

4.3 CONSTRUCTION EFFECTS

4.3.1 Setting

The project site consists of approximately 62 acres in downtown Santa Monica, generally situated south of the Santa Monica Freeway and east of Pacific Coast Highway. The Specific Plan Area is bounded by Fourth Street on the east, Ocean Avenue on the west, Pico Boulevard on the south, and extends northward across the I-10 freeway to include all of the Sears complex and the Santa Monica Place shopping center. Main Street bisects the Specific Plan Area in a north to south direction.

Land uses currently existing in the Civic Center Specific Plan area east of Main Street include City Hall, a Los Angeles County Court facility, the Public Safety Facility, and the Santa Monica Civic Auditorium. Land uses west of Main Street in the Specific Plan area include the existing RAND Corporation Headquarters facility and associated parking, and the new RAND Corporation Headquarters building currently under construction. Also west of Main Street and along Ocean Avenue within the CCSP area are Chez Jay Restaurant, the 1733 Ocean Avenue office building, and the Ocean Lodge motel. West of I-10 within the project area are the Holiday Inn, Sears and Santa Monica Place Shopping Center. The Viceroy Hotel is located on the southwest corner of the Specific Plan area. Figure 2-3 in Section 2.0, *Project Description*, presents an aerial view of the project site and surrounding areas.

The site is located in an urbanized setting. The general vicinity of the project is completely developed and contains a wide variety of residential, office, and retail uses, including the Third Street Promenade and several retail and office buildings. Uses to the west of the site include the Santa Monica Pier, beach recreational areas, parking lots, single and multifamily residential, visitor serving retail and lodging. Uses to the south of the site include the Main Street Commercial District and the Ocean Park neighborhood. The Doubletree Hotel, Santa Monica High School, and an office complex are located east of the site across Fourth Street.

Construction effects are related to the site preparation and development components of a project's implementation. These include potential impacts relating to air quality, noise, solid waste generation, and water quality, as well as construction-related traffic, parking, and staging issues that may disrupt circulation during the construction period.

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Residential uses are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.



Similarly, some land uses are considered more sensitive to construction-related noise levels than others, due to the amount of noise exposure (in terms of both exposure time and insulation from noise) and the types of activities typically involved. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, parks and outdoor recreation areas are generally considered more sensitive to noise than are commercial and industrial land uses.

As discussed in Section 4.2, *Air Quality*, and Section 4.10, *Noise*, existing uses within the Civic Center Specific Plan project area include the Viceroy Hotel, the Holiday Inn, the Ocean Lodge Motel, and the Civic Auditorium. Existing uses within the immediate project vicinity include the Santa Monica High School and Doubletree Hotel to the east across Fourth Street, several hotels located along Ocean Avenue to the west of the site, and residential apartments and condominiums above retail uses on Fourth Street and on Broadway to the north of the site. In addition, condominiums are located southwest of the project site along Pico Boulevard.

4.10.2 Impact Analysis

a. Methodology and Significance Thresholds. The major impacts associated with project construction include temporary changes in traffic patterns, air quality, noise, solid waste generation, and water quality.

Traffic Related Construction Impacts. Traffic impacts associated with construction activities are considered significant when project construction would interfere with the existing traffic flow or cause unsafe conditions, or if it would introduce truck traffic through a residential area.

Air Quality Construction Impacts. Temporary construction-related air quality emissions were estimated using the California Air Resources Board's (ARB's) URBEMIS 2002 computer model. Construction-related air quality impacts are considered significant if emissions associated with construction would exceed adopted South Coast Air Quality Management District (SCAQMD) thresholds. Temporary construction emission thresholds have been set by the SCAQMD on a daily basis as follows:

- 75 pounds per day of ROC
- 100 pounds per day of NO_x
- 550 pounds per day of CO
- 150 pounds per day of PM₁₀
- 150 pounds per day of SO_x

In addition to the above thresholds, if quarterly construction emissions would exceed 2.5 tons for ROC or NO_x, 24.75 tons for CO, or 6.75 tons for PM₁₀, or SO_x, air quality impacts relating to construction are considered significant.

