

The draft Initial Study/ Negative Declaration for the 2013-2021 Housing Element was circulated for review and comment by the public, agencies, and organizations for a 30-day public review period that began on October 4, 2013 and concluded on November 4, 2013. The Notice of Intent (NOI) to adopt the ND was posted with the Los Angeles County Clerk and the State Clearinghouse, mailed to all neighborhood groups, made available on the City's website, distributed to all relevant public agencies, and mailed to all City neighborhood groups. No comment letters were received during the 30-day public review period. No changes were made to the draft Initial Study/Negative Declaration.



City of
Santa Monica

City of Santa Monica
2013-2021 Housing Element
Initial Study/Negative Declaration

October 2013

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

INTRODUCTION

This document is an Initial Study to evaluate the potential environmental effects of the proposed 2013-2021 Housing Element (herein referenced as the "Project" or "Housing Element"). This document has been prepared in accordance with the relevant provisions of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the State CEQA Guidelines as implemented by the City of Santa Monica. The 2013-2021 Housing Element is a project subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study/Negative Declaration evaluates the potential direct, indirect, and cumulative environmental effects associated with the Project, as proposed.

The Housing Element sets forth the City's Goals, Objectives, and Policies concerning housing and housing-related services and the City's approach to addressing its share of the regional housing need. The Project is described in detail in Section 2.3, *Project Characteristics*.

BACKGROUND

The Council adopted the City of Santa Monica's 2008-2014 Housing Element in November 2008 and it was certified by the State in January 2009. Although there is still more than one year left in the planning cycle, the State legislature advanced the next housing element period (October 10, 2013 through June 2021) in order to coincide with the timing for developing the region's long range transportation plan, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS links regional land use with transportation investments throughout Southern California to address challenges of climate change, livability and mobility. The RTP/SCS that SCAG adopted on April 4, 2012 met the State requirements to show how its programs and projects would reduce greenhouse gas emissions and climate change potential through integrated land use and transportation planning. SCAG followed up by adopting the Regional Housing Needs Assessment (RHNA) on October 4, 2012, based on the data input for the RTP/SCS. The RHNA was certified by HCD on November 26, 2012. State law requires that jurisdictions adopt their new Housing Elements within 12 months of SCAG's RHNA adoption, with a grace period of 120 days.

Public Outreach, Planning Commission, and City Council Review

The first outreach phase for developing the Housing Element took place between July and November 2012, consisting of presentations on State housing element requirements, emerging data trends, the RHNA and the City's preparation schedule. Presentations were made to a number of City commissions and boards as well as other community stakeholders. These included:

- Commission for the Senior Community
- Planning Commission
- Disabilities Commission
- Commission on the Status of Women
- Rent Control
- Social Services Commission
- Housing Commission
- Stakeholders Roundtable
- Chamber Land Use Committee
- Neighborhood Councils Monthly Meeting

Public input was incorporated into the draft Housing Element, which was released for public review in July 2013. On [August 7, 2013](#), the Planning Commission held a discussion and provided comments on the draft. On [August 27, 2013](#), the Council held a study session and also provided comments. The August 2013 draft Housing Element, currently being reviewed by HCD, incorporated comments received in these discussions.

The Regional Housing Needs Assessment (RHNA)

A core component of the Housing Element is a response to the requirements of the Regional Housing Allocation contained in the RHNA, a State-mandated process that determines the amount of future housing growth for which each city and county must plan in order to be prepared to accommodate a fair share of statewide population change.

The RHNA process begins with the California Department of Housing and Community Development's (HCD) projection of future statewide housing need, and apportionment of this need to regional councils of government throughout the state. SCAG is the regional council for the counties of Los Angeles, Orange, Imperial, Riverside, San Bernardino and Ventura and allocates a share of affordable housing to each county and city within its region. For the 2014-2021 RHNA period, applicable to this Housing Element, the City of Santa Monica was assigned an allocation of 1,674 units. This allocation is more than 250% higher than the 2008-2014 RHNA allocation of 662 units. Of the 1,674 units, the RHNA specifies that 974 (58%) are to be affordable units targeted to households meeting defined criteria for incomes ranging from extremely low through moderate.

The Housing Element is required to identify a sufficient number of sites with appropriate zoning and market potential to accommodate the construction of the allocated number of housing units in the jurisdiction. Jurisdictions are not required to actually construct all units to comply with the RHNA, but must identify "suitable sites" and demonstrate feasibility for building housing in these locations for all economic segments of the community. The tool that is used to meet this requirement is known as the "Suitable Sites Inventory" (See Housing Element Appendix B). The Housing Element demonstrates that the City has suitable sites to meet its RHNA target without changes to existing land use regulations. State Housing Element law recognizes that the RHNA may exceed available resources and the community's ability to satisfy this need. Consequently, a city may establish a lower quantified objective for housing units by income category, including extremely low income, to be constructed, rehabilitated, and conserved over the period of the element. The 2013-2021 Housing Element's quantified objective is 1,371 units divided into specified income categories.

Housing Element and the LUCE

The Housing Element incorporates a complete list of the adopted housing policies in the 2010 Land Use and Circulation Element (LUCE). The Housing Element provides for the protection of existing housing and supports diverse housing opportunities, including affordable and workforce housing. The LUCE created a framework to integrate housing with existing and future transit investment. The anticipated completion of the Exposition Light Rail line by 2015, including three Santa Monica stations, creates opportunities for developing affordable and market rate housing within walking distance of transit while encouraging the conservation of existing residential neighborhoods. Specifically, the LUCE preserves 96% of the City with growth concentrated in only 4% of the City's land area. The Housing Element relies upon LUCE strategies to support a mixed-use Downtown, create new housing near the stations in former industrial areas adjacent

to Bergamot Station and Memorial Park, and encourage housing as a priority on high-capacity transit corridors, such as Wilshire Boulevard. Additionally, consistent with the LUCE and the 2008-2014 Housing Element, the Housing Element emphasizes income-restricted affordable housing in transit-oriented districts because living near public transit can reduce household transportation costs and increase mobility, as well as contribute to the City's goal of no net new PM peak hour trips.

PURPOSE AND LEGAL AUTHORITY

In accordance with the California Environmental Quality Act (Public Resources Code Section 21000, et. Seq.) and the 2013 State CEQA Guidelines, the City of Santa Monica as lead agency is required to undertake the preparation of an Initial Study to determine whether the Project would have a significant environmental impact.

