by or belonging to the City of Los Angeles were also studied using CMA methodology. Project related traffic impacts have been assessed using HCM methodology for all intersections (Tables 9A and 10A of the Traffic Study). The CMA methodology is City of Los Angeles' preferred adopted methodology for determining traffic impacts. Mitigation measures were developed for impacts found generated under either the HCM or CMA methods.

Comment 30-7

6. At congested intersections, traffic volumes in the Traffic Study are a measure of the departure flow rate (capacity) instead of demand flow rate

On page 4.15-5, the DEIR states, "Traffic volume data for both the weekday morning (7:30 to 9:30 a.m.) and afternoon (5:00 to 7:00 p.m.) peak periods (collected in fall 2007) was obtained from the City of Santa Monica's TRAFFIX database for 37 of the 56 study intersections. For the remaining 19 study intersections, new traffic volume data was collected in 2008, 2009, or 2010. See the Traffic Study Appendix F for figures of the existing traffic volumes at the 56 intersections."

At several intersections, the Traffic Study reports the existing V/C to be almost 1.0. The fact that the V/C ratio is almost 1.0 during the peak hours reveals that the measured traffic volumes were of the number of vehicles able to depart the intersection rather than the number arriving at the intersection and joining the queue.

For an intersection that was operating beyond capacity at the time of the count (oversaturated), then those measured traffic volumes were only of vehicles able to enter the intersection, not the number that wanted to enter. The number of vehicles that are capable of being served by an oversaturated intersection is defined as the capacity of the intersection. Therefore, whoever counted the traffic volumes for congested intersections reported in the Traffic Study simply measured the capacity of the intersection and not demand.

In other words, the Traffic Study does not in fact comply with the HCM method as the DEIR otherwise represents, because the traffic study only counts the number of cars that can get through a congested intersection on a green light, rather than the number of cars WAITING to get through the congested intersection but can't before the light turns red.

In fact, the HCM cautions against using traffic volume instead of demand at an oversaturated intersection. On page 2-2, the HCM states (see attachment):

In this manual, demand is the principal measure of the amount of traffic using a given facility. Demand relates to vehicles arriving; volume relates to vehicles discharging. If there is no queue, demand is equivalent to the traffic volume at a given point on the roadway. Throughout this manual, the term volume generally is used for operating conditions below the threshold of capacity.

On page 5-18, the HCM has these definitions:

Volume- The number of persons or vehicles passing a point on a lane, roadway, or other traffic way during some time interval, often 1 h, expressed in vehicles¹ bicycles, or persons per hour.

Volume to capacity ratio - The ratio of flow rate to capacity for a transportation facility.

The traffic volumes reported in Appendix F of the DEIR are counts of traffic for each movement (left turn, through or right turn). The HCM method uses V/C for each movement to determine the delay and

LOS of the movement and for the intersection as a whole, so it is important to know which flow rate to use in the calculation. For signalized intersections, page 16-14 of the HCM provides the answer:

v/c Ratio

The ratio of flow rate to capacity (v/c), often called the volume to capacity ratio, is given the symbol X in intersection analysis. It is typically referred to as degree of saturation. For a given lane group i , X_i is computed using Equation 16-7.

$$X_i = (v/c)_i = v_i/s_i(g_i/C) = v_iC/s_i g_i$$

Where

$X_i = (v/c)_i$ = ratio for lane group i ,
 v_i = actual or projected demand flow rate for lane group i (veh/h),
 s_i = saturation flow rate for lane group i (veh/h)
 g_i = effective green time for lane group i (s), and
 C = cycle length (s)

Sustainable values of X_i range from 1.0 when the flow rate equals capacity to zero when the flow rate is zero. Values above 1.0 indicate an excess of demand over capacity.

Note that even though the formula is for the "volume to capacity ratio", the quantity in the numerator is in reality the "actual or projected demand flow rate," not the volume as defined on page 5-18 of the HCM. Thus the meaning of the term volume depends on context. Usually "volume" means the actual flow rate past a point, but in the term "volume to capacity ratio," "volume" means the demand flow rate.

As long as an intersection is undersaturated, the actual flow rate and the demand flow rate are the same, since all vehicles that arrive on a red light are served during the subsequent green. At an undersaturated intersection, then, $V/C < 1$. Exhibit 7-5 from the Highway Capacity Manual illustrates how a signalized intersection works:

(EXHIBIT 7-5)

The upper diagram shows how the green and red lights act like a valve, turning the vehicle flow on and off. The lower diagram shows the cumulative number of arrivals and departures. Note how the queue grows during the red lights and discharges during the green lights.

But at an oversaturated intersection, some vehicles have to wait through more than one green light before being served. In fact, one way to determine the actual capacity of an intersection to serve vehicle demand is to measure the throughput during a congested period. For the oversaturated intersections included in the DEIR, the traffic counts actually measure capacity (departures or throughput) and not demand (arrivals).

By using traffic counts at the oversaturated intersections as the base volume in Level of Service Worksheets, the Traffic Study is misapplying the HCM method. Instead, demand volume (arrivals) should have been entered.

This statement on page 16-3 of the HCM makes it clear that traffic counts are not to be used for oversaturated conditions:

Traffic volumes (for oversaturated conditions, demand must be used) for the intersection must be specified for each movement on each approach. (Highway Capacity Manual, Transportation Research Board, National Academies of Sciences, 2000)

Further support for this point can be found in the January 2006 Newsletter for the Center for Microcomputers in Transportation (McTrans), which the University of Florida runs for the Federal Highway Administration of the US Department of Transportation. An article in the newsletter entitled, "Analyzing Congested Signalized Intersections" (attached) states:

Volume is defined as the number of vehicles passing a point during a specified time period. Demand is the number of vehicles that desire to travel past a point during a specified period and is frequently higher than actual volumes where congestion exists.

Generally, volume data are collected by counting vehicles as they cross the stop line (those getting through the intersection), instead of counting upstream to more accurately measure the demand (those wanting to get through the intersection). This standard practice is fine for intersections with a demand less than capacity, but it is not acceptable for analyzing congested intersections. Where demand exceeds capacity, arrival volumes must be observed by counting the number of queued vehicles at periodic intervals as well as the departure volumes. ("Analyzing Congested Signalized Intersections", January 2006 Newsletter, Center for Microcomputers in Transportation (McTrans), University of Florida)

This basic error in traffic counting by the Traffic Study contained in the DEIR results in underestimating the traffic demand, which results in inaccurate assessments of existing traffic. Thus, a proper traffic study is essential for accurately assessing the project's traffic impacts. Because this traffic study was not prepared properly, the DEIR cannot possibly be relied upon to reflect the true significance of this project's traffic impacts.

Therefore, the Traffic Study needs to be revised so that the Level of Service Worksheets use arrivals (demand) instead of departures (traffic volume).

Response 30-7

The commenter states that at congested intersections, traffic volumes in the traffic study are a measure of the departure flow rate (capacity) instead of demand flow rate. This is acknowledged. At locations operating under oversaturated conditions where downstream constraints limit the number of vehicles that can pass through an intersection, the counted traffic volumes can be suppressed below the true demand. In this circumstance, level of service calculations using standard capacity values that do not account for the oversaturation can provide an artificially good and unrealistic result. In recognition of this phenomena, for the traffic study, peak hour saturation flow was observed, and saturation flow rates were calculated and applied for the following intersections:

- Cloverfield Boulevard & I-10 EB On-Ramp
- Bundy Drive & Olympic Boulevard
- Bundy Drive & Pico Boulevard
- Bundy Drive & I-10 EB On-Ramp
- Barrington Avenue & Olympic Boulevard

At the beginning of the study, Fehr & Peers determined that the calculated LOS of the above intersections without adjustment were not reflective of actual conditions. Saturation flow rates were applied in order to account for this observation. There are additional intersections within the study area beyond those listed above that also operate at poor levels of service. Saturation flow rate adjustments were not applied at all poorly operating intersections, however, since some were already estimated to operate at a deficient LOS without adjustment.

Comment 30-8

7. The Traffic Study fails to use best available methods for measuring demand at congested intersections

The article referenced above entitled, "Analyzing Congested Signalized Intersections" (attached) states:

Where demand exceeds capacity, arrival volumes must be observed by counting the number of queued vehicles at periodic intervals as well as the departure volumes. A detailed method for doing this may be found in most traffic engineering textbooks, e.g., Traffic Engineering by Roess et al. ("Analyzing Congested Signalized Intersections", January 2006 Newsletter, Center for Microcomputers in Transportation (McTrans), University of Florida)

This article refers to arrival volumes, whereas the traffic volumes in the DEIR measure departure volumes. If arrival volumes are greater than departure volumes, then the excess vehicles are stored in a queue until they can be served.

McTrans itself provides a method for measuring arrival volumes (demand) at congested intersections in the DAITA program, part of the HCS+ package of computer programs that implements the procedures in the 2000 Highway Capacity Manual (HCM) and is used by many transportation agencies across the country for transportation planning purposes, including traffic impact analyses. Thus, the Traffic Study should be revised to use the HCS+ method of measuring demand at congested intersection so that impacts can be accurately assessed, as they are by most other agencies across the country.

Response 30-8

The commenter states that the traffic study fails to use best available methods for measuring demand at congested intersections. The Traffic Study was prepared in accordance with the City of Santa Monica Traffic Study Guidelines, which requires analysis of all study intersections using HCM methodology. The HCM intersection analysis was conducted in Traffix software, which is a comprehensive traffic impact analysis (TIA) and intersection analysis tool.

For many of the congested locations, throughput is limited by congestion at downstream locations; thus saturation flow (using guidelines from Highway Capacity Manual, Special Report 209, Third Edition, Transportation Research Board, 1998) was observed at those locations and entered into the Traffix software when calculating LOS at intersections using the HCM methodology (see Response 30-7).

Comment 30-9

8. The DEIR incorrectly reports acceptable levels of service at intersections that are over Capacity

Starting on page 4.15-7, the DEIR lists several intersections with acceptable average delays yet with V/C ratios in excess of 1.0. For instance, the intersection of 20th Street and Wilshire Boulevard (Number 1), Table 4.15-6 on page 4.15-7 shows an existing AM peak delay of 34 seconds (LOS C) and a V/C of 1.374.

In Table 4.15-4 on page 4.15-6, the DEIR states, that for Level of Service F, the "Volume to capacity ratio > 1.0" and defines it as "FAILURE. Backups from nearby locations on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths."

Appendix C of the Traffic Study contains the Level of Service Worksheets for the study intersections. The first worksheet for 20th Street and Wilshire Boulevard during the AM Peak is attached. The first column of data is for the northbound left turn. After adjustments, the volume for the left turn movement ("Final Vol.") is 133 vehicles per hour and the V/C ratio ("Volume/Cap") is 1.37. If the calculation of the V/C ratio is accurate, then for every 1.37 vehicles that arrive during the AM peak hour, only 1, or 73% can leave. The remaining 27% of vehicles must wait in queue until they can be served. Therefore, approximately 36 of the 133 vehicles that arrived during the peak hour will not have been served and will be sitting in a queue. Traffic engineers commonly assume that each vehicle in a queue takes up about 25

feet, so the length of the left turn queue at the end of the AM peak hour would be 898 feet. But an inspection of an aerial photo of the intersection (attached) shows that the left turn lanes at this location are less than 150 feet long. Thus the left turn queues will spill over into the through lanes, effectively blocking the intersection and causing breakdown of the intersection and areawide congestion.

The same intersection breakdown will occur at every intersection for which $V/C > 1.0$, which potentially includes every intersection in Table 4.15-6 on page 4.1 5-7 for which the V/C ratio is close to or greater than 1. By ignoring the breakdown of the intersection and areawide congestion caused by left turn queues spilling over into through lanes, the OEIR misstated the LOS for existing conditions. Therefore the OEIR does not accurately assess the significance of impacts for all intersections with V/C ratios close to or greater than 1.

Response 30-9

The commenter states that the DEIR incorrectly reports acceptable levels of service at intersections that are over capacity. LOS is reported based on delay, unless the delay is LOS F. When delay is LOS F, LOS is reported based on V/C . This approach is in accordance with City of Santa Monica Traffic Study Guidelines. Additionally, unique driver behavior in the Los Angeles area may account for this discrepancy between delay and V/C . At the location in question (20th Street and Wilshire Boulevard), left turning vehicles are in fact not “spilling over in to the through lanes, effectively blocking the intersection and causing breakdown of the intersection and area wide congestion.” Rather, the effective throughput of left turning vehicles is higher than possible during allotted green time due to the fact that drivers routinely make left turns on yellow and red at permitted locations. These left turn movements are in fact not causing area wide congestion. Area wide congestion is primarily caused by lack of capacity on roadways during the PM peak period as motorists travel east or south from Santa Monica and West Los Angeles.

Comment 30-10

9. Tile DEIR fails to use multiperiod analysis for intersections with $V/C > 1.0$ as required by the Highway Capacity Manual method

On page 16-23, the HCM states:

DETERMINING LEVEL OF SERVICE

Intersection LOS is directly related to the average control delay per vehicle....

The results of an operational application of this method will yield two key outputs: volume to capacity ratios for each lane group and for all of the critical lane groups within the intersection as a whole, and average control delays for each lane group and approach and for the intersection as a whole along with corresponding LOS.

Any v/c ratio greater than 1.0 is an indication of actual or potential breakdown. In such cases, multi period analyses are advised. These analyses encompass all periods in which queue carryover due to oversaturation occurs....

A critical v/c ratio greater than 1.0 Indicates that the overall signal and geometric design provides Inadequate capacity for the given flows

When the v/c approaches or exceeds 1.0, it is possible that delay will remain at acceptable levels. This situation can occur, especially if the time over which high v/c levels occur is short. It can also occur if the analysis is for only a single period and there is queue carryover. In the latter case, conduct of a multiperiod analysis is necessary to gain a true picture of delay. The analysis must consider the results of

both the capacity analysis and the LOS analysis 10 obtain a complete picture of existing or projected Intersection operations.

Inspection of the Level of Service Worksheets reveals that the DEIR utilized only single period analyses (for the peak hour) for all signalized intersections, even those for which the VIC ratio approached or exceeded 1.0. Therefore the delays at all oversaturated intersections were underestimated. For the intersection of 20th Street and Wilshire Boulevard, for example, a multiperiod analysis for the AM peak would have shown a delay significantly larger than 34 seconds and an LOS worse than C, moving it from the acceptable to the unacceptable range of LOS.

By not performing mutli-period analyses for the intersections with $V/C > 1.0$, the DEIR misstated the actual levels of congestion, and therefore, by extension, fails to accurately assess project-related traffic impacts. The Traffic Study should be revised in this and other ways pointed out in this comment letter, so that the DEIR can be revised to accurately identify, evaluate, and mitigate all significant traffic impacts.

Response 30-10

The commenter states that the DEIR fails to use multiperiod analysis for intersections with $V/C > 1.0$ as required by the HCM method. Santa Monica traffic study guidelines require the analysis of AM and PM peak hours to assess traffic impacts (with projects within the downtown core also requiring Saturday peak hour analysis). The AM and PM peak hour analysis identifies the two highest volume peak hours for assessing impacts. Where impacts were identified, and feasible mitigations proposed, project related traffic impacts would be mitigated for other hours of analysis if they too were found impacted by the project. For impact analysis, which is the purpose of the CEQA document, it would be redundant to assess more than the AM and PM peak hours.

Comment 30-11

10. It is apparent that the preparer of the Traffic Study did not personally visit the study intersections, resulting in a failure to recognize existing congested conditions at many study intersections as well as a failure to recognize that turning counts at those intersections were not reflective of actual demand.

Although the Traffic Study acknowledges that several of the study intersections are already congested, it is apparent that either the persons collecting the field data either never visited the study intersections during the peak periods or did not report his/her observations to the preparer of the Traffic Study, contrary to this recommendation from the ITE Proposed Recommended Practice, (attached):

If the person overseeing the analysis is not the person collecting the field data, then that individual should also undertake personal observations of the key intersections and road segments, plus observations of existing traffic conditions. (Transportation Impact Analyses for Site Development, an ITE Proposed Recommended Practice, Institute of Transportation Engineers, 2005, page 19)

Also:

It is recommended that LOS for existing conditions be confirmed through field observations whenever possible. This will help verify assumptions. (Transportation Impact Analyses for Site Development, an ITE Proposed Recommended Practice, Institute of Transportation Engineers, 2005, page 60)

It was clearly possible to confirm the LOS of the study intersections through field observations. At those intersections where the reported V/C ratios well exceeded 1.0 despite the fact that the traffic counts could not have exceeded capacity, it would have been evident from field observations that something was wrong. Indeed, the field observations would have demonstrated that the traffic counts should not have been entered as V in the LOS worksheet. But since the mistake was not caught, it is evident that field

observations were not made to confirm the results in the LOS worksheet. Again, the failure of the Traffic Study to accurately assess existing traffic conditions results in an inaccurate traffic impact analysis with respect to the project DEIR.

Response 30-11

The commenter states that the preparer of the Traffic Study did not personally visit the study intersections, resulting in a failure to recognize existing congested conditions at many study intersections as well as a failure to recognize that turning counts at those intersections were not reflective of actual demand. The preparer of the traffic study, Fehr & Peers, is a Santa Monica firm with over two decades of experience in preparing traffic studies for projects in the City. All study intersections were visited as part of this study to observe traffic operations and perform fieldwork (lane geometries, signal timings, etc). As stated in Response 30-7, when field observations were conducted it was determined that a certain intersections appeared to be operating at a worse LOS than was calculated using HCM methodology. Saturation flow adjustments were applied to these intersections. As stated in Response 30-9, above, LOS is reported based on delay, unless the delay is LOS F. When delay is LOS F, LOS is reported based on V/C. This approach is in accordance with City of Santa Monica Traffic Study Guidelines.

Comment 30-12

11. The DEIR estimates existing level of service (LOS) instead of actually measuring it

Because the HCM method uses delay as its measure of evaluation and because delay is measurable in the field, it is possible to accurately measure the existing LOS based on field observations.

Instead, the existing levels of service shown in Table 4.15-12 on page 4.15-25 of the DEIR show that the HCM method was used to estimate the existing V/C ratio (based on a formula that uses the turning counts and number of lanes 'at an intersection). But because the V/C ratio is not directly measurable nor something that is experienced by the driver, it is difficult for the analyst to know whether the results are reasonable. Had an analyst from Fehr & Peers actually visited at least some of the study intersections during the AM and PM peak hours, he/she would have seen immediately that the V/C calculations in the Traffic Study were incorrect, particularly for the congested intersections. Existing LOS should be measured, not estimated, otherwise, DEIR traffic impact analyses really have no credibility.

Response 30-12

The commenter states that the Draft EIR estimates existing level of service (LOS) instead of actually measuring it. As stated in response 30-11, above, all study locations were visited during the course of the study and locations which showed a calculated LOS to be better than observed were adjusted downward using a saturation flow rate.

Comment 30-13

12. Despite the fact that the proposed project is mixed-use and is located near transit, the number of motor vehicle trips generated by the project will increase by 963%.

Table 4.15-15 on page 4.15-39 of the DEIR shows that the number of daily motor vehicle trips generated by the existing mobile home park is 245 while the number of daily motor vehicle trips generated by the proposed project is 2605, an increase of 963%.

