



City of Santa Monica

2008—2014 Housing Element

Initial Study/Neighborhood Impact Statement and Negative Declaration

July 18, 2008

Prepared for: City of Santa Monica
Planning and Community Development Department
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Santa Monica, California 90401
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INITIAL STUDY/NEIGHBORHOOD IMPACT STATEMENT AND NEGATIVE DECLARATION

DATE FILED: JULY 16, 2008

This checklist is to be completed for all projects that are subject to environmental review under the California Environmental Quality Act (CEQA). The information, analysis, and conclusions contained in the checklist form the basis for deciding whether an Environmental Impact Report (EIR), a Negative Declaration (ND), or a Mitigated Negative Declaration (MND) is to be prepared. Additionally, the checklist shall be used to focus an EIR on the effects determined to be potentially significant.

INTRODUCTION

1. Project title:

City of Santa Monica Housing Element (2008—2014)

2. Lead agency name and address:

City Planning Division, Planning and Community Development Department, 1685 Main Street, Room 212, Santa Monica, CA 90401

3. Contact person and phone number:

Elizabeth Bar-El, AICP, Senior Planner, (310) 458-8341

4. Project location:

City of Santa Monica

5. Project sponsor's name and address:

City of Santa Monica, Planning and Community Development Department

6. General plan designation:

Various per General Plan

7. Zoning:

Various per Zoning Map

8. Description of project:

The City of Santa Monica proposes to adopt a Housing Element as mandated by Sections 65580 to 65589 of the Government Code, which continues the very successful programs of its 2000-2005 Housing Element. State Housing Element law requires that each City and County identify and analyze existing and projected housing needs within their jurisdiction and prepare goals, policies, programs and quantified objectives to further the development, improvement, and preservation of housing. Housing and its production are critical to the economic and social well-being and vitality of the community and its residents.

Preparing a Housing Element may be approached as a regulatory exercise to meet State requirements during a relatively short-term period, or the effort may be embraced as a tool for the community to plan for broad-based, long-range housing needs. This Housing Element does both, fulfilling all of the State's Housing Element mandates while tying in to other City planning processes to express Santa Monica's long-term commitment to creating housing that is affordable to a diverse community. Thus, even as this document describes the tremendous efforts and resources that the City of Santa Monica commits to a successful affordable housing program, it contemplates the context of eroding affordability due to market and legislative forces that are beyond the City's control.

Providing a range of housing opportunities at all affordability levels has been and continues to be a core value for the City of Santa Monica. However, over the years, Santa Monica's many fine attributes have resulted in a high "willingness to pay" for the privilege of living in the City that, combined with the finite amount of land within the City's borders, has triggered a substantial rise in prices. Increasingly, this differs substantially from the average resident's ability to pay. The lack of a range of housing choices directly impacts Santa Monica's workforce and increases demand on its transportation network. These issues are central to the City's housing policy.

The City is presently undertaking a comprehensive update of its Land Use and Circulation elements (LUCE). As part of the LUCE process, the City is assessing locations where new housing production may be most appropriate. These targeted locations include transit opportunities and nearby retail services in traditionally nonresidential areas. As part of LUCE Update process, the City will assess the development of a strategy for the target development of housing within new transit oriented neighborhoods. Certain programs and objectives of this proposed housing element acknowledge this new land use strategy which will be developed and analyzed as part of the LUCE process.

The following table includes the Housing Plans goals and policies:

Summary of Housing Programs for the 2008-2014 Housing Element

OBJECTIVE	PROGRAM	TIMEFRAME	AGENCY
Goal 1.0: Promote the construction of new housing within the City's regulatory framework.			
1.a: Assess and Revise, Where Appropriate, City Regulatory Requirements	Periodically review and, where necessary, revise planning, zoning and development regulations, assessments, and fees to ensure that they support the development of a variety of housing types and prices including workforce housing and live/work spaces. The City will continue to promote residential uses in nonresidential zoning districts.	Review planning, zoning and development regulations annually. Promote residential uses in nonresidential districts on an ongoing basis.	City Planning Division; City Attorney's Office.
1.b: Continue to Streamline the Permit Approval Processes	Continue to monitor permit processing procedures and provide handbook and outreach materials of interdepartmental regulations and services to guide applicants through the development approval process. The City will also continue to expand the type of data available on the "Permits" tracking system and improve reporting procedures to facilitate project tracking and provide up-to-date information.	Ongoing	City Planning Division; Building and Safety Division; Information Systems Division.
1.c: Maintain Architectural Review and Development Compatibility	Continue to implement City architectural review guidelines, review development standards, and revise as appropriate, to provide project applicants with clear design direction and ensure design compatibility.	Ongoing	City Planning Division
Goal 2.0: Encourage the production of housing for all income categories including housing for the community's workforce.			
2.a: Maintain an Affordable Housing Production Program	Continue to monitor, evaluate, and revise the affordable housing production program as necessary to meet the housing needs of the community, prepare an annual report concerning compliance with Proposition R and update fees and housing cost requirements annually.	Annually	City Housing Division; Planning Division; Housing Authority
2.b: Maintain a Density Bonus Program	Maintain the City's density bonus program and revise as necessary to remain consistent with State Law and meet the City's needs	Ongoing	City Planning Division
2.c: Provide Technical and Financial Assistance for Housing Production	The City will continue to provide financial and technical assistance to nonprofit housing providers to support the development of affordable housing, including special needs housing. The City will also continue to seek out local, state, and federate funds to support the construction of affordable housing.	Ongoing	City Housing Division (lead); Human Services Division
2.d: Assess Alternative Affordable Housing Finance Programs	Continue to implement the City's land banking program, purchase publicly and privately owned land for the use of affordable housing, and use creative means for facilitating the production of housing such as the use of 'air-rights' on City buildings.	Ongoing	Housing & Economic Development Department; City Planning Division
2.e: Assess Use of City-Owned/Publicly-Owned Land for Affordable Housing	Continue to implement the City's land banking program, purchase publicly and privately owned land for the use of affordable housing, and use creative means for facilitating the production of housing such as the use of 'air-rights' on City buildings.	Ongoing	Housing & Economic Development Department; City Planning Division

Summary of Housing Programs for the 2008-2014 Housing Element

OBJECTIVE	PROGRAM	TIMEFRAME	AGENCY
2.f: Foster Housing Development through Development Agreements	Continue to enter into Development Agreements that provide community benefits by including on-site affordable housing or payment of affordable housing fees beyond existing City requirements to the extent appropriate.	Ongoing	City Planning Division; City Attorneys Office; Housing Division
2.g: Facilitate the Development and Maintenance of Special Needs Housing	Continue to utilize existing and new financial resources and strengthen partnerships with service providers to create and retrofit existing housing for special needs households.	Ongoing	Housing Division; City Human Services Division
2.h: Facilitate the Development of Housing within Targeted Locations	Develop a land use strategy and update the City's Land Use Element by the end of 2009 to identify areas of new residential development near existing and future transit connections and served by nearby retail uses and services.	Update the LUCE by the end of 2009 and identify areas for new residential development	City Planning Division
2.i: Assess the Development of Workforce Housing	<p>Explore the development of housing that is affordable to the city's workforce, including rental, ownership, and forms of employer-provided transitional housing through development of a Workforce Housing Program/Initiative. This program will be focused on households with income above 120 percent of the area median income and could possibly be capped at 180 percent of the area median income. Possible parameters of the program are as follows:</p> <ul style="list-style-type: none"> > Provide regulatory development incentives, particularly in conjunction with proximity to transit, and other possible tools that may be included in the City's zoning ordinance. > The workforce housing program should not detract from current affordable housing programs for households below 120 percent of the median-income level 	Develop Workforce Housing initiative by the end of 2009	City Planning Division
2.j: Facilitate the Provision of Emergency, Transitional, and Permanent Housing for the Homeless	Continue to seek and leverage outside funds for emergency and transitional housing development and work in partnership with local nonprofits for housing and supportive services. The City's quantified goal for homeless services is to provide outreach, emergency shelter, transitional housing, case management, permanent housing and employment assistance to approximately 2,800 homeless persons annually, including mentally ill men and women, victims of domestic violence, and youth	Ongoing	City Human Services Division; Housing Division
2.k: Maintain Proposition I Monitoring	Monitor utilization of Proposition I authority through annual reporting of new "low rent-housing projects."	Annually	Housing Division

Summary of Housing Programs for the 2008-2014 Housing Element

OBJECTIVE	PROGRAM	TIMEFRAME	AGENCY
Goal 3.0: Protect the existing supply of affordable housing.			
3.a: Develop Programs to Address State and Federal Legislative Mandates	Continue to implement programs to protect tenants against landlord cancellation of existing Section 8 contracts (including City and/or private foundation-funded subsidy) to enable tenants to remain and pay the maximum allowable rent (MAR) such as the TARP program. Continue to take all necessary steps to increase HUD's Fair Market Rent (FMR) for Santa Monica so that Section 8 can offer competitive market rate rent; continue to fund the acquisition and rehabilitation of existing rental units	Ongoing	Housing Division (lead); Rent Control Agency
3.b: Protection of Mobile Home Park Tenants	Continue to protect tenants at existing mobile home parks and assist with mobile home park rehabilitation.	Ongoing	Housing Division; City Planning Division; Rent Control Agency
3.c: Maintain a Tenant Eviction Protection Program	Continue to prevent unlawful evictions through monitoring and enforcing of "just cause" eviction protections, and continue to provide fair housing services through the Consumer Protection Unit of the Santa Monica City Attorney's Office. The City will continue to review current laws and recommend any needed modifications to ensure protection of tenants to the maximum extent feasible.	Ongoing	City Attorney's Office; Rent Control Agency; Housing Division; Human Services Division
3.d: Facilitate the Preservation of At-Risk Housing	The City will continue to monitor the status of at-risk projects within the City, advise tenants in advance of potential conversion dates, and assist in answering questions from residents of at-risk housing.	Ongoing	Housing Division
Goal 4.0: Promote the rehabilitation and continued maintenance of existing housing.			
4.a: Maintain a Low Income Residential Repair Program	Support and fund the rehabilitation of 350 multi-family units and provide 250 minor home repairs.	By 2014	Housing Division; Santa Monica Housing Authority
4.b: Maintain a Housing Code Enforcement Program	Continue to implement the City's housing code enforcement program. The Building and Safety Division will coordinate with the Housing Division to provide information on available rehabilitation assistance to correct code deficiencies.	Ongoing	Building and Safety Division; Housing Division
4.c: Maintain an Earthquake Retrofitting Program	Continue to require earthquake retrofitting in compliance with seismic upgrade regulations.	Ongoing	Building and Safety Division
4.d: Maintain a Lead-Based Paint and Asbestos Hazards Reduction Program	Continue to implement an educational program and potential other assistance to address the abatement and removal of lead-based paint and educate construction industry and train enforcement personnel to ensure safe construction sites.	Ongoing	Housing Division (lead); Building and Safety Division; Environmental and Public Works Management