Noise Construction Impacts. Noise associated with construction activity is evaluated using construction equipment noise level estimates contained in the USEPA report *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* (1971). The City's Noise Ordinance (Municipal Code § 4.12) prohibits noise associated with demolition and



other construction activities from exceeding the allowable exterior noise level for any noise zone by more than 20 dB. The Ordinance applies to all noise sources located on private property. The noise ordinance also provides that construction equipment which would exceed these noise standards may only be operated between the hours of ten a.m. and three p.m. As part of this ordinance, properties within the City are assigned a Noise Zone based on their corresponding zoning district. Section 4.1.2.050 of the Ordinance specifies designated noise zones. In general, residential uses are located within Zone I, commercial districts are designated Noise Zone II, and manufacturing or industrial districts are designated as Noise Zone III. The project site itself lies within Zone II. However, the hotel uses on Ocean Avenue, the Santa Monica High School across 4th Street on the east, and the Ocean Park Neighborhood in close proximity to the east would be considered sensitive uses.

Table 4.3-1 shows the allowable noise levels and corresponding times of day for each of the three identified noise areas. Maximum allowable construction noise limits are shown in parenthesis.

Table 4.3-1 Exterior (and Construction) Noise Standards for Stationary Noise Sources

Noise Zone	Time Interval	Allowable Leq 15 minute continuous measurement period (construction noise limit)	Allowable Leq 5 minute continuous measurement period (construction noise limit)
I	<u>Monday – Friday</u> 10 pm – 7 am 7 am – 10 pm	50 (70) dBA 60 (80) dBA	55 (75) dBA 65 (85) dBA
	<u>Saturday and Sunday</u> 10 pm – 8 am 8 am – 10 pm	50 (70) dBA 60 (80) dBA	55 (75) dBA 65 (85) dBA
II	All days of week 10 pm to 7 am 7 am to 10 pm	60 (80) dBA 65 (85) dBA	65 (85) dBA 70 (90) dBA
III	Anytime	70 (90) dBA	75 (95) dBA

Source: City of Santa Monica Municipal Code § 4.12.050(a)

A significant noise impact would occur if construction activities result in an exceedance of the above noise standards shown in parenthesis above. In addition, the Ordinance stipulates that a maximum instantaneous A-weighted, slow sound pressure level cannot exceed the decibel limits cited above for each noise zone plus forty dBA, for any period of time.

In addition, Section 4.14.110 of the Noise Ordinance states that construction activity may not occur before 8:00 am or after 6:00 pm Monday through Friday, before 9:00 am or after 5:00 pm on Saturday, and does not allow construction activity to occur on Sunday or major national holidays, unless an after-hours permit is obtained. However, the Ordinance does allow construction activities conducted by employees of the City or public utilities while conducting duties associated with their employment to occur after 7:00 am Monday through Friday.



Water Quality Construction Impacts. Construction-related water quality impacts are considered significant if construction would cause erosion or siltation such that surface water quality is substantially degraded.

Solid Waste Generation Construction Impacts. Construction-related solid waste impacts are considered significant if construction generates a significant amount of solid waste that cannot be accommodated by area landfills.

b. Project Impacts and Mitigation Measures.

Impact CON-1 **Project construction would temporarily increase truck traffic in the project area, which could disrupt the normal use of sidewalks and roadways along the project boundaries, and also affect parking availability. This is considered a Class II, significant but mitigable impact.**

Project construction of each of the four components identified in Section 2.0, *Project Description*, is anticipated to last approximately 12-18 months. Construction activity would not be expected to re-route traffic to residential streets due to the primarily commercial nature of the Civic Center area. However, construction activity would temporarily re-route traffic, depending upon which project component/structure is being constructed. Construction traffic is expected to utilize the Santa Monica Freeway (I-10) and major roadways directly accessible to the project site, including Pico Boulevard, Fourth Street, Ocean Avenue, Colorado Boulevard, and Second Street.

During construction staging, the storage of construction equipment may require the use of street parking and temporary closure of portions of some surrounding roadways. Construction activity may also require the temporary closure of the sidewalks adjacent to the site, thus disrupting pedestrian activity in the area.

In addition to the reduction in on-street parking capacity during construction of the proposed project, construction site workers would temporarily compete with other users of parking facilities during the construction period, thus temporarily reducing the available supply of public parking. Construction activities would also be expected to temporarily disrupt use of employee parking areas for some project components. Construction of proposed subterranean parking structures would involve excavation below natural grade. During parking structure excavation and during concrete pours, it is possible that multiple trucks would be stacked to receive export soil or deliver concrete.