A major advantage of mixed-use development is trip reduction. In this project, however, the vast majority of employed residents will need to commute to jobs off-site. And because jobs in the Los Angeles area tend to be dispersed, they are not served well by public transit (Near The Rails But Still On The Road: Research Casts Doubt On The Region's Strategy 01 Pushing Transit-Oriented Residential Projects To Get

People Out Of Cars, by Sharon Bernstein and Francisco Vara-Orta, LA Times, June 30, 2007 (attached). The conclusion is that most residents will commute by private automobile.

Response 30-13

The commenter states that despite the fact that the proposed project is mixed-use and is located near transit, the number of motor vehicle trips generated by the project will increase by 963 percent. There is no question that new development will induce new vehicle trips when compared to the existing uses on site. Even in the most transit friendly and walkable cities such as New York, London, and Paris many trips generated by new development will be by automobile. However, by providing a mix of uses in a pedestrian, bicycle, and transit friendly environment, the project will generate fewer vehicle trips than if was located in a suburban or exurban location with access solely or almost entirely by automobile.

Comment 30-14

13. Since the number of motor vehicle trips will increase by 963%, the project is inconsistent with Santa Monica's trip reduction goals

Statements in the DEIR that the project is consistent with Santa Monica's trip reduction goals, including its goal of no net new trips, are incorrect.

Response 30-14

The commenter states that since the number of motor vehicle trips will increase by 963 percent, the project is inconsistent with Santa Monica's trip reduction goals. The City of Santa Monica trip reduction goals are citywide, understanding that new development will generate vehicle trips. The Santa Monica LUCE adopted in July 2010 provides a framework for integrating land use and transportation to reduce vehicle trips; encourage walking, bicycling and transit use; and create active, pedestrian-oriented neighborhoods. The LUCE proposes the creation of a complete multi-modal transportation system which builds upon the City's investment in transit and the opportunity offered by the coming of the Expo Light Rail line. The LUCE focuses future development into transit-oriented districts (such as the Bergamot district) and along transit corridors. The LUCE establishes the goal of achieving no net new evening peak period vehicle trips generated citywide within Santa Monica, with the intent to invest in the transportation system to substantially reduce vehicle trips generated by new development and to offset new vehicle trips with reductions elsewhere in the circulation system, such as existing development. The no net new evening peak period goal is not a requirement to be applied on a project by project basis. Rather, the goal envisions reducing vehicle trips for existing and future uses on a Citywide basis through land use and transportation policies set forth by the LUCE. The trip generation estimates for the project incorporate trip reduction measures assuming that the project implements effective TDM strategies in accordance with Santa Monica LUCE policies.

Comment 30-15

14. The Traffic Study fails to determine that the proposed project will result in significant impacts on at least one Caltrans intersection

According to page I of the Caltrans Guide, no increase in delay per vehicle is allowed for intersections that are already operating poorly. Since the project will add traffic to at least two Caltrans intersections projected to operate poorly in 2011, the impact of the proposed project will be unacceptable per Caltrans criteria.

Response 30-15

The commenter states that the Traffic Study fails to determine that the proposed project will result in significant impacts on at least one Caltrans intersection. The traffic study identifies impacts at three Caltrans facilities:

- Centinela Avenue & Santa Monica Boulevard
- Centinela Avenue & I-10 Westbound ramps
- Bundy Drive & I-10 Eastbound ramps

The statement that “no increase in delay per vehicle is allowed for intersections that are already operating poorly” is part of Caltrans guidelines was not found in *Guide for the Preparation of Traffic Impact Studies* (Caltrans, December 2002). The Caltrans guide does not establish thresholds of significance to determine impacts. Please see Response 1-3 for a discussion of impacts on Caltrans facilities.

Comment 30-16

15. The DEIR fails to identify bicycle impacts on roads without bicycle facilities

The Traffic Study restricts its analysis of bicycle impacts to roads with bicycle facilities (Class I, II or III bikeways).

Section 885.2(f) of the California Streets and Highways Code has, since 1993 confirmed, "The bicycle is a legitimate transportation mode on public roads and highways." By restricting the identification of bicycle impacts only to bicycle facilities, the DEIR fails to identify possible impacts on roadways without bicycle facilities. Without an analysis of bicycling on such roadways, it is impossible to determine whether the proposed project will result in a significant impact on bicyclists or whether the project will encourage and facilitate bicycling.

Response 30-16

The commenter states that the DEIR fails to identify bicycle impacts on roads without bicycle facilities. It is unclear as to what specific impacts on roads without bicycle facilities that the commenter is referring to. Notwithstanding, the Traffic Study for the proposed project does consider the City’s Bicycle Action Plan and whether the project would conflict with this plan. The project would provide bicycle facilities for bicycle commuters and the City will continue to implement its bicycle plan (Santa Monica Bike Action Plan, City of Santa Monica, October 2011) to encourage bicycling throughout the City, including a priority bikeway on Yale/Stewart Streets, adjacent to the project site. The proposed project would include the extension of Pennsylvania Avenue, and a new north-south road (New Road) along the site’s western border from Colorado Avenue to the site’s southern property line. The Pennsylvania Avenue extension would be comprised of two travel lanes (one in each direction), parking lanes, and sidewalks on both sides. On the project site, the street would be constructed at grade over a section of the project’s subterranean parking garage. The New Road would also be comprised of two travel lanes, parking lanes, and sidewalks. New Road would be shared with the adjacent property to the west and provide access into the project site.”

Letter 31

March 6, 2012

Brenda Barnes
dhsbrenda@gmail.com

Comment 31-1

As I feel might be necessary to exhaust administrative remedies, I am informing you both that destruction of trailers is taking place at Village Trailer Park in contradiction to the contents of the Draft EIR for the proposed development project here, subject of a proposed development agreement. I also am as part of what might be necessary to exhaust administrative remedies asking that you require an EIR before any more trailers are destroyed here.

The part of the Draft EIR stating no destruction of trailers--which says TWICE that no trailers will be demolished--is on p. 168:

"Construction activities would include demolition of the existing one-story building office building on the project site (no trailers are proposed to be demolished), excavation, building construction, utilities/infrastructure improvements, paving and landscaping. The proposed project would include the demolition of the existing one story office building on-site (no trailers are proposed to be demolished)."

No trailers were destroyed on this site in the 25 years I have lived here, since 1986. When someone moved a manufactured home onto the site, the manufactured home company (professionals who do this as part of their business so want to save people trouble and get referrals to replace trailers with manufactured homes in the future--not developers who are in every way possible trying to harass us into moving), took the old trailer away and disposed of it somewhere else (or maybe sold it or put it in a museum, I don't know).

Response 31-1

Please see Response 3-57, above, for a discussion regarding the demolition of the existing trailers on the project site. As indicated, the demolition of the trailers on the project site was a ministerial act and not subject to CEQA.

Trailers that have not been relocated and/or moved from the site prior to the issuance of a demolition permit for permanent buildings on the project site would be demolished on-site. The revisions are indicated in Chapter 10.0, Corrections and Additions, of this Final EIR. These revisions constitute minor corrections to the analysis. There are no new significant impacts associated with the project that have not already been identified as part of the Draft EIR.

Comment 31-2

One of our neighbors had \$22,000 in hospital charges from an asthma attack he had two days after the last bout of destruction of trailers here. We feel sick every time it happens. My now deceased ex-husband spent many years living here before any trailers were destroyed, but after he had acute leukemia and stayed in this trailer ONE NIGHT after these developers had destroyed trailers on the property, had to be hospitalized with an infection that may ultimately have killed him several months later. Tenant harassment laws should protect us. We should at least be relocated at the developers' expense while the destruction is going on, if it is not prohibited. The City should protect us from this.

Response 31-2

Please see Response 3-24, above, for a detailed discussion regarding air quality impacts during proposed construction.

Comment 31-3

In addition to the health impacts, we also are losing our right to quiet enjoyment here, so I am addressing this both to the Planning Department and to the City Attorney's office. I am assuming the City granted a demolition permit for the destruction of trailers that is happening today. I know such a permit was either granted or forged the last time 10 trailers were destroyed, November 11-16, 2011, since I saw something that looked like a City permit at that time. Every time I have gone to the Planning Dept to check on permits for this property, however, the screen has been blank, unlike the condition for any other property in Santa Monica. I am going back to check the permits on this property today, and I hope the screen will not be black. If it is, I am adding the lack of public information on permits to the facts showing possible conspiracy of the City with the developers elements of our case against this development. In any event, if a permit was either granted or required, the destruction of these trailers is a "project" under CEQA, Publ. Res. C. sec. 21065(c).

§ 21065.

"Project" means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following:

.....

- c. An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. [Emph. add.]

Response 31-3

See Response 3-57, above. The commenter is defining "Project" under CEQA. The commenter is referring to the demolition of several trailers that had occurred during the preparation of the Final EIR. The demolition of these trailers is a separate action from the proposed project and not subject to CEQA. Specifically, the City's Building and Safety Division issued ministerial permits (i.e. non-discretionary) for utility disconnection at the specified lots. The trailers are considered personal property and therefore their removal does not require a permit from the City.

Pursuant to Section 21080 of the Public Resources Code, CEQA does not apply to, "Ministerial projects proposed to be carried out or approved by public agencies." Section 15268 of the CEQA Guidelines goes on to further define "Ministerial Projects" as follows:

- (a) Ministerial projects are exempt from the requirements of CEQA. The determination of what is "ministerial" can most appropriately be made by the particular public agency involved based upon its analysis of its own laws, and each public agency should make such determination either as part of its implementing regulations or on a case-by-case basis.
- (b) In the absence of any discretionary provision contained in the local ordinance or other law establishing the requirements for the permit, license, or other entitlement for use, the following actions shall be presumed to be ministerial:
 - 1) Issuance of building permits.
 - 2) Issuance of business licenses.
 - 3) Approval of final subdivision maps.
 - 4) Approval on individual utility service connections and disconnections.

Because the City issued ministerial permits for utility disconnection and does not govern the removal of personal property, CEQA does not apply to the removal of the trailers.

Comment 31-4

Because no trailers were destroyed here until the development project was proposed, the environmental impacts of destroying them are at least an indirect, if not a direct, result of the proposed development. Destroying the trailers will have environmental impacts even if the proposed development is ultimately disapproved, which is why the destruction of trailers must either be subject to a separate EIR or be included in the current DEIR (which of course will mean recirculating the EIR) under Publ. Res. C. sec 21065.3:

Response 31-4

Please see Response 31-3, above, for a discussion regarding the recent demolition of several trailers on the project site.

Comment 31-5

§ 21065.3.

"Project-specific effect" means all the direct or indirect environmental effects of a project other than cumulative effects and growth-inducing effects.

The effects in the categories of an EIR that should be done about destruction of these trailers, in alphabetical order, as used in the DEIR for the proposed project are:

It is having an effect on the environment, first in making the site look different, so an aesthetic effect.

Response 31-5

Please see Response 31-3, above, for a discussion regarding the recent demolition of several trailers on the project site. With regard to the demolition of the trailers that would occur as part of the proposed project, Section 4.1, Aesthetics, of the Draft EIR identifies construction and operation impacts that would occur under the proposed project. As analyzed therein, impacts would be less than significant.

Comment 31-6

It is also having an effect on the environment in affecting air quality. We first demand a baseline analysis of the air quality on this site now (which will, due to the error of not doing one in 2006 when this project was first proposed, not actually be a baseline report of the air quality, since at least 37 trailers have already been destroyed by these developers--however, it will at least be a report as of now, so future impacts can be better evaluated). After that, we demand that the quantities of all types of pollution of the air be evaluated after every destruction of a trailer, if any future such destructions are allowed. When such evaluation shows further degradation of the air quality here, as the sicknesses many of us have endured when prior destructions of trailers occurred, so we feel sure it will, we demand further destruction of trailers be prohibited due to that result.

Response 31-6

Please see Response 31-3, above, for a discussion regarding the recent demolition of several trailers on the project site.

With regard to the demolition of the trailers that would occur as part of the proposed project, Section 4.4, Construction Effects, of the Draft EIR identifies construction air quality impacts that would occur under

the proposed project. The air quality analysis estimated criteria pollutant emissions generated during construction activity based on guidance provided by the SCAQMD in the *CEQA Air Quality Handbook* (1993). The SCAQMD has posted updates to the *Handbook* on their website, as necessary (<http://www.aqmd.gov/ceqa/hdbk.html>). As directed by the SCAQMD, air emissions were estimated using computer models (e.g., URBEMIS for construction emissions). The SCAQMD methodology does not state that the evaluation of impacts under CEQA include baseline air quality monitoring at the project site or monitoring during construction activity. The SCAQMD requires that construction emissions be predicted and compared to the identified thresholds of significance. The analysis must be completed prior to approval of the project and the beginning of construction activity. Monitoring air quality during construction activity cannot be a part of the project approval process under CEQA as the project must first be approved before construction can begin. The Draft EIR adequately addressed air quality impacts and further analysis is not necessary.

Comment 31-7

The destruction of trailers the way these developers are doing it also involves destruction of trees and other plant life, having an effect on the biological resources of the site. If such destruction of plants is in fact not included in the demolition permits they receive, which I will know after I can read the permit they got for this destruction they are doing starting today, then this informs you that they do, in fact, destroy biological matter as well as the structures of trailers (which are buildings under the definition in the National Park Service guidelines, and the City makes no distinction between buildings and structures). If they are allowed under their demolition permit from the City to destroy biological matter, the environmental impact of that is something that needs to be covered in an EIR, either the one already existing or a new one on just destruction of trailers with biological matter.

Response 31-7

Section 4.3, Biological Resources, of the Draft EIR identifies impacts to biological resources that would occur under the proposed project. Additionally, please see Responses 6-2 through 6-4, above, for a discussion of impacts and mitigation.

Comment 31-8

Destruction of trailers here while we are living here also is having an effect on the environment, as a construction effect. There is noise, noxious smells (I am leaving now, at a little after noon, due to the impact of the smell inside my house, which is at least 100' away from the site of trailer B-3, which was destroyed with a claw attachment on a bobcat beginning after 10 a.m., and I will cover my face with a construction mask when I do so), dust and blocking of access and egress (even to the point of hazard if there should be a fire or medical emergency), all of which need to be addressed in an EIR.

Response 31-8

Please see Responses 31-6, above, for a discussion of construction impacts. The air quality analysis appropriately focused on off-site construction air quality and noise impacts. It is not anticipated that additional trailers will be demolished prior to the project being approved by the City. If the project is approved, no one would live on the project site during construction activity and there would not be on-site air quality and noise impacts.

Comment 31-9

It also makes the site has a cultural resources environmental effect, as it makes the site have less integrity as an historical site. On this subject, see our supplemental comments to the DEIR on the subject of historical and cultural effects of the project, the Report of City Consultant ICF to the Landmarks Commission concluding this site is an historical district under the City's ordinance governing historical

districts. Also see as well as our pending Writ of Mandate case against the City's denial of our appeal of the Landmark Commission's designation of the site as a Landmark without the trailers, which because it was about the site without the trailers is not itself directly relevant but does indicate complexity of the subject and therefore the lack of wisdom of destroying trailers pending a full judicial determination of the legal status of the site.

Response 31-9

Please see Response 3-50, above, for a discussion regarding the decision of the Landmarks Commission.

Comment 31-10

Destruction of trailers here while we are living here also is having an effect on the environment, as a geology and soils effect. The soil was not tested here for the DEIR. Therefore, you cannot know how bad the soil is from the numerous raw sewage spills from the sewer we endured for the first 14 years I lived here, one or two a year. To have that soil disturbed without an EIR is unconscionable.

Response 31-10

A Phase I Environmental Site Assessment was prepared for the project site and is included as Appendix J of this Final EIR. While the project site is listed on the California Hazardous Material Incident Reporting System (CHMIRS) due to an accidental release of 50 gallons of sewage overflow from a damaged private lateral line in 2008. Cleanup was reportedly conducted by the responsible party, and based on the nature of release reported, the listing of the subject property on the database is not considered to represent a significant environmental concern. Furthermore, based on the Phase I, there is no evidence of soil contamination on the project site and soil testing would not be necessary.

Comment 31-11

A special part of the air quality effect that needs to be addressed is greenhouse gas emission from the destruction.

Response 31-11

Please see Response 29-16, above, for a discussion of greenhouse gas emission impacts. The Draft EIR adequately addressed GHG emissions and further analysis is not necessary.

Comment 31-12

Again, as in the soil effect, hazardous materials are being disturbed both outside and inside these trailers. The developers have never, to my knowledge, had any inspections for mold or formaldehyde (the latter of which I smelled in the Park for two days after the last bout of destruction). They never have claimed to have done so. Inspection for these hazardous materials is not required by law in general, but here we have had a resident manager have to quit her job and move because of a disease caused by mold, and many of us suspect other symptoms we have are due to mold. It is pervasive in all the trailers I have ever seen here, but I am not going to endanger my health by looking to see if it is there in each of these trailers. An EIR needs to be done including that.

Response 31-12

Please see Response 31-10, above, for a discussion regarding impacts to hazards and hazardous materials.

Comment 31-13

Today we saw one of the workmen watering the site with a water hose while the destruction of B-3 was taking place. Where do you think the water went that included pollutants from the site? Into the aquifer, of course. This is an example of the hydrology and water quality effects of destruction of these trailers that need to be covered in an EIR.

Response 31-13

The following mitigation measures have been included in the EIR to address impacts associated with the release of hazardous materials from the demolition of the existing structures on-site:

HM1 Prior to issuance of a demolition permit for the permanent buildings on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.

HM2 Prior to issuance of a demolition permit for the permanent buildings on the project site, lead-based paint testing shall be conducted for existing structures to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.

HM3 An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

Impacts associated with water quality and stormwater run-off are addressed in Section 4.9, Hydrology and Water Quality, of the Draft EIR.

Comment 31-14

The neighborhood effects also need to be covered. The same effects to a lesser degree affect the neighborhood that affect all of us here on the site. Noise, dust, pollution of air, soil and water, disturbance of polluted soil, on and on, all the effects mentioned here disturb the neighborhood as they do the residents on the site.

Response 31-14

Section 4.11, Neighborhood Effects, of the Draft EIR provides an analysis of the operational and construction impacts of the proposed project on the surrounding neighborhood.

Comment 31-15

Noise has already been mentioned.

Response 31-15

Construction-related noise and vibration impacts are analyzed in Section 4.4, Construction Effects, of the Draft EIR. As indicated, construction-related noise impacts would be less than significant. However, construction-related vibration impacts would be significant and unavoidable.

Comment 31-16

Housing, of course, is being destroyed, so that effect needs to be covered as well.

Response 31-16

Housing and population impacts are addressed in Section 4.13, Population and Housing, of the Draft EIR. As stated therein, the project site is developed with 109 trailer home lots. All of the 109 spaces are rent-controlled housing. Although there are 109 spaces at the project site, approximately 76 of them are currently occupied by trailers. The remaining mobile home lots are vacant.

As stated in the Draft EIR, the proposed project would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units. Therefore, the proposed project would not displace substantial number of housing; impacts would be less than significant. With regard to the displacement of people, as stated in Section 4.13, Population and Housing, the Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. However, for the current residents who do not choose this option, other housing options would be available as part of the project's relocation plan. Upon implementation of the relocation provisions which would be enforced through the Development Agreement, population displacement impacts would be less than significant.