Summary of Housing Programs for the 2008-2014 Housing Element

OBJECTIVE	PROGRAM	TIMEFRAME	AGENCY
Goal 5.0: Provide housing assistance and supportive services to very low, low, and moderate income households and households with special needs.			
5.a: Maintain a Section 8 Rental Assistance and Housing Voucher Program	Continue to operate the Section 8 programs and advocate for funding guidelines that are competitive in Santa Monica and pursue additional funding to maintain the financial feasibility of the program and if possible, expand it.	Ongoing	Santa Monica Housing Authority
5.b: Maintain a Community Development Grant Program	Continue to implement a coordinated case management program linking homeless individuals with housing, employment, and other support services.	Ongoing	Human Services Division
5.c: Maintain a Home Buyers Assistance Program	The City will continue to operate the TORCA Shared Appreciation Program and will look at developing future homeownership housing on a case-by-case basis.	Ongoing	Housing Division
5.d: Provide Tenant Relocation Assistance	Continue to implement the Tenant Relocation Assistance program and periodically review existing City policies and ordinances and recommend modifications if deemed necessary.	Ongoing	City Attorney's Office; Housing Division; Rent Control Agency
5.e: Maintain a Temporary Relocation Program	Continue the Temporary Relocation Program, including providing emergency hotel vouchers for tenants who have been ordered to vacate their units by the City for code violations or safety reasons.	Ongoing	Housing Division
5.f: Address Threats to the HUD Section 8 Rental Subsidy Program	Continue the Tenants Assistance Rental Program to pay for a percentage of the MAR for Section 8 tenants whose HUD contracts were cancelled and apply as needed to HUD for Santa Monica to receive enhanced rental vouchers.	Ongoing	Housing Division
Goal 6.0: Eliminate discrimination in the rental or sale of housing on the basis of race, religion, national origin, sex, sexual preference, age, disability, family status, aids, or other such characteristics.			
6.a: Maintain Fair Housing Programs	Continue to implement fair housing programs. Educate landlords about discrimination and educate the real estate community on the necessity of ensuring that their practices meet the objectives of the fair housing laws.	Ongoing	City Attorneys Office
6.b: Provide Tenant/Landlord Mediation and Legal Services	Continue to support tenant/landlord mediation and legal services assistance.	Ongoing	City Attorneys Office; Rent Control Agency
Goal 7.0: Promote quality housing and neighborhoods.			
7.a: Provide a Residential Neighborhood Safety Program	Continue to offer neighborhood safety programs in cooperation with the Police Department.	Ongoing	Police Department (lead); Human Services Division; Housing Division
7.b: Maintain Energy and Water Conservation Programs	Continue to monitor energy and water usage in the city and investigate other appropriate programs to conserve these scarce natural resources. The City has a goal to reduce residential and commercial water use 20 percent by 2010 and reduce the overall energy usage in the City.	Reduce residential and commercial water use by 20 percent by 2010	Environmental Programs Division

Summary of Housing Programs for the 2008-2014 Housing Element

OBJECTIVE	PROGRAM	TIMEFRAME	AGENCY
7.c: Facilitate Sustainable Housing Development	Continue to develop environmentally sustainable buildings in Santa Monica. The City's goal as stated in the SCP is to certify all new buildings eligible for LEED certification which are 10,000 square feet or larger, by 2010. At a minimum, 20 percent should attain LEED Silver, 10 percent Gold, and 2 percent Platinum certification, with the remainder categorized simply as "Certified". Further, 50 percent of new buildings smaller than 10,000 square feet should obtain at least LEED certification or its equivalent by 2010. This target includes all municipal construction.	2010	City Planning Division (lead); Building and Safety, Environmental and Public Works Management
7.d: Maintain an Office Development Mitigation Program	Continue implementation of the Office Mitigation Program.	Ongoing	City Planning Division (lead); Housing Division; Community and Cultural Services Department
7.e: Monitor Rate of Development Activity in Multi-family Residential Districts	Continue to monitor the rate of development activity in multifamily residential districts. Report on an annual basis the number of planning applications granted for new housing construction.	Ongoing	City Planning Division
Goal 8.0: Promote the participation of citizens, community groups, and governmental agencies in housing and community development activities.			
8.a: Maintain a Citizen Notification Program	Continue to publicize development and policy proposals to all interested parties through the use of noticing, the radio, cable TV, and the City's webpage.	Ongoing	City Planning Division
8.b: Conduct Housing Element Review	Implement identified housing element programs within the time frames identified. Annually review grant-funded programs and redevelopment set-aside programs.	Ongoing	City Planning Division (lead); Housing Division.
A full list of programs is provided in Chapter 2 of the Draft Housing Element.			

9. Surrounding land uses and setting:

Santa Monica is one of the most densely populated urban areas in California. Consisting of 8.3 square miles, the Department of Finance estimated that the community had a population of approximately 91,124 residents in 2007.

Most land in Santa Monica was developed by the mid-1960s. Since that time growth has resulted principally from recycling lower intensity land uses to higher density uses. In recent years, the City has also experienced significant residential development in its commercial zones. Reflecting the high proportion of multi-family units, Santa Monica has one of the highest proportions of rental households in Los Angeles County. Approximately 70 percent of all households rented their homes, while 30 percent of households owned the unit they lived in. The highest concentration of owner-occupied housing is located north of Wilshire Boulevard, and the highest concentration of renter-occupied housing is located east of Lincoln Boulevard and along the Pico Boulevard Corridor.¹

In terms of urban form, Santa Monica's neighborhoods are largely marked by their variety of designs, rather than by any dominant style. Residential buildings in Santa Monica tend to be a little older than those throughout California, with around half of the city's residential buildings constructed prior to 1960. Multi-family developments of more than five units comprised the majority of the homes in the community (65 percent) followed by single-family attached and detached homes (23 percent), and smaller multi-family complexes of two to four units (11 percent). Mobile homes comprise less than 1 percent of all Santa Monica residences.²

High land values have also increased pressures on redeveloping the city's industrial corridor due to the value and age of buildings located on large sites. The planned extension of the Expo light rail line in the area will change the area's dynamics and offer opportunities for transit-oriented development within the planning period. This could provide an opportunity to establish land uses that promote a more inclusive city, as well as increased housing opportunities for Santa Monica workers who do not currently live in Santa Monica. The Housing Element covers the Regional Housing Needs Allocation (RHNA) period from January 1, 2006 through June 30, 2014, which includes the City's fair share of regional housing need of (662) units in the following income categories: very low income (164); low income (107); moderate income (114) and above moderate income (277). The City has substantially achieved the RHNA requirement through infill development projects.

To address housing issues, the City has focused efforts on providing new affordable housing through construction, acquisition and rehabilitation for families, seniors, homeless and special needs households, providing rental assistance, offering rehabilitation assistance for owner and renter households, a range of social service assistance for residents and homeless individuals.

10. Other public agencies whose approval is required:

Prior to the City Council review, the Planning Commission will review the project and forward recommendations to the City Council. Other appropriate City agencies may also review the project and make recommendations to the City Council.

Housing element law requires the Department of Housing and Community Development (HCD) to review local housing elements for compliance with State law and to report its written findings to the local government. The Housing Element will be submitted to the California State Department of Housing and Community Development for certification.

¹ 2000 Census data.

² California Department of Finance, January 2007.

I. LEGAL AUTHORITY

This Initial Study/Neighborhood Impact Statement and Negative Declaration (IS/ND) for the proposed 2008-2014 Housing Element, referred to as the proposed project or Housing Element, has been prepared in accordance with the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15063 (c) lists the following purposes of an Initial Study:

- 1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.
- 2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.
- 3) Assist in the preparation of an EIR, if one is required.
- 4) Facilitate environmental assessment early in the design of a project.
- 5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment.
- 6) Eliminate unnecessary EIRs.
- 7) Determine whether a previously prepared EIR could be used with the project.

According to Section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration) of Article 6 (Negative Declaration Process) of the CEQA Guidelines:

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- b) The initial study identifies potentially significant effects, but:
 - 1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - 2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

The City of Santa Monica Planning and Community Development Department has prepared an Initial Study and Neighborhood Impact Statement to determine the level of environmental review necessary for the proposed Housing Element. Based on the analysis in the Initial Study, it has been determined that all project-related environmental impacts are less-than-significant; a Negative Declaration will meet the requirements of CEQA.

II. PUBLIC REVIEW

In accordance with CEQA and the State CEQA Guidelines, a 30-day public review period for this IS/ND commenced on July 18, 2008 and will conclude on August 18, 2008. The Draft IS/ND has specifically been distributed to interested or involved public agencies, organizations, and private individuals for review. In addition, the Draft IS/ND is available for general public review at:

City of Santa Monica
Planning & Community Development
Department
1685 Main Street, Room 212
Santa Monica, CA 90401

Santa Monica Public Library
1343 6th Street
Santa Monica CA 90401
(310) 4458-8600
Hours: 10 am – 9 pm, Monday-Thursday
10 am – 5:30 pm, Friday and Saturday
1 pm – 5 pm, Sunday

During the public review period, the public will have an opportunity to provide written comments on the information contained within this Draft IS/ND. The public comments on the Draft IS/ND and responses to public comments will be incorporated into the Final IS/ND. The City's Planning Commission will use the Final IS/ND for all environmental decisions related to this project.