It is anticipated that construction staging areas would primarily be accommodated on site and, if closure of some portions of the public right-of-way were required, signage and fencing would be used to warn pedestrians and vehicles in the area. It may be necessary to close the sidewalk adjacent to the construction site during a portion of construction of the project. Appropriate sidewalk closures as well as signage to direct pedestrians to the opposite sidewalk would be needed.

Overall, impacts to pedestrian and vehicular flow in the area and the temporary reduction in parking capacity are considered potentially significant impacts.



Mitigation Measures. The following mitigation measure is recommended to reduce construction traffic impacts.

CON-1 Construction Impact Mitigation Plan. The applicant shall prepare and implement a Construction Impact Mitigation Plan to provide for traffic and parking capacity management during construction. This plan shall be subject to review and approval by the City and, at a minimum, shall include the following:

- *Phasing of construction activities for each project component to minimize disruption to the roadway network;*
- *A public information program to advise motorists of impending construction activities (e.g., media coverage, portable message signs, and information signs at the construction site);*
- *Approval from the City, or Caltrans if required, for any construction detours or construction work requiring encroachment into public rights-of-way, or any other street use activity (e.g., haul routes);*
- *Timely notification of construction schedules to all affected agencies (e.g., Police Department, Fire Department, Department of Public Works, Department of Planning and Community Development, Los Angeles County Superior Court, Los Angeles County Sheriff's Department, and transit agencies);*
- *Coordination of construction work with affected agencies five to ten days prior to start of work;*
- *A traffic control plan for the streets surrounding the work area, which includes specific information regarding the project's construction and activities that will disrupt normal traffic flow;*
- *Minimizing dirt and demolition material hauling and construction material delivery during the morning and afternoon peak traffic periods and cleaning of streets and equipment as necessary;*
- *Scheduling and expediting of work to cause the least amount of disruption and interference to the adjacent vehicular and pedestrian traffic flow. Weekday daytime work on City streets shall primarily be performed between the hours of 9:00 AM and 3:00 PM;*
- *Limiting of queuing of trucks to on-site and prohibition of truck queuing on area roadways;*
- *Scheduling of preconstruction meetings with affected agencies to properly plan methods of controlling traffic through work areas;*
- *Designation of off-site construction staging areas;*
- *Storage of construction material and equipment within the designated work area and limitation of equipment and material visibility to the public;*
- *Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica; and,*
- *Provision of off-street parking for employees of the Civic Center Specific Plan area, which may include the use of a remote location with shuttle*



transport to the site, if determined necessary by the City of Santa Monica.

Significance After Mitigation. With implementation of the required Construction Impact Mitigation Plan, impacts would be reduced to a less than significant level.

Impact CON-2 Project construction would generate a temporary increase in air pollutant emissions. Worst-case daily emissions would exceed established SCAQMD thresholds for ROC and NO_x. Therefore, impacts are considered Class I, significant and unavoidable.

Construction within the Specific Plan area would involve demolition of some existing structures, site preparation, and construction of new buildings. This activity would result in temporary air quality impacts due to the generation of fugitive dust (PM₁₀) and exhaust emissions associated with heavy construction vehicles. During project grading, the soils that underlie the site would be turned over and moved around, exposing the soil to wind erosion and dust entrainment by onsite operating equipment. The operation of heavy construction equipment would result in emissions of the ozone precursors, reactive organic compounds (ROC) and nitrogen oxides (NO_x), as well as carbon monoxide (CO). Construction worker vehicles traveling to and from the site would also contribute a small amount of emissions.

The Civic Center Specific Plan would be developed in phases over a period of about eight years, with active construction occurring over five of the eight years¹. The URBEMIS 2002 air quality modeling program was used to estimate the amount of emissions that could be generated during construction of the CCSP area over this time frame (refer to the Air Quality Modeling Data sheets, on file at the City of Santa Monica Planning and Community Development Department for assumptions and results (2004)). The URBEMIS model evaluates construction emissions based on three discrete phases of site development: (1) demolition, (2) site grading, and (3) building construction. The building construction phase is further divided into three subphases: (1) building, (2) application of architectural coatings, and (3) paving. The model assumes that each phase and subphase of construction would occur in order and that subsequent phases would not start until the previous phase is completed. The number of pieces of heavy construction equipment that would be needed onsite was estimated given the size of the site and the development proposed. Eleven pieces of equipment were assumed to be required during demolition, nine pieces during site grading, ten during the building phase, and eight during paving.