Letter 32

March 7, 2012

Michael McKinsey, Brenda Barnes, and Peter Naughton

Comment 32-1

Grounds for Appeal as provided in Code of Civil Procedure. § 1094.5:Failure to Proceed as Required by Law, Abuse of Discretion, Making a Decision Not Based on Substantial Evidence.

Detailed Discussion:

As to the negative decision by the Landmarks Commission on 2/13/12.

Santa Monica Municipal Code ("SMMC") § 9.36.180(a)(1) provides for an appeal of denial of an application for designation of a Landmark, which is what happened on 2/13/12. The vote was 5-2 against designating a Landmark, as was the vote against a motion to designate a Landmark on only the criterion 1 of the Landmarks Commission's criteria. That criterion is, according to SMMC § 9.36.100(a)(1) "landmark designation of a structure, improvement, natural feature or an object" [may be approved by the Landmarks Commission if it finds that it meets one or more of the following criteria) ... (1) It exemplifies, symbolizes, *or* manifests elements of the cultural, social, economic, political *or* architectural history of the City.[Emphasis added.]

A consultant was hired by the City to give the report, called a "City Landmark Assessment Report" on its title page, on whether VTP met the requirements of the law to designate landmark status. This report concluded that it did, on both the criterion listed above and the fourth criterion of the law, which is: "It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, *or* the use of indigenous materials *or* craftsmanship. *or* is a unique *or* rare example of an architectural design, detail *or* historical type valuable to such a study." [Emphasis added.]

That consultant's name is ICF International, which is one of the Top 100 government contractors in the United States and is a public corporation traded on the NASDAQ exchange and employing 4,000 people in the US. See, http://en.wikipedia.org/wiki/ICF_International. The principal author of the Report for the City was Peter Moruzzi, who is an established expert in the mid-Century period, an acknowledged expert on mid-century Modern architecture and design." <http://www.lggraphics.com/software/gallery/desertholiday.php>, 2008; <http://www.havanabeforecastro.com/>, and 10 pages of citations to separate available pieces of authority under a Google search for his name. This report was based on voluminous personal knowledge of the site as well as the principal author's specific expertise on the period and being presented in the name of such a prominent governmental contractor.

Opposing the request for landmark designation were a combination of two forces.

First was a 41-page report manufactured from documents obtainable in public records and based on one visit to VTP on November 14, 2011, with 96 pages of attachments, submitted February 6, 2012 for a meeting held February 13, 2012. This submission date was seven (7) days before the meeting, after the 10-day notice of the meeting had already gone out. In spite of that untimeliness, we were not given the continuance we requested to respond to it after each of the Landmarks Commission members referred to the point made in that report, as a reason for voting against landmarking the site, that trailers can be moved by their owners and therefore cannot be landmarked. To deny the continuance request under these circumstances was abuse of discretion, which caused the negative, incorrect decision of the Landmarks Commission.

This report states on its title page that it was done for "The Luzzatto Company", which is a real estate investment firm and brokerage headquartered in Santa Monica, which has nothing whatever to do with Village Trailer Park except it has apparently sold shares on behalf of the owner of the land for a proposed development of the site (www.luzzattocompany.com). It was failure to proceed as required by law to even consider a report paid for and presented to the Commission by a non-party to the request and a party not shown by evidence to have any even equitable interest in the subject property-much less legal title as claimed falsely by Mr. Luzzatto to the Commission.

This report calls itself, also on the title page, a "Historic Resource Assessment." This was done by a tiny seven-person firm in existence as an architecture firm since 1994, of academics out in the San Fernando Valley named Chattel Architecture, Planning & Preservation, Inc., which states on its website that it specializes in "preconstruction management." www.chattel.us. This firm first has a conflict of interest in preparing such a report in this case, in that it represents as an architect, construction consultant, and contractor, parties in Santa Monica who want to preserve buildings and build new ones, but it was hired for this job to say why the buildings should not be preserved, by a firm that is not even an owner and has no equitable interest in the property as it stands, but instead is a developer if the buildings on the property are not preserved.

This firm is the same firm that made the same negative report regarding the same historical period-likewise saying the property that was later found to be a STATE historical landmark did not qualify to be even a City one-in a report referred to in Lincoln Place Tenants Association v. City of Los Angeles (2nd Dist., 2005)130 Cal.AppAth 1491, 1498 (hereinafter called "Lincoln Place"):

The owners of Lincoln Place opposed the application for monument status and submitted a report by Robert Chattel, AIA, expressing the view the property did not meet the city's criteria for designation as an historic monument. Chattel's report noted a portion of another garden style apartment complex, Park La Brea, had already been designated a city historic monument.

It was failure to proceed as required by law for the Commission to take the same incorrect conclusion from this Report that had been in error in Lincoln Place for the following reasons (and others that with more time appellants reserve the right to point out):

- (1) Once again, the same firm not shown to be an expert on the period concluded that there was another property allegedly more deserving of landmark status.
- (2) Once again, the same firm not shown to be an expert on the period or to have personal knowledge regarding any property other than the subject one, if that, used inapplicable properties as comparables-located in distant places and not even declared to be historical landmarks-to declare the subject not as historical as those others-which is not the standard in Santa Monica;
- (3) Once again, using guidelines of the National Park Service and other agencies other than the City's own definitions and criteria, the only ones that apply, the Report supplied inapplicable "red herring" arguments the Commission improperly used; and
- (4) The Commission failed to proceed as required by law in giving such a weightless report, both in authorship and methodology, any weight whatsoever. That the Commission then adopted the conclusion of this Report based on that faulty analysis-that the subject property did not have historical significance without the trailers, which are personal property belonging to the tenants of the land (called homeowners in the Mobilehome Residency Law, Civil Code §§ 798 et seq.) constitutes failure to proceed as required by law, abuse of discretion, and/or making a decision not based on substantial evidence.

Moreover, Chattel's late preparation of the report, use of six out of seven inapplicable comparables, and being involved in a presentation to the Commission using 10 or 15 obvious skills (see below), marks it as

unprofessional at best. Chattel was representing only the developer, The Luzzatto Company, and by making this report and presentation embarrassed itself as having no credibility left, after the poor showing in Lincoln Place.

The Commission also failed to proceed as required by law in adopting arguments of this Report supported by 10 or 15 obvious shills who appeared and read from half-page typed sheets they brought up with them, from laptops, or from what they claimed to be e-mails written by someone else. Many of them used the same words, although some besides using the same words, did vary from the script to try to make presentations sound personal. In addition to being obviously scripted, the arguments these shills made were so blatantly class-based and racist, it was shocking. They said things like why would we want out-of-town visitors who might be given a landmarks map, to visit a trailer park? (Because it shows a unique part of the history of the City?!) And this gem: "When I heard Village Trailer Park was up to be considered as a landmark, I just had to come and oppose such an unheard-of thing being done in our beautiful city with its high-class landmarks known worldwide." (With this attitude, not to worry-such snooty visitors would not stray from the Promenade to Pico Neighborhood.)

One of the pieces of correspondence included in the Commission's packet (which left out at least two pro-landmarking communications appellants know of, while including 4 out of 5 negative ones), even has an underline still, where the shill using it as his or her own work was supposed to fill in what Santa Monica street *s/he* lived on, but instead just sent in the e-mail form with the underline still in it. (Attachment D to 12LM-001 Landmarks Commission Hearing Packet, February 13, 2012, Public Correspondence, last page, e-mail Scott Albright from Russ Belinsky.) Note also that the person sending that e-mail, Russ Belinsky, actually is an investment banker with the firm of Dunn & Phelps in Los Angeles and unless his street is filled in, appears to have no connection whatsoever with Santa Monica. In any event, unless that line is filled in and the details of what he knows about VTP and why he knows it are given, his opinion is just the same kind of class-based and racially-motivated opinion used by all the other shills in their oral presentations to the Commission, impermissible for a governmental agency to use. [http://www.duffandphell2s.com/Ex12ertise/our team/pages/bio.aspx?list=People&ID=8](http://www.duffandphell2s.com/Ex12ertise/our%20team/pages/bio.aspx?list=People&ID=8). The press release for Dunn & Phelps's 2006 acquisition of Chanin Capital Partners, a firm the company profile of Belinsky says he co-founded, was issued in New York and states Chanin was founded in 1984 and had offices in New York, Los Angeles, Detroit and London. <http://www.12mewswire.co.uk/cgilnews/release?id=183062> Nonetheless, Belinsky's e-mail says he has been a long-time resident of Santa Monica-and says he lives on __Street.

Finally, the other force working against VTP being declared a landmark was the same legal bias following us around from place to place for over five years now. This is the manufactured argument by the City Attorney's office (which is apparently what led to the City's entering into an MOU to try to enter into a Development Agreement with Luzzatto in 2006), that goes like this: 1) The owner of VTP has the legal right to go out of the mobilehome park business; 2) Therefore, all the tenants who have their trailers on the land have no right to stay; 3) Therefore, the trailers will disappear sometime soon and there is nothing whoever is speaking at the time can do to prevent that; so 4) Whatever is being asked for by those tenants must regrettably be denied. This is basically the logical fallacy that led to the LUCE's not excluding residential areas as possible areas to be rezoned commercial and high-density residential in the Mixed-Use Creative District, in 2010; then to the City Council's not instructing its staff to explore all alternatives to protect the health and safety of the residents of VTP, in 2011; and now to the Landmarks Commission's not designating the VTP site a City landmark, in 2012. That the City's attorney present at the Commission meeting would not correct the Commission's mistaken reasoning shows he is part of the conspiracy whereby the City has already pre-determined to approve the Development Agreement with Luzzatto and friends, prior to consideration of the EIR for the subject proposal and without so deciding in a public meeting as required by state law. This fits with the three actions listed above and the Housing Department's writing to VTP residents that we were "being displaced," so would get housing priority.

It is virtual madness to think 109 families who own their own homes are going to disappear because developers want to make money on land where the local rent control law, as a matter of public policy, gives the homeowners unwaiveable rights to stay. This is because the use stated as what the Park land was going to be used for--to keep the land vacant for investment--in the 2006 eviction notice served by these proposed developers was unlawful, and the City's MOU with the developers constitutes an attempt to get around the Rent Control Law, over which the City has no jurisdiction other than through the Rent Control Board, which did not sign off on the MOU. The law firm on behalf of the proposed developer when they gave that eviction notice in 2006 was required by the state law allowing the owner to stop doing business as a mobilehome park owner, to state it had all the permits it needed under local law to complete the stated proposed converted use of the mobilehome park site, or at what meeting within 15 days it would get those permits. Actually, it could not then or now qualify for the removal permit from The Rent Control Board required to make the tenants of the land move, since a removal permit for housing covered by rent control requires an equal number of units be proposed to be built on the site and covered by rent control. The Rent Control Law is part of the City Charter, superior to the power of the City Council, which through the Mayor is the only entity that signed off on the MOU. The Rent Control Law in the City Charter does not allow removal of rental units and their demolition so that land can be vacant and kept for investment.

The important point at this time is that at each level where we have presented our cases to governmental entities, the logical fallacy outlined above was not even relevant to whatever we were asking them for. Again it was so with the Landmarks Commission.

Each member of the Commission, even the two of seven (Commissioners Bach and Genser) voting in favor of land marking, stated as part of his or her reasoning that the Deputy City Attorney present had told them repeatedly that they could not landmark uses of land, and it seemed to them that the use of this land as a trailer park was necessary, or at least desirable, to preserve its significance and integrity as a landmark. This was so even though their consultant had answered the very question of whether the site would still qualify as a landmark under the legal criteria they had to follow, if no trailers were there. He said yes it would. because like any vacant historical landmark, the permanent structures. which include the trees and other landscaping. would still evoke the feeling of the Park.

The Commission also failed to proceed as required by law in failing to consider the question and advise the City Council it could declare VTP with the historic trailers currently on the site, an historic district. The Commission did so by ignoring the only evidence it had before it that it could require the owners of individual trailers to maintain the historic character of the trailers on the site, as well as require new trailers put on the site to be historic. Declaring VTP an "historic district" would give the Commission jurisdiction to require the exteriors of historic trailers on the site to maintain that historic character, the same way the Commission has jurisdiction to require any changes to a house within an historic district to maintain the historic quality of the district. In fact, the City Planning Staff had jurisdiction to prevent any changes to historic trailers simply by completing an application for designation of VTP as an historic district.

SMMC § 9.36.130

Historic District designation procedure.

(c) Upon determination by City staff that an application for designation of an Historic District is complete, any alteration, restoration, construction, removal, relocation or demolition, in whole or in part, of or to a building or structure within a proposed Historic District is prohibited, and no permit issued by any City Department, board or commission including a conditional use permit, a tentative tract map or parcel map permit, a final tract map or parcel map permit, a development review permit, any Zoning Administrator permit, architectural review permit, rent control permit, or building permit authorizing any such alteration, restoration, construction, removal, relocation or demolition shall be granted while a public hearing or any appeal related thereto is pending. [Emphasis added.]

Then if the City Council approved the designation of an historic district by the Commission, alterations of historic trailers to change their historic character would be prohibited permanently by approving the Commission's declaration of an historic district or by approving an application on its own, and thereby keep historic trailers from being moved, demolished, or altered on the exterior so as to change their historic character::

(I) The City Council shall by ordinance have the power, after a public hearing, whether at the time it renders a decision to designate a Historic District or at any time thereafter, to specify the nature of any alteration, restoration, construction, removal, relocation or demolition of or to a building or structure within a Historic District which may be performed without the prior issuance of a certificate of appropriateness pursuant to this Chapter. The City Council shall by ordinance also have the power after a public hearing to amend, modify or rescind any specification made pursuant to the provisions of this subsection. [Emphasis added.]

Even the landlord's report-which claims in a paragraph that proves on its face that trailers are "buildings"-admits "trailers" at VTP at least fall between the definition of "buildings" and that of "structures." On p. 18 it quotes from the National Park Service's guidance document as to the difference between a building and a structure and then comes to a conclusion from that parsing that is wrong on its face, as follows:

National Park Service guidance, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, provides direction on how to evaluate potential historical resources, classifying resources as buildings, sites, districts, structures or objects. Based on the definitions provided for these classifications, trailers themselves fall somewhere between buildings and structures. Buildings are defined as being "made principally to shelter any form of human activity." Structures, on the other hand, are defined as "those functional constructions made usually for purposes other than creating human shelter."⁷³ Examples of structures include but are not limited to automobiles, airplanes, bandstands, and trolley cars. For example, Angels Flight Railway as well as Atchitson [sic.], Topeka, and Santa Fe Railway Steam Locomotive No. 3751 were both listed as structures in the National Register in 2000; the RMS Queen Mary, a retired ocean liner permanently docked at Long Beach Harbor, was also listed as a structure in the National Register in 1993. Trailers share qualities of both buildings and structures, providing human shelter but being functionally similar to vehicles. [Emphasis added.]

That this conclusion is false on its face is indicated by the indisputable fact that every trailer at VTP was "made principally to shelter any form of human activity." In fact, they were all made to shelter human beings as a residence, either temporary or permanent, either moving or stationary. Therefore, under the National Park Service's definition, every trailer is a "building." In any event, the difference between a structure and a building is a difference without any legal distinction in Santa Monica Landmark law, since the codes all allow designation of a building or structure, making no distinction.

SMMC § 9.36.030 Definitions, for purposes of the Landmarks and Historic Districts section of the Municipal Code, has two relevant definitions, the first (actually second in the definitions themselves, but first here for purposes of this discussion), for both a landmark and an historic district, the second for an historic district: alone.

Improvement: Any building, structure, place, site, work of art, landscape feature, plantlife, life-form, scenic condition or other object constituting a physical betterment of real property, or any part of such betterment.

Contributing Building or Structure: A building or structure which has been identified by the Landmarks Commission as one which contributes to the designation of an area as a Historic District. [Emphasis added.]

To make it abundantly clear that Santa Monica law--unlike perhaps the National Park Service's guidelines, which are not applicable here--makes no distinction between real and personal property for purposes of what designation of a Landmark can cover, Santa Monica's definitions also include this:

Exterior Features: The architectural style, design, general arrangement, components and natural features or all of the outer surfaces of an improvement, including, but not limited to, the kind, color and texture of the building material, the type and style of all windows, doors, lights, signs, walls, fences and other fixtures appurtenant to such improvement, and the natural form and appearance of, but not by way of limitation, any grade, rock, body of water, stream, tree, plant, shrub, road, path, walkway, plaza, fountain, sculpture or other form of natural or artificial landscaping. [Emphasis added.]

SMMC § 9.36.100 gives the following criteria regarding the Commission's jurisdiction to designate an Historic District:

.....

(b) For the purposes of this Chapter, a geographic area ... of thematically related properties may be designated a Historic District if the City Council finds that such area meets one of the following criteria:

(1) Any of the criteria identified in Section 9.36.1 00(a)(1) through (6).

.....

(3) It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.

(4) It has a unique location, a singular physical characteristic, ... of a neighborhood, community (Prior code § 9607; added by Drd. No.1 028CCS, adopted 3/24/76; amended by Drd. No. 1590CCS § 1, adopted 7/23/91)

Regarding the specific question of whether the VTP with the trailers met any of the criteria to designate either a Landmark or an Historic District, it clearly did according to the only evidence presented, and therefore the Commission failed to proceed as required by law in basing a decision on incorrect legal advice rather than on evidence. A decision based on legal advice is entitled to no weight and will be visited de novo (from the beginning, anew, as if the decision had not been made), by a court, which will determine for itself whether the legal advice was correct.

The City's consultant was the only one giving any evidence other than the members of the Park and neighbors who spoke to them in favor of landmarking the site--in what is called public comment rather than evidence--who indicated he had actually been to the Park and investigated every part of it. They themselves had spent at most a few hours wandering around it, and four of the seven had not been there at all.

That evidence was given on pp. 12-13 of the ICF Nov. 2011 report, where the City's own consultant--again, the only impartial witness who actually had personal knowledge of the site--states VTP could be designated an "historic district," as well as a "landmark."

Whether the Village Trailer Park qualifies as a historic district rests on the question of what constitutes a potential district contributor in this context. While most of the individual trailers are privately owned and would thereby be potentially eligible as contributors to a 'Village Trailer Park Landmark District,' the property itself consists of only two parcels upon which the private trailers are parked. Typically, district contributors are identified by their Assessor's Parcel Number (APN) of which, as noted, there are only two. However, Santa Monica Landmark Districts have been recognized as areas containing groups of resources that have good integrity and are historically significant as a cohesive group. While each resource in a Landmark District may not be individually worthy of Landmark status, collectively they are recognized for their historical significance, visual qualities, and ambiance of the past.

The majority of trailers in Village Trailer Park possess good integrity and have been shown to have historic significance as a cohesive group. Collectively, along with the trailer park's permanent buildings, overall plan, and mature landscaping, they demonstrate an undeniable ambiance of the past. Therefore, based upon such reasoning, the Village Trailer Park with its numerous individually-owned trailers would constitute a potential Landmark District. [Emphasis added.]