In reviewing the Draft IS/ND, affected public agencies and interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential project impacts on the environment, and ways in which the significant effects of the project are proposed to be avoided or mitigated. Comments on the Draft IS/ND should be submitted in writing prior to the end of the 30-day public review period and must be postmarked by August 18, 2008. Please submit written comments to:

Elizabeth Bar-El, AICP, Senior Planner
City of Santa Monica Planning and Community Development Department
1685 Main Street, Room 212
Santa Monica CA 90401
(310) 458-8341

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Energy and Climate Change | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Construction Effects | <input type="checkbox"/> Land Use | <input type="checkbox"/> Shade and shadows |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Transportation and Traffic |
| <input type="checkbox"/> Economic and Social Impacts | <input type="checkbox"/> Neighborhood Effects | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	<input checked="" type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input type="checkbox"/>
I find that the proposed project MAY have a “potentially significant impact” or “less than significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>

Elizabeth Bar-El, AICP, Senior Planner

July 16, 2008

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL ISSUES

I. AESTHETICS

Would the project:

(a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Scenic vistas are typically categorized as either panoramic views (visual access to a large geographic area) or focal views (visual access to a particular object, scene, setting, or feature of interest. For example, uninterrupted views of the Pacific Ocean may be considered a panoramic scenic vista. None of the housing programs or actions associated with adoption and implementation of the Housing Element would change any City policies or regulations related to building height, urban design, tree preservation or planting, or exterior lighting. Future residential development would occur as infill, as the City is built out, located within commercial areas or existing residential neighborhoods. Any land use changes that could result in impacts to scenic vistas will be addressed in the LUCE EIR, and project-specific CEQA analysis would be required for all future development. Adoption and implementation of the Housing Element would result in no impact on scenic vistas.

(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Currently, there are no official State scenic highways within the City boundaries. State Route 1 (Pacific Coast Highway) is an eligible state scenic highway, although it is not officially designated as such.³ However, the City of Santa Monica has identified several scenic corridors, including: 1) Santa Monica Freeway within the Coastal Zone; 2) Ocean Avenue from the north Coastal Zone boundary to Barnard Way; 3) Pacific Coast Highway (Route 1) within the City limits; 4) Barnard Way from Ocean Avenue to south City boundary; 5) Wilshire Boulevard from the Coastal Zone boundary to Ocean Avenue; and 6) Santa Monica Mall.⁴ Projects that would impede visual access along these routes may result in potential impacts to scenic resources. As future development projects are implemented, project-specific CEQA analysis would be required to determine whether any adverse impacts to scenic resources would occur. In addition, any land use changes that could adversely affect scenic resources that are proposed in the LUCE Update will be analyzed in the LUCE EIR.

The proposed project does not include changes to development standards that might affect these corridors. Consequently, the Housing Element would not substantially damage scenic resources within a State or locally designated scenic highway or corridor. Therefore, adoption and implementation of the Housing Element would result in no impact to scenic resources.

³ Caltrans, State Scenic Highway Program, website: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed April 18, 2008.

⁴ City of Santa Monica, Local Coastal Program, Map 13, 1992

(c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City is currently an urban environment that is fully built out, and the existing visual development pattern is already established. The proposed document does not result in any change to the City’s existing policies, procedures, and regulations, including architectural review and landscaping requirements to ensure that any proposed residential project does not substantially degrade the existing visual character or quality of a site and its surroundings. Although future development that would be permitted under the Housing Element may alter the visual character of an existing site within the City, the future design and construction of new residential uses would be compatible in scale, design, character, and quality to existing uses because of these policies, procedures, and regulations. Consequently, adoption and implementation of the Housing Element would not substantially degrade the existing visual character or quality of the City. There is no impact.

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City has a range of existing policies, procedures, and regulations to ensure that any proposed residential project does not create a new source of substantial light or glare. The City reviews all development plans, including zone clearance, site design, landscaping, architectural design, and building plan check, to ensure conformance with development standards and policies established in the General Plan and Municipal Code. Adoption and implementation of the Housing Element would not result in any specific developments that have not already been permitted under the City’s Land Use Element. The Housing Element would not create any new sources of light or glare that would adversely affect day or nighttime views in areas of the City. There would be no impact.

II. AGRICULTURE RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The City is fully developed and urbanized. There are no prime agricultural lands within the City boundaries, and excepting community gardens, there are no sites within the City that are currently used for agricultural

purposes. The City is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁵ Therefore, conversion of farmland to non-agricultural uses would not occur. There would be no impacts.

III. AIR QUALITY

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

(a) Conflict with or obstruct implementation of the applicable air quality plan?

Discussion

The City is located within the South Coast Air Basin, which is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). This area has some of the highest concentrations of air pollutants in the nation and has been classified as a nonattainment area for ozone and fine particulate matter (PM₁₀) by the federal government and the State of California. A project is deemed inconsistent with air quality plans if it results in population and/or employment growth that exceeds growth estimates in the applicable air quality plan. The new Housing Element continues to encourage residential development, particularly affordable housing, and could result in some population growth. However, no residential development would occur under the Housing Element that was not permitted in the previous Housing Element and analyzed in the previous environmental analysis conducted for that process. The Housing Element addresses the RHNA requirements for 2008-2014 and the proposed LUCE further addresses the long-term population increase in the City for the next 20 years. Future developments would entail grading and construction activities that could require a significant number of new vehicle trips, which could result in the exceedance of the SCAQMD significance thresholds for one or more criteria pollutants. In addition, the increase in vehicular traffic associated with the operation of new developments in the City may also cause potentially significant impacts to carbon monoxide (CO) concentrations along congested streets and at congested intersections. While this could potentially impact air quality, each new development or renovation project is subject to its own CEQA process where the project-specific impacts associated with air quality will be analyzed. The proposed Housing Element would not result in housing not already permitted under the Land Use Element of the General Plan. Rather, the proposed Housing Element continues existing policies and provides a framework for addressing the City’s future housing needs. Therefore, no impacts are anticipated.

(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Discussion

The Housing Element would generally continue existing housing policies and would not introduce new development in the City (long-range policies will be addressed in the LUCE update). Future development permitted under the Housing Element would generate air pollutants as a result of construction and operation-related emissions which could violate air quality standards. Construction emissions are generated by construction equipment and from dust stirred up during construction activity, and may result in significant, temporary, short-term impacts to air quality. The SCAQMD has established standards for air quality constituents generated by construction and by operational activities for such pollutants as ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and particulate matter (PM₁₀).

⁵ California Department of Conservation, 2008, Important Farmland in California Map retrieved from http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp2004_11_17.pdf on Mach 18.

Housing allowed under the proposed Housing Element continues the same programs as the previous Housing Element and does not exceed the level already permitted in the City’s Land Use Element. Any changes proposed in the LUCE will be analyzed in the LUCE EIR. Each new development or renovation project would be subject to its own CEQA process where the project-specific impacts associated with air quality would be properly analyzed. Therefore, implementation of the Housing Element would result in a less-than-significant impact.

(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The new Housing Element would continue existing housing policies and would not introduce new development in the City. Housing allowed under the Housing Element would not exceed the level already permitted in the City’s Land Use Element. Any changes proposed in the LUCE Update that affect housing will be analyzed in the LUCE EIR. Each new development or renovation project would be subject to its own CEQA process where the project-specific impacts associated with air quality would be analyzed. Therefore, adoption and implementation of the Housing Element would result in a less-than-significant impact.

(d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large.⁶ Examples of such receptors are hospitals, nursing homes, child care centers, and schools. The new Housing Element encourages green building practices and development that would reduce vehicle miles traveled and help balance the air quality impacts of additional housing development. Housing allowed under the Housing Element does not exceed the level already permitted in the City’s Land Use Element. Any changes proposed in the LUCE Update will be analyzed in the LUCE EIR. Each new development or renovation project would be subject to its own CEQA process where project-specific impacts associated with air quality would be analyzed. This impact would, therefore, be less than significant.

(e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The 2008-2014 Housing Element would continue existing housing policies and would not introduce new development in the City other than as already allowed under the current Land Use Element. The Housing Element provides a framework to address future housing demands. Each new development or renovation project would be subject to its own CEQA process where project-specific impacts associated with air quality would be properly analyzed. Therefore, the proposed Housing Element would not result in any impacts.

⁶ South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, pg. 5-1

IV. BIOLOGICAL RESOURCES

Would the project:

(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Santa Monica is fully urbanized and has few natural open space areas, with the exception of parks. Except for the coastal bluffs and the beach, there are no wetlands, wildlife corridors, or other areas within the City that could support native plant and animal coastal communities. The only relatively undisturbed area within the City is a narrow strip of coastal bluff vegetation. There are three sensitive terrestrial plant species that could occur in the City, including: 1) Ventura marsh milk vetch found in coastal salt marshes, usually within the high tide level; 2) many-stemmed dudleya found thin and shallow soils on rocky outcrops; and 3) Gambel’s yellow cress found in freshwater and brackish marshes, at the margin of lakes, and along streams right at sea level.⁷ However, the lack of large-scale contiguous native habitats and the ease of public access to the shoreline have resulted in little opportunity for these or any other sensitive plant and animal species to remain in the City of Santa Monica. The Land Use Element does not allow for development on the bluffs or beach, and development under the Housing Element thus would not result in a substantial adverse impact on any candidate, sensitive, or special-status species, riparian habitat, or sensitive natural community.

There is the potential for birds protected under the *Migratory Birds Treaty Act* (MBTA) to nest in the numerous trees within the City. These trees are protected by the City’s Tree Ordinance. Each new development or renovation project that could be permitted under the Housing Element would be subject to its own CEQA process where the project specific related impacts associated with sensitive species would be properly analyzed. Furthermore, mitigation measures would require surveys for MBTA-protected species, which would include impact-avoidance measures to ensure that the substantial loss of these species will not occur. Such mitigation measures would ensure the protection of migratory bird species/habitat, through focused surveys, agency consultation, and off-site habitat conservation and/or enhancement. As there are no proposed policy changes that would affect habitats and migratory patterns, a less-than-significant impact would occur.