If, as a result of the Initial Study, the lead agency finds that there is evidence that any aspect of the Project may cause a significant environmental effect, the lead agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze Project-related and cumulative environmental impacts. Alternatively, if the lead agency finds that there is no evidence that the Project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the lead agency shall find that the Project would not have a significant effect on the environment and shall prepare a negative declaration or mitigated negative declaration for the Project. Such determination can be made only if "there is no substantial evidence, in light of the whole record before the lead agency" that such an effect may occur (Section 21080(c), Public Resources Code).

The City of Santa Monica has prepared this Initial Study/Negative Declaration to evaluate the potential environmental effects of the 2013-2021 Housing Element. For the most part, the Housing Element does not propose substantive changes to the City's adopted housing policies and programs, including those contained in the LUCE, and does not propose any changes to standards in the Zoning Ordinance. Additionally, the Housing Element provides for the continuation of policies and programs that were adopted in the 2008-2014 Housing Element. Under CEQA, the continuation of preexisting policies do not constitute changes to the existing environment (See *Black Property Owners Association v. City of Berkeley* (1994) 22 Cal. App. 4th 974). In addition, there are some new policies and programs in the Housing Element (such as Objective/Program 2.f, 2.G, and 5.a), that are reflective of policies and programs adopted in the LUCE and emphasize the need to increase housing opportunities for seniors, disabled, and the City's workforce. No changes in the environment would occur as a result of these new policies and programs. Based on the above, the Initial Study/Negative Declaration has concluded that adoption of the proposed 2013-2021 Housing Element would not result in significant impacts on the environment.

This IS/ND, which is ultimately required to be adopted by the City Council in accordance with CEQA, is intended as an informational document. Should future residential development require discretionary action by the City of Santa Monica, project-level CEQA review will be required to determine project-specific impacts. Evaluation of future project-level impacts would be too speculative to include in this IS/ND (see CEQA Guidelines Section 15145).

DOCUMENTS INCORPORATED BY REFERENCE

This IS/ND incorporates, by reference, the City's previously certified Program Environmental Impact Report [EIR] (June 2010) prepared for the Land Use and Circulation Element (LUCE) pursuant to CEQA Guidelines Section 15150. As discussed in Section 15150 of the CEQA

Guidelines, "an EIR or negative declaration may incorporate by reference all or portion of another document which is a matter of public record or is generally available to the public.... Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." The LUCE EIR is available for review at the City of Santa Monica City Hall, located at 1685 Main Street in Santa Monica.

- *City of Santa Monica Land Use and Circulation Element (LUCE) Program Environmental Impact Report (EIR), April 2010, State Clearinghouse No. 2009041117*

**CITY OF SANTA MONICA
INITIAL STUDY
AND NEGATIVE DECLARATION**

1. Project title:

City of Santa Monica 2013-2021 Housing Element

2. Lead agency name and address:

City of Santa Monica
1685 Main Street
Santa Monica, CA 90407

3. Contact person and phone number:

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

4. Project location:

Citywide

The City of Santa Monica is an urban community located in west Los Angeles County, approximately 20 miles west of downtown Los Angeles. The City is bounded on the north, south, and east by the City of Los Angeles, and on the west by the Pacific Ocean.

5. Project applicant/sponsor's name and address:

City of Santa Monica, Strategic and Transportation Planning Division

6. General plan designation:

Various

7. Zoning:

Various

8. Description of project:

The 2013-2021 Housing Element is an element of the General Plan that provides guidance to plan for broad-based long-range housing needs. The 2013-2021 Housing Element is essentially an update of the 2008-2014 Housing Element that retains the same goals that guide the City's commitment to high quality housing for a diverse community, with an emphasis on efforts to produce affordable housing units and retain affordability and access to housing for households at all income levels. The 2013-2021 Housing Element has been developed to meet California State legal requirements and is subject to review and certification by the State Department of Housing and Community Development (HCD).

The Housing Element contains six chapters as follows:

1. Introduction: This chapter provides the State and local context for the document and summaries of the community outreach process and research methods and sources.

2. Housing Plan: This chapter sets forth the goals, objectives and programs, highlighting some of the most significant goals, including the quantified objectives for housing production and rehabilitation, and the City's broad range of services that support the City's long-term commitment to making housing policy a priority.

3. Housing Needs Assessment: This chapter provides demographic and housing data that describe the characteristics and needs of the community and form the basis for analysis in the document.

4. Potential Constraints on Housing: This chapter presents the State-required analysis of governmental and non-governmental constraints to housing production and conservation.

5. Housing Resources: This chapter analyzes available resources for building and subsidizing housing and presents the required suitable sites analysis.

6. Review of Past Performance: This chapter reviews the City's implementation of the programs included in the current 2008-2014 Housing Element.

The Housing Element includes four appendices: (A) the Suitable Sites Inventory; (B) a list of permitted projects in process; (C) a complete list of housing-related goals in the LUCE and (D) meeting summary notes from the Housing Element public outreach process.

9. Existing land uses in the City:

Almost all of the land in the City of Santa Monica is developed with established residential neighborhoods, commercial corridors, mixed-use districts, light industrial and creative office uses, a civic center, parks, schools and other community-serving facilities, public services, and utilities.

10. Approval required (e.g., permits, financing approval, or participation agreement.)

- Adoption of Negative Declaration (City of Santa Monica City Council)
- Adoption of Housing Element
- Approval of Housing Element from the California Department of Housing and Community Development (HCD)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

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.

- 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.

- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find that the proposed project MAY have a "potentially significant impact" or "potentially 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.

- 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) its effects are less than or equal to the effects disclosed in the earlier EIR or NEGATIVE DECLARATION, nothing further is required.

Francie Stefan
Strategic and Transportation Planning Manager

Date

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| I. AESTHETICS/VISUAL RESOURCES. 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"/> |

No Impact. Major scenic vistas in the City are those associated with the beach, the bay, the Pier, and the bluffs. As stated in the Program EIR (pg. 4.1-59), the City’s LUCE includes policies intended to preserve public view corridors, including western views of the ocean from east-west streets and boulevards, public views of the ocean and the Pier from Palisades Park, and public views from the Pier to the City. The Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, adoption of the Housing Element, in itself, would not result in physical impacts on scenic vistas.