Table 4.3-2 shows the worst-case daily construction emissions for demolition and site grading². During both phases, fugitive dust would result in the greatest amount of PM₁₀ emissions, while construction equipment would generate the greatest amount of NO_x, ROC, and CO emissions. Total NO_x emissions during both phases of construction would exceed the 100-pound-per-day SCAQMD threshold for that pollutant.

¹ A construction period of five years (60 months) was used because that is the maximum length allowable for construction in the URBEMIS 2002 model.

² It is assumed that the demolition phase of construction takes 6 months and the site grading phase takes 8 months.



Table 4.3-3 shows the worst-case daily emissions during the building construction phase of project development, broken down by subphase³. As shown, NO_x emissions would exceed the 100-pound-per-day threshold during the building and paving subphases of building construction. The highest emissions of ROC would occur during the application of architectural coatings in subphase 3 of building construction and would exceed the SCAQMD daily significance threshold of 75 pounds per day for this pollutant.

**Table 4.3-2 Worst-Case Daily Construction Emissions
 During Site Preparation (Unmitigated)
 (lbs per day)**

Construction Phase	Emission Source	ROC	NO _x	CO	PM ₁₀
Demolition	Fugitive Dust	NA	NA	NA	26.88
	Equipment Emissions	22.91	230.44	153.85	8.77
	Worker Trips	0.32	0.39	7.23	0.02
DEMOLITION TOTAL		23.23	230.83	161.08	35.67
<i>Threshold (peak day)</i>		<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>
Site Grading	Fugitive Dust	NA	NA	NA	20.00
	Equipment Emissions	16.59	139.54	122.97	6.01
	Construction Worker Trips	0.08	0.04	0.88	0.01
SITE GRADING TOTAL		16.67	139.58	123.85	26.02
<i>Threshold (peak day)</i>		<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>

NA = not applicable
 See Air Quality Modeling Data sheets on file at the City of Santa Monica Planning and Community Development Department.

Overall, construction-related air quality impacts are considered significant for NO_x and/or ROC in all phases of construction.

³ It is assumed that the building subphase of construction takes 35 months, the architectural coatings subphase takes 7 months, and the paving subphase takes 4 months.



**Table 4.3-3 Worst-Case Daily Construction Emissions
 During Building Construction (Unmitigated)
 (lbs per day)**

Construction Subphase	Emission Source	ROC	NO _x	CO	PM ₁₀
Building	Equipment Emissions	22.50	168.96	168.34	7.43
	Worker Trips	3.78	2.11	44.95	0.62
BUILDING TOTAL		26.28	171.07	213.29	8.05
<i>Threshold (peak day)</i>		<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>
Architectural Coatings	Coatings Off-Gassing	408.40	NA	NA	NA
	Construction Worker Trips	3.04	1.77	37.40	0.63
ARCHITECTURAL COATINGS TOTAL		411.44	1.77	37.40	0.63
<i>Threshold (peak day)</i>		<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>
Paving	Asphalt Off-Gassing	0.18	NA	NA	NA
	Equipment Emissions	16.55	103.04	138.02	3.57
	Worker Trips	0.05	0.03	0.62	0.01
PAVING TOTAL		16.78	103.07	138.64	3.58
<i>Threshold (peak day)</i>		<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>

NA = not applicable
 See Air Quality Modeling Data sheets on file at the City of Santa Monica Planning and Community Development Department.

Mitigation Measures. The following mitigation measures are required to minimize dust, ROC, and NO_x emissions for the proposed project.