(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Aerial Atlas of Los Angeles County, 1991)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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There is no riparian habitat in the City; thus, no impact would occur. For a discussion regarding other sensitive habitat areas, see the discussion under item IV(a).

⁷ City of Santa Monica, 2005, Santa Monica Opportunities and Challenges, July , p. 3-107

(c) 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? (Aerial Atlas of Los Angeles County, 1991)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There are no federally protected wetlands within the City of Santa Monica. Therefore, there would be no impact.

(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City of Santa Monica is an urban, built environment that does not contain any wildlife corridors. Future developments associated with the continuing policies reflected in the 2008-2014 Housing Element would occur within a built-out, urban environment. Future development projects within the City are not anticipated to interfere with the movement of any native resident or migratory fish or wildlife species, with migratory wildlife corridors, or impede the use of native wildlife nursery sites. No impact would occur.

(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (City of Santa Monica Tree Ordinance, 2003)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The Housing Element does not propose any policies that would conflict with local policies and ordinances protecting biological resources, including the City’s Tree Protection Ordinance (Chapter 7.40 of the City’s Municipal Code). Retention of mature trees is encouraged wherever possible. As such, there would be no impact.

(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (U.S. Fish and Wildlife Service, 1991)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There are no Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional, or state habitat conservation plans that are applicable to the City of Santa Monica. No impact would occur.

V. CONSTRUCTION EFFECTS

(a) Would the project have considerable construction-period impacts due to the scope, or location of construction activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The Housing Element continues existing policies and provides a policy framework to address the City’s future housing needs. There are no specific development projects proposed as part of the Housing Element. Adoption

and implementation of the Housing Element would not directly result in any physical alterations. Construction impacts are analyzed on a project-specific basis, and the CEQA review required for any future land use changes that could result in construction-period impacts would be addressed in project-specific environmental documents. There would be no impact from adoption and implementation of the Housing Element.

VI. CULTURAL RESOURCES

Would the project:

(a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There are numerous buildings of significance within the City. These include buildings of historic or cultural value (representing a significant contribution to the City’s history or identity) that may merit special recognition, treatment, or preservation. Buildings of cultural value within the City consist of residential and commercial structures, religious institutions, schools, landscape features and bridges, and library resources. The City has long supported historic preservation, and implements local programs to facilitate the preservation of historic structures based on the policies of the City’s Historic Preservation Element. The City will continue to implement these programs and policies to protect historic resources. The Housing Element does not include specific development projects, and instead, only provides a framework for the City’s anticipated future housing demand. The provision of such a framework to guide population growth in the City would not result in any physical changes to existing structures. Consequently, the Housing Element would not cause a substantial adverse change in the significance of a historical resource. Therefore, adoption and implementation of the Housing Element would result in no impact to historic resources.

(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

As discussed previously, the Housing Element does not include specific development projects, and instead, provides a framework for the City’s anticipated future housing demand. The provision of such a framework to guide population growth in the City would not result in any physical changes to existing structures or sites within the City. Consequently, the Housing Element would not cause a substantial adverse change in the significance of any cultural resources, including archeological resources, paleontological resources, and human remains. Therefore, adoption and implementation of the Housing Element would result in no impact to these resources.

VII. ECONOMIC AND SOCIAL IMPACTS

(a) Does the project have economic or social effects which would result in additional physical changes (e.g. if a new shopping center located away from a downtown shopping area would take business away from the downtown and thereby cause business closures and eventual physical deterioration of the downtown)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The Housing Element provides a framework to guide future City housing needs and continues existing policies. Adoption and implementation of the Housing Element would not result in any direct physical alterations to existing structures or sites in the City. However, residential development that would be permitted under the proposed project could increase economic and social activity within the City over time as new specific developments are proposed. Proposed Housing Element policies would facilitate housing in targeted areas as part of the LUCE Update. These potential new housing areas include the City’s major corridors and locations near transit stations. Any economic and social impacts of these potential land use changes will be addressed in the LUCE EIR. Therefore, these impacts are considered less than significant.

VIII. ENERGY AND CLIMATE CHANGE

(a) Would the project encourage the wasteful or inefficient use of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Require or result in the construction of new energy production and/or transmission facilities or expansion of existing facilities, the construction of which could cause significant environmental effects have considerable construction-period impacts due to the scope, or location of construction activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Would the project make a substantial contribution to greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The Housing Element does not increase the level of housing above that already permitted under the existing Land Use Element and 2000-2005 Housing Element. Infrastructure needs are based on projections and land uses included in a City’s General Plan; therefore, the infrastructure needs of future housing in the City have already been considered. The Housing Element would continue existing City policies, and any proposed changes to land use that could affect housing in the City would be analyzed in the LUCE EIR. Policies in the Housing Element promote the use of sustainable construction techniques and environmentally sensitive design for all housing, including compliance with all City energy and water conservation programs. The City offers numerous programs to reduce water and energy consumption for businesses and residents. In 2006 the City adopted the Community Energy Independence Initiative, which couples energy efficiency, solar installation and distributed generation throughout the community’s building infrastructure in an effort to become a ‘net zero energy’ community. Also, the City requires all new construction to exceed Title 24 of the *Uniform Building Code* regarding water and energy conservation by 10 percent.

In 2006, the California State Legislature adopted AB32, the *California Global Warming Solutions Act of 2006*, which focuses on reducing greenhouse gas emissions in California. Greenhouse gases, as defined under

AB 32, include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires the California Air Resources Board (ARB), the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to statewide levels in 1990 by 2020. In April 2007 ARB published a list of three discrete early action greenhouse gas emission reduction measures that can be implemented by 2010; however, these reduction measures include the requirement of low-carbon fuels, reduction of refrigerant losses from motor vehicle air conditioning maintenance and methane capture in municipal landfills, and therefore, are not applicable to a plan such as the Housing Element. The law further requires that such measures achieve the maximum technologically feasible and cost-effective reductions in greenhouse gases from sources or categories of sources to achieve the statewide greenhouse gas emissions limit for 2020.

As the proposed Housing Element does not include any specific development projects and continues existing housing policies, implementation of the project would not directly contribute to greenhouse gas emissions. Any land use changes that could affect greenhouse gas emissions will be analyzed in the LUCE EIR. Worth noting, however, is that the issue of greenhouse gases and global climate change is typically addressed on a cumulative level. An individual project contributes to a potentially significant impact by its incremental contribution to the cumulative increase in greenhouse gas emissions from all sources, which together can produce measurable impacts on global climate change. Dispersed development patterns, which require higher per capita vehicle miles traveled (VMT), can exacerbate the generation of greenhouse gases by requiring longer and more frequent vehicle trips. By contrast, compact development containing a mix of residential and nonresidential land uses provides opportunities for residents to live and work within close proximity, reducing VMT.

The City of Santa Monica has established a Sustainable City Plan indicator for greenhouse gas emissions as a total of citywide emissions. The City’s greenhouse gas emissions reduction targets include 30 percent reduction in green house gas emissions below 1990 levels by 2015 for municipal operations and a 15 percent in green house gas emissions below 1990 levels by 2015 city-wide. Current climate models are available to analyze climate change on a global scale and to measure greenhouse gas emissions at the local scale. There are established standards for measuring and reporting a community’s greenhouse gas emissions and the methodology for calculating greenhouse gas emissions is standardized and widely used. The City has calculated its municipal and community-wide greenhouse gas emissions for 1990, 1995, and 2000. The City of Santa Monica is a founding member of the California Climate Action Registry and beginning in June 2008, will measure, verify, and publicly report GHG emissions annually. Policies in the Housing Element encourage housing near transit and services that promote walkability, emphasize utilization of green building techniques, construction of low-income and workforce housing, and incorporate the proposed LUCE policies for new housing to be located adjacent to the City’s major corridors and transit locations. The Housing Element aims to reduce vehicle trips and encourage alternative transportation opportunities to reduce greenhouse gas emissions resulting from vehicle trips. The City also promotes the use of sustainable construction techniques and environmentally sensitive design for all housing to minimize greenhouse gas emissions from construction and operation activities. Therefore, because implementation of the Housing Element would be consistent with City’s other policy efforts to encourage increased energy efficiency and reduce greenhouse gas emission through land use design, this impact would be less than significant.

IX. GEOLOGY AND SOILS

Would the project:

(a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The City is not listed within an Alquist-Priolo Earthquake Zone.⁸ Therefore, no impact would occur.

(ii)	Strong seismic ground shaking? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

As with all development in Southern California, the City is located in a seismically active region and may be subject to the effects of ground shaking. The principal seismic hazard would result from strong ground shaking due to earthquakes produced by local faults, including the Santa Monica Fault, Hollywood Fault, or Newport-Inglewood-North Branch. The Santa Monica-Malibu Coast Fault extends in an east-west direction along the southern margins of the western Santa Monica Mountains and into Santa Monica Bay. A fault hazard zone has been established around this earthquake fault. This fault is capable of generating a maximum credible earthquake of 6.7.⁹ Moderate to severe groundshaking at any of the proximate faults could result in loss of life or damage to property due to damage or failure of structural and non-structural building components. However, as required by the *California Building Code* for the construction of new buildings and/or structures, specific engineering design and construction measures would be required to avoid potential adverse impacts to human life and property caused by seismically included groundshaking. Adoption of the 2008-2014 Housing Element maintains the programs of the previous Housing Element and would not result in development projects, but would allow the ongoing maintenance and construction of housing as is currently permitted by the City’s adopted Land Use Element. Future housing development pursuant to housing policies could involve excavation, grading, and building construction at individual sites throughout the community. Depending on the location of development, new units could be exposed to geotechnical and seismic hazards. The City reviews every housing development proposal to assess the potential for hazards and requires geotechnical reports if a development is proposed on an at-risk site. Such reports detail specific engineering and building techniques required by State and local building codes to avoid hazards, thus ensuring any impacts remain less than significant.