The landlord's report gave seven supposed comparables, all but one of which it admitted had NOT been declared landmarks (p. 21). It distinguishes the one that had been made a landmark in Los Angeles from VTP on the ground that the former had been involved in early tourist use whereas VTP had not (id.), a claim the City's consultant also explicitly refutes on evidence that between 1958-59 and 1960-61 70% of trailer sites at VTP had changed occupants. Feb. 2012 ICF Landmark Assessment Report, p. 8. Clearly a trailer park built in 1950 will not demonstrate the same history as one built in the 1920s, another difference without any legal distinction. Landmarks in Santa Monica need be only 40 years old, not 90. However, VTP demonstrates a distinct historical period in the evolution of transitory and then permanent housing:

The first available city directory in which Village Trailer Park is listed is the 1952-53 edition. Frank J. and Florence H. Rosar appear as the park's managers; there are no listings for occupants of the individual trailers within the park. The same is true for the 1954 city directory where only property managers Angus and Martha Robinson are identified at the subject property address. The 1958-59 edition, in contrast, has 52 entries for Village Trailer Park each with individual telephone numbers. This change in how the subject property is identified in city directories implies that what had once been a transient population was becoming relatively permanent. Yet, a review of Village Trailer Park entries in the 1960-61 city directory reveals that only 18 of 61 households (30%) had appeared in the previous edition, meaning that 70% of the property's occupants in 1960-61 did not reside there previously. At least in the early 1960s, the rate of residential turnover at the trailer park was high. In contrast, an informal walk through Village Trailer Park on November 7, 2011 revealed an abundance of what appeared to be pre- 1980 trailers many of which were surrounded (if not encased) by mature landscaping, suggesting that a substantial number have been continuously occupied for many years if not decades. ICF City Landmark Assessment, November 2011, p. 6, emphasis added.

It also is to be noted that Village Trailer Park is covered by rent control, which means that by April 10, 1978, the base date for rent control, all 109 spaces registered with Rent Control at the property then were occupied permanently. Therefore, there was no evidence to support any conclusion other than that the VTP site had, like the Monterey Trailer Park designated a Landmark by the City of Los Angeles, been involved in the history of a city, in this case of progression of an ever-more automobile-based society, from traveling around with mobile living spaces, to being permanently based in the City of Santa Monica in those same previously-mobile homes.

Moreover, the Mobilehome Residency Law preamble to eviction sections gives state law support for the historical nature of trailers and mobile homes as now permanent structures, as follows:

Civil Code § 798.55.

(a) The Legislature finds and declares that, because of the high cost of moving mobilehomes, the potential for damage resulting therefrom, the requirements relating to the installation of mobilehomes, and the cost of landscaping or lot preparation, it is necessary that the owners of mobilehomes occupied within mobilehome parks be provided with the unique protection from actual or constructive eviction afforded by the provisions of this chapter.

Thus, the historic event related to trailers was well- shown by all the available evidence to have been that VTP was a solely transient park for travelers from its building in 1951 to before or at least by 1958-59, and that until sometime after 1960-61 even though the residents had permanent spaces as indicated by

their being listed in the City telephone directory individually as residents, nonetheless they remained highly transient until sometime before 1978 (which the City's consultant's February 2012 report states happened by about 1970, p. 10). The City's consultant's report concludes this makes VTP part of the history of residential trailers, the only such part remaining in Santa Monica today. In spite of the consequent lack of any evidence to support the decision, the Landmarks Commission decided it was the use of the Park that was being asked to be landmarked, and since the Deputy City Attorney who advises them had told them use could not be maintained if the owner did not want to do so because of the four points outlined above, they had to vote against land marking the site.

SMMC § 9.36.180 provides the following regarding appeal of this denial of the application:

An appeal to the City Council of an action of the Landmarks Commission shall be processed in accordance with the following procedure:

(a) Each of the following actions by the Commission may be appealed to the City Council:

(1) Any decision relating to an application for the designation of a Landmark.

.....

(b) Any person may appeal a determination or decision of the Commission by filing a notice of appeal with the City Planning Division on a form furnished by the Planning Division. Such notice of appeal shall be filed within ten consecutive days commencing from the date that such determination or decision is made by the Commission The notice of appeal shall be accompanied by a fee required by law. Notwithstanding any of the foregoing, any member of the Commission or City Council may request a review by the Commission or City Council of any determination or decision of the Commission without the accompaniment of such fee in the amount required by law.

(c) The City Council shall schedule a public hearing to be held within forty-five days after the notice of appeal is properly filed with the City Planning Division. The owner of the improvement may agree to extend the time period for the City Council to hold and conclude the public hearing on the application.

(d) Not more than twenty days and not less than ten days prior to the date scheduled for a public hearing, notice of the date, time, place and purpose thereof shall be given by the Director of Planning by at least one publication in a daily newspaper of general circulation, and shall be mailed to:

(1) The appellant;

(2) The owner and residential or commercial tenants of the Landmark in the case of any action regarding a Landmark;

.....

(4) The owners of all real property and residential and commercial tenants within three hundred feet of the exterior boundaries of the lot or lots on which a Landmark is located in the case of any action regarding a Landmark;

.....

The names and addresses of such owners as are shown on the records of the Los Angeles County Assessor shall be used for providing this notification. The address of the residential and commercial tenants shall be determined by visual site inspection or other reasonably accurate means. The failure to send notice by mail to any such real property where the address of such owner is not a matter of public record shall not invalidate any proceedings in connection with the proposed designation. The Commission or the City Council may also give such other notice as it may deem desirable and practicable.

(e) At the conclusion of the public hearing, or any continuation thereof, the City Council shall render its decision on the notice of appeal and shall approve, in whole or in part, or disapprove the prior determination or decision of the Commission. Any continued public hearing must be completed within thirty days from the date set for the initial public hearing. The City Council decision shall be in full force and effect from and after the date such decision is made. If the City Council fails to take action on the notice of appeal within the thirty day time period, the notice of appeal shall be deemed disapproved. The owner of the improvement may agree to extend the time period for the City Council to hold and conclude the public hearing on the application.

(f) Within thirty days after the decision has been made, the City Council shall approve a statement of official action which shall include:

(1) A statement of the applicable criteria and standards against which the application for designation was assessed.

(2) A statement of the facts found that establish compliance or non-compliance with each applicable criteria and standards.

(3) The reasons for a determination to approve or deny the application.

(4) The decision to deny or to approve with or without conditions and subject to compliance with applicable standards.

(g) The appellant and the owner of the Landmark in the case of a decision regarding a Landmark, ... shall be provided a copy of the statement of official action, using for this purpose the names and addresses of such owners as are shown in the records of the Los Angeles County Assessor. (Prior code § 9612; added by Ord. No. 1028CCS, adopted 3124176; amended by Ord. No. 1429CCS, adopted 12/8/87; Ord. No. 1590CCS § 1, adopted 7/23/91; Ord. No. 2166CCS § 2, adopted 8/9105) Emphasis added.

There does not appear to be any form for the appeal, none being given in the Planning Department's forms for Landmark Designation, nor does there appear to be any fee. We'll check this tomorrow when the Planning Department is open.

In addition to the above, according to the Minutes adopted at the January 9,2012 meeting, for the December 12, 2011 meeting where the Commission voted to create an Application to Designate VTP's site a Landmark (apparently not distinguishing at that time, as some of the above discussion indicates the Commission should have, between an application for a Landmark and an application to designate an Historic District), "Commissioner Fresco stated that Maurice Conn, who wrote westerns in the 1950s, lived at the Village Trailer Park." Other than the City's consultant's February 2012 report listing Conn as living at VTP in 1958-59, p. 22, no one ever mentions this again. However, our research on the Internet indicates Conn was a very prominent producer, director, and writer of films, not in the 1950s but rather in the 1930s and 1940s. Ten (10) of his films are still available to rent from amazon.com, <http://www.amazon.com/s?ie=UTF8&rh=n%3A2625373011%2Ck%3AMaurice%20Conn&page=1>.

(How many of you involved in the film business would wish ten of your films would still be available to rent over 60 years from now?!) Compared to the bus driver the City's consultant discusses, this is a historical personage connected to VTP. Therefore, for an additional reason other than the two he concluded justified designating a landmark, VTP also qualifies.

Luzzatto told the Commission that he was "one and the same," when we objected that he did not have an equitable interest in the property, and the Commission asked him if he was "the owner, the developer, or what." We have a copy of the deed transferring 50% interest in Village Trailer Park from Village Trailer Park, Inc. to Village Trailer Park, LLC, (the developer entity), which states signed by James Muramatsu, President, and Muriel Shapiro, Secretary of Village Trailer Park, Inc, that the parties involved in the transfer were all the same parties that had owned the property before the transfer. This was to avoid reassessment of the property for property tax collection under Prop 13. This fraud helped mislead the Commission and helped cause it to make a decision not allowed by law.

More detail on evidence is provided below:

Based on the conclusion of the consultant, ICF International, the property at 2930 Colorado Avenue meets two of the City of Santa Monica's Landmark Criteria (1 and 4).

Therefore, the FOSP Board strongly urges the Landmarks Commission to designate the Village Trailer Park as a City Landmark.

ICF International- City Landmark Assessment Report - February 2012

CONCLUSION

"The context in which Village Trailer Park is being assessed is 'Trailer Parks in the cultural, social, economic and architectural development of Santa Monica, 1951 -1970.' As has been shown, trailer parks in Santa Monica were a prominent component in the development of the City's tourist economy from the early postwar years until approximately 1970, when trailer parks had evolved from transient vacation stopovers to permanent residential communities. With its 105 spaces, Village Trailer Park - erected in 1951 - today represents about 10% of the roughly 950 trailer spaces that existed in Santa Monica in 1952.

"As a social phenomenon, the progression from transient to permanent residential community led to Village Trailer Park becoming the City's best remaining example of a neighborhood of closely spaced towable vehicles/dwellings set amongst lush landscaping with residents sharing recreational amenities.

"As a cultural landscape, Village Trailer Park is based on a planned design (roads, aligned spaces, communal and administrative buildings, utility hookups) enhanced over time by the introduction of flora, vernacular landscape elements, and decorative additions to trailers and outdoor living spaces by its residents over a 60 year period.

"Architecturally, the subject property exhibits all of the key character defining features typical of a traditional trailer park in its plan, permanent buildings, amenities and landscaping.

"Further, Village Trailer Park exhibits a high level of physical integrity, especially when compared with Mountain View Mobile Home Park with the latter's intrusion of incompatible mobile and newly constructed dwellings.

"In summary, based on current research and the above assessment, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4).

Additional information:

Landmarks Commission agenda for February 13, 2012:

<http://www01.smgov.net/planning/landmark/agendas/2012/lca02132012.htm>

Agenda item 9-C. Landmark Designation 12LM-001, 2930 Colorado Avenue, to determine whether VTP should be designated as a City Landmark.

Staff Report: [http://www01.smgov.net/planning/landmark/agendas/2012/12LM-001%20\(2930%20Colorado%20Avenue%20-%20VTP\)%20Staff%20Report%20\(February%202012\).pdf](http://www01.smgov.net/planning/landmark/agendas/2012/12LM-001%20(2930%20Colorado%20Avenue%20-%20VTP)%20Staff%20Report%20(February%202012).pdf)

Consultant's Report: <http://www01.smgov.net/planningandmark/agendas/2012/Village%20Trailer%20Park%20LM%20AssessmentFinal.pdf>

Village Trailer Park, 2930 Colorado Avenue, Santa Monica, California
City Landmark Assessment Report, Evaluation Report, Building Permit History, Photographs, Tax Assessor Map, Sanborn Maps

Prepared for: City of Santa Monica Planning Division

Prepared by: ICF International, Los Angeles, California - February 2012 - Excerpts:

"In summary, based on current research and the above assessment, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4). The property was evaluated according to statutory criteria as follows:

Landmark Criteria:

9.36.100(a)(1) It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.

The subject property is an excellent example of a traditional trailer park exhibiting all of the key character defining architectural features typical of the type (plan, permanent buildings, amenities, and landscaping). In addition, as a cultural landscape, Village Trailer Park manifests the cultural history of Santa Monica through its planned design and the evolution of its landscape by the introduction of flora, vernacular landscape elements, and decorative additions to trailers and outdoor living spaces by its residents over a 60 year period.

With over 950 trailer spaces in the City in 1952, Santa Monica was evidently a popular vacation destination for motorists towing recreational vehicles, and a noteworthy component of the City's tourist economy after World War II. Village Trailer Park, with its 105 trailer spaces, exemplifies this aspect of the City's economic development in the 1950s.

Further, Village Trailer Park manifests the social evolution of trailer parks in Santa Monica from transient stopovers to permanent residential communities with a look and ambiance unique to the property type. Therefore, Village Trailer Park's period of significance is from 1951, the property's date of construction, to 1970, when trailer parks were no longer vacation destinations but permanent residential communities.

In sum, the property exhibits a substantial degree of physical and historical integrity in its location, design, setting, workmanship, materials, feeling and association that manifests the architectural, cultural, economic and social history of the City of Santa Monica in the postwar era. Therefore, the subject property appears to satisfy this criterion.

9.36.100(a)(3) It is identified with historic personages or with important events in local, state or national history. Current research did not reveal that the subject property is associated with any historic personages or with important events in local, state, or national history. Therefore, the subject property does not appear eligible for local landmark designation under this criterion.

9.36.100(a)(4) It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.

The subject property appears to meet this criterion.

As one of only two remaining trailer parks in Santa Monica - and the only one that exhibits a very high level of integrity - Village Trailer Park fully embodies the distinguishing architectural characteristics of the type. Specifically, the property features private paved roads; numerous trailer spaces with concrete pads; a recreational club house; manager's residence; management office; laundry room/community bathroom facility; and landscaping. It also includes a swimming pool, which was promoted as a unique amenity when the trailer park opened in 1950.

Therefore, it can be concluded that Village Trailer Park is valuable to a study of the architectural history of the middle decades of the 20th century in Santa Monica.

9.36.100(a)(6) It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

Although Village Trailer Park has existed at this location since 1950 (and later with some street frontage along a quiet portion of Stanford Street) much of the property is hidden behind tall bushes along Colorado Avenue with only the park's perpendicular center road fully visible from the street. As a result, while partially visible by pedestrians it is not especially visible by automobiles because the driver must purposely look south as he/she passes the property to notice its presence. Because the subject property does not maintain a strong physical presence at its mid-block location, it does not appear eligible for local landmark designation under this criterion.

A comment for the consideration of a Certificate of Appropriateness for Village Trailer Park:
It is suggested that any replacement vehicle (trailer) proposed for the designated property be consistent with the historic definition of a trailer - maximum width and length with wheels and a tow hitch. This would preclude the placement of contemporary mobile or permanent homes on the property similar to what has occurred at the city-owned Mountain View Mobile Home Park.

Landmarks Commission - December 12, 2011 agenda:
<http://www01.smgov.net/planning/landmark/agendas/2011/lca12122011.htm>

Agenda item 12-A. Discussion and possible consideration as to whether to file an application to designate the Village Trailer Park located at 2930 Colorado Avenue as a City Landmark.

Consultant's Report: <http://www01.smgov.net/planning/landmark/agendas/2011/Village%20Trailer%20Park%20LM%20Assessment.pdf>

Consultant's Report excerpts:

Village Trailer Park, 2930 Colorado Avenue, Santa Monica, California

City Landmark Assessment Report - November 2011
Evaluation Report, Building Permit History, Photographs, Tax Assessor Map, Sanborn Maps

CONCLUSION

In summary, based on current research and the above assessment, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4). The property was evaluated according to statutory criteria as follows:

Landmark Criteria:

9.36.100(a)(1) -It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.

The subject property is an excellent example of a traditional trailer park exhibiting all of the key character defining architectural features typical of the type (permanent buildings, amenities, plan, and landscaping). It also represents a tangible example of when Santa Monica was a vacation destination for motorists towing recreational vehicles that became an additional component of the City's economic development after World War II.

Further, Village Trailer Park manifests the social evolution of trailer parks in Santa Monica from transient stopovers to permanent residential communities with a look and ambiance unique to the property type.

In sum, the property exhibits a substantial degree of physical and historical integrity in its location, design, setting, workmanship, materials, feeling and association that manifests the architectural, economic and social history of the City of Santa Monica in the postwar era.

Therefore, the subject property appears to satisfy this criterion.

9.36.1 00(a)(4) - It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.

The subject property appears to meet this criterion. As one of only two remaining trailer parks in Santa Monica and the only one that exhibits a very high level of integrity Village Trailer Park fully embodies the distinguishing architectural characteristics of the type.

Specifically, the property features private paved roads; numerous trailer spaces with concrete pads and hookups for electricity, gas, water, and sewage; a recreational club house; manager's residence; management office; laundry room/community bathroom facility; swimming pool; and landscaping.

The property also contains a substantial number of trailers manufactured from the 1950s through the 1970s.

Therefore, it can be concluded that Village Trailer Park is valuable to a study of the architectural history of the middle decades of the 20th century in Santa Monica."

Additional excerpts:

"Consistent with the design of most trailer parks, the subject property features numerous narrow trailer spaces. Based on the site map posted near the park entrance, there are 105 available spaces arranged in six rows with each space outfitted with a concrete pad and connections for electricity, water, gas, and sewage. Pole lamps illuminate the spaces along an asphalt strip of sidewalk fronting the driveway. Woven throughout the site are dozens of enormous mature trees of many varieties and dense landscaping that provide abundant shade and a park-like setting to the property....

"Given that the Village Trailer Park has existed at this location for 61 years there is an understandably wide variety of makes, models, and sizes of trailers scattered throughout the complex. In addition, it appears that many of the trailers were manufactured as early as the 1950s and 1960s with a few as recent as the 21st century. Visual inspection suggests that a substantial number of the trailers have occupied their spaces for many years - perhaps decades. Quite a number are thoroughly embraced by mature plants and have substantial additions attached to them, particularly on the side with the trailer entrance. These additions greatly expand a trailer's available living space. Although technically roadworthy (each is on wheels and has a tow hitch on the front) it appears that, due to deterioration, age and disrepair, many would no longer fare well on the highway

"A review of the occupations listed for residents of Village Trailer Park in 1958-59 reveals a wide variety of affiliations (see Table 1). Occupations include construction superintendent, postal carrier, postal clerk, Bullock's clerk, PBX operator, accountant, electrician, several salesmen, machinist, YMCA engineer, office manager, mason, student, beautician, construction foreman, mechanic, writer, a number of retirees, widows, and, somewhat surprisingly given his high position, an assistant vice president of the General Telephone Company (Henry L. Williamson). There were also four employees of Douglas Aircraft: three technicians and a blue printer. Similar results were found in the 1960-61 city directory suggesting that the residents of Village Trailer Park were employed in a broad spectrum of blue and white collar occupations

"In 2002, the City of Los Angeles declared the Monterey Trailer Park (6411 North Monterey Road) a Historic Cultural Monument.¹⁵ as "a prime example of an early 20th Century recreation and housing resource in the booming Post WWI Los Angeles area

"Photographic evidence and city directory research confirm that trailer parks were prevalent in Santa Monica, particularly after World War II in the eastern portions of the City. Trailer parks in Santa Monica initially served as convenient locations for travelers to rest as recreational stopovers or longer term seasonal vacation destinations. As such, they represent an important component of Santa Monica's economic development as a vacation destination in the middle decades of the 20th century. In addition, they also served as accommodations for workers at local manufacturing plants such as Douglas Aircraft Company due to a widespread regional housing shortage during World War II. Over time, trailer parks transitioned from recreational stopovers into semi-permanent and permanent housing for blue and white collar workers in the City.

"Due to their generally standard design in terms of plan, circulation, small narrow lot size, amenities (club house, swimming pool, manager's residence, laundry building) and landscaping, trailer parks as mature residential communities took on a specific look and ambiance unique to the property type. This is especially true of Village Trailer Park, which, on account of its high level of integrity (in comparison with Mountain View Mobile Home Park), is unlike any neighborhood in Santa Monica."