Additionally, the Housing Element in large measure does not propose changes to the City’s adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.1-59).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City’s RHNA allocation and the City’s policies supporting affordable and workforce housing. The LUCE EIR acknowledged that, on certain project sites, future new land uses within existing standards may result in taller structures than currently exist. However, existing Santa Monica Municipal Code requirements and development standards, together with applicable goals and policies of the Conservation Element and Local Coastal Program Land Use Plan, help to protect scenic vistas throughout the City. Furthermore, in compliance with CEQA, any potential impacts to scenic vistas of any specific future residential project would be analyzed at the time of their proposal. Therefore, **no impact** on scenic vistas would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| 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"/> |

No Impact. There are no State-designated scenic highways in the City of Santa Monica. The Housing Element is a General Plan policy document that addresses housing need in the City; no

actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, adoption of the Housing Element would not damage scenic resources.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.1-58).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Future land uses in the City would comply with the existing standards set forth in the City's Municipal Code, as well as applicable LUCE policies protecting scenic resources. Furthermore, in compliance with CEQA, any potential impacts to scenic resources of any specific future residential project would be analyzed at the time of their proposal. Therefore, **no impact** on scenic resources would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| 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"/> |

No Impact. The General Plan Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, no changes in the visual character would result from adoption of the Housing Element.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.1-60).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New future residential projects would be subject to design review by the City's Architectural Review Board to ensure high quality design as required by Chapter 9.32 of the Santa Monica Municipal Code (SMMC). Furthermore, in compliance with CEQA, any potential impacts on visual character of any specific future residential project would be analyzed at the time of their proposal and would be required to comply with the City's Municipal Code, as well as applicable policies set forth in the City's LUCE. Therefore, **no impact** related to visual character would occur as a result of the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The City is primarily built-out, and a significant amount of ambient light from urban uses already exists. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Consequently, the Housing Element would not create a new source of substantial light or glare.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.1-62).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. As stated in the LUCE EIR (pg. 4-1-62), new housing development would generally occur as infill of vacant or underutilized parcels within already built-out areas of the City. Thus, the majority of land use changes would be located in areas that already experience existing light sources. In addition, design review by the City's Architectural Review Board would include the evaluation of new lighting and glare sources. Furthermore, in compliance with CEQA, any potential impacts related to light and glare of any specific future residential projects would be analyzed at the time of their proposal. Therefore, **no impact** related to light and glare would occur as a result of the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| e) Create a new source of shade or shadow that would adversely affect sensitive structures or uses? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Consequently, the Housing Element would not result in physical changes in the environment that could produce new shade shadow impacts.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.1-63).

Implementation of the programs contained in the Housing Element would accommodate new housing to address the City's RHNA allocation. As stated in the LUCE EIR (pg. 4.1-63), it is possible that buildings could cast shadows onto nearby shadow-sensitive land uses such as residential uses or open space. However, the goals and policies provided in the LUCE encourage and require the preservation and enhancement of the distinct visual characters of the City's individual neighborhoods and districts. Furthermore, in compliance with CEQA, any potential impacts related to shading of any specific future residential projects would be analyzed at the time of their proposal. Therefore, **no impact** related to shade/shadow would occur as a result of the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| II. AGRICULTURE AND FORESTRY RESOURCES. Would the project: | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or non-forest uses? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. There are no agricultural uses/land or forest land in the City of Santa Monica. The City is fully developed with urban uses and is not utilized or zoned for agricultural or forestry resources. Consequently, the Housing Element would not convert farmland to non-agricultural uses. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, **no impact** on agricultural resources or forestry resources would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| III. AIR QUALITY. Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. A project would not conflict with an applicable air quality plan if its population and/or employment growth are consistent with the growth estimates in the Air Quality Management Plan (AQMP). The AQMP growth projections is based on growth projections adopted by the Southern California Association of Governments (SCAG), which in turn, relies upon cities' adopted general plan growth projections. Consequently, a project that complies with the City's LUCE is considered to be in compliance with the AQMP. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in air pollutant emissions.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.2-16).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Future residential development anticipated under the Housing Element would generate pollutant emissions due to new vehicle trips, stationary sources (e.g., use of natural gas and electricity for heating, cooling, and lighting of residential units), and use of construction equipment. However, because the 2013-2021 Housing Element would not change the standards for residential uses within the LUCE, the level of emissions associated with residential development under the Housing Element has been analyzed within the LUCE EIR. Additionally, the Housing Element would further the air quality reduction goals of the LUCE by supporting new housing near transit while protecting existing residential neighborhoods. Furthermore, in compliance with CEQA, any potential impacts related to the AQMP and air quality of any specific future residential projects would be analyzed at the time of their proposal. Therefore, the 2013-2021 Housing Element would not conflict with the AQMP and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. **No impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, expose sensitive receptors to pollutants or create odors.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element Update contains policies encouraging housing in transit-rich areas in order to reduce vehicle trips and associated air quality impacts. The Housing Element policies are consistent with current LUCE policies as they relate to the identification of potential sites for housing. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.2-20).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City’s RHNA allocation and the City’s policies supporting affordable and workforce housing. In compliance with CEQA, any potential impacts related to the siting of any specific future residential projects near substantial pollutant concentrations or odor sources would be analyzed at the time of their proposal. Therefore, the 2013-2021 Housing Element would not expose sensitive receptors to substantial pollutant concentrations or create objectionable odors affecting a substantial number of people. **No impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| 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 US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The LUCE EIR (pg. 4.3-20) determined that there are no riparian or sensitive habitats known to occur in the City of Santa Monica. The City has little undisturbed native vegetation. In addition, there are no blueline streams or wetland habitat. The City is not recognized as an existing or proposed, or Significant Ecological Area (SEA) that links wildlife populations. No habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans apply to the City. Consequently, the Housing Element would not affect any sensitive habitats or sensitive species, wetlands, or SEA. **No impact** on sensitive habitats, wildlife population, wetlands, migratory wildlife, and habitat conservation areas would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| f) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As previously stated, the General Plan Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in impacts on biological resources.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.3-24).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Federal, state, regional, and local policies and regulations related to the protection of important biological resources include: Federal Endangered Species Act, Federal Migratory Bird Treaty Act, California Endangered Species Act, California Fish and Game Code, and the City of Santa Monica's Urban Forest Master Plan (UFMP) and Tree Code. As stated in the LUCE EIR (pg. 4.3-22), the types of development that would occur in the City would largely consist of redevelopment and would not extend the boundaries of the City into previously