(iii)	Seismic-related ground failure, including liquefaction? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The City of Santa Monica General Plan identifies few areas within the City where liquefaction potential is evident. There are three liquefaction areas generally located within the City: (1) southwest portion of the City

⁸ State of California- Department of Conservation, California Geological Survey -Alquist-Priolo Earthquake Fault Zones, Retrieved from <http://www.consrv.ca.gov/cgs/rghm/ap/pages/affected.aspx> on Feb 19, 2008.

⁹ Maximum credible earthquake: the largest earthquake a fault is believed capable of generating. Page 1-37 of City of Santa Monica Safety Element.

from Adelaide Drive to approximately Marine Street; (2) southeast portion of the City from the Pacific Ocean to approximately 23rd Street; (3) northeast portion of the City, between Wilshire and Olympic Boulevards, and between 23rd Street to Centinela Avenue.¹⁰ As liquefaction of soils could be caused by strong vibratory motion from seismic events, the risk of this hazard would be prevalent throughout Southern California in liquefaction-prone areas.

The City is currently fully built out and the general area where liquefaction potential exists is developed with residential uses. Liquefaction potential does not necessarily limit development, as site-specific geotechnical studies would be required by the City to determine soil properties and specific potential for liquefaction in a specific area prior to development. Compliance with the standards set forth in the *California Building Code (CBC)* would require an assessment of this hazard and projects would be required to incorporate design measures into structures to mitigate this hazard. As noted, above, the City reviews every housing proposal to assess the potential for hazards and requires geotechnical reports if a development is proposed on an at-risk site. Such reports detail specific engineering and building techniques required by State and local building codes to avoid hazards. Additionally, because the liquefaction-prone areas are already developed with residential uses, it is unlikely that future infill opportunities would occur in these areas. Therefore, this impact is considered to be less than significant.

(iv) Landslides? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Please see (ii) and (iii), above. According to the City of Santa Monica Geologic Hazards Map, Ocean Avenue and Palisades Beach Road between Arizona Avenue and Santa Monica Boulevard is located in a high risk area for landslides.¹¹ Other areas of elevation in the City include Sunset Park and Franklin Hill; the remainder of the City is relatively flat; therefore the absence of significant ground slopes makes the potential for landslides low. The regulations protecting the public from geo-seismic hazards such as landslides are contained in *California Code of Regulations*, Title 24, Part 2 (the CBC) and *California Public Resources Code*, Division 2, Chapter 7.8 (the *Seismic Hazards Mapping Act*). Both of these regulations apply to public buildings (and a large percentage of private buildings) intended for human occupancy. The CBC is based on the current *Uniform Building Code*, but contains Additions, Amendments, and Repeals that are specific to building conditions and structural requirements in the State of California. City and county codes are permitted to be more stringent than Title 24, but are required to be no less stringent. Chapter 16 of the CBC deals with General Design Requirements, including, but not limited to, regulations governing seismically resistant construction (Chapter 16, Division IV). Chapters 18 and A33 deal with excavations, foundations, retaining walls, and grading, including, but not limited to, requirements for seismically resistant design, foundation investigations, stable cut and fill slopes, and drainage and erosion control. The City of Santa Monica has adopted the 2001 CBC as the *City of Santa Monica Building Code*. Compliance with these regulations for new development would ensure that impacts are less than significant. The Housing Element adoption does not permit new development that is not already permitted by the City’s Land Use Element; therefore, no new impacts would occur.

(b) Result in substantial soil erosion or the loss of topsoil? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Although the City is fully urbanized, grading and excavation activities associated with development in the future may expose soils to short-term wind and water erosion. However, all construction activities associated with

¹⁰ City of Santa Monica Geologic Hazards Map, April 2001

¹¹ City of Santa Monica Geologic Hazards Map, April 2001

development permitted under the Housing Element would be required to comply with *California Building Code* Chapter 70 standards, which would ensure implementation of appropriate measures during grading activities to reduce soil erosion.

In addition, development permitted under the Housing Element would be subject to regional and local regulations pertaining to construction activities. Specifically, development that is greater than five acres in size would be required to comply with the provisions of the General Construction Activity Stormwater Permit adopted by the State Water Resources Control Board (SWRCB), which would require the employment of Best Management Practices (BMPs) to limit the extent of eroded materials from a construction site. All development that is between one and five acres would be required to comply with the provisions of the National Pollution Discharge Elimination System (NPDES) Phase II regulations concerning the discharge of eroded materials and pollutants from construction sites.

Adherence with Section 7.10.060 of the City’s Municipal Code would reduce erosion-related impacts to a less-than-significant level.

(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The adoption and implementation of the proposed Housing Element would not permit projects not already permitted by existing City policy. According to the City of Santa Monica General Plan Safety Element, Ocean Avenue and Palisades Beach Road between Arizona Avenue and Santa Monica Boulevard are located within a high-risk landslide area. However, as discussed above, compliance with the CBC would be required for all new development or redevelopment permitted under the Housing Element. The City of Santa Monica may be susceptible to subsidence from groundwater withdrawal for domestic uses as well as differential settlement of uncertified fills or landfills within the City. However, subsidence due to groundwater withdrawal has not been documented to date.¹² In addition, according to the City’s General Plan Safety Element, subsidence, especially near former clay pits, could occur. All new development permitted under the Housing Element would be required to comply with State and local regulations to minimize such risks. Impacts are considered less than significant.

(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The presence of highly expansive soils as identified by the City of Santa Monica Safety Element (1995) may result in potential impacts to future buildings and other improvements allowed under the Housing Element. Surficial deposits in the City consist predominately of Pleistocene and Holocene age alluvial and beach deposits. As part of the construction permitting process, the City requires completed reports of soil conditions at the specific construction sites to identify potentially unsuitable soil conditions including liquefaction, subsidence, and collapse. The evaluations must be conducted by registered soil professionals, and measures to eliminate inappropriate soil conditions must be applied, depending on the soil conditions. The design of foundation

¹² City of Santa Monica General Plan Safety Element.

support must conform to the analysis and implementation criteria described in the City’s Building Code. Adherence to the City’s codes and policies as well as the guidelines set forth in the City’s *Guidelines for Geotechnical Reports*¹³ would ensure the maximum practicable protection available for users of buildings and infrastructure and their associated trenches, slopes, and foundations. Impacts are considered less than significant.

(e) 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? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City of Santa Monica is almost entirely built out, with established utility services. Future development in the City allowed under the Housing Element would be provided sanitary sewer service by the by the Utilities Division of the City’s Environmental and Public Works Management Department. No impact would occur.

X. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (City of Santa Monica Safety Element, 1990)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Construction and operation of future residential development may involve limited use, storage, transport, and/or generation of hazardous materials such as typical household-type cleaning products as well as maintenance products (e.g., paints, solvents, cleaning products), and grounds and landscape maintenance could also use a wide variety of commercial products formulated with hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides, although some of these are or may be banned in the future to comply with the City’s sustainability goals. Future residential development is not expected to introduce any unusual hazardous material. Compliance with local, State, and federal regulations would minimize risks associated with the routine transport, use, or disposal of hazardous materials. Adoption of the 2008-2014 Housing Element would not lead to any new activity that will routinely transport hazardous materials. Therefore, future residential development under the Housing Element would not result in any impacts.

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (City of Santa Monica Safety Element, 1990)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Due to the age of existing buildings throughout the City, the potential for encountering asbestos and lead-based paint during potential redevelopment or demolition activities exists. However, various regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos and lead have been adopted

¹³ Found at the City’s website: <http://santa-monica.org/planning/buildingsafety/SMGeotechGuidelines%20-%20July%202005%20final.pdf>

for demolition activities. These requirements include SCAQMD Rules and Regulations pertaining to asbestos abatement (including Rule 1403), Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from Title 8 of the *California Code of Regulations*, Part 61, Subpart M of the *Code of Federal Regulations* (pertaining to asbestos), and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

In California, asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the State Department of Health Services. Compliance with these regulations would ensure that construction workers and the general public would not be exposed to asbestos and lead during potential demolition activities. The proposed Housing Element is not expected to introduce any new activity or unusual hazardous materials that would result in a reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Future residential development in neighborhoods zoned exclusively for residential uses would not expose residents to hazardous materials from typical household chemicals and solvents. In areas zoned for mixed use, new units may be constructed in close proximity to commercial businesses that store or use hazardous materials. Through site plan review and building permit review processes, the city Fire Department reviews projects to ensure that adequate construction approaches and other safeguards are incorporated into a project to protect residential uses from any potential hazard. Therefore, adoption and implementation of the 2008-2014 Housing Element would result in less-than-significant impacts associated with hazardous upset and accident conditions.

(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (City of Santa Monica Safety Element, 1990)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Schools located within the City include: Franklin Elementary, McKinley Elementary, Edison Elementary, Grant Elementary, Will Rogers Elementary, Roosevelt Elementary, John Muir Elementary, Lincoln Middle School, John Adams Middle School, Olympic High School, and Santa Monica High School, as well as several private schools. As noted in subsection (a), above, adoption of the 2008-2014 Housing Element would not lead to any new activity that will routinely transport hazardous materials or handle acutely hazardous materials. Routine household chemicals that would be utilized in future residential development would be in small amounts and would not represent a significant hazard. Residential development would not emit hazardous emissions; any construction impacts to air quality that could involve hazardous emissions within one-quarter mile of an existing or proposed school (diesel particular emissions) are addressed in Air Quality. Therefore, there would be no impact.

(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Leaking Underground Storage Tank Information System, 1999)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

New residential developments, as permitted under the Housing Element, would be subject to a site-specific CEQA review process in order to assess whether a project site is listed as a hazardous materials site pursuant to Government Code Section 65962.5. If a development site is identified as such, appropriate remediation action

¹⁴ City of Santa Monica, Emergency Preparedness in Santa Monica. Accessed online April 28, 2006: <http://santamonicafire.org/disaster/>

would be required prior to the commencement of construction activities. All development, including that permitted under the Housing Element, is required to comply with existing federal, state, and local regulations pertaining to hazardous materials sites. Therefore, the implementation of the Housing Element would result in a less-than-significant impact.