Response 32-1

This comment does not pertain to the environmental analysis in the Draft EIR; however, the comment is noted for the record and will be forwarded to decision makers for review and consideration.

As part of the Landmark application process, two historic assessments that evaluated eligibility for City landmark status were prepared for the project site in February 2012. The Village Trailer Park Historic Resource Assessment was prepared by Chattel Architecture Planning and Preservation, Inc. According to this report's findings, the property is ineligible for listing locally as a Santa Monica Landmark, in the California Register of Historical Resources and in the National Register of Historic Places. Additionally, a City Landmark Assessment Report was prepared for the Village Trailer Park by ICF International. According to this report, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4):

On February 13, 2012, the Landmarks Commission held a public hearing to discuss the two reports and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission voted to not designate the property. As was previously determined in the Draft EIR, impacts on historic resources would be less than significant. The Landmarks Report and associated information has been included as new Appendix I and a discussion of this information has been added to Section 4.5, Cultural Resources. Please see Chapter 10.0, Corrections and Additions, of this Final EIR for these revisions.

10.0 CORRECTIONS AND ADDITIONS

As required by Section 15088 of the CEQA Guidelines, this section provides corrections or clarifications to the Draft EIR. None of the corrections and additions constitutes significant new information or substantial project changes as defined by Section 15088.5 of the CEQA Guidelines. Corrections and Additions to the Draft EIR are provided in underline or ~~strikeout~~ text as needed to indicate an addition or deletion, respectively.

GENERAL

After publication of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 with minor reductions in the commercial square footage. Alternative 3 was thoroughly described and analyzed in Chapter 5.0, Alternatives, of the Draft EIR). Specifically, as analyzed in the Draft EIR, Alternative 3 would develop a mix of apartments and condominiums/townhouses that would provide a total of 486 residential units. As with the proposed project, a portion of the residential units would be subject to the City of Santa Monica's rent control ordinance with some units deed restricted as affordable housing units. Provisions related to the rent control and dedication of apartment units for the Village Trailer Park residents would also be included as part of a Development Agreement between the City and the project applicant. The commercial component of Alternative 3 would include approximately 26,280 square feet of ground level commercial space (which is a slight reduction compared to the 28,297 square feet analyzed in the Draft EIR).¹

As analyzed in Chapter 5.0, Alternatives of the Draft EIR, Alternative 3 would not result in new significant impacts or increase the severity of previously identified significant impacts. The impacts of Alternative 3 would be less or similar to the proposed project's impacts. Therefore, Alternative 3 would not change any of the conclusions reached in the Draft EIR.

INTRODUCTION

- Page 1-1, Purpose And Legal Authority, last paragraph, revise as follows:

This EIR is to serve as an informational document for the public and the City of Santa Monica decision-makers. The process will culminate with Planning Commission and City Council hearings to consider certification of a Final EIR and approval of the project.

SUMMARY

- Page 2-2, fifth complete paragraph, revise as follows:

The Development Agreement between the City and the developer ~~will include~~ would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. This process is ongoing, but it is likely that some of the residents will have the opportunity to relocate to the nearby City-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project. Additional relocation options for the remaining Village Trailer Park residents will also be identified as part of the Development Agreement relocation plan.

¹The slight reduction in commercial square footage would not materially alter the analysis of Alternative 3 in the Draft EIR. Therefore, no further revisions to reflect the reduction are necessary in Chapter 5.0, Alternatives, of the Draft EIR.

- Page 2-6, Alternative 1 – No Project Alternative, add the following:

Alternative 1 – No Project Alternative. The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, “no project” does not mean that development on the project site will be prohibited. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]). The No Project Alternative assumes any and all scenarios and procedural actions taken whereby the existing mobile home park would remain as is and no project would be developed. This includes a scenario where a resident owned mobile home park subdivision is created or a scenario where the existing mobile home park remains due to City and/or other third party acquisition of the property. Furthermore, it can be assumed that the No Project Alternative could result in all occupation of the existing 109 mobile home lots.

- Page 2-7, Alternative 3 – Increased Residential/Decreased Office Alternative, revise as follows:

Alternative 3 – Increased Residential/Decreased Office Alternative. This alternative would involve increasing the proposed residential component from 71 percent to approximately ~~80~~ 92 percent of the project, resulting in an increase of ~~50~~ 93 residential units and a reduction of ~~36,324~~ 88,747 square feet of creative office and neighborhood-serving retail compared to the proposed project. ~~Under this Alternative, the developer would be expected to include 89 low income housing units to achieve the density bonus.~~ Alternative 3 would include street improvements similar to the proposed project and would be built to the same height ~~and FAR~~ as the proposed project. The total proposed gross building area would be 395,939 square feet for a FAR of 2.36, which is slightly less than the proposed project.

- Page 2-9, Table 2-2: Summary of Impacts and Mitigation Measures, Construction Effects, delete Mitigation Measures **CON2** and **CON3**. (Subsequent mitigation measures have been renumbered accordingly).

~~**CON2** — The construction contractor shall utilize materials that do not require painting, when such materials are available.~~

~~**CON3** — The construction contractor shall use pre-painted construction materials, when such materials are available.~~

- Pages 2-10 and 2-11, Table 2-2: Summary of Impacts and Mitigation Measures, Construction Effects, revise Mitigation Measure as follows:

~~**CON8**~~**CON6** Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).

~~**CON14**~~**CON12** Construction noise levels shall not exceed the City of Santa Monica’s noise standards except for between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.

- Pages 2-14, Table 2-2: Summary of Impacts and Mitigation Measures, Geology and Soils, Mitigation Measures **GS1**, revise as follows.

GS-1 At the time of final building plan check, a site-specific Geotechnical Report shall be submitted to the City of Santa Monica Building and Safety Division for review and approval. The Geotechnical Report shall be prepared in accordance with the City's *Guidelines for Geotechnical Reports* and at a minimum shall address: seismic hazards (fault management zone; groundshaking; liquefaction; subsidence, etc); hydrocollapse potential; and expansive soils. Information obtained from the Geotechnical Report shall be incorporated into the design and construction of the proposed project. The recommendations provided in the Geotechnical Report as well as Santa Monica Building Code requirements regarding foundation design, retaining wall design, excavations and shoring shall be fully implemented.

- Pages 2-14 and 2-15, Table 2-2: Summary of Impacts and Mitigation Measures, Geology and Soils, Mitigation Measures **GS2** through **GS4**, revise as follows.

GS2 Construction and excavation activities shall adhere to the Best Management Practices (BMPs) set forth by the City of Santa Monica Urban Runoff Pollution Ordinance (Chapter 7.10 of the Santa Monica Municipal Code). Such BMPs include using plastic coverings to prevent erosion of any unprotected area, such as mounds of dirt or dumpsters, along with devices designed to intercept and safely divert runoff.

GS3 ~~Prior to the issuance of a grading permit, the contractor shall notify the City that all grading activities will be scheduled for completion before the start of the rainy season (between November and April).~~ All grading activities shall be scheduled for completion before the start of the rainy season (between November and April) to the extent feasible. If grading events do occur during the raining season, a rain event action plan shall be prepared and designed to protect all exposed portions of the site within 48 hours of any likely precipitation event forecast of 50 percent or greater probability.

GS4 ~~During the rainy season (between November and April), an~~ An erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Santa Monica Building and Safety Department to minimize potential erosion during construction. The erosion control plan shall be a condition prior to issuance of any grading permit.

- Page 2-16, Table 2-2: Summary of Impacts and Mitigation Measures, Hazards and Hazardous Materials, revise Mitigation Measures **HM1** and **HM2** as follows:

HM1 Prior to issuance of a demolition permit for the permanent structures on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.

HM2 Prior to issuance of a demolition permit, lead-based paint testing shall be conducted for existing ~~permanent~~ structures and trailers to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.

- Page 2-16, Table 2-2: Summary of Impacts and Mitigation Measures, Hazards and Hazardous Materials, add the following mitigation measure:

HM3 An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

- Page 2-18, Table 2-2: Summary of Impacts and Mitigation Measures, Construction Effects, delete Mitigation Measures **CON2** and **CON3**. (Subsequent mitigation measures have been renumbered accordingly).

~~**CON2** The construction contractor shall utilize materials that do not require painting when such materials are available.~~

~~**CON3** The construction contractor shall use pre-painted construction materials when such materials are available.~~

- Pages 2-19, Table 2-2: Summary of Impacts and Mitigation Measures, Construction Effects, revise Mitigation Measure as follows:

~~**CON8**~~**CON6** Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).

~~**CON14**~~**CON12** Construction noise levels shall not exceed the City of Santa Monica's noise standards except for between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.

- Pages 2-25 and 2-26, Table 2-2: Summary of Impacts and Mitigation Measures, Traffic and Transportation, revise Mitigation Measures **T4** and **T6** as follows:

T4 Centinela Avenue/I-10 Westbound Ramps. The traffic signal at the Centinela Avenue/I-10 Westbound Ramps intersection shall be modified to provide protected-permitted left-turn phasing for northbound approach to decrease delay at the worst approach of the intersection to address. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the permitted-protected left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. Since this intersection is shared by the City of Santa Monica and City of Los Angeles, this mitigation measure must be approved by LADOT. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

T6 Barrington Avenue/Olympic Boulevard. Convert the eastbound left-turn phasing from permitted to protected permitted. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the protected-permitted left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors and/or signal heads. Furthermore this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. The applicant shall use its good faith reasonable efforts to obtain such approval, from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

PROJECT DESCRIPTION

- Page 3-1, Existing Development and Uses, second paragraph, revise as follows:

The existing buildings on-site are one-story. ~~The only permanent structure is the~~ one-story office is located at the entrance of the mobile home park, ~~which is one story~~ and is built in a typical mid-century modern style with low-slung buildings, distinct lines and large slanted windows. The adjacent pool is surrounded by a chain link fence. In addition to the office, the project site is occupied with a manager's residence and laundry facility. The remaining uses on-site are RVs, trailers, mobile homes (collectively referred to in this document as "mobile homes") in various styles and conditions, as well as surface parking. Many of the mobile homes on-site have been customized by the owners with exterior decoration such as awnings, plants and other foliage.

- Page 3-20, Construction Activities, footnote 4 has been deleted and the remaining footnotes have been renumbered accordingly:

⁴~~While the maximum depth of excavation is estimated to be approximately 26 feet below ground surface (bgs), the construction air quality analysis within this Draft EIR estimates a conservative depth and excavation of approximately 34 feet bgs.~~

- Page 3-20, Site Preparation, revise as follows:

Exported Soil: Approximately ~~79,000~~ 146,813 cubic yards.
Daily On-Road Truck Travel: ~~1,278~~ 1,854 VMT

- Page 3-21, second complete paragraph, revise as follows:

The Development Agreement between the City and the developer would be informed by ~~include~~ a tenant impact report, as required by California law, and would include a relocation plan for existing Village Trailer Park residents, which must be approved by the City Council. This entitlement process is ongoing, and relocation options include the opportunity to relocate to the nearby City-owned Mountain View Mobile Home Park and the rent controlled apartment units to be developed as part of the project. Additional relocation options for the remaining Village Trailer Park residents would also be identified as part of the Development Agreement process. In addition, provisions related to the rent control and dedication of units for the Village Trailer Park residents will be included as part of the Development Agreement and associated relocation plan.

ENVIRONMENTAL IMPACTS

- Page 4-1, Cumulative Impacts, revise as follows:

CUMULATIVE IMPACTS – An analysis of past, present, and ~~probably~~ probable future projects producing related or cumulative impacts. CEQA defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects.

BIOLOGICAL RESOURCES

- Pages 4.3-4 and 4.3-5, revise as follows:

City of Santa Monica ~~Community Forest~~ Urban Forest Master Plan. In 2000, the City adopted the Community Forest Management Plan, which sets forth objectives and policies with regard to the management of the City's Community Forest. The plan's objectives including enhancing the community forest, promoting the conservation of tree resources, maintaining trees in a healthy condition, ensuring the optimum planting of trees, and educating the public.

The City ~~is currently drafting~~ adopted a long range Urban Forest Master Plan on December 13, 2011, which updates and expands upon the Community Forest Management Plan. The plan ~~will~~ provides long-term guidance for the preservation and enhancement of the City's urban forest. The plan ~~will~~ includes guiding principles, goals, and management strategies for addressing the ~~the~~ needs of the urban forests. As part of the Urban Forest Master Plan, the City has released a draft Designated Street Tree list, which establishes the recommended tree species for each block of the City. The City's Urban Forest Master Plan states that the best option for existing trees is for them to remain in their existing location. However, relocation of public trees may be considered as a part of new city public improvement projects. All tree relocations will be subject to review and approval by the City Council upon completion of the project's community design and commission review processes.

The City will incorporate existing healthy trees in the design of city public improvement projects wherever consistent with the project's design objectives and after a community design process where proposed tree relocations and removals are identified. Where tree removal is included as part of the proposed design, the City will provide incentives for relocation of trees that have good survival prospects. The Urban Forest Master Plan also sets out criteria that must be met for street tree removal and the process to request street tree removal including appeals and public notification.

CONSTRUCTION EFFECTS

- Page 4.4-5, Impact CON-1, revise as follows:

Impact CON-1 **Daily regional construction emissions would exceed the SCAQMD significance threshold for volatile organic compounds without mitigation. However, Mitigation Measures CON1 through CON3 would reduce impacts to less than significant.**

- Page 4.4-6, Site Preparation, revise as follows:

Maximum Depth of Excavation: ~~34~~ 26 feet
Exported Soil: Approximately ~~79,000~~ 146,813 cubic yards.
Daily On-Road Truck Travel: ~~1,278~~ 1,854 VMT

- Page 4.4-6, footnote 3 has been deleted and the remaining footnotes have been renumbered accordingly:

³~~While the maximum depth of excavation is estimated to be approximately 26 feet below ground surface (bgs), the construction air quality analysis within this Draft EIR estimates a conservative depth and excavation of approximately 34 feet bgs.~~

- Page 4.4-7, Table 4.4-4: Estimated Daily Construction Emissions - Unmitigated, revise as follows:

TABLE 4.4-4: ESTIMATED DAILY CONSTRUCTION EMISSIONS - UNMITIGATED						
Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5} /a/	PM ₁₀ /a/
DEMOLITION						
On-Site Emissions	3	21	13	<1	2	5
Off-Site Emissions	<1	2	2	<1	<1	<1
Total Emissions	3	23	15	<1	2	5
SITE PREPARATION						
On-Site Emissions	4	27	17	<1	10	41
Off-Site Emissions	2 <u>3</u>	29 <u>36</u>	9 <u>15</u>	<1	1	1
Total Emissions	6 <u>7</u>	46 <u>63</u>	26 <u>32</u>	<1	11	42
TRENCHING						
On-Site Emissions	2	13	8	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	13	9	<1	1	1
PAVING						
On-Site Emissions	1	9	7	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	9	8	<1	1	1
BUILDING						
On-Site Emissions	2	12	10	<1	1	1
Off-Site Emissions	2	8	32	<1	<1	1
Total Emissions	4	20	42	<1	1	2
COATING						
On-Site Emissions	89	<1	<1	<1	<1	<1
Off-Site Emissions	<1	<1	2	<1	<1	<1
Total Emissions	89	<1	2	<1	<1	<1
Maximum Regional Total	89	46 <u>63</u>	42	<1	11	42
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	Yes	No	No	No	No	No
Maximum On-Site Total	--	27	17	--	10	41
Localized Significance Threshold /b/	-- /c/	196	1,296	-- /c/	5	11
Exceed Threshold?	-- /c/	No	No	-- /c/	Yes	Yes
/a/ URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.						
/b/ Assumed a four-acre project site and a 25-meter (82-foot) receptor distance.						
/c/ SCAQMD has not developed localized significance methodology for VOC or SO _x .						
SOURCE: TAHA, 2011.						

- Page 4.4-7, Mitigation Measures, delete mitigation measures **CON2** and **CON3**. All references to these mitigation measures have been deleted and subsequent mitigation measures have been renumbered accordingly.

~~**CON2** The construction contractor shall utilize materials that do not require painting when such materials are available.~~

~~**CON3** The construction contractor shall use pre-painted construction materials when such materials are available.~~

- Page 4.4-8, Table 4.4-5: Estimated Daily Construction Emissions - Mitigated, revise as follows:

TABLE 4.4-5: ESTIMATED DAILY CONSTRUCTION EMISSIONS - MITIGATED						
Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5} /a/	PM ₁₀ /a/
DEMOLITION						
On-Site Emissions	3	21	13	<1	2	5
Off-Site Emissions	<1	2	2	<1	<1	<1
Total Emissions	3	23	15	<1	2	5
SITE PREPARATION						
On-Site Emissions	4	27	17	<1	10	41
Off-Site Emissions	2 3	25 36	40 15	<1	1	1
Total Emissions	6 7	52 63	27 32	<1	11	42
TRENCHING						
On-Site Emissions	2	13	8	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	13	9	<1	1	1
PAVING						
On-Site Emissions	1	9	7	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	9	8	<1	1	1
BUILDING						
On-Site Emissions	2	12	10	<1	1	1
Off-Site Emissions	2	8	32	<1	<1	1
Total Emissions	4	20	42	<1	1	2
COATING						
On-Site Emissions	9	<1	<1	<1	<1	<1
Off-Site Emissions	<1	<1	2	<1	<1	<1
Total Emissions	9	<1	2	<1	<1	<1
Maximum Regional Total	9	52 63	42	<1	11	42
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
Maximum On-Site Total	--	27	17	--	10	41
Localized Significance Threshold /b/	-- /c/	196	1,296	-- /c/	5	11
Exceed Threshold?	-- /c/	No	No	-- /c/	Yes	Yes
/a/ URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.						
/b/ Assumed a four-acre project site and a 25-meter (82-foot) receptor distance.						
/c/ SCAQMD has not developed localized significance methodology for VOC or SO _x .						
SOURCE: TAHA, 2011.						

- Page 4.4-10, Mitigation Measures, revise as follows:

~~CON8~~**CON6** Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).

- Page 4.4-12, Mitigation Measure, revise as follows:

~~CON14~~**CON12** Construction noise levels shall not exceed the City of Santa Monica's noise standards except for between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.

CULTURAL RESOURCES

- Page 4.5-3, Historic Resources, add the following:

Two historic resources assessments were prepared for the proposed project in February 2012 to assess the project site's potential for historic significance. Specifically, a City Landmark Assessment Report was prepared by ICF international and a Historic Resource Assessment was prepared by Chattel Architecture, Planning and Preservation, Inc. On February 13, 2012, the Landmarks Commission held a public hearing to discuss the two reports and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission voted to not designate the property. The Landmarks Report and associated information has been included as Appendix I of the Final EIR.