undisturbed areas. As a result, potential impacts to the habitat and range of known sensitive species in the area are not anticipated. Furthermore, all new residential development would be required to be consistent with the General Plan and/or current zoning designations. New projects would also be required to adhere to the UFMP and Tree Code requirements as well as existing LUCE policies that protect/enhance the urban forest. Furthermore, in compliance with CEQA, any potential impacts on biological resources of any specific future residential projects would be analyzed at the time of their proposal. Therefore, **no impacts** would occur as a result of the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|-------------------------------------|--------------------------|
| V. 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. There are a number of historical resources in the City of Santa Monica. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in impacts on historical resources.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.4-43).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Depending on location, future housing development in the City would have the potential to result in the removal of a historical resource but, as analyzed in the LUCE EIR (pg. 4.4-43), the LUCE established a rigorous regulatory framework that would preserve historic structures within the City. In addition to establishing preservation and conservation policies that aim to protect the defining features that make the City unique, the LUCE also established Neighborhood Conservation Overlay Districts and criteria that would provide additional regulatory tools for preserving and enhancing residential neighborhoods. In addition, the City's Landmarks Commission reviews all applications for demolition of structures over 40 years of age. Furthermore, in compliance with CEQA, any potential impacts on historical resources of any specific future residential projects would be analyzed at the time of their proposal. New housing projects occurring in the City would be required to adhere to existing City requirements that protect historical resources. Therefore, the Housing Element would result in a **less than significant impact** on historical resources.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|-------------------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. As previously stated, the General Plan Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, uncover archaeological resources, paleontological resources, or human remains.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.4-45).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. As discussed in the LUCE EIR (pg. 4.4-45), there is the possibility that important prehistoric and historic-age archaeological resources, paleontological resources, and human remains could be found in the subsurface of the City and be discovered during earthwork activities. The extent and condition of such subsurface resources would be dependent upon the amount of intrusive ground disturbing activities required for the construction of existing buildings and associated infrastructure.

However, new development projects would be subject to all applicable federal, state, regional, and local policies and regulations related to the protection of important archeological resources, paleontological resources, and buried human remains. Therefore, the Housing Element would result in a *less than significant* impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-----------|
| VI. GEOLOGY AND SOILS. Would the project: | | | | |

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|-------------------------------------|--------------------------|
| 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. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. There are no designated Alquist-Priolo Earthquake Fault Rupture zones in the City. However, due to the presence of the Santa Monica Fault branches that crosses through the City, there are City-designated Fault Hazard Management Zones crossing through the City.¹ Therefore, the City could be exposed to groundshaking during a seismic event. Because no actual development or rezoning/re-designation of land is proposed as part of the Housing Element, its adoption would not, in itself, expose people or structures to seismic risks.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg 4.5-21).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Depending on the location, future housing development could be exposed to fault risks and groundshaking during a seismic event. However, compliance with policies already adopted as part of the City's Safety Element, as well as requirements in the Santa Monica Building Code ensures that all new construction adhere to the most current building and seismic codes. New development occurring in the City would be subject to all applicable federal, state, regional, and local policies and regulations related to seismic safety including those contained in the Santa Monica Municipal Code (SMMC) and Santa Monica Building Code. In addition, in accordance with the City's Guidelines for Geotechnical Reports, new projects in the City must submit a site-specific geotechnical investigation that includes standards

¹ City of Santa Monica, Geologic Hazards Map, online at <http://gismap.santa-monica.org/GISMaps/pdf/geohaz.pdf>; accessed May 13, 2013.

and requirements for addressing seismic safety.² The geotechnical investigation must be submitted to the City for review and approval before a grading or building permit can be issued by the City for a proposed project. Therefore, the Housing Element would result in a **less than significant** impact associated with an earthquake fault.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|-------------------------------------|--------------------------|
| iii. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. Strong ground shaking occurring in areas with high ground water tables and poorly consolidated soils can result in liquefaction. As identified in the LUCE EIR (pg. 4.5-22), the areas along the coastline, southwestern city limits, and the northern portion between Colorado Avenue and Santa Monica Boulevard are believed to be susceptible to liquefaction during seismic events. In the event of an earthquake, liquefaction could occur. No actual development or rezoning/re-designation of land is proposed as part of the Housing Element, which is a policy document only. Therefore, its adoption would not, in itself, result in impacts related to liquefaction.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.5-22).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New projects in the City would be required to first assess the potential for liquefaction at the building site and to provide a site-specific Geotechnical Report with design recommendations to mitigate the site's liquefaction potential. The geotechnical investigation must be submitted to the City for review and approval before a grading or building permit can be issued by the City for a proposed project. In addition, new projects would be required to comply with the standards and requirements of the SMMC and Santa Monica Building Code to ensure the maximum practicable seismic protection for structures. Therefore, the Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-----------|
| | | | | |

² City of Santa Monica, Guidelines for Geotechnical Reports, online at http://www.smgov.net/uploadedFiles/Departments/Building_and_Safety/Plan_Check/SMGeotechGuidelines%20-%20March%202010%20final.pdf; accessed May 13, 2013.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-----------------|------------------------------------|---|-------------------------------------|--------------------------|
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. Landslides are often associated with earthquakes, but there are other factors that can influence the occurrence of landslides. These factors include the slope, the moisture content of the soil, and the composition of the subsurface geology. The City of Santa Monica is generally flat; however, landslides could occur along the coastline and the northern edge of the City, both of which exhibit steeper grades. Because no actual development or rezoning/re-designation of land is proposed as part of the Housing Element, its adoption would not, in itself, expose people or structures to landslide risks.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg 4.5-20).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New land uses would be required to comply with all sections of the SMMC, including SMMC Section 8.20 (Special Provisions for Hillside Buildings), which sets forth specific building requirements beyond the CBC that relate directly to development in hillside areas. New development projects occurring in the City would be required to provide site-specific geotechnical investigations to determine the potential for geological hazards.³ The geotechnical investigation must be submitted to the City for review and approval before a grading or building permit can be issued by the City for a proposed project. Therefore, the 2013-2021 Housing Element would result in **a less than significant impact** associated with landslides.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|-------------------------------------|--------------------------|
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. Land in the City is largely developed, and therefore, the potential for large areas of exposed topsoil that could be subject to erosion is considered minimal. As previously stated, the Housing Element is a General Plan policy document that addresses

³ City of Santa Monica, Guidelines for Geotechnical Reports, online at http://www.smgov.net/uploadedFiles/Departments/Building_and_Safety/Plan_Check/SMGeotechGuidelines%20-%20March%202010%20final.pdf; accessed May 13, 2013.

housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in impacts related to soil erosion.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.5-23).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Demolition and construction activities for new housing projects within the City would be required to comply with the erosion and sediment controls mandated by the National Pollution Discharge Elimination System (NPDES) program and/or Section 7.10 of the Santa Monica Municipal Code (Urban Runoff Pollution Control Ordinance). Therefore, compliance with existing regulatory requirements would ensure that new housing uses do not increase the level of soil erosion and loss of topsoil within the City. Therefore, the proposed Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|-------------------------------------|--------------------------|
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. Liquefaction-prone areas could also be susceptible to lateral spreading. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in impacts related to liquefaction.