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The Santa Monica Municipal Airport is governed by the Santa Monica Airport Code and the Los Angeles Regional Planning Commission/ALUC guidelines. The ALUC document is intended to provide for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations and to protect the municipal environment from the effects of aircraft noise. Future land use development, including that permitted under the Housing Element, would be judged compatible with the airport based on criteria set forth in the ALUC Procedural Policies contained in the Airport Land Use Compatibility document. Therefore, adherence to the ALUC policies would ensure that future residential development would not result in a safety hazard for people residing or working in the vicinity. Adoption of this element will not result in any changes to the current conditions. This impact would be less than significant.

(f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There is no private airstrip within the City. No impact would occur.

(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (City of Santa Monica Safety Element, 1990)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City of Santa Monica Local Hazard Mitigation Plan¹⁴ details emergency response procedures for the City and includes preventative policies. Construction and operation activities related to future residential development would comply with all relevant policies in the plan, as deemed applicable. The provision of new housing opportunities throughout the City, as outlined in the policies of the Housing Element would not impair or interfere with implementation of the City’s Emergency Response Plan, and no impacts would occur.

(h) 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? (Aerial Atlas of Los Angeles County, 1991)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City of Santa Monica is highly urbanized and is not located adjacent to wildland areas and therefore, future residential developments would not be exposed to substantial wildland fire risks. No impact would occur.

XI. HYDROLOGY AND WATER QUALITY

Would the project:

(a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The 2008-2014 Housing Element would continue existing housing policies and would not introduce new development in the City other than as already allowed under the current Land Use Element. The City is located in an area that includes existing and adequate storm drainage facilities. The City has stringent code requirements to reduce stormwater runoff. New residential development requires drainage into on-site filtration pits, in addition to minimum levels of permeable surface, and the Housing Element continues these policies. Residential landscaping and irrigation requirements would also apply. Additionally, all new development would be subject to regional regulations pertaining to construction activities. Specifically, development on 1 acre or more of land (or less than 1 acre if part of an overall plan of common development) would be required to comply with the provisions of the General Construction Activity Stormwater Permit adopted by the SWRCB. Under this permit, applicants are required to prepare, retain, and implement at the construction site a Stormwater Pollution Prevention Plan (SWPPP). This permit would require the employment of Best Management Practices (BMPs) to limit the extent of eroded materials from discharging into the drainage system and affecting water quality.

Although the operation of development projects allowed under Housing Element could also impact water quality standards via stormwater runoff, which could carry small amounts of oil, grease, trash, and metals into waterways, they would be subject to the Los Angeles Regional Water Quality Control Board’s (LARWQCB) NPDES permit system. Under this permit system, all existing and future municipal and industrial discharges to surface waters within the City would be subject to regulations. Specifically, these permits contain limits on the amount of pollutants that could be contained in each facility’s discharge.

Developments within the City would also be subject to the provisions in the City’s Urban Runoff Reduction ordinance (SMMC 7.10.060). This ordinance requires the project to submit an Urban Runoff Mitigation Plan¹⁵ specifying measures for reduction of runoff-related wastes. Under the provisions of this chapter, any discharge that would result in or contribute to a violation of the City’s NPDES permit, either separately considered or when combined with other discharges, is prohibited. As such, with adherence to these requirements, there would be no violation of any water quality standards or waste discharge requirements, and there would be no impact.

(b) Substantially deplete groundwater supplies or interfere substantially 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 that would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Approximately 88 percent of the City’s 13.4 million gallon per day potable water supply is purchased from the Metropolitan Water District (MWD) of Southern California due to MTBE contamination of the City’s wells. (It

¹⁵ City of Santa Monica Green Building Program, “Performance Ordinances in Santa Monica,” Accessed online April 28, 2006: <http://www.greenbuildings.santa-monica.org/introduction/introperformanceordinance.html>

should be noted that the City is progressing with remediation efforts that will return the City to its own water supply, with less dependence on imported water.) The remaining 12 percent of the water supply is provided by local groundwater from the Charnock and Coastal Sub-Basins of the Santa Monica groundwater basin.¹⁶ The majority of the City is developed and covered with impervious surfaces; there is little opportunity for groundwater recharge activities. However, by harvesting rainwater as per Section 7.10 Urban Runoff Pollution, increased infiltration and groundwater recharge could occur. Future development within the City would not substantially increase the amount of impermeable surfaces in the area. In fact, as explained in Section XI(a), new development must meet stringent permeability requirements. Thus, the proposed Housing Element would not result in impacts associated with the interference of groundwater recharge.

(c) 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 that would result in substantial erosion or siltation on or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The City is not located in the immediate vicinity of a stream or river. Additionally, the City is built out, future development within the City would be infill development that would not substantially increase the amount of impermeable surfaces in the area. As noted, above, City policies aim to increase the extent of permeable surfaces as properties redevelop. Therefore, the Housing Element would have no impact on issues related to alterations of drainage patterns.

(d) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Impacts related to stormwater drainage systems would be less than significant. The Santa Monica Urban Runoff Recycling Facility (SMURFF) treats dry weather runoff through conventional and advanced treatment processes to remove urban pollutants from the City’s two largest urban water flow areas (representing 90 percent of all City flows), recycling the polluted water so it can be used for beneficial purposes. SMURFF can treat 500,000 gallons per day, which is about 4 percent of the City’s daily water use. Stringent City requirements require that new residential development provide drainage into on-site filtration pits, in addition to minimum levels of permeable surface. The Housing Element continues current policies and would not encourage development that would create or contribute large amounts of runoff. Therefore, issues related to increased runoff are considered less than significant.

(e) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

Refer to the discussion under XI(a). All new development would be subject to regional and local regulations pertaining to construction activities to mitigate potential impacts to water quality. In particular, future developments permitted under the Housing Element would be required to comply with the provisions of the General Construction Activity Stormwater Permit adopted by the SWRCB as well as the NPDES permit system. In addition, future developments would be subject to the provisions in the City’s Urban Runoff Reduction

¹⁶ City of Santa Monica. Sustainable City Progress Report, November 2007. 2006 Estimates. http://www.smgov.net/EPD/scpr/ResourceConservation/RC2_WaterUse.htm. Accessed April 7, 2008.

ordinance. As such, potential impacts of future development on water quality standards or waste discharge requirements are considered to be less than significant.

(f) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (City of Santa Monica Safety Element, 1995; Houston, J.R. and A.W. Garcia, 1974)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(g) Place within a 100-year flood hazard area structures that would impede or redirect flood flows? (City of Santa Monica Safety Element, 1995; Houston, J.R. and A.W. Garcia, 1974)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(h) 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? (City of Santa Monica Safety Element, 1995; Houston, J.R. and A.W. Garcia, 1974)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The proposed Housing Element does not result in changes that would cause housing to be placed in areas subject to flooding. The City of Santa Monica is not located within a 100-year flood plain. There are no natural floodplains remaining within the City, and the entire City is contained within Zone C (FEMA Map No. 060159). Small portions of the City lie within the inundation limits of the Stone Canyon and Riviera Reservoirs. Inundation from failure of the Stone Canyon Reservoir could impact approximately 5,000 Santa Monica residents in the eastern portion of the City. The southern limits of the inundation area of the Riviera Reservoir do not contain structures that would be affected by dam failure. The City also owns three 5-million-gallon reservoirs – Arcadia, Mount Olivette, and San Vicente. The Mount Olivette Reservoir tanks were constructed in 1949 and, while no inundation studies are currently available, this older tank may pose a localized hazard due to seiching or overtopping during a seismic event. Following annual safety inspections by the State, operational and maintenance recommendations are initiated by the dam owners in order to remain in compliance with State safety standards. All State and federal dams upstream from Santa Monica are in compliance with safety standards. The *Emergency Services Act* (Government Code Section 8550) recognizes the State’s responsibility for mitigating even unlikely hazards, especially the catastrophic potential for inundation. Most dam failures are not expected to occur instantaneously, if at all, during a major earthquake (Toppozada, et al., 1988).¹⁷ In addition, the City of Los Angeles Department of Water and Power, who manages the Stone Canyon Dam, maintains a Disaster Plan that results in an increase of warning time and includes provisions for emergency drawdown of water to reduce reservoir levels and telemetered early warning signals to alert dam personnel of significant increases in seepage, a critical precursor that can undermine the foundation and threaten the stability of the dam. Because of State regulations that ensure mitigation of hazards from dam failure, this impact would be less than significant.

(i) Inundation by seiche, tsunami, or mudflow? (City of Santa Monica Safety Element, 1995)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The proposed Housing Element does not result in changes that would cause housing to be placed in areas subject to inundation by seiche, tsunami, or mudflow. The three reservoirs owned by the City pose potential inundation hazards resulting from seiche due to earthquakes. The low-lying coastal areas of the City are susceptible to tsunami inundation resulting from large distant earthquakes or an earthquake or landslide within Santa Monica

¹⁷ Toppozada, T.R., Real, C.R., and Parke, D.L., 1988, Earthquake history of California, in Lee, W.H.K., Meyers, Herbert, and Shimazaki, Kunihiko, eds., Historical seismograms and earthquakes of the world: San Diego, Calif., Academic Press, p. 267-275.

Bay. Historic tsunami inundation data indicate run-up in southern California has varied from approximately 1 to 6 feet; run-up in Santa Monica resulting from the 1964 Alaska earthquake was approximately 6 feet. Debris and mud flows are rivers of rock, earth, and other debris saturated with water. They develop when water rapidly accumulates in the ground, during heavy rainfall, changing the earth into a flowing river of mud or “slurry.” Land use zoning, professional inspections, and proper design can minimize many landslide, mudflow, and debris flow problems. Because all new development and redevelopment is required to conform to the requirements of the CBC, risks from mudflows would be minimized.