CON-2(a) Dust Minimization. Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site through implementation of the following:

- *During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems are to be used to the extent necessary to prevent dust from leaving the site and to create a crust after each day's activities cease.*
- *During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, streets and sidewalks within 150 feet of the site perimeter shall be swept and cleaned a minimum of twice weekly.*
- *During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds 15 miles per hour.*
- *Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.*



CON-2(b) Construction Equipment Conditions. Construction equipment used on the site shall meet the following conditions in order to minimize NO_x and ROC emissions:

- *The number of pieces of equipment operating simultaneously must be minimized through efficient management practices;*
- *Construction equipment must be maintained in tune per manufacturer's specifications;*
- *Equipment shall be equipped with 2- to 4-degree engine timing retard or pre-combustion chamber engines;*
- *Catalytic converters shall be installed, to the extent feasible;*
- *Diesel-powered equipment such as booster pumps or generators should be replaced by electric equipment, to the extent feasible; and*
- *The operation of heavy-duty construction equipment shall be limited to no more than 5 pieces of equipment at any one time.*

CON-2(c) Low-VOC Coatings. Low-VOC architectural coatings shall be used in construction whenever feasible and shall coordinate with the SCAQMD to determine which coatings would reduce VOC emissions to the maximum degree feasible.

Significance After Mitigation. Implementation of the above measures would reduce construction-related emissions to the greatest degree feasible (see Air Quality Modeling Data sheets on file at the City of Santa Monica Planning and Community Development Department for mitigated emissions). With mitigation, the worst-case daily NO_x emissions during the site grading phase and the paving subphase of construction would be reduced to below the 100-pound-per-day threshold. However, worst-case daily NO_x emissions during demolition and building and ROC emissions associated with the application of architectural coatings would continue to exceed the SCAQMD significance threshold for those pollutants. Therefore, the impact during these phases of construction would remain unavoidably significant.

Impact CON-3 Project construction would intermittently generate high noise levels on and adjacent to the site. This may affect sensitive receptors near the project site. This is considered a Class II, significant but mitigable, impact.

The grading/excavation phase of project construction tends to create the highest noise levels because of the operation of heavy equipment. As shown in Table 4.3-4, noise levels associated with heavy equipment typically range from about 78 to 88 dBA at 50 feet from the source. Continuous operation of this equipment during a nine-hour workday can cause noise levels onsite and at adjacent receptor locations that are well above ambient levels.

Section 4.1.2.050 of the City's Noise Ordinance specifies designated noise zones. In general, residential uses are located within Zone I, commercial districts are designated Noise Zone II, and manufacturing or industrial districts are designated as Noise Zone III. The project site itself lies within Zone II. However, the hotel uses on Ocean Avenue, Santa Monica High School across 4th Street on the east, and the Ocean Park Neighborhood in close proximity to the east of the project site, are within residential districts and are thereby classified in Zone 1 .



The City’s Noise Ordinance prohibits noise associated with demolition and other construction activities from exceeding the allowable exterior noise level for any zone by more than 20 dB, except during the hours of 10 am to 3 pm. The allowable exterior noise level for Zones I and II, and the allowable construction noise level for each zone are shown in Table 4.3-1 above.

Table 4.3-4 Typical Noise Levels at Construction Sites

Construction Phase	Average Noise Level at 50 Feet	
	Minimum Required Equipment On-Site	All Pertinent Equipment On-Site
Clearing	84 dBA	84 dBA
Excavation	78 dBA	88 dBA
Foundation/Conditioning	88 dBA	88 dBA
Laying Subbase, Paving	78 dBA	79 dBA
Finishing and Cleanup	84 dBA	84 dBA

Source: Bolt, Beranek and Newman, “Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances,” prepared for the U.S. Environmental Protection Agency, 1971.

A significant noise impact would occur if construction activities result in an exceedance of the noise standards shown in parenthesis in Table 4.3-1 above. In addition, the Ordinance stipulates that a maximum instantaneous A-weighted, slow sound pressure level cannot exceed the decibel limits cited above for each noise zone plus forty dBA, for any period of time.

The operation of heavy equipment during construction of the proposed project would result in temporary increases in noise in the immediate vicinity of the construction site. The highest noise levels generally occur during excavation and foundation development, which involve the use of such equipment as backhoes, bulldozers, shovels, and front-end loaders. Noise levels from point sources such as construction sites typically attenuate at a rate of about 6 dBA per doubling of distance. Therefore, only areas within a few hundred feet of construction sites would be exposed to construction noise levels.

Continuous operation of construction equipment during a nine-hour workday can cause noise levels onsite and at adjacent receptor locations that are well above ambient levels and could exceed the criteria in the City’s Noise Ordinance. The existing uses *within* the project site boundary are the County Courthouse, City Hall, Public Safety Facility, Civic Auditorium, 1733 Ocean Avenue, the Ocean Lodge Motel, the Viceroy Hotel, and the Holiday Inn.