Additionally, the Housing Element does not propose any changes to the City's existing land use and residential standards, and is consistent with policies set forth in the LUCE. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR.

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New housing projects occurring in the City would be required to prepare site-specific geotechnical investigations to ensure that new land uses would not be located on unstable soils or geologic units. The geotechnical investigation must be submitted to the City for review and approval before a grading or building permit can be issued by the City for a proposed project. In addition, new projects would be required to comply with the standards

and requirements of the SMMC and Santa Monica Building Code to ensure the maximum practicable seismic protection for structures. Therefore, the proposed Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Less Than Significant Impact. A soil’s potential to shrink and swell depends on the amount and types of clay in the soil. The soil type of most concern in the City is the Diablo series, which has a high expansion potential. According to the CDFA, Diablo soils are located in the northwestern portion of the City. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, create substantial risks to life or property from expansive soils.

Additionally, the Housing Element in large measure does not propose changes to the City’s adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.5-25).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City’s RHNA allocation and the City’s policies supporting affordable and workforce housing. New housing developments in the City would be required to prepare a site-specific geotechnical investigation that would identify potentially unsuitable soil conditions and appropriate measures and/or design features to address expansive soils. Thus, adherence to the building code requirements, as well as the geotechnical investigation requirements, would reduce impacts related to expansive soils. Therefore, the proposed Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As stated in the LUCE EIR (pg. 4.5-19), the entirety of the City of Santa Monica is served by established wastewater conveyance and treatment services. All housing development occurring in the City would connect to the existing sewer system and would not require the use of septic tanks. Therefore, **no impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| VII. GREENHOUSE GAS EMISSIONS. Would the project: | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, generate greenhouse gas emissions.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.14-49). The LUCE addresses GHG emissions through its land use and transportation policies such as focusing development near transit, creating complete neighborhoods, supporting infill mixed-use projects, affordable and transit-oriented housing located near jobs and transit. The Housing Element reinforces the LUCE goal of focusing housing near transit, which would help to achieve goals of greenhouse gas emissions reductions. As stated in the Housing Element, the City has incorporated a number of green building measures to help reduce greenhouse gas emissions which include:

- Require that new housing be solar ready for future photovoltaic installation]
- Require that new construction exceed minimum state energy standards by at least 15%
- Require water efficient landscaping and irrigation system
- Provide incentives for rainwater and graywater capture and reuse

In addition, the Housing Element includes continuing policies aimed at developing sustainable housing through green building incentives and requirements, conserving water and energy

citywide and reducing GHG gases through strategic connections between housing, employment and transit opportunities.

Therefore, adoption of the Housing Element would result in a **less than significant impact** on greenhouse gas emissions and adopted plans to reduce greenhouse gas emissions.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|-------------------------------------|--------------------------|
| VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project: | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. No hazards are associated with the policies or programs contained in the Housing Element Update. Therefore, its adoption would not, in itself, create hazards as a result of the transport, storage, and use of hazardous materials or the accidental release of hazardous materials. Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.6-22).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Although new housing projects could increase the quantity of hazardous materials used and hazardous waste generated, such materials and wastes would be typical of those used and generated by existing uses. Furthermore, it is anticipated that such hazardous materials would be used and disposed of in accordance the regulations, standards, and guidelines established by the EPA, Cal/EPA, the adopted regulations of Los Angeles County, and City of Santa Monica related to storage, use, and disposal of hazardous materials. Therefore, adoption of the Housing Element would result in a **less than significant impact**.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As previously stated, the Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. No hazards are associated with the policies or programs contained in the Housing Element Update. The Housing Element addresses the City's housing need. Housing developments do not pose significant risks to schools. Therefore, its adoption would not, in itself, result in hazards within ¼ mile of an existing or proposed school.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.6-25). **No impacts** on schools would occur as a result of adopting the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|-------------------------------------|--------------------------|
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5, and as a result, would it create a significant hazard to the public or the environment ? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. As stated in the LUCE EIR (pg. 4.6-26), the City contains known hazardous materials sites including sites containing LUSTs, voluntary cleanup sites, and small-quantity generators of hazardous waste. The EIR further states that land use changes on these sites could increase potential hazards risks to the public and/or environment. No actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, expose people or structures to hazardous materials sites.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the

2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.6-26).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Future residential projects associated with implementation of the Housing Element update would be subject to site-specific CEQA review in order to assess whether the site is listed as a hazardous materials site, pursuant to Government Code Section 65962.5. If a residential project is located in an area identified as a hazardous materials site, the responsible party would be required to undertake remediation procedures prior to ground disturbance under the supervision of the appropriate regulatory oversight agencies (County Environmental Health Division, Department of Toxic Substances Control [DTSC], or Regional Water Quality Control Board [RWQCB]), depending upon the nature of any identified contamination. Therefore, adopting the Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No 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 a 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"/> |

Less Than Significant Impact. The Santa Monica Municipal Airport is located in the southeastern portion of the City. As analyzed in the LUCE EIR, all air traffic within the City are subject to many stringent regulations to protect the public from potential aircraft hazards or other safety concerns, such as Federal Aviation Administration (FAA) regulations and Caltrans regulations. In addition, the LUCE EIR states that all development surrounding any airport is required to comply with that airport's Airport Land Use Plan (ALUP) which addresses airport operations on public safety. As discussed previously, the Housing Element does not include specific development projects. Therefore, its adoption would not, in itself, expose people or structures to airport risks.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.6-27).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing.