The City has a Local Emergency Management System Plan, which is part of the State of California’s statewide emergency management system. The City’s plan meets all the requirements of the state system. Furthermore, the City’s Emergency Operations Center (EOC) team comprises representatives from all City departments and local agencies. The EOC is responsible for disaster planning and response in the City, and meets regularly to train, practice and discuss the City’s disaster preparedness. The EOC team also undergoes annual disaster drills. Finally, the City has implemented a Local Hazard Mitigation Plan, which addresses potential natural hazards that could impact the City. The Plan is in compliance with federal regulations regarding disaster mitigation planning.

While the City is exposed to a risk from tsunami, seiche, and mudflows, the Local Emergency Management System Plan and Local Hazard Mitigation Plan, as well as compliance with CBC regulations, would reduce these risks to the greatest extent feasible. Therefore, impacts would be considered less than significant.

XII. LAND USE AND PLANNING

Would the project:

(a) Physically divide an established community?

Discussion

The proposed Housing Element continues previous Housing Element policies that provide the policy framework for residential development anticipated over the next seven years throughout the City. The proposed Housing Element includes policies to be consistent with the proposed LUCE, which may encourage future development to occur within transit-oriented areas in order to maintain and conserve the City’s existing residential neighborhoods. The proposed project, in conjunction with any adopted LUCE policies, would guide housing and population growth within the City to include mixed-income levels centered around sustainable land use policies to create a cohesive and well-developed community. As one of the principles of the proposed Housing Element is to ensure the continued maintenance and conservation of existing residential neighborhoods, project implementation would not physically divide an established community. No impact would occur.

(b) Conflict with any 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (City of Santa Monica Land Use Element)

Discussion

The Housing Element coincides with the City’s development of a new LUCE, affording the City an opportunity to closely examine and coordinate the issues of community growth, land use, housing, transportation, and community design. As a result, the Housing Element reflects the vision, goals, and principles for the City through the planning period of 2014 and beyond, in concert with the 20-year horizon of the proposed LUCE.

Implementation of the 2008-2014 Housing Element would ensure that the City is in compliance with the Regional Housing Needs Allocation (RHNA) period from January 1, 2006 through June 30, 2014. SCAG has assigned Santa Monica an allocation of 662 units for the 2008– 2014 planning period to meet the Regional Housing Needs Allocation (RHNA) requirement. The City would comply with the 2008–2014 RHNA requirements based on projects already under construction or in the process of receiving building permits. However, an additional 47 affordable units would be needed in the low–income category to satisfy the RHNA allocation within each income category; although it is noted that the very low income category has been exceeded by 36 units. Proposed policies promote affordable housing provision throughout the City. Policies 2.1, 2.2 and 2.5 incorporate assistance in housing for extremely low-, very low-, low- and moderate-income households and housing for the City’s workforce that earns above moderate income but unable to find affordable housing in the City. Policy 2.7 encourages affordable housing assistance for low income as well as the City’s workforce.

In addition, the proposed Housing Element complies with SB 2 which requires local jurisdictions to strengthen provisions for addressing the housing needs of the homeless, including identifying a zone or zones where emergency shelters are allowed as a permitted use without a conditional use permit. The City’s “Action Plan for Addressing Homelessness in Santa Monica,” adopted in March 2008, has made the reduction of street homelessness a high priority. Implementation of the Housing Element would ensure that the City continues to focus on addressing the housing needs of the vulnerable homeless population living on the streets of Santa Monica. Implementation of the Housing Element would continue to implement policies to address homeless housing assistance throughout the City. For example, policy 5.3 would encourage a regional fair share approach to providing housing opportunities and assistance to the homeless population in the City. Policy 5.4 would continue to match housing and supportive service resources to the needs of priority homeless populations: Santa Monica’s chronically homeless; those whose last permanent address was in Santa Monica; and vulnerable members of Santa Monica’s workforce. In addition, the Housing Element would continue to ensure that OP-2, Op-3, Op-4, R3, R4, BCD, RVC, CP, CM, C2, C3, C3-C, C4, C5, C6 and BSCD zoning categories allow homeless shelters to address homeless housing needs within the City. Therefore, there are no impacts.

(c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (SCAG, 1988)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There are no applicable Habitat Conservation Plans, Natural Conservation Community Plans, or other approved habitat conservation plans that are applicable to the City. No impact would occur.

XIII. MINERAL RESOURCES

Would the project:

(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The City of Santa Monica is currently fully developed and urbanized, and is not considered a regionally significant mineral resource area by the California Division of Mines and Geology (DMG). Limited, if any,

mineral resource extraction sites exist within the City, and any that do function actively would be zoned appropriately for such a use.^{18,19} Adoption and implementation of the proposed Housing Element would not result in the development of future housing development in areas that are functioning as mineral resource extraction sites; any proposed land use changes that could affect mineral resources would be addressed in the LUCE EIR. In addition, because the proposed project does not include specific development projects, adoption and implementation of the Housing Element would not result in the loss of availability of any mineral resource areas. Therefore, no impact would occur.

XIV. NEIGHBORHOOD EFFECTS

(a) Would the proposal have considerable effects on the project neighborhood?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There are no specific development projects proposed as part of the Housing Element; rather, the implementation of the proposed project would provide a policy framework for the City’s future housing demand. Implementation of the project alone would not result in any physical alterations. Subsequently, there would also not be any considerable effects on neighborhoods within the City. As noted, above, construction effects are project-specific and must be analyzed on that basis. Therefore, as future residential development is proposed throughout the City, project-specific CEQA review would analyze any potential adverse neighborhood effects. Therefore, there would be no impact from adoption and implementation of the Housing Element.

XV. NOISE

Would the project result in:

(a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (City of Santa Monica Noise Ordinance, SMMC Section 4.12, (rev. through May 2008))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (City of Santa Monica Noise Ordinance, SMMC Section 4.12, (rev. through May 2008))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (City of Santa Monica Noise Ordinance, SMMC Section 4.12, (rev. through May 2008))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? City of Santa Monica Noise Ordinance, SMMC Section 4.12, (rev. through May 2008))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

¹⁸ City of Santa Monica, 2008, Phone Conversation with Pete Friedrich of City Engineering Department, May 6.
¹⁹ City of Santa Monica, 2008, Phone Conversation with City Planning Department, May 6.

Implementation of the proposed Housing Element would provide a policy framework to address future housing demand and continues existing policies. Adoption and implementation of the Housing Element would not develop land uses not already permitted under the Land Use Element of the City’s General Plan and, would not, therefore, generate new sources of excessive noise that have not been previously considered. Future development projects in the City could have the potential to generate long-term and short-term noise through project operations and construction activities, respectively. Long-term operation of future housing projects would not result in any groundborne vibration or excessive groundborne noise, although construction activities may result in excessive groundborne vibration and excessive groundborne noise levels. As such, the construction of future residential development in the City may exceed permitted noise levels. However, the Noise Ordinance prohibits construction activities between 6 p.m. and 7 a.m. on weekdays and between 5 p.m. and 9 a.m. on Saturdays; no construction is allowed on Sundays or holidays. Further, subsection 4.12.110 provides additional restrictions for noise levels from construction activities. Operational noise associated with vehicular traffic, outdoor activities, and stationary mechanical equipment in new development could result in a permanent ambient increase in noise levels; however, because all new development or redevelopment would be required to comply with the City’s Noise Ordinance, increases associated with regular residential noise such as HVAC equipment, which requires screening, would not exceed City standards. In addition, each new development or renovation project would be subject to its own CEQA process where the project-specific impacts associated with noise levels would be analyzed. Therefore, implementation of the Housing Element would result in less-than-significant construction noise impacts and no substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (City of Santa Monica Noise Element, 1992)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The Santa Monica Municipal Airport is located on 3223 Donald Douglas Loop South in the City of Santa Monica. The airport, on average, handles 350 to 400 operations a day, which include 18,575 jets in 2007. There were 214 noise violations in 2007, down 9 percent from the previous year. The Santa Monica Municipal Airport is governed by the *Santa Monica Airport Code* and the Los Angeles Regional Planning Commission/ Airport Land Use Commission’s Airport Land Use Compatibility (ALUC) guidelines. This document is intended to provide for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations and to protect the municipal environment from the effects of aircraft noise. Potential land use development is to be judged compatible with the airport based on criteria set forth in the ALUC Procedural Policies contained in the Airport Land Use Compatibility document. Future residential development in proximity to the Santa Monica Airport associated with the Housing Element would be required to comply with building guidelines to be in compliance with FAR Part 77 regulations and local regulations. Therefore, the impact would be less than significant.

(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (City of Santa Monica Noise Element, 1992)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

There are no private airstrips located within the City. No impact would occur.

XVI. SHADE/SHADOWS

Would the project:

(a) Produce extensive shadows affecting adjacent uses or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The 2008-2014 Housing Element does not call for higher height limits than currently permitted in the Zoning Code. Should the City’s Land Use and Circulation Element allow housing with increased height, these impacts will be analyzed in the LUCE EIR. Future residential development that might shade neighboring land uses for more than a few hours at a time would be considered on a project-specific level, as shade/shadow impacts are also dependent on the existence of any directly adjacent sensitive uses. Therefore, the proposed project has no impacts.

XVII. POPULATION AND HOUSING

Would the project:

(a) 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

The 2008-2014 Housing Element is an update of the 2000–2005 Element, and consists of new technical data, revised goals, updated policies, and a series of programs and implementing measures. The Housing Element provides a policy framework to address the City’s future housing needs. Policy 1.1 encourages housing near transit and services that promote walkability, and Policy 1.2 encourages new housing developments in nonresidential zones and transit oriented development. In addition, Policy 2.8 emphasizes incorporating the LUCE policies, when adopted, for new housing to be located in the City’s major corridors and transit locations.