The nearest uses adjacent to the project site boundaries to the east are the Doubletree Hotel and Santa Monica High School, located east of the site across Fourth Street. The nearest structure proposed within the CCSP to these uses would be the Child Development Center, which would be located approximately 200 feet away from the High School athletic field and Doubletree Hotel, and approximately 50 feet away from the Courthouse. The nearest high school building would be approximately 250 feet away from proposed construction. At these distances, construction-related noise could be as high as 88 dBA at the courthouse and 75 dBA at the nearest high school building, and approximately 76 dBA at the Doubletree Hotel and high



school athletic field. Although ambient noise levels in the area are high (>70 dBA) due to traffic on Fourth Street, construction noise may be audible at the Courthouse, and may occasionally be heard at the Doubletree and the high school.

The nearest uses to the west of the project site are the hotel, motel, and office uses along Ocean Avenue. These uses would be approximately 110 feet away from the proposed structures in the Village Special Use District and the proposed park related building in the Palisades SUD, resulting in potential noise levels of approximately 82 dBA, thus exceeding the allowable construction noise levels for Zones I and II. This is considered a potentially significant impact. The proposed construction of the Santa Monica Place SUD would be approximately 120 feet north of the Holiday Inn. Construction noise levels have the potential to exceed the Zone I and Zone II noise limits in this area also.

Section 4.14.110 of the Noise Ordinance also states that construction activity may not occur before 8:00 am or after 6:00 pm Monday through Friday, before 9:00 am or after 5:00 pm on Saturday, and it does not allow construction activity to occur on Sunday or major national holidays, unless an after-hours permit is approved. The project would be required to comply with restrictions in the Noise Ordinance that limit the times when construction may occur. In addition, the Ordinance requires that, prior to issuance of a building permit, all development projects located within 500 feet of any residential development or other similar land uses must submit a list of equipment and activities required during construction, and signs giving notice of construction activity are required to be posted at the site. However, as discussed above, early morning and late afternoon construction activity could generate noise exceeding the City's construction noise standards unless mitigated. This is considered a potentially significant impact.

Mitigation Measures. The following measures are recommended to reduce construction noise impacts at the site to remain within permitted standards.

- CON-3(a) Diesel Equipment Mufflers.** All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- CON-3(b) Electrically-Powered Tools.** Electrical power shall be used to run air compressors and similar power tools.
- CON-3(c) Additional Noise Attenuation Techniques.** For all noise-generating construction activity on the project site, additional noise attenuation techniques shall be employed to reduce noise levels to City of Santa Monica noise standards. Such techniques may include, but are not limited to, the use of sound blankets on noise generating equipment and the construction of temporary sound barriers between construction sites and nearby sensitive receptors.
- CON-3(d) Construction Sign Posting.** In accordance with Municipal Code Section 4.12.210, the project applicant shall be required to post a



sign informing all workers and subcontractors of the time restrictions for construction activities. The sign shall also include the City telephone numbers where violations can be reported and complaints associated with construction noise can be submitted.

- CON-3(e) Construction Noise Hotline.** Project applicants shall provide a telephone number for local residents to call to submit complaints associated with construction noise. The number shall be posted on the project site and shall be easily viewed from adjacent public areas.

Significance After Mitigation. Implementation of the recommended mitigation measures would ensure consistency with the City's Noise Ordinance, thereby reducing project impacts to a level considered less than significant.

- Impact CON-4 All project options would generate solid waste during demolition and construction activities. Existing landfills in the area have adequate capacity to accommodate the expected increase. However, due to the limited nature of regional landfill capacity, the impact from the generation of construction-related in solid waste is considered Class II, potentially significant but mitigable.**

Implementation of the four components of the proposed CCSP would include the removal of the existing surface parking lot areas and the removal of some building areas. Overall, implementation of the proposed CCSP would result in the construction of up to 775 units of mixed-use multifamily housing with 20,000 square feet (sf) of new ground-floor neighborhood commercial use, 150,000 sf of public and community facilities, 560,000 sf of reconfigured or reconstructed commercial retail, 85,000 sf of commercial office space, and associated street, parking and open space/park improvements. In particular, Component 2, the Santa Monica Place Special Use District, which would include redevelopment of the shopping center and the development of up to 450 housing units and 85,000 sf office, would result in a substantial amount of construction debris.