Future housing projects could occur near the Santa Monica Airport; however, these projects would be subject to site-specific CEQA review in order to assess potential airport hazards. These projects would also be required to be compatible with the land use standards established in the City's Municipal Code, the LUCE, and the ALUP. Therefore, adopting the Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| 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"/> |

No Impact. As stated in the LUCE EIR (pg.4.6-28), there are no existing private airstrips within the City. As a result, no safety hazard associated with location near a private airstrip would occur under the 2013-2021 Housing Element. Therefore, **no impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|-------------------------------------|--------------------------|
| g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant. The Santa Monica Fire Department (SMFD) conducts disaster preparedness training sessions, drills, and exercises for the general public and city employees. The City also adopted the Santa Monica Emergency Response Plan in 2006, which is based on the National Incident Management System (NIMS) guidelines and the state Standardized Emergency Management System (SEMS) guidelines. The Plan provides guidance for the City's response to emergency situations associated with natural and manmade disasters. The Plan concentrates on management concepts and response procedures relative to large-scale disasters. Since no actual development or rezoning/re-designation of land is proposed as part of the Housing Element, its adoption would not, in itself, result in adverse impacts on an emergency management plan.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to

affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.6-28).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New housing development occurring in the City would be subject to review by the SMFD to ensure that they would not impair or interfere with an adopted emergency response plan. Therefore, the Housing Element would result in a *less than significant* impact.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As stated in the LUCE EIR (pg. 4.6-22), the City is characterized by features typical of the urban landscape and vegetation is dominated by nonnative ornamentals. No wildlands exist within the City limits. Therefore, the 2013-2021 Housing Element would not expose people or structures to significant risks due to wildland fires. **No impact** associated with wildland fires would occur.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|---|------------------------------|-------------------------------------|
| IX. 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"/> |
| 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 which 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"/> |

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As a General Plan policy document that addresses housing need in the City, no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in adverse impacts on water quality or water runoff.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.7-32).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New housing projects will be required to adhere to water quality and runoff regulations including those set forth by the National Pollution Discharge Elimination System (NPDES)' Construction General Permit and the City's Urban Runoff Pollution Ordinance (Section 7.10 of the Santa Monica Municipal Code) to address potential water quality impacts or water runoff. It should also be noted that new development projects occurring in the Plan area would be subject to environmental review to assess the potential for water quality impacts. Therefore, **no impact** would occur as a result of the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|---|------------------------------|-------------------------------------|
| g) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As stated in the LUCE EIR (pg. 4.7-29), the City of Santa Monica is not located within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map. Therefore, new housing development occurring under the Housing Element would not place structures within a 100-year flood hazard area. Thus, no impact would occur. **No impact** associated with flood hazards would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|-------------------------------------|--------------------------|
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. As stated in the LUCE EIR (pg. 4.7-37), the General Plan Safety Element defines the risks in the City of Santa Monica from inundation or flooding resulting from the failure of a dam or levee as low. In addition, while the Stone Canyon Reservoir and the Riviera Reservoir could cause flood impacts, the City of Santa Monica adopted the Standard Emergency Management System/National Incident Management System (SEMS/NIMS) Emergency Response Plan. The Plan provides guidance for the City's response to emergency situations associated with natural and manmade disasters, including inundation as a result of the failure of a dam or levee, should a human-made or natural disaster occur. Therefore, adoption of the Housing Element would result in a **less than significant impact**.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|-------------------------------------|--------------------------|
| j) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. As a General Plan policy document that addresses housing need in

the City, no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, result in adverse impacts related to inundation by seiche, tsunami, or mudflow.

A seiche is a standing wave occurring in an enclosed or partially enclosed body of water, such as a lake, reservoir, or bay. There are no enclosed or partially enclosed large bodies of water in the City. Therefore, the potential for inundation from a seiche is considered remote. Mudflows (also called debris flows) result from the downslope movement of soil and/or rock under the influence of gravity. The City is not located downslope from any steep hillsides. The City is not at risk from inundation by mudflow.

A tsunami is a large ocean wave caused by a significant undersea disturbance such as earthquakes. The low-lying beachfront areas of the City are designated as tsunami hazard area. Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. The City of Santa Monica has adopted the Standard Emergency Management System/National Incident Management System (SEMS/NIMS) Emergency Response Plan. The Plan provides guidance for the City's response to emergency situations associated with natural and manmade disasters, including inundation as a result of the failure of a dam or levee, should a human-made or natural disaster occur. Therefore, adoption of the Housing Element would result in a **less than significant impact**.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| X. LAND USE AND PLANNING. Would the project: | | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. No actual development or rezoning/re-designation of land is proposed as part of the Housing Element. The Housing Element policies guide housing, emphasizing provision of affordable housing and new housing developed in conjunction with services that would also serve the existing community. In this sense, its policies may serve to unite and provide more civic activity in contrast to concerns about physically dividing an established community. One of the guiding principles in the 2010 LUCE was to preserve neighborhoods and create complete communities. The Housing Element would not rezone or change the land use designations established by the LUCE. Furthermore, no actual development is proposed by the Housing Element nor would the Housing Element grant entitlements for future development. The Housing Element establishes goals, policies, and objectives (such as Goal 1.0, Policies 1.1, 1.2, 1.3, 1.4, 1.5, 1.9, and Objective 1.f) to reinforce the LUCE goal to preserve existing neighborhoods. Therefore, the Housing Element would not physically divide an established community.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the

preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.8-114).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New residential development would be required to comply with all applicable plans and regulations including the LUCE, adopted specific plans, and the City's Municipal Code. All development projects are subject to environmental review as appropriate in compliance with CEQA prior to approval. Therefore, **no impact** on established communities would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-------------------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. No actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, physically divide an established community.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. The proposed Housing Element is an update and revision of the previous Housing Element and predominately consists of new technical data and updated policies and implementation programs to be consistent with current State law and the City's LUCE. The LUCE created a framework to integrate housing with existing and future transit investment. The Housing Element is consistent with the LUCE goal of providing affordable housing near transit-oriented districts. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.8-109).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New residential development would be required to comply with all applicable plans and regulations including the LUCE, adopted specific plans, and the City's Municipal Code. Additionally, all development projects are subject to environmental review as appropriate to comply with CEQA prior to approval. Therefore, **no impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As analyzed in the LUCE EIR (pg. 4.8-114), the City does not have a habitat conservation or natural community conservation plan because the City does not contain any significant habitat capable of supporting sensitive species or any significant ecological areas. Since there is no habitat conservation plan or natural community conservation plan applicable to the City, the Housing Element would not conflict with an applicable habitat conservation or community conservation plan. **No impact** on habitat conservation areas would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| XI. 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"/> |

No Impact. There are no valued mineral resources or mineral resource recovery sites in the City of Santa Monica. As was determined in the LUCE EIR, the entire City is urbanized and does not contain any mineral resources. Therefore, the Housing Element would not result in impacts on mineral resources. Therefore, **no impact** on mineral resources would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-----------|
| XII. NOISE. Would the project result in: | | | | |