The quantified objective of the Housing Element is achieving the RHNA requirement for 2008-2014; further population increases would be examined in the LUCE EIR based on its proposed long-term goals. Adoption and implementation of the Housing Element would not induce growth beyond that already anticipated in the current Land Use Element. Implementation of the proposed project would not result in a direct or indirect population increase, as no specific projects are proposed as part of the Housing Element. Rather, the proposed project simply provides appropriate guidance for the residential growth that would occur with or without project implementation. Therefore, impacts associated with population growth are less than significant.

(b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Housing Element focuses on expanding housing opportunities for all segments of the population and improving the quality of existing housing stock. Adoption of the proposed Housing Element would not result in the removal of any housing. Therefore, there is no impact.

XVIII. PUBLIC SERVICES

(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
(i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Police protection?				
(iii) Schools?				
(iv) Parks?				
(v) Other public facilities?				

Discussion

The City provides a range of public services to accommodate the needs of its residents. These include fire protection, police protection, parks, and other facilities. These facilities are designed to accommodate the service needs of the population and, therefore, standard service levels have been established. Service standards are determined by a combination of factors, including firefighter or police officers per 1,000 residents, response times, park acreage per 1,000 residents, and other measures. The City analyzes its budget annually to assess public service needs and allocates spending accordingly. Taxes and fees assessed on new development pay the cost of providing services.

Housing allowed under the Housing Element would not exceed the level already permitted in the current Land Use Element. Public service needs are projected based on development permitted in the Land Use Element. There are no specific development projects proposed as part of the Housing Element; rather, the Housing Element would provide a policy framework for the City’s housing needs. Since the policies of the Housing Element are a continuation of previous policies and are consistent with the current Land Use Element, the adoption of the Housing Element would not create a demand for new facilities beyond those currently anticipated and planned. This impact would be less than significant.

With regard to schools, the Santa Monica-Malibu Unified School District provides public education for grades K-12. As adoption of the Housing Element would not create a demand for new schools beyond those currently anticipated and planned, as the housing units provided would be within the limits permitted by the Land Use

Element, this impact would be less than significant. In addition, development impact fees adopted by school districts constitute full mitigation for school impacts pursuant to State law.

XIX. RECREATION

(a) Would the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

There are no specific development projects proposed as part of the Housing Element; rather, the Housing Element would provide a policy framework for the City’s future housing needs. Housing allowed under the Housing Element would not exceed the level already permitted in the current Land Use Element. The City’s long-range plans to maintain and create new parks are contained in its Open Space Element. Adoption of the Housing Element would not create a demand for new parks beyond those currently anticipated and planned. This impact would be less than significant.

Adoption of the Housing Element does not include recreational facilities or require the construction or expansion of recreational facilities. There would be no impact.

XX. TRANSPORTATION/TRAFFIC

Would the project:

(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? (City of Santa Monica Land Use and Circulation Element, 1987)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The 2008-2014 Housing Element would not directly result in the construction of new housing units. The proposed project would provide a policy framework for the City’s residential needs and continues the City’s housing policies contained in the previous Housing Element. All new housing production would occur within the limits established by the current Land Use Element and Zoning Ordinance. Further, all new residential development is subject to its own CEQA process where project-specific impacts associated with transportation/traffic during construction and operation would be analyzed. The City will continue to examine individual housing development proposals as they are submitted to determine whether any site-specific approaches are required to address focused traffic concerns. Therefore, the adoption of the Housing Element would not have any impacts on traffic.

(c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Refer to the discussion under item XV(e). No impacts would occur.

(d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

There are no specific development projects proposed as part of the Housing Element; rather, the implementation of the proposed project would provide a policy framework for the City’s residential needs. Therefore, implementation of the proposed Housing Element would have no impact associated with the potential for hazardous design features or inadequate emergency access or parking.

(g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? (City of Santa Monica Land Use and Circulation Element, 1987)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The 2008-2014 Housing Element is an update of the 2000–2005 Element, and consists of new technical data, and restated goals, policies, programs and implementing measures. The Housing Element provides a policy framework to address the City’s housing needs. Policy 1.1 encourages housing near transit and services that promote walkability, and Policy 1.2 encourages new housing developments in nonresidential zones and transit oriented development. In addition, Policy 2.8 emphasizes incorporating LUCE policies, when adopted, for new housing to be located within the City’s major corridors and adjacent to transit. As such, the Housing Element encourages more alternative transportation options within the City and would not conflict with adopted policies, plans, or programs supporting alternative transportation. Rather, the Housing Element policies support bicycle and transit policies. Therefore, there would be no impact.

(h) Involve right-of-way dedication resulting in a reduced lot area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i) Reduce access to other properties and uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(j) Create abrupt grade differential between public and private property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

There are no specific development projects proposed as part of the Housing Element. Access to other properties and nearby uses would not be altered as a result of adoption and implementation of the Housing Element. Therefore, there would be no impact associated with right-of-way dedication that could result in a reduced lot area, reduced access to other properties, or grade differential between public and private property.

XXI. UTILITIES AND SERVICE SYSTEMS

Would the project:

(a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Housing allowed under the Housing Element would not exceed the level already permitted in the current Land Use Element. There are no specific development projects proposed as part of the Housing Element; rather, the implementation of the proposed project would provide a policy framework for the City’s future residential needs. Long-term wastewater treatment needs and plans have been based on the Land Use Element. Any changes to the amount of allowable housing proposed in the LUCE with regard to wastewater treatment will be analyzed in the LUCE EIR. The wastewater generated by future residential projects that would be permitted under the proposed project would continue to be collected by the Utilities Division of the City’s Environmental and Public Works Management Division. Adoption and implementation of the Housing Element would not result in the direct increase in wastewater generation. Therefore, there would be no impact.

(b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Housing allowed under the Housing Element would not exceed the level already permitted in the current Land Use Element. Planning for water and wastewater treatment facilities is based on the uses included in the Land Use Element. There are no specific development projects proposed as part of the Housing Element; rather, the Housing Element would provide a policy framework for the City’s housing needs. The previous Housing Element EIR determined that the City’s current water and wastewater facilities can support the level of infill development permitted and, therefore, no significant impact would occur from adoption and implementation of the proposed Housing Element. Additionally, the City currently maintains adequate storm drainage facilities. Therefore, because implementation of the Housing Element would not require or result in the construction or alteration of storm drain facilities, there would be no impact.

(e) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Housing allowed under the Housing Element would not exceed the level already permitted in the current Land Use Element, and there would be no additional demand for water supplies as a result of adoption of the Housing

Element. There are no specific development projects proposed as part of the Housing Element; rather, the Housing Element would provide a policy framework for the City’s housing needs. The City’s current water facilities can support the level of infill development permitted, although new housing would consume additional water. Existing aggressive City programs to minimize net new demands for water, including low-flow plumbing features and retrofit programs, and landscaping and irrigation restrictions will reduce this impact. Therefore, no significant impact would occur from adoption and implementation of the Housing Element.

(f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

Housing allowed under the Housing Element would not exceed the level already permitted in the current Land Use Element. There are no specific development projects proposed as part of the Housing Element; rather, the Housing Element would provide a policy framework for the City’s housing needs. Therefore, because implementation of the Housing Element would not result in an increase in solid waste disposal, no impact would occur.

(g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Discussion

The proposed Housing Element policies do not conflict with any statutes or regulations pertaining to solid waste. All future development projects within the City must comply with federal, State, and local regulations pertaining to solid waste. No impact would occur.

XXII. MANDATORY FINDINGS OF SIGNIFICANCE

(a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Discussion

As discussed above, the 2008-2014 Housing Element would not provide for housing development in any sensitive biological resource area, nor would adoption of the Housing Element directly affect any historic resources, which are protected by Historic Preservation Element policies. In addition, project-specific environmental analysis would be required for all future developments under the Housing Element. Consistent with current City policy, the Housing Element does not allow for development on the bluffs or beach, and thus will not result in a substantial adverse impact on any candidate, sensitive, or special-status species, riparian habitat, or sensitive natural community.

There is the potential for birds protected under the Migratory Birds Treaty Act to nest in the numerous trees within the City. These trees are protected by the City’s Tree Ordinance. Each new development or renovation project that could be permitted under the Housing Element would be subject to its own CEQA process where the project specific related impacts associated with sensitive species would be properly analyzed. Furthermore, mitigation measures would require surveys for MBTA-protected species, which would include impact-avoidance

measures to ensure that the substantial loss of these species will not occur. Such mitigation measures would ensure the protection of migratory bird species/habitat, through focused surveys, agency consultation, and off-site habitat conservation and/or enhancement. The City has long supported historic preservation, and implements local programs to facilitate the preservation of historic structures. The City will continue to implement these programs and policies to protect historic resources. Therefore, a less-than-significant impact would occur.

(b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Discussion

The 2008-2014 Housing Element is a policy document that provides a framework for addressing the City’s future housing demand. Residential development occurring under the Housing Element would not exceed the limits established in the Land Use Element. Cumulative impacts of all housing programs have been considered in all sections of this Initial Study. Adoption and implementation of the Housing Element would not result in any significant adverse cumulative effects. Furthermore, the project is not growth inducing, but rather guides future anticipated residential needs. Thus, adoption of the Housing Element would not contribute to the cumulative effects of population growth. Cumulative impacts would be less than significant.

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

Discussion

As identified throughout the analysis herein, adoption and implementation of the 2008-2014 Housing Element would not have an environmental effect that would cause substantial adverse effects on human beings either directly or indirectly. Therefore, this is considered a less-than-significant impact.

REFERENCES

City of Santa Monica Housing Element, 2000-2005.

_____, Geologic Hazards Map, April 2001

_____, Districting Map, March 2004

_____, Designated Landmarks, Historic Districts, and Structures of Merit Map, 2007

_____, Historic Preservation Element, September 2002

_____, Airport Influence Area Map, May 2003

_____, Santa Monica- Malibu Unified School District Map, 2005

_____, General Plan Safety Element, 2005.

_____, Technical Background Report for the Safety Element of the General Plan, 1995

_____, Green Building Program, “Performance Ordinances in Santa Monica,” Accessed online April 28, 2006:
<http://www.greenbuildings.santa-monica.org/introduction/introperformanceordinance.html>

_____, Municipal Code.

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