- Page 4.5-10, first complete paragraph, revise as follows:

As discussed above, none of the structures on the project site, nor any properties in the immediate vicinity are listed in the Santa Monica Historic Resources Inventory,² nor designated as a Landmark or a Historic District.³ Also, the project site is not listed in the National Register⁴ or the California Register.⁵ Subsequent to circulation of the Draft EIR, an application to designate the property as a City Landmark was received by the Landmarks Commission. As part of the Landmark application process, two historic assessments that evaluated eligibility for City landmark status were prepared for the project site in February 2012. The Village Trailer Park Historic Resource Assessment was prepared by Chattel Architecture Planning and Preservation, Inc. According to this report's findings, the property is ineligible for listing locally as a Santa Monica Landmark, in the California Register of Historical Resources and in the National Register of Historic Places. Additionally, a City Landmark Assessment Report was prepared for the Village Trailer Park by ICF International. According to this report, the property located at 2930 Colorado Avenue appears to meet two of the City of Santa Monica's Landmark Criteria (1 and 4). On February 13, 2012, the Landmarks Commission held a public hearing to discuss the two reports and consider the Landmark application. After a lengthy discussion regarding the historic merits of the property, the commission voted to not designate the property. The Landmarks report and associated information is included as Appendix I of this Final EIR. Therefore, the proposed project would not cause an adverse change in a historical resource. Impacts would be less than significant.

GEOLOGY & SOILS

- Page 4.6-8, Mitigation Measure GS1, revise as follows:

GS1 At the time of final building plan check, a site-specific Geotechnical Report shall be submitted to the City of Santa Monica Building and Safety Division for review and approval. The Geotechnical Report shall be prepared in accordance with the City's *Guidelines for Geotechnical Reports* and at a minimum shall address: seismic hazards (fault management zone; groundshaking; liquefaction; subsidence, etc); hydrocollapse potential; and expansive soils. Information obtained from the Geotechnical Report shall be incorporated into the design and construction of the proposed project. The recommendations provided in the Geotechnical Report as well as Santa Monica Building Code requirements regarding foundation design, retaining wall design, excavations and shoring shall be fully implemented.

²City of Santa Monica Historic Resources Inventory, December 2010, available at: <http://www01.smgov.net/planning/planningcomm/historicresources.html>, accessed March 17, 2011.

³City of Santa Monica Designated Landmarks and Historic Districts, available at: <http://www01.smgov.net/planning/planningcomm/designatedlandmarks.html>, accessed September 21, 2010

⁴National Register of Historic Places database, available at: <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>, accessed September 21, 2010.

⁵California Register of Historical Places database, available at: http://ohp.parks.ca.gov/listed_resources/?view=county&criteria=19, accessed March 3, 2011.

- Page 4.6-10, Mitigation Measures GS2 through GS4 , revise as follows:

GS2 Construction and excavation activities shall adhere to the Best Management Practices (BMPs) set forth by the City of Santa Monica Urban Runoff Pollution Ordinance (Chapter 7.10 of the Santa Monica Municipal Code). Such BMPs include using plastic coverings to prevent erosion of any unprotected area, such as mounds of dirt or dumpsters, along with devices designed to intercept and safely divert runoff.

GS3 ~~Prior to the issuance of a grading permit, the contractor shall notify the City that all grading activities will be scheduled for completion before the start of the rainy season (between November and April).~~ All grading activities shall be scheduled for completion before the start of the rainy season (between November and April) to the extent feasible. If grading events do occur during the raining season, a rain event action plan shall be prepared and designed to protect all exposed portions of the site within 48 hours of any likely precipitation event forecast of 50 percent or greater probability.

GS4 ~~During the rainy season (between November and April), an~~ An erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Santa Monica Building and Safety Department to minimize potential erosion during construction. The erosion control plan shall be a condition prior to issuance of any grading permit.

GREENHOUSE GAS

- Page 4.7-10, first and second complete sentences, revise as follows:

As shown in **Table 4.7-2**, the proposed project would result in ~~7,003~~ 7,008 metric tons of CO₂e per year under the Cumulative Plus Project (Year 2020) Conditions. The Approval Year Plus Project (Year 2011) Conditions would result in ~~7,143~~ 7,151 metric tons of CO₂e per year.

- Page 4.7-10, Table 4.7-2: Greenhouse Gas Emissions, revise as follows:

TABLE 4.7-2: GREENHOUSE GAS EMISSIONS	
Source	Carbon Dioxide Equivalent (Metric Tons per Year)
APPROVAL YEAR (YEAR 2011) CONDITIONS	
Mobile	385
General Electricity	157
Water Cycle Electricity	14
Natural Gas	263
Solid Waste Decomposition	170
Total Approval Year (Year 2011) Conditions	989
APPROVAL YEAR PLUS PROJECT (YEAR 2011) CONDITIONS	
Mobile	4,308
General Electricity	1,370
Water Cycle Electricity	108
Natural Gas	979
Solid Waste Decomposition	1,301
Total Approval Year Plus Project (Year 2011) Conditions	8,066
Total Net Operational Emissions	7,077
Construction Emissions Amortized /a/	66 74
Total Project Emissions	7,143 7,151
Regional Significance Threshold	10,000
Exceed Threshold?	No
CUMULATIVE BASE (YEAR 2020) CONDITIONS	
Mobile	388
General Electricity	157
Water Cycle Electricity	14
Natural Gas	263
Solid Waste Decomposition	170
Total Cumulative Base (Year 2020) Conditions)	992
CUMULATIVE PLUS PROJECT (YEAR 2020) CONDITIONS	
Mobile	4,168
General Electricity	1,370
Water Cycle Electricity	108
Natural Gas	979
Solid Waste Decomposition	1,301
Total Cumulative Plus Project (Year 2020) Conditions	7,926
Total Net Operational Emissions	6,934
Construction Emissions Amortized /a/	66 74
Total Project Emissions	7,000 7,008
Regional Significance Threshold	10,000
Exceed Threshold?	No
/a/ The SCAQMD recommends accounting for construction emissions by averaging them over a 30-year project lifetime.	
SOURCE: TAHA, 2011.	

HAZARDS & HAZARDOUS MATERIALS

- Pages 4.8-2 and 4.8-3, Existing Setting, after the second paragraph, add the following:

In addition, a Phase I Environmental Site Assessment (ESA) Report was prepared for the project site by Partner Engineering and Science Inc. in February 2012 and is included in Appendix J of this Final EIR. The Phase I ESA indicates that the project site is listed on the California Hazardous Material Incident Reporting System (CHMIRS) due to an accidental release of 50 gallons of sewage overflow from a damaged private lateral line in 2008. Cleanup was reportedly conducted by the responsible party, and based on the nature of the release reported, the project sites' listing on the database is not considered to represent a significant environmental concern. Furthermore, according to the Phase I ESA, there is no evidence of soil contamination on the project site and soil testing would not be necessary.

- Page 4.8-3, Existing Setting, Asbestos Materials and Lead-Based Paint, add the following:

The Phase I ESA concluded that due to the age of the buildings on-site, there is a potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. Overall, all suspect ACMs and painted surfaces were observed in good condition and do not pose a health and safety concern to the occupants of the project site at this time.

- Page 4.8-8, Impact HM2, revise as follows:

Impact HM2 **The proposed project could potentially uncover asbestos and lead based paint during demolition of existing structures. Therefore, the proposed project could potentially 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. Implementation of Mitigation Measures HM1 and HM2 through HM3 would reduce this impact to less than significant.**

- Page 4.8-9, second complete paragraph, revise as follows:

Construction activities would include demolition of the existing ~~one-story building office permanent buildings~~ on the project site (~~no trailers are proposed to be demolished~~), excavation, building construction, utilities/infrastructure improvements, paving and landscaping. ~~The proposed project would include the demolition of the existing one-story office building on-site (no trailers are proposed to be demolished).~~ In addition, any trailers that have not been relocated and/or moved from the site prior to the issuance of a demolition permit for the permanent buildings would be demolished on-site. It is likely that asbestos and lead-based paint are present in buildings and trailers constructed prior to 1978. According to the Los Angeles County Assessor's Office, the office structure on-site was built in 1950. In addition, the trailers on the property were manufactured prior to 1978. Given that the project site includes a building and trailers ~~one building~~ predating 1978, it is reasonable to assume that these materials are present and could be encountered during demolition. Therefore, without mitigation, the proposed project would potentially result in significant impacts related to the accidental release of hazardous materials.

- Page 4.8-9, Mitigation Measures, revise as follows:

HM1 Prior to issuance of a demolition permit for the permanent structures on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.

HM2 Prior to issuance of a demolition permit for the permanent structures on the site, lead-based paint testing shall be conducted for existing ~~permanent~~ structures and trailers to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.

HM3 An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.

- Page 4.8-10, Level of Impact After Mitigation, revise as follows:

With implementation of Mitigation Measures **HM1** and ~~HM2~~ through **HM3**, impacts related to the routine transport, use, disposal or upset involving the release of hazardous materials would be reduced to less than significant.

LAND USE & PLANNING

- Page 4.10-9, add the following:

Bergamot Area Plan

No adopted specific plans or area plans are in effect that would apply to the project site. However, the City of Santa Monica is currently in the process of preparing a Bergamot Area Plan, which would address area-wide issues such as land use, circulation, publicly accessible open space, urban form and scale, parking, community benefits, area-wide infrastructure, and coordinated implementation. The Bergamot Area Plan would be consistent with the LUCE.

- Page 4.10-10, first paragraph, revise as follows:

The project site has a zoning designation of Residential Mobile Home Park District (R-MH). According to Section 9.04.08.06.010 of the SMMC, permitted uses within the R-MH zone include, but are not limited to, mobile homes and small family day care homes. The R-MH zone also allows large family day care homes with a performance standards permit as well as child day care centers with a conditional use permit. The R-MH zone does not establish maximum height and floor area ratio (FAR) but requires that a Development Review permit be processed for any new development within the zone. The project includes land uses that are not consistent with the very limited types of uses in the R-MH zone; however, the proposed Development Agreement (DA) establishes that the proposed project needs to only be consistent with the General Plan development standards and type and mix of allowable land uses for the project site. **Figure 4.10-5** shows the zoning designations for the project site and surrounding area.

- Pages 4.10-16 and 4.10-17, Table 4.10-3: Proposed Project Consistency With Local Plan and Policies, after Policy B 12.1, add the following policies and consistency discussions to the table :

TABLE 4.10-3: PROPOSED PROJECT CONSISTENCY WITH LOCAL PLANS AND POLICIES	
Applicable Goal/Objective/Policy	Proposed Project Consistency
CITY OF SANTA MONICA GENERAL PLAN	
<i>Land Use and Circulation Element</i>	
D 24.13 <u>Retain the Village Trailer Park to the extent feasible, and permit recycling to other uses that are consistent with the MUCD and in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks.</u>	<u>Yes – This policy recognizes that the project site is a mobilehome park and that the park owner may close the park. The Development Agreement between the City and the developer would be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents in compliance with the City's Rent Control Charter Amendment and sections of the California Government Code applicable to recycling mobile home parks.</u>
D 24.14 <u>Explore means to sustain Village Trailer Park's economic viability by incorporating it into a larger multi-property master plan, if feasible, or by the transfer of development rights that have as a goal, preserving existing housing as an integral part of a new mixed-use project.</u>	<u>Yes – An alternative to retain the Village Trailer Park on the project site was explored but ultimately was deemed infeasible due to the following: (1) a TDR program does not yet exist to implement such a transfer of development rights and therefore is totally dependent on the cooperation of individual property owners to participate in common ownership; (2) adjacent property owners did not express an interest in participating in a transfer of development rights or in forming a single ownership entity; and (3) the maximum height and floor area ratio (FAR) established in the LUCE cannot be exceeded and therefore, the LUCE cannot accommodate the amount of development rights that would be transferred from the Village Trailer Park property to the adjacent two properties.</u>

- Page 4.10-18, Santa Monica Affordable Housing Program, revise as follows:

Santa Monica Housing Element. The proposed project would increase the City's available housing stock by developing 166 apartments and 227 condominiums. Of the 166 apartment units, 52 would be deed restricted as affordable housing. These housing units would be located within 0.25 mile of the future Bergamot Expo Light Rail station. These features of the proposed project are consistent with the first two policies of the Housing Element listed in **Table 4.10-3**. The remaining policy would require that the project applicant provide relocation assistance to the existing residents of Village Trailer Park. These options include, but are not limited to relocation back to the site in the newly constructed affordable housing units or to the Mountain View Mobile Home Park or the rent controlled apartment units to be developed by the project. The Development Agreement will include a ~~tenant impact report and~~ plan for relocation of existing Village Trailer Park residents, including provisions related to the dedication of units for the existing residents. Therefore, the proposed project would be consistent with the Housing Element.

NEIGHBORHOOD EFFECTS

- Page 4.11-1, Santa Monica General Plan, revise as follows:

The Santa Monica General Plan, adopted in 1984, contains the seven State required elements including land use, circulation, housing, open space, noise, conservation, and safety. In addition, the City has adopted a historic preservation element. The elements of the General Plan ~~has~~ have not been ~~comprehensively~~ concurrently revised in recent years, although there have been periodic amendments to the majority of the elements, including the Land Use and Circulation Element (LUCE) in 2010, Noise Element in 1992, the Open Space Element in 2001, the Historic Preservation Element in 2002, and the Housing Element in 2008.

- Page 4.11-3, Impact CON-1, delete reference Mitigation Measure CON2 and CON3. All references to these mitigation measures have been deleted and subsequent mitigation measures have been renumbered accordingly.

Impact CON-1 Daily regional construction emissions would exceed the SCAQMD significance threshold for volatile organic compounds without mitigation. However, Mitigation Measures ~~CON1 through CON3~~ would reduce impacts to less than significant.

- Page 4.11-7, Impact T-3, revise as follows:

Impact T-3 The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) conditions. No feasible mitigation measures are available to reduce project impacts. Therefore, ~~without mitigation~~, the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.

NOISE

- Page 4.12-7, Existing Setting, first paragraph, revise as follows:

Vehicular traffic is the predominant noise source in the project vicinity. Using existing traffic volumes provided by the project traffic consultant, the ~~CNEL~~ L_{dn} was calculated for various roadway segments near the project site using the Traffic Noise Model Look-Up Program. Existing peak hour noise levels are shown in **Table 4.12-4**. Mobile noise levels in the project area range from ~~55.1~~ 54.1 to ~~75.2~~ 74.2 dBA ~~CNEL~~ L_{dn} .

POPULATION AND HOUSING

- Page 4.13-3, Housing, first paragraph, add the following:

The median house price in the City of Santa Monica is \$925,000, much higher than the City of Los Angeles (\$450,000) and nearby Culver City (\$499,000).⁶ This dramatic increase in home value is largely attributed to location, the amenities the City offers, and the limited amount of developable space. In order to ensure fairness and affordability in housing, rent-control is a common practice used to preserve affordable housing in the City. Section 9.04.02.030.025 of the Santa Monica Municipal Code defines Affordable Housing as “Housing in which one hundred percent of the dwelling units are deed-restricted or restricted by an agreement approved by the City for occupancy by low or moderate income households. Such projects may also include non-residential uses, as long as such uses do not exceed thirty-three percent of the floor area of the total project.”

- Pages 4.13-7 and 4.13-8, Regulatory Framework, after the discussion of the City of Santa Monica General Plan, Housing Element, add the following:

City of Santa Monica Rent Control Law

The existing units on the project site are subject to the Rent Control Law.

The City’s Rent Control Law (Article XVII of the City charter) was adopted in 1979 to alleviate housing shortage by establishing a Rent Control Board empowered to regulate rentals in the City of Santa Monica so that rents will not be increased unreasonably and so that landlords will receive no more than a fair return.

The City’s Rent Control Law provides that any landlord who desires to remove a controlled rental unit from the rental housing market by demolition, conversion or other means is required to obtain a permit from the Rent Control Board prior to such removal from the rental housing market in accordance with rules and regulations promulgated by the Board. In order to approve such a permit pursuant to Charter Section 1803(t)(i), the Board is required to make a finding that the landlord cannot make a fair return by retaining the controlled rental unit.

In addition, under Charter Section 1083(t)(ii), the Board may approve such a permit:

(i) If the Board finds that the controlled rental unit is uninhabitable and is incapable of being made habitable in an economically feasible manner, or

(ii) If the permit is being sought so that the property may be developed with multifamily dwelling units and the permit applicant agrees as a condition of approval, that the units will not be exempt from the provisions of this Article pursuant to Section 1801(c) and that at least fifteen (15) percent of the controlled rental units to be built on the site will be at rents affordable by persons of low income.

In addition, the Rent Control Charter Amendment provides that the Housing Element of the General Plan of the City of Santa Monica shall at all times contain a provision that neither the City Council nor any City agency shall approve an application for tentative subdivision map or tentative parcel map for a converted unit until and unless the applicant first obtains a removal permit as required by this Section. This subsection shall not apply to any tentative subdivision map or tentative parcel map approved in accordance with Article XX relating to tenant ownership rights.

⁶Movoto Real Estate website, <http://www.movoto.com/statistics/ca.htm>, accessed on October 19, 2010.

- Page 4.13-8, Thresholds of Significance, after the list of bulleted, add the following:

It should also be noted that the focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the physical environment. Accordingly, CEQA Guidelines Section 15064(e), economic and social impacts of a project are not to be treated as "significant" impacts on the physical environment, as defined. To the extent that there is a direct or indirect causal connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is "significant." Population and housing displacement impacts are relevant CEQA issues to the extent that displacement would result in physical changes to the environment, (i.e., necessitate the construction of replacement housing elsewhere).

- Page 4.13-10, last paragraph, revise the first sentence as follows:

According to the Santa Monica City Charter Article 1803(t)(ii) ("Rent Control Law"), a removal permit from the Rent Control Board is required for removal of the rent-controlled mobile home spaces, and as, such permit will require a one-for-one replacement of affordable, rent-controlled units.

- Pages 4.13-10 and 4.13-11, Impact PH-3 discussion, revise third and fourth sentences as follows:

The Development Agreement between the City and the developer will ~~include~~ be informed by a tenant impact report and would include a plan for relocation of existing Village Trailer Park residents, which must be approved by City Council. Some of the existing residents would have the option of moving to the nearby, City of Santa Monica-owned Mountain View Mobile Home Park or the rent controlled apartment units to be developed as part of the project.

PUBLIC SERVICES AND RECREAION

- Page 4.14-10, Impact PS-2, revise as follows:

Impact PS-2 The proposed project would incrementally increase demand on the SMPD. However, the increase would not significantly affect services ratios, response times, or other performance objectives and would not require the construction of new police facilities. Impacts would be less than significant.

TRANSPORTATION AND TRAFFIC

- Page 4.15-18, Table 4.15-10: City of Los Angeles Significant Impact Criteria, revise as follows:

TABLE 4.15-10: CITY OF LOS ANGELES SIGNIFICANT IMPACT CRITERIA		
Intersection Condition with Project Traffic		Project-Related Increase in V/C Ratio
Level of Service	V/C Ratio	
C	0.701 – 0.800	Equal or greater than 0.40
D	0.801 – 0.900	Equal to or greater than 0.020
E,F	> 0.901	Equal to or greater than 0.010 Any net increase in average seconds of delay per vehicle
SOURCE: Fehr & Peers, Draft Traffic Study for the Village Trailer Park Project, October 2011.		