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| b) Exposure of persons to or generation of noise levels in excess of standards established in the Santa Monica General Plan, the City Noise Ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The General Plan Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, generate temporary or permanent noise or groundborne vibration.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.9-27).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. All future new residential development projects would be subject to site-specific analysis of noise impacts. Additionally, future housing projects would be required to adhere to the City of Santa Monica Noise Ordinance with regard to construction and operation noise. Therefore, no impacts would occur as a result of the Housing Element.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-----------|
|--|------------------------------------|--|------------------------------|-----------|

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|-------------------------------------|--------------------------|
| h) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. The Santa Monica Airport is located in the southeast corner of the City. As discussed previously, the Housing Element only provides a framework for the City's anticipated future residential growth and housing demand. The Housing Element is a policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, expose people to airport noise.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.9-51).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. All future new residential development projects would be subject to site-specific analysis of airport noise impacts. Additionally, future residential land uses surrounding the Santa Monica Airport would be required to comply and be compatible with the land use standards established in the City's Municipal Code, the LUCE, and the Santa Monica Airport Land Use Plan. Therefore, the Housing Element would result in a **less than significant** impact.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-------------------------------------|
| a) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. There are no private airstrips in the vicinity of the City. Therefore, the Housing Element would not result in noise impacts related to a private airstrip. **No impact** would occur.

| XIV. POPULATION AND HOUSING. Would the project: | | | | |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The General Plan Housing Element addresses housing need in the City and includes a Housing Plan to address the City’s RHNA housing allocation for the 2013-2021 period and support focusing housing near multi-modal transportation hubs, including a strong component of deed-restricted affordable housing. No actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, indirectly or directly generate population growth.

Additionally, the Housing Element in large measure does not propose changes to the City’s adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. The Housing Element is consistent with the the LUCE and as such, the Housing Element would not result in population increases over what the LUCE had forecasted. The Housing Element also supports LUCE strategies to integrate land use and transportation to achieve a sustainable community by strategically locating affordable and workforce housing in areas associated with transit, and encouraging the creation of walkable complete neighborhoods with local-serving commercial and housing uses. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.10-12).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City’s RHNA allocation and the City’s policies supporting affordable and workforce housing. As individual housing projects are proposed, they will be analyzed individually for their potential impacts on population and housing. Therefore, as a policy document, the Housing Element would not induce substantial population growth, and **no impacts** would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| 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"/> |

No Impact. The Housing Element provides policies that address housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. No actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, displace housing or people.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.10-13).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. The Housing Element is required to include Suitable Sites Inventory that identifies sites that are located in mixed-use commercial districts, mostly on vacant or commercial parcels. This was specifically developed to avoid the loss of existing housing, which would displace residents. Future development of these parcels and other parcels not identified would be subject to review and analysis of potential displacement impacts on a case by case basis. Although displacement is not anticipated, projects that could result in displacement may be required to provide relocation assistance and/or replacement housing in accordance with federal, state, and local requirements. As a policy document, the Housing Element would not result in the displacement of people or housing. Therefore, **no impacts** would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|-------------------------------------|--------------------------|
| XV. PUBLIC SERVICES. 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: | | | | |
| a) Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. Fire protection services in the City are provided by the Santa Monica Fire Department (SMFD), which has four fire stations with emergency response time estimated at approximately four minutes. According to the SMFD, they are currently operating at acceptable levels of fire protection services. The General Plan Housing Element is a policy document that addresses housing need in the City and does not include any specific development or rezoning/re-designation of land. Adoption of the Housing Element would not directly generate a demand for fire protection services. Therefore, its adoption would not, in itself, create increased demand for SMFD services.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.11-9).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. As part of the planning and development review process, new residential development projects would be evaluated by the SMFD to determine the level of and demand for fire protection services that would be generated by each project. Therefore, impacts on fire protection services would be *less than significant*.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-----------------------|------------------------------------|--|-------------------------------------|--------------------------|
| b) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. Police protection services in the City are provided by the Santa Monica Police Department (SMPD). The SMPD does have a 5-year staffing plan created by the department and approved by the City Council to increase police personnel levels based on demand, contingent on budgetary constraints. SMPD also has equipment enhancement programs, also contingent upon budgetary constraints. SMPD expansion might be accommodated on the site of the Department's existing facility through new construction and/or remodel or by the development of a police substation. The General Plan Housing Element is a policy document that addresses housing need in the City and does not include any specific development or rezoning/re-designation of land. Therefore, its adoption would not, in itself, create increased demand for SMPD services.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.11-14).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. As part of the planning and development review process, new residential development projects would be evaluated by the SMPD to determine the level of and demand for police protection services that would be generated by each project. Therefore, impacts on police protection services would be *less than significant*.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-------------|------------------------------------|--|-------------------------------------|--------------------------|
| c) Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. The Santa Monica-Malibu Unified School (SMMUSD) provides public education to school-age students in the City. The General Plan Housing Element is a policy document that addresses housing need in the City and does not include any specific

development or rezoning/re-designation of land. Therefore, its adoption would not, in itself, generate new students.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.11-23).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. As documented in the Housing Element, the average size of households and the percentage with children in Santa Monica is below the regional median. In general, Housing Element policies will not lead to a significant number of new school-age children that has not been anticipated by the SMMUSD. In addition, all new residential development occurring in the City is required to contribute funds in accordance with SMMUSD's currently adopted developer fees (as authorized by SB 50 Leroy Green School Facilities Program [1998]). This fee would go towards expanding and upgrading SMMUSD facilities to accommodate enrollment at Santa Monica public schools associated with development. According to Government Code Section 65996, the developer fees authorized by SB 50 are deemed as a matter of law to be full and complete school facilities mitigation. Therefore, impacts would be *less than significant*.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-----------------------------|------------------------------------|--|------------------------------|-------------------------------------|
| d) Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Less Than Significant Impact. The City of Santa Monica has 27 public parks, which includes the recently opened Tongva Park, as well as the beach areas. Library services in the City are provided by four SMPL libraries: the Main Library, the Montana Avenue Branch, the Fairview Branch, and the Ocean Park Branch. In addition, the Pico Branch Library is currently under construction and expected to open by 2014. The Housing Element contains policies to address the City's housing needs. Because no specific development or rezoning/re-designation of land is included, its adoption would not, in itself, generate new students.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.11-28 and 4.11-42).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and