In Los Angeles County, construction waste makes up 15% to 25% of the total solid waste stream. Both Assembly Bill (AB) 939 and the Santa Monica Sustainable City Program have a goal of reducing solid waste in accordance with state law. The reduction of construction and demolition waste are an important part of that effort.

As discussed in Section 4.15, *Utilities*, in 2000, the City adopted a Construction and Demolition Material Waste Management Plan (City of Santa Monica Municipal Code 7.60). The plan requires applicants for construction and demolition permits to submit a waste management plan that indicates the volume, type, and potential for recycling for each waste to be generated, as well as the proposed method of collection or disposal and the total volume of materials requiring landfilling.

Project demolition and construction would be subject to the requirements of the City's Construction and Waste Management Plan. The proposed CCSP stipulates that new



development at the Civic Center site shall conform to the City's Solid Waste Reduction and Recycling Plan, including any current or future requirements for source reduction, recycling, alternative procurement policies, and on-site recycling space.

Mitigation Measures. Compliance with the City's Construction and Demolition Material Waste Management Plan would ensure that the quantity of waste generated during demolition activities would be minimized. However, the following mitigation measures are recommended to ensure maximum reduction of construction and demolition material.

- CON-4(a) The applicant shall prepare and submit a demolition plan for review and approval by the City. The plan shall include methods to maximize salvage and recycling of building and landscape materials. The plan shall include a recovery rate for each material type in the demolition contract. The plan shall also include strategies for the salvage of reusable historic materials and reusable materials in good conditions.
- CON-4(b) During construction and demolition activities, the applicant shall separate for recycling all materials that are accepted for recycling in the Los Angeles region, including, but not limited to, metals, woodwaste, and clean fill.
- CON-4(c) The applicant shall schedule the removal of reusable and recyclable materials prior to demolition to maximize recovery rate.
- CON-4(d) The applicant shall provide separate bins for all recyclables on-site. Such bins shall be labeled clearly in several languages or with universal symbols. The applicant shall also provide orientation prior to the start of construction for workers to train them to use the recycle bins provided. If there is insufficient space on-site, the applicant shall contract with a recycling company to receive mixed loads for separation and recycling.
- CON-4(e) The applicant shall use pre-engineered or factory cut material. Examples of this type of material include, but are not limited to, factory trusses, laminated and other engineered wood products, sheet metal cladding and roofing, 9 foot gypsum board, pre-cut headers, and pre-assembled joist bridging. The applicant shall also use reusable and recyclable forming materials, such as steel forms or standard wood systems, where feasible.

Significance After Mitigation. Compliance with a construction waste reduction plan including implementation of the above measures would reduce impacts from the generation of solid waste during the demolition and construction phases of the proposed project to less than significant levels.

- Impact CON-5** **Project construction could potentially result in the erosion and sedimentation of soils offsite, with temporary adverse impacts to water quality. This is considered a Class III, less than significant, impact.**



As discussed in Section 4.7, *Hydrology and Water Quality*, the proposed project involves demolition, excavation and grading for construction of the various components of the proposed CCSP. During site preparation, soil erosion could occur and contribute to a decrease in water quality offsite. However, compliance with the applicable requirements of the National Pollutant Discharge Elimination System (NPDES) and the City's Urban Runoff Pollution Control Ordinance for construction activities would ensure that construction does not significantly affect water quality.

Mitigation Measures. Compliance with Mitigation measures GEO-6(a), GEO-6(b), and GEO-6(c), listed in Section 4.5, *Geology*, of this EIR, which require preparation of a Storm Water Pollution Prevention Program to comply with NPDES requirements, the covering and removal of stockpiled soil, and compliance with the City's Urban Runoff Pollution Control Ordinance, would ensure that construction-related water quality impacts are less than significant. Therefore, no mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant.

c. Cumulative Impacts. Individual construction projects located throughout the City would create temporary traffic, air quality, noise, water runoff and solid waste impacts similar to those described for the project. However, the effects of construction activity would be highly localized in nature. Consequently, compliance with standard construction mitigation requirements similar to those described for the project on a case-by-case basis would mitigate any potential impacts from individual construction projects.