- Page 4.15-18, Table 4.15-11: City of Santa Monica Significance Impact Criteria – Collector, Feeder, and Local Streets , revise as follows:

TABLE 4.15-11: CITY OF SANTA MONICA SIGNIFICANCE IMPACT CRITERIA – COLLECTOR, FEEDER, AND LOCAL STREETS	
COLLECTOR STREETS	
A transportation impact is significant if the Base ADT is:	Greater than 13,500 and there is a net increase of one trip or more in ADT due to project-related traffic
	Greater than 7,500 but less than 13,500 and the project-related traffic increases the ADT by 12.5% or the ADT becomes 13,500 or more
	Less than 7,500 and the project related traffic increases the ADT by 25%
FEEDER STREETS	
A transportation impact is significant if the Base ADT is:	Greater than 6,750 and there is a net increase of one trip or more in ADT due to project-related traffic
	Greater than 3,750 but less than 6,750 and the project related traffic increases the ADT by 12.5% or the ADT becomes 6,750 or more
	Less than 3,750 and the project related traffic increases the ADT by 25%
LOCAL STREETS	
A transportation impact is significant if the Base ADT is:	Greater than 2,250 and there is a net increase of one trip or more in ADT due to project-related traffic
	Greater than 1,250 but less than 2,250 and the project-related traffic increases the ADT by 12.5% or the ADT becomes 2,250 or more
	Less than 1,250 and the project-related traffic increases the ADT by 25%.
SOURCE: Fehr & Peers, <i>Draft Traffic Study for the Village Trailer Park Project</i> , October 2011.	

- Pages 4.15-19 and 4.15-20, Approval Year (Year 2011) Conditions, before the first paragraph, add the following:

Section 15125 of the State CEQA Guidelines directs that:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation [“NOP”] is published, or if no notice of preparation is published at the time environmental analysis is commenced, from both a local and regional perspective. These environmental settings will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant [emphasis added].” (14 Cal. Code Reg. 15125 (a)).

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

For this EIR, the NOP year for existing conditions (2010) is generally used as the baseline environmental setting for analyzing most of the project’s impact areas in this EIR. However, for the analysis of traffic impacts, this EIR uses the project’s approval year of 2011 as the ‘baseline’ environmental setting. The

purpose of establishing the project's approval year as the 'baseline' for the analysis for traffic impacts is that it is a more accurate representation of traffic conditions that change over the time period that the EIR is being prepared. Therefore, an ambient growth rate of 0.8% has been applied to account for increased traffic volume from related projects that have received their Certificates of Occupancy between the NOP date and project's anticipated approval year and for forecasted traffic growth as substantiated by Southern California Association of Governments (SCAG) projections, LA County Congestion Management Plan (CMP) subarea projections, and the City's actual historical traffic volume patterns. The decision in Save Our Peninsula Committee v. Monterey County Bd. of Supervisors (2001) 87 Cal.App.4th 99, 125-126, supports this alternative use of baseline traffic levels: "For instance, where the issue involves an impact on traffic levels, the EIR might necessarily take into account the normal increase in traffic over time. Since the environmental review process can take a number of years, traffic levels as of the time the project is approved may be a more accurate representation of the existing baseline against which to measure the impact of the project." Because an environmental baseline that differs from the date of the NOP is reasonable and results in a more accurate environmental analysis of traffic impacts, this EIR uses the estimated time of project approval (2011) as the baseline for analyzing traffic impacts.

- Page 4.15-29, Item No. 1, first paragraph, add the following:

1. Traffic generated by specific development projects located in the City of Santa Monica and neighboring areas of the City of Los Angeles expected to be constructed by Year 2020 using trip generation rates calibrated for use in the Santa Monica TDFM. Specific development projects that have been accounted for in the TDFM are listed in Table 3-3 in Chapter 3.0 Project Description.

- Page 4.15-56, Mitigation Measure **T4**, revise as follows:

T4 Centinela Avenue/I-10 Westbound Ramps. The traffic signal at the Centinela Avenue/I-10 Westbound Ramps intersection shall be modified to provide protected-permitted left-turn phasing for northbound approach to decrease delay at the worst approach of the intersection to address. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the permitted-protected left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. Since this intersection is shared by the City of Santa Monica and City of Los Angeles, this mitigation measure must be approved by LADOT. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

- Page 4.15-57, fourth paragraph, revise as follows:

Mitigation Measures **T1** and **T4** would mitigate the impacts at the four identified intersections to less than significant levels based on the City of Santa Monica significance criteria. However, Mitigation Measure **T4** must be approved by LADOT and/or Caltrans and therefore, the impact will be considered significant and unavoidable. As indicated in the Traffic Study, there are no feasible mitigation measures to fully mitigate the six significantly impacted intersections wholly or partially in the City of Los Angeles. As shown in **Table 4.15-19**, after mitigation, impacts to the following 11 of intersections would be significant and unavoidable:

- Page 4.15-73, Mitigation Measure **T6**, revise as follows:

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- **T6 Barrington Avenue/Olympic Boulevard.** Convert the eastbound left-turn phasing from permitted to protected permitted. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the protected-permitted left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors and/or signal heads. Furthermore this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

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- Page 4.15-74, Level of Impact After Mitigation, revise as follows:

T4 Centinela Avenue/I-10 Westbound Ramps. Mitigation Measure **T4** was determined to fully mitigate the project related impacts. Therefore, the proposed project's impact at this intersection would be less than significant based on the City of Santa Monica significance criteria. However, this mitigation measure would not fully mitigate the impact per the City of Los Angeles' significance criteria. Since this intersection is shared with the City of Los Angeles, this mitigation measure must be approved by LADOT. Therefore, the project impact at this intersection remains significant and unavoidable until approval by the City of Los Angeles, since the decision of implementing this improvement cannot be made entirely by the City of Santa Monica. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

T6 Barrington Avenue/Olympic Boulevard. Using both the City of Santa Monica and City of Los Angeles methodology and criteria, it was determined that Mitigation Measure ~~**T5**~~ **T6** would fully mitigate project impacts at this location. Since this intersection is owned and controlled by the City of Los Angeles, this mitigation measure must be approved by LADOT. Therefore, the project impact at this intersection remains significant and unavoidable until approval by the City of Los Angeles, since the decision of implementing this improvement cannot be made entirely by the City of Santa Monica. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.

- Page 4.15-76, Impact T-3, add the following:

Impact T-3 **The proposed project would increase traffic levels along neighborhood street segments in the vicinity of the project site. The projected increases are above City adopted thresholds on 6 of the 15 studied street segments under the Approval Year Plus Project (Year 2011) Conditions. The projected increases are above City adopted thresholds on 5 of the 15 studied street segments under the Cumulative Plus Project (Year 2020) Conditions. No feasible mitigation measures are available to reduce project impacts. Therefore, ~~without mitigation,~~ the proposed project would result in a significant and unavoidable impact related to neighborhood traffic.**

- Page 4.15-82, Cumulative Impacts, Item No 1, add the following:

1. Traffic generated by specific development projects located in the City of Santa Monica and neighboring areas of the City of Los Angeles expected to be constructed by Year (2020) using trip generation rates calibrated for use in the Santa Monica TDFM. Specific development projects that have been accounted for in the TDFM are listed in Table 3-3 of Section 3.0, Project Description;

UTILITIES AND SERVICE SYSTEMS

- Page 4.16.1-1, third paragraph, revise as follows:

~~Up~~ Historically until 1996, local groundwater comprised up to 70 percent of the City's water supply. However, in 1996, the Charnock groundwater sub-basin, a source of City groundwater, was found to be contaminated. The groundwater contamination resulted in the reduction of groundwater pumped and used by the City. ~~Since that time~~ Between 1996 and mid-2011, the City ~~has~~ relied on imported water from the MWD.⁷ ~~Over the past water year~~ In 2010, imported water represented 78.35 percent of the City's water supply.⁸ The City plans to reduce its reliance upon imported water and maximize groundwater production in the near future.

- Pages 4.16.1-1 and 4.16.1-2, Exiting Setting, after the fourth paragraph, add the following:

Water production is recorded monthly by Santa Monica water staff and reported annually to the California Department of Water Resources (DWR). Although no formal safe yield determination has been made for the Santa Monica Basin, based upon studies performed by the USGS, the average yield based upon estimated inflows and outflows between 1971 and 2000 was about 7,500 afy. Empirical evidence suggests that the practical pumping maximum is approximately 7,680 gpm (12,400 afy). Currently, there are no established limits on groundwater withdrawal in the Santa Monica [Groundwater] Basin. To further assess safe groundwater yields, the City has engaged the services of a hydrogeology firm to prepare a groundwater production model that will provide numerical information and groundwater sufficiency related to annual withdrawals and long-term safe yield.

- Page 4.16.1-2, Local Groundwater, revise as follows:

As described in Section 4.9 Hydrology & Water Quality, the City obtains local groundwater from the Arcadia, Olympic, and Charnock sub-basins of the Santa Monica Groundwater Basin. The City pumps groundwater from the following groundwater well fields: the Arcadia Well Field, which extracts groundwater from the Arcadia Subbasin; the Santa Monica Well Field, which extracts groundwater from the Olympic Subbasin; and the Charnock Well Field, which extracts groundwater from the Charnock Subbasin. From 1995 until December 2010, the City's groundwater production was limited because of the cessation of groundwater pumping activities within the Charnock sub-basin related to groundwater contamination. Groundwater remediation and the operation of the recently-upgraded SMWTP currently allows the City to maximize local groundwater production and resume groundwater pumping activities within the Charnock sub-basin. ~~The City currently meets 70 percent of water demand through groundwater pumping activities.⁹~~

Based on current data and assumptions groundwater supplies can be relied upon for all hydrologic years and in some instances could be increased (maximized) on a short-term basis, if necessary. As stated previously, Santa Monica has improved its local groundwater supply through construction and operation of a new water treatment facility in the Charnock subbasin; Santa Monica could sustainably produce 8,200 afy from that one subbasin. In addition, Santa Monica will produce approximately 4,200 afy from the Arcadia and Santa Monica subbasins. These sources combined could sustainably supply safe yields of up to approximately 12,400 afy of groundwater and, if necessary, the City could purchase imported water.

⁷City of Los Angeles, *Opportunities and Challenges Report*, July 2005.

⁸City of Santa Monica Public Works Department Water Resources Division, Susan Lowell, P.E, e-mail correspondence, dated September 8, 2010.

- Page 4.16.1-2, last paragraph, second to last sentence, revise as follows:

Under the WSAP, the City’s water allocation would be allocated approximately 12,229 acre-feet per year until 2025.

- Page 4.16.1-5, first paragraph and Table 4.16.1-2: Estimated Existing Water Usage, revise as follows:

The City provides water to the project site through two water connections from a City-owned water main beneath Colorado Avenue. The segment of the Colorado Avenue water main serving the project site is approximately 40 inches in diameter. The project site is developed with 109 trailer home lots. Although there are 109 spaces at the project site, approximately 76 of them are currently occupied by trailers. **Table 4.16.1-2** shows the estimated existing water usage of the project site. The estimated existing water usage is approximately ~~9,424~~ 8,437 gpd. This represents less than one percent of the total water the City supplied daily during the 2009/2010 water year and of the treatment capacity of the SMWTP, respectively.

TABLE 4.16.1-2: ESTIMATED EXISTING WATER USAGE				
Use	Quantity	Units	Water Usage Rate (gpd/unit) /a/	Wastewater Generation (gpd)
Village Trailer Park	76	Dwelling units	124111	9,4248,436
Estimated Usage of Existing Uses on the Project Site				9,4248,436
<small>/a/ Rate based on average gallons per day from water bills for the project site from July 2009 through July 2010. Total water usage on the project site was divided by 76 dwelling units (the number of existing mobile homes on the project site).</small>				
<small>SOURCE: City of Santa Monica, <i>Land Use and Circulation Element Final Environmental Impact Report Volume 1: Final EIR</i>, April 2010.</small>				

- Page 4.16.1-6, second paragraph, revise as follows:

City of Santa Monica 2010 Urban Water Management Plan. The City of Santa Monica UWMP was prepared in accordance to the State UWMPA. The rules and regulations of the UWMPA can be found in the California Water Code Division 6, Part 2.6, Sections 10610-10656. The CWMPA requires that urban water suppliers develop water management plans, every five years, to actively pursue efficient use of available supplies. In accordance to the CWMPA, the ~~LADWP~~ City of Santa Monica prepared an UWMP. The latest ~~LADWP~~ UWMP was recently released in July 2011. The City’s UWMP includes a (1) description the existing and planned sources of water available to the supplier, (2) discussion of water supply reliability, (3) water demand management measures, and (4) a water shortage contingency plan. The proposed project would comply with the requirements of the City’s UWMP. The City’s 2010 UWMP analyzes future water demand and water supplies through 2020. The 2010 UWMP accounted for future growth that would occur in the City, including growth that would occur with forecasted buildout of the LUCE. This growth includes future development projects such as the proposed project. The Draft EIR concluded that the project’s water demand would constitute an incremental portion of the forecasted 2010 UWMP demand and therefore, impacts on water supply would be less than significant.

- Pages 4.16.1-8 and 4.16.1-9, Impact U-2, revise discussion and Table 4.16.1- 3: Estimated Water Usage of the Proposed Project, revise as follows:

The proposed project would include the development of a 399,581-square-foot mixed-use project with 166 apartments, 227 condominiums, 105,334 square feet of creative office, and 11,710 square feet of neighborhood-serving retail. Development of the proposed project would result in an increase in long-term water demand for consumption, operational uses, maintenance and other activities on the project site. The estimated water usage of the proposed project is shown in **Table 4.16.1-3**. The proposed project would result in a water demand of approximately 61,022 gpd. When accounting for the removal of the existing trailers on the site, the net water usage of the proposed project is approximately ~~51,598~~ 52,586 gpd of water, which represents approximately 0.4 percent of the City’s water demand per day in 2009/2010.

TABLE 4.16.1-3: ESTIMATED WATER USAGE OF THE PROPOSED PROJECT				
Use	Quantity	Units	Water Usage Rate (gpd/unit) /a/	Water Usage (gpd)
Dwelling Unit	393	Dwelling units	124	48,732
Production/Office	105,334	Square feet	0.1	10,533
Retail	11,710	Square Feet	0.15	1,757
Estimated Total Water Usage of Proposed Project				61,022
Less Existing Water Usage				(9,424-8,436)
Net Water Usage of Proposed Project				51,598-52,586
<i>/a/: City of Santa Monica, Land Use and Circulation Element Final Environmental Impact Report Volume 1: Final EIR, April 2010.</i>				

Additionally, according to the City’s 2010 UWMP, the City projects that in 2020 it would supply 24,475 acre-feet of water during a normal water year or 24,015 acre-feet of water during a single dry year or multiple dry years.¹⁰ The proposed project’s net water usage would represent approximately less than 0.1 percent of the City’s projected total water supply in 2020 during a normal water year and single dry/multiple dry years. This would be an incremental increase of the water forecasted to be supplied in 2020, and thus, it is anticipated that City would have sufficient groundwater and imported water entitlements to serve the proposed project. It should be noted that the project’s net water demand of ~~51,598~~ 52,586 gpd is conservative since it does not account for water use reductions that would occur from implementation of the project’s water conservation measures that are required to comply with the City’s Green Building Ordinance and to achieve a LEED rating. Thus, project water demand would likely be less than the calculated net increase of ~~51,598~~ 52,586 gpd. In addition, the City has indicated that it would be able to supply water to the proposed project.¹¹ Therefore, the proposed project would not result in an increase in water demand that would strain available supply. Impacts would be less than significant.

- Pages 4.16.3-4 and 4.16.3-5, Impact US-8, revise discussion and Table 4.16.3-3: Estimated Solid Waste Generation During the Demolition and Construction Phase of the Proposed Project, revise as follows:

Construction of the proposed project would generate construction and demolition waste such as asphalt, concrete, and dirt. Existing trailers on the project site would not be disposed of at any landfills and would be stored in a location off-site for storage and/or re-use. **Table 4.16.3-3** shows the amount of solid waste generated during the demolition and construction phases of the proposed project. Approximately ~~391,134~~ 252,524 tons of solid waste would be generated during the construction and demolition phase of the proposed project, including exported soil. Developers of the proposed project would comply with SMMC Chapter 8.108 Subpart C and consequently, would divert at least 65 percent of solid waste generated during the demolition and construction phases away from landfills. Compliance with SMMC Chapter 8.108 Subpart C would result in a maximum of ~~136,897~~ 88,383 tons of solid waste disposed of at landfills serving the City. The Class III landfills, inert waste, and refuse-to-energy facilities serving the project site have a remaining capacity of approximately 2.3 billion tons, and a combined daily capacity of 65,740 tons per day. Solid waste generated by the proposed project would reduce the remaining capacities of the disposal facilities by less than one percent. This is a nominal reduction of the remaining capacities of the Class III landfills, inert waste, and refuse-to-energy facilities serving the project site. The Class III landfills, inert waste, and refuse-to-energy facilities serving the project site would have sufficient permitted capacity to accommodate the proposed project’s construction waste disposal needs. Therefore, the proposed project would be served by a landfill with sufficient capacity to handle construction debris; impacts would be less than significant.

¹⁰City of Santa Monica, 2010 Urban Water Management Plan, 2011.

¹¹City of Santa Monica Public Works Department – Water Resources, Susan Lowell, P.E., written correspondence, September 21, 2010.

TABLE 4.16.3-3: ESTIMATED SOLID WASTE GENERATION DURING THE DEMOLITION AND CONSTRUCTION PHASE OF THE PROPOSED PROJECT				
Use	Building Area (sq ft)	Solid Waste Generation Rate (pounds/sq ft) /a/	Solid Waste Generated (pounds)	Solid Waste Generated (tons)
DEMOLITION PHASE				
Existing Structures	3,454	115	397,210	199
Asphalt and Concrete Roadway and Trailer Pads /b/	n/a	n/a	737,656	368
Soil Export /c/, /d/	n/a	n/a	18,666,000	9,333
Total Solid Waste Generated During Demolition Phase			19,800,866	9,900
CONSTRUCTION PHASE				
Residential	231,875	115	26,665,625	13,333
Production/Office	105,334	155	16,326,770	8,163
Retail	11,710	155	1,815,050	908
Soil Export /e/, /c/	n/a	n/a	236,667,000	118,334
			<u>440,439,000</u>	<u>220,220</u>
Total Solid Waste Generated During Construction Phase			564,807,445	277,404
			485,246,445	242,624
Total Solid Waste Generated during Construction and Demolition Phases			781,134,311	391,134
			505,047,311	252,524
/a/ Solid waste generation rates obtained from US EPA Characterization of Building-Related Construction and Demolition Debris study. /b/ Assumes that asphalt is 721 kilograms per cubic meter or 9.26 pounds per cubic foot. Also assumes that, currently, project site includes 159,321 square feet, or 95 percent of the project site has asphalt that is six inches thick. There is 79,661 cubic feet, or 737,656 pounds, of asphalt. /c/ URBEMIS Model, found in Appendix C of this EIR, assumes that 6,222 cubic yards of soil would be exported off the project site during the demolition phase. /d/ Assumes one cubic yard is equivalent to 1.5 tons. /e/ The URBEMIS model, found in Appendix C of this EIR, assumes that 78,889 cubic yards of soil would be exported off the project site during the construction phase. SOURCE: United States Environmental Protection Agency, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i> , 1998 and TAHA, 2011.				

ALTERNATIVES

- Page 5-5, Reduced Project Alternative to Reduce Traffic Impacts, add the following:

In addition, the financial feasibility analysis provided by the project applicant determined that this alternative would not be financially feasible. As such, this alternative has been eliminated from further consideration. Notwithstanding, an in-depth analysis of this alternative has been provided in Appendix K of this EIR.