workforce housing. New developments would be required to contribute open space and other facilities to satisfy the demand for parks and other public facilities. As part of the planning and development review process, all new residential development projects would be evaluated on a case-by-case basis to determine the level of and demand for public services that would be generated by the project. Therefore, the impacts would be *less than significant*.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-------------------------------------|
| XVI. 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Less Than Significant Impact. Please refer to discussion above Section XV - Parks.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| XVIII. TRANSPORTATION/TRAFFIC. Would the project: | | | | |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-------------------------------------|
| b) Conflict with an applicable congestion management program, including but not limited to a level of service standards and travel demand standards, or other standards established by the county Congestion Management Agency for designated roads or highways? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Less Than Significant Impact. The LUCE created a framework to integrate housing with existing and future transit investment. The Housing Element is consistent with adopted policies addressing circulation and/or alternative modes of transportation. The Housing Element includes policies to plan for future housing in transit-rich areas including Santa Monica’s three future Expo light rail stations. As a General Plan policy document, the Housing Element addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not, in itself, generate new students.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. The Housing Element includes a Housing Plan to address the City’s RHNA housing allocation for the 2013-2021 period, which is consistent with the LUCE and as such, the Housing Element would not result in traffic increases over what the LUCE had forecasted. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adopting the 2013-2021 Housing Element Update would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg 4.12-53).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City’s RHNA allocation and the City’s policies supporting affordable and workforce housing. Project-specific traffic impacts that could result from future residential development in the City will be evaluated on case-by-case basis through an appropriate level of environmental review under CEQA as projects come forward. Therefore, impacts would be *less than significant*.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-----------|
| | | | | |

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| d) Result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As discussed previously, the Housing Element update does not include specific development projects, and instead, only provides a framework for the City’s anticipated future residential growth and housing demand. Adoption of the Housing Element itself would not involve building any structures and thus would not result in any changes to air traffic patterns and in any substantial safety risks related to aircraft traffic.

Additionally, the Housing Element in large measure does not propose changes to the City’s adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.12-51). Therefore, **no impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-------------------------------------|
| e) 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"/> |

No Impact. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. The Housing Element would not result in physical impacts or the development of hazardous design features.

Additionally, the Housing Element in large measure does not propose changes to the City’s adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.12-51).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Ongoing development proposals would be reviewed on a case-by-case basis as they arise to determine if project layouts, driveway locations, land use types, or actual intensities would result in hazardous conditions. Therefore, **no impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|------------------------------|-------------------------------------|
| f) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. As a policy document that addresses housing need in the City and does not specifically include development or rezoning/re-designation of land, the Housing Element would not result in physical impacts or inadequate emergency access.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.12-52).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. New residential development would be reviewed on a case-by-case basis to determine if project layouts, driveway locations, land use types, or actual intensities could impact emergency access. New development would be required to meet all applicable local and State regulatory standards for adequate emergency access, including California Building Code, Municipal Code and Fire Code requirements. Therefore, **no impact** would occur.

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|-------------------------------------|--------------------------|
| IX. UTILITIES AND SERVICE SYSTEMS. Would the project: | | | | |
| a) Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|------------------------------------|--|-------------------------------------|--------------------------|
| c) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) 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"/> |

Less Than Significant Impact. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. As such, adoption of the Housing Element, by itself, would not generate water or wastewater.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.13-41).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. The City adopted a 2010 Urban Water Management Plan (UWMP)⁴, which reflects the City's aggressive efforts to achieve local water supply autonomy (i.e., no longer relying on imported supplies) by 2020. In order to achieve local water supply autonomy, the City has committed to reducing per capita demand to 123 gallons per capita per day (gpcd). Based on the 2010 UWMP, water supplies are sufficient to meet Citywide water demands of future growth. Furthermore, as future residential development projects are proposed, each project would be evaluated on a case by case basis to ensure that adequate water and wastewater infrastructure capacity exists to serve the project and if necessary, mitigate for its impacts. Therefore, impacts would be less than significant.

⁴ City of Santa Monica, 2010 Urban Water Management Plan

| | Significant and Unavoidable Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|------------------------------------|--|------------------------------|-------------------------------------|
| f) Fail to 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"/> |
| g) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The City actively implements waste reduction/diversion programs in compliance with State law. In 2012, the City diverted more than 70 percent of its wastes from the landfill, exceeding the target established in the Sustainable City Plan and the state's diversion rate.⁵ To continue this success and further increase recycling and composting, Santa Monica is developing a Zero Waste Strategic Plan to reach a diversion goal of 95 percent by 2035.⁶ The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. As such, adoption of the Housing Element, by itself, would not generate solid waste impacts.

Additionally, the Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Moreover, the new policies and programs that are proposed would not have any potential to affect the environment. Therefore, adoption of the Housing Element would not create new impacts or increase the significance of impacts identified in the LUCE EIR (pg. 4.13-51).

Implementation of the programs contained in the Housing Element could result in new housing that addresses the City's RHNA allocation and the City's policies supporting affordable and workforce housing. Therefore, Housing Element would result in **no impact**.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| | | | | |

⁵ City of Santa Monica, Sustainable City Report Card 2012; online at http://www.smgov.net/uploadedFiles/Departments/OSE/Categories/Sustainability/Sustainable_City_Report_Card_2012.pdf accessed September 18, 2013.

⁶ City of Santa Monica City Council Agenda, March 19, 2013; online at <http://www.smgov.net/departments/council/agendas/2013/20130319/s2013031904-A.htm>; accessed September 13, 2013.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| XXI. 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 wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. The Housing Element does not authorize any development. Therefore, its adoption would not significantly 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. Therefore, **no impact** would occur.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. The proposed project involves the adoption of the City's General Plan Housing Element, which guides future housing. No specific development projects would occur as a result of the Housing Element; and no redesignation/rezoning of land is proposed. Therefore, adoption of the Housing Element, in itself, would not result in cumulative impacts.

Furthermore, cumulative impacts associated with future housing development have been evaluated at a program level in the LUCE EIR. The Housing Element in large measure does not propose changes to the City's adopted housing-related policies and programs including those

set forth in the LUCE and the 2008-2014 Housing Element. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2008-2014 Housing Element. Since the Housing Element is consistent with the LUCE; therefore, adopting the Housing Element would not create new cumulative impacts or increase the significance of cumulative impacts identified in the LUCE EIR. Impacts would be *less than significant*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact. As identified throughout the analysis herein, the Housing Element would not have an environmental effect that would cause substantial adverse effects on human beings either directly or indirectly. Impacts would be *less than significant*.