- Page 5-6, Alternative 1 – No Project Alternative, add the following:

Alternative 1 – No Project Alternative. The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. However, “no project” does not mean that development on the project site will be prohibited. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]). The No Project Alternative assumes any and all scenarios and procedural actions taken whereby the existing mobile home park would remain as is and no project would be developed. This includes a scenario where a resident owned mobile home park subdivision is created or a scenario where the existing mobile home park remains due to City and/or other third party acquisition of the property. Furthermore, it can be reasonable to assume that the No Project Alternative could result in occupation of all of the existing 109 mobile home lots on the project site.

Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for the purposes of this analysis, under the No Project Alternative, the existing mobile home park uses on-site (approximately 76 mobile homes) would remain. Pennsylvania Avenue would not be extended through the project site, and there would not be a connection to Colorado Avenue via a new street. All existing utility infrastructure would remain.

- Page 5-7, Alternative 3 – Increased Residential/Decreased Commercial Alternative, revise as follows:

Alternative 3 – Increased Residential/Decreased Commercial Alternative. This alternative would involve increasing the proposed residential component from 71 percent to approximately ~~80~~ 92 percent of the project, resulting in an increase of ~~50~~ 93 residential units and a reduction of ~~36,324~~ 88,747 square feet of creative office and neighborhood-serving retail compared to the proposed project (**Table 5-2**). ~~Under this Alternative, the developer would be expected to include 89 low income housing units to achieve the density bonus.~~ Alternative 3 would include street improvements similar to the proposed project and would be built to the same height and FAR as the proposed project. The total proposed gross building area would be 395,939 square feet for a FAR of 2.36, which is slightly less than the proposed project.

- Page 5-24, Utilities and Services Systems, last paragraph, revise as follows:

Water. Under Alternative 2, the net water demand would be ~~43,406~~ 44,393 gpd, which is a reduction of ~~8,192~~ 8,193 gpd as compared to the proposed project (**Table 5-11**). This change is largely attributed to the decrease in residential units. Therefore, water demand impacts under Alternative 2 would be less than that under the proposed project. Less-than-significant impacts related to water demand are anticipated under Alternative 2. Impacts under Alternative 2 would be less than the proposed project.

- Page 5-25, Table 5-11: Estimated Water Usage Under Alternative 2, revise as follows:

TABLE 5-11: ESTIMATED WATER USAGE UNDER ALTERNATIVE 2				
Use	Quantity	Units	Water Usage Rate (gpd/unit)	Water Usage (gpd)
Residential	221	Dwelling units	124	27,464
Production/Office	217,944	Square feet	0.1	21,794
Retail	24, 216	Square Feet	0.15	3,632
Estimated Total Water Usage of Alternative 2				52,830
<i>Less Existing Water Usage</i>				<i>(9,424 8,436)</i>
Net Water Usage of Alternative 2				43,406 44,393
Net Water Usage of Proposed Project				51,598 52,586
Difference from Proposed Project				(8,192) (8,193)
SOURCE: TAHA, 2011				

- Page 5-36, Utilities and Services Systems, first paragraph, revise the first sentence as follows:

Water. Under Alternative 3, the total net water demand would be ~~54,521~~ 55,509 gpd, which is an increase of 2,923 gpd as compared to the proposed project (**Table 5-24**).

- Page 5-36, Table 5-24: Estimated Water Usage Under Alternative 3, revise as follows:

TABLE 5-24: ESTIMATED WATER USAGE UNDER ALTERNATIVE 3				
Use	Quantity	Units	Water Usage Rate (gpd/unit)	Water Usage (gpd)
Residential	486	Dwelling units	124	60,264
Production/Creative Office	11,270	Square feet	0.1	1,127
Retail	17,027	Square Feet	0.15	2,554
Estimated Total Water Usage of Alternative 3				63,945
<i>Less Existing Water Usage</i>				<i>(9,424 8,436)</i>
Net Water Usage of Alternative 3				54,521 55,509
Net Water Usage of Proposed Project				54,598 52,586
Difference from Proposed Project				2,923
SOURCE: TAHA, 2011				

- Page 5-40, Environmentally Superior Alternative, after the last paragraph, add the following:

Subsequent to circulation of the Draft EIR, the project Applicant announced their intention to pursue development of Alternative 3 – Increased Residential/Decreased Commercial Alternative. This alternative would result approximately 486 residential units, consisting of 141 studios/one-bedroom apartment units, 270 one-bedroom condo units, and 75 two-bedroom units. As with the proposed project, this alternative would replace all 109 rent-controlled mobile home lots on a one-to-one basis with 109 rent-controlled apartment units.

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

11.1 INTRODUCTION

This chapter is the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Village Trailer Park Project (the proposed project). Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines require adoption of a MMRP for all projects for which an EIR has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180, which was enacted on January 1, 1989, to ensure the implementation of all mitigation measures adopted through the CEQA process. Specifically, Section 21081.6 of the Public Resources Code states that "...the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that the program]...shall be designed to ensure compliance during project implementation."

11.2 PURPOSE

The purpose of the MMRP is to ensure that the mitigation measures identified in the Draft and Final EIR to mitigate the potentially significant environmental effects of the proposed project are, in fact, properly carried out. The implementation of this MMRP shall be carried out by the City of Santa Monica.

11.3 RESPONSIBILITIES AND DUTIES

The MMRP describes the procedures for the implementation of the mitigation measures to be adopted for the proposed project as identified in the Draft and Final EIR. The MMRP for the proposed project will be in place through all phases of the proposed project, including design (pre-construction), construction, and operation (post-construction both prior to and post-occupancy). The City of Santa Monica Department of Planning and Community Development shall be responsible for administering the MMRP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety, Department of Public Works, etc.), consultants, or contractors. The Department of Planning and Community Development will also ensure that monitoring is documented through reports (as required) and that deficiencies are promptly corrected. The designated environmental monitor (e.g., City building inspector, project contractor, certified professionals, etc., depending on the provision specified below) will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

11.4 MONITORING AND REPORTING PROCEDURES

Table 11-1 identifies each mitigation measure; the action required for the measure to be implemented; the time at which the monitoring is to occur; the monitoring frequency; and the agency or party responsible for ensuring that the monitoring is performed. In addition, the table includes columns for compliance verification. These columns will be filled out by the monitoring agency or party and would document monitoring compliance. Where an impact was identified to be less than significant, no mitigation measures were required.

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
BIOLOGICAL RESOURCES					
BR1 Prior to removal, trees on the project site will be inspected for bird nests by a qualified biologist. Inspection of the trees shall occur prior to the typical breeding/nesting season (March 1 st through August 30 th). If nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established, within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has failed. If no nesting is observed, trees to be removed from within the project site shall be netted to prevent birds from inhabiting the trees prior to removal and construction.	Field inspection by a qualified biologist prior to removal of trees on the project site	Santa Monica Building and Safety Division; project applicant; on-site construction manager; qualified biologist	Santa Monica Building and Safety Division		
CONSTRUCTION EFFECTS					
CON1 The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter).	Review of planned coating materials prior to construction; field verification during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division; SCAQMD		
CON2 Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.	Field inspection during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division; SCAQMD		
CON3 The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road: <ul style="list-style-type: none"> • Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; • Pave the surface extending at least 100 feet and at least 20 feet wide; • Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or • Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. 	Field inspection during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division;		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
CON4 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).	Field inspection during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division;		
CON5 Construction activity on unpaved surfaces shall be suspended when wind speed exceed 25 miles per hour (such as instantaneous gusts).	Field inspection during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division;		
CON6 Ground cover in disturbed areas shall be replaced as quickly as possible. Otherwise, non-toxic chemical soil stabilizers shall be applied according to manufacturer specifications, to all inactive portions of the construction site (previously graded areas inactive for four days or more).	Field inspection during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division;		
CON7 Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.	Field verification during first and second stage smog alerts	Santa Monica Building and Safety Division; ; on-site construction manager	Santa Monica Building and Safety Division		
CON8 All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.	Written confirmation from on-site construction manager that noise attenuation techniques are used to reduce noise levels	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division		
CON9 Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment).	Written confirmation from on-site construction manager that quieter equipment is being used through periodic field inspections	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division		
CON10 The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators when electricity from power poles is readily available at the construction area.	Written confirmation from on-site construction manager electrically-powered tools are used during construction through field inspections	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
CON11 Construction haul truck and materials delivery traffic shall only travel on a City-approved construction route.	Field inspections	Santa Monica Building and Safety Division; Santa Monica Transportation Division; on-site construction manager	Santa Monica Building and Safety Division; Santa Monica Transportation Division		
CON12 Construction noise levels shall not exceed the City of Santa Monica's noise standards except for between the hours of 10:00 a.m. and 3:00 p.m., Monday through Friday, in accordance with Section 4.12.110(d) of the Santa Monica Municipal Code.	Field inspections	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division		
CON13 In accordance with Santa Monica Municipal Code Section 4.12.120, the project applicant shall be required to post a sign informing all workers and subcontractors of the time restrictions for construction activities. The sign shall also include the City telephone numbers where violations can be reported and complaints associated with construction noise can be submitted.	Confirmation that the applicant posts a sign informing all workers and subcontractors of time restrictions for construction and City telephone numbers	Santa Monica Building and Safety Division; project applicant	Santa Monica Building and Safety Division		
CON14 The applicant shall prepare, implement, and maintain a Construction Impact Mitigation Plan which shall be designed to: <ul style="list-style-type: none"> Prevent material traffic impacts on the surrounding roadway network; Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable; Ensure safety for both those constructing the project and the surrounding community; and Prevent substantial truck traffic through residential neighborhoods. <p>The Construction Impact Mitigation Plan shall be subject to review and approval by the following City departments: Environmental and Public Works Management (EPWM); Fire; Planning and Community Development; and Police to ensure that the Plan has been designed in accordance with this mitigation measure. This review shall occur prior to commencement of any construction staging for the project. It shall, at a minimum, include the following:</p>	A review of the Construction Impact Mitigation Plan by EPWM prior to commencement of any construction staging for the project	EPWM; Fire; Planning and Community Development; and Police	EPWM; Fire; Planning and Community Development; and Police		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
<p>Ongoing Requirements Throughout the Duration of Construction</p> <ul style="list-style-type: none"> • A detailed traffic control plan for work zones shall be maintained which includes at a minimum accurate existing and proposed parking and travel lane configurations; warning, regulatory, guide and directional signage; and area sidewalks, bicycle lanes and parking lanes. The plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans must be reviewed and Approved by the Transportation Management Division prior to commencement of construction and implemented in accordance with this approval. • Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m., including: dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an After Hours Permit. • Streets and equipment shall be cleaned in accordance with established EPWM requirements. • Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on Santa Monica streets. Limited queuing may occur on the construction site itself. • Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit. • Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division. • Provision of off-street parking for construction workers, 					

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
<p>which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica.</p> <p>Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction</p> <ul style="list-style-type: none"> • Advise the traveling public of impending construction activities (e.g. information signs, portable message signs, media listing/notification, implementation of an approved traffic control plan). • Approval from the City through issuance of a Use of Public Property Permit, Excavation Permit, Sewer Permit or Oversize Load Permit, as well as any Caltrans Permits required, for any construction work requiring encroachment into public rights-of-way, detours or any other work within the public right-of-way. • Timely notification of construction schedules to all affected agencies (e.g., Big Blue Bus, Police Department, Fire Department, Environmental and Public Works Management Department, and Planning and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet. • Coordination of construction work with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal. • Approval by the Transportation Management Division of any haul routes involving earth, concrete or construction materials, and equipment hauling. 					

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM						
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance		
				Check	Verification	
GEOLOGY AND SOILS						
GS-1	At the time of final building plan check, a site-specific Geotechnical Report shall be submitted to the City of Santa Monica Building and Safety Division for review and approval. The Geotechnical Report shall be prepared in accordance with the <i>City's Guidelines for Geotechnical Reports</i> and at a minimum shall address: seismic hazards (fault management zone; groundshaking; liquefaction; subsidence, etc); hydrocollapse potential; and expansive soils. Information obtained from the Geotechnical Report shall be incorporated into the design and construction of the proposed project. The recommendations provided in the Geotechnical Report as well as Santa Monica Building Code requirements regarding foundation design, retaining wall design, excavations and shoring shall be fully implemented.	Approval of plans prior to construction to verify compliance with recommendations provided in the study; field verification during construction	Santa Monica Building and Safety Division; project applicant; on-site construction manager	Santa Monica Building and Safety Division		
GS2	Construction and excavation activities shall adhere to the Best Management Practices (BMPs) set forth by the City of Santa Monica Urban Runoff Pollution Ordinance (Chapter 7.10 of the Santa Monica Municipal Code). Such BMPs include using plastic coverings to prevent erosion of any unprotected area, such as mounds of dirt or dumpsters, along with devices designed to intercept and safely divert runoff.	Approval of plans prior to construction to verify compliance with recommendations provided in the study; field verification during construction	Santa Monica Building and Safety Division; on-site construction manager	Santa Monica Building and Safety Division		
GS3	All grading activities shall be scheduled for completion before the start of the rainy season (between November and April) to the extent feasible. If grading events do occur during the raining season, a rain event action plan shall be prepared and designed to protect all exposed portions of the site within 48 hours of any likely precipitation event forecast of 50 percent or greater probability.	Notification of construction schedule	Project applicant	Santa Monica Building and Safety Division		
GS4	During the rainy season (between November and April), an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Santa Monica Building and Safety Department to minimize potential erosion during construction. The erosion control plan shall be a condition prior to issuance of any grading permit.	Submittal of erosion control plan; field verification that BMPs are in place during construction	Santa Monica Building and Safety Department; on-site construction manager	Santa Monica Building and Safety Division		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
GS5 Provisions shall be made for adequate surface drainage away from the areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water runoff and the transport of silt and sediment.	Field verification during construction	On-site construction manager	Santa Monica Building and Safety Division		
HAZARDS AND HAZARDOUS MATERIALS					
HM1 Prior to issuance of a demolition permit for the permanent structures on the project site, a Licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures and trailers to be demolished that are present on the project site. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the project site.	Completion of an asbestos survey and abatement if necessary from a Licensed Asbestos Inspector	Project applicant	SAQMD		
HM2 Prior to issuance of a demolition permit, lead-based paint testing shall be conducted for existing permanent structures and trailers to be demolished. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.	Completion of a lead-based paint survey and abatement if necessary from a lead-based paint/materials abatement contractor	Project applicant	Santa Monica Building and Safety Division		
HM3 An operations and maintenance program shall be implemented in order to safely manage the suspect ACMs and LBP located at the project site.	Completion of an operations and maintenance program if necessary from an asbestos and lead-based paint/materials abatement contractor	Project applicant	Santa Monica Building and Safety Division		
HYDROLOGY AND WATER QUALITY					
HW1 If temporary and/or permanent dewatering on the project site is required, the Applicant shall obtain a dewatering permit from the City of Santa Monica Water Resources Protection Program prior to the issuance of a grading permit. Soil and groundwater testing to a minimum depth of 50 feet shall be conducted to the satisfaction of the Water Resources Protection Program staff. If contaminated groundwater is discovered on-site, treatment and discharge of the contaminated groundwater shall be conducted in compliance with applicable regulatory requirements including the Los Angeles Regional Water Quality Control Board standards.	Obtain a dewatering permit if necessary from the City of Santa Monica Water Resources Protection Program	Project applicant	Santa Monica Building and Safety Division		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM						
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance		
				Check	Verification	
TRAFFIC AND TRANSPORTATION						
T1	23rd Street/Ocean Park Boulevard. Add an exclusive right-turn lane on the eastbound approach of Ocean Park Boulevard. The mitigation measure was proposed due to the heavy existing eastbound through movement volumes. The proposed mitigation would require shifting the existing eastbound through lane approach approximately two feet to the north to provide room for a functional right-turn lane. The proposed mitigation would require implementation of peak period parking restrictions for the first 75 feet of parking (approximately three parking spaces) closest to the intersection (eastbound on Ocean Park Boulevard, west of 23 rd Street) so vehicles can make eastbound right-turns onto 23 rd Street from Ocean Park Boulevard during the peak periods or when there is available space outside of peak periods. The proposed mitigation measure would require some restriping and peak period parking restriction signage at the eastbound approach of this intersection.	Review and approval of a traffic mitigation plan submitted to the City prior to project completion	Santa Monica Transportation Management Division	Santa Monica Transportation Management Division		
T2	Cloverfield Boulevard/Santa Monica Boulevard. The westbound left-turn phasing of the Cloverfield Boulevard/Santa Monica Boulevard intersection shall be modified from a protected phase to a permitted-protected phase to decrease delay at the worst approach of the intersection to address the impact. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate during other time periods. Implementation of this mitigation measure would necessitate the provision of a combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads.	Review and approval of a traffic mitigation plan submitted to the City prior to project completion	Santa Monica Transportation Management Division	Santa Monica Transportation Management Division		
T3	Stewart Street/Olympic Boulevard. The traffic signal at the Stewart Street/Olympic Boulevard intersection shall be modified to provide protected-permitted left-turn phasing for northbound and eastbound approaches to decrease delay at the worst approaches of the intersection to address the impact. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. Implementation of this mitigation measure would necessitate the provision of a combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.	Review and approval of a traffic mitigation plan submitted to the City prior to project completion	Santa Monica Transportation Management Division	Santa Monica Transportation Management Division		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
<p>T4 Centinela Avenue/I-10 Westbound Ramps. The traffic signal at the Centinela Avenue/I-10 Westbound Ramps intersection shall be modified to provide protected-permitted left-turn phasing for northbound approach to decrease delay at the worst approach of the intersection to address. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the permitted-protected left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. Since this intersection is shared by the City of Santa Monica and City of Los Angeles, this mitigation measure must be approved by LADOT. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.</p>	<p>Review and approval of a traffic mitigation plan submitted to the City prior to project completion</p>	<p>Santa Monica Transportation Management Division</p>	<p>Santa Monica Transportation Management Division and City of Los Angeles Department of Transportation</p>		
<p>T5 26th Street & Wilshire Boulevard. Convert the protected permitted phasing for the eastbound and westbound left turn movements to permitted phasing. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. This mitigation measure would require temporary signage during a period of adjustment for motorists and the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors, and/or signal heads. Furthermore, this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues.</p>	<p>Review and approval of a traffic mitigation plan submitted to the City prior to project completion</p>	<p>Santa Monica Transportation Management Division</p>	<p>Santa Monica Transportation Management Division</p>		

TABLE 11-1: MITIGATION MONITORING AND REPORTING PROGRAM					
Mitigation Measures	Action Required	Responsible Party	Monitoring Party	Compliance	
				Check	Verification
<p>T6 Barrington Avenue/Olympic Boulevard. Convert the eastbound left-turn phasing from permitted to protected permitted. The City shall monitor the operation of this intersection and adjust the signal timing and phasing as appropriate. The implementation of the protected-permitted left-turn phasing would necessitate the provision of some combination of new signage, controller cabinets, poles, mast arms, detectors and/or signal heads. Furthermore this mitigation measure will provide the City greater flexibility in adjusting traffic signal operations to address peak hour congestion issues. The applicant shall use its good faith reasonable efforts to obtain such approval from the City of Los Angeles. If timely approved by the City of Los Angeles, such improvements shall be completed prior to issuance of a certificate of occupancy for the project.</p>	<p>Review and approval of a traffic mitigation plan submitted to the City prior to project completion</p>	<p>Santa Monica Transportation Management Division</p>	<p>City of Los Angeles Department of Transportation</p>		