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Subject: Evaluation of Recommended Changes to the Draft Downtown Community Plan (DCP) and Program Environmental Impact Report (EIR) Since Issuance of the Final Program EIR

This memorandum provides minor updates and corrections to the Program Environmental Impact Report (EIR) for the Downtown Community Plan (DCP) in light of the proposed changes to the DCP that were initiated after issuance of the Final Program EIR in April 2017. This memorandum addresses whether these changes to the DCP – made as result of the Planning Commission and City Council hearings – would create new or substantially more severe environmental impacts than those identified in the Program EIR, which was prepared in compliance with the California Environmental Quality Act (CEQA).

1.0 PROJECT BACKGROUND

The DCP sets forth City policy guidance and an implementation plan for the Downtown through the 2030 planning horizon. Consistent with the framework provided by the Land Use and Circulation Element (LUCE), the DCP provides a proactive strategy for the Downtown to evolve into a more accessible, multi-modal, and pedestrian-friendly urban district that serves the needs for a diverse community. The LUCE specifically recommends that the DCP address a number of planning issues including:

- Building form and public realm in the Downtown,
- Provision of open space,
- Affordable and workforce housing demand
- Diverse mobility options
- Quality of pedestrian access from areas south of the Downtown core
- Constrained linkages from Downtown to the beach
- Incorporation of the new western terminus station (Downtown Station) of the Expo Light Rail Transit line (Expo LRT) into the fabric of the Downtown

The DCP is intended to be a plan for the long-term enhancement of the Downtown to improve the quality of life and sustainability while also conserving the character of the adjacent neighborhoods. The Plan addresses important issues in the Downtown including historic preservation, high quality architecture, sensitive urban design, diverse housing opportunities, sustainable features, expansion of cultural arts offerings, additional

open spaces to support walkability, support for the retail/entertainment district, additional office space to meet the needs of the “Silicon Beach” creative businesses, and integration with the Expo LRT.

The City of Santa Monica (City) has undertaken the following CEQA review process:

- On September 13, 2013, a Notice of Preparation (NOP) for preparation of a Program EIR was filed with the California State Clearinghouse in the Governor’s Office of Planning and Research (OPR) and the Los Angeles County Clerk/Recorder (County Clerk).
- A public Scoping Hearing was held on October 3, 2013, and public comments were received until October 21, 2013 (CEQA Guidelines §15082).
- A Draft Program EIR was released by the City for a 90-day public review period and filed with OPR and the County Clerk on February 3, 2016 (State Clearinghouse No. 2010091056).
- The Draft Program EIR released on February 3, 2016 included a Project Description that reflected the first draft of the Downtown Specific Plan that was released on February 20, 2014.
- Subsequent to publication of the Draft Program EIR, the City prepared a Recirculated Draft Program EIR in accordance with CEQA Guidelines Section 15088.5. The Recirculated Draft Program EIR included only the revised portions of the EIR necessary to make the EIR consistent with the DCP in order to ensure that the Project Description was finite and stable consistent with CEQA Guidelines Section 15124. The Recirculated Draft Program EIR was released for a 45-day review period beginning February 1, 2017 and ending on March 20, 2017.
- In April 2017, a Final Program EIR was issued by the City. The Final Program EIR provided written responses to all public comments received by the City during the public review period of the Draft Program EIR and Recirculated Draft Program EIR, as well as any text changes to the EIR and a mitigation monitoring program.

Following the release of the Final Program EIR, a Final Public Hearing Draft DCP was released in April 2017. The Planning Commission conducted multiple hearings on the Draft DCP on April 26, May, 10, May 11, May 17, May 18, and May 31, 2017 and made recommendations for revisions, clarifications, additions, and deletions of policies. Following the Planning Commission hearings, the City Council conducted a public hearing and began deliberations on July 10 and July 11, 2017 and endorsed the Planning Commission’s recommendations and gave final direction on changes to be made to the Final Public Hearing Draft DCP. This memorandum summarizes and evaluates the City Council’s complete recommended changes to the DCP and any resultant alterations to previous environmental analysis prepared in the Final EIR. A copy of the list of suggested changes is included as Attachment A to this memorandum.

2.0 CEQA REQUIREMENTS

Under CEQA, a Lead Agency is required to recirculate an EIR when “significant new information” is added to the EIR subsequent to its issuance for public review/consideration (refer to Section 15088.5 of the CEQA Guidelines). Under Section 15088.5, subdivision (a), “significant new information” is defined as including the disclosure of any of the following:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;

- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponent has declined to implement. Under Section 15088.5, subdivision (b), "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications to an adequate EIR." In light of CEQA Section 215088.5, this memorandum evaluates the recommendations for policy and language changes to the proposed DCP and to the EIR and makes a determination as to whether the recommended changes would constitute "significant new information."

3.0 RESULTS

3.1 Recommended Changes to the Proposed DCP

This memorandum reviews the suggested policy and language revisions to the DCP as a result of City Council's direction to staff on the Public Hearing Draft DCP, incorporates minor updates and revisions as necessary to the Final Program EIR, and determines whether conditions outlined in CEQA Guidelines Section 15088.5 are met. In all, 275 changes to the Draft DCP are recommended following the release of the Final Program EIR in April 2017 (see Attachment A). In addition, there are 3 potential changes that could be adopted by the City Council:

Potential Change No. 1:

Administrative Approval request for projects up to 25,000 square feet for any new non-profit youth-serving community assembly facility replacing an existing legally-established non-profit, youth-serving community assembly facility or expansion of an existing facility if such replacement building or expansion exceeds 25,000 square feet within Tier 1 limits and is located on land occupied by the non-profit youth-serving community assembly use as of July 25, 2017.

Potential Change No. 2:

For parcels in the Wilshire Transition District that (a) front on Wilshire Boulevard, (b) are not adjacent to a residentially-zoned parcel, and (c) are designated Downtown Core under the LUCE, the Tier 2 maximum height and FAR for housing projects shall be 60 feet and 2.75 FAR.

Potential Change No. 3:

Potential change in development process thresholds to allow housing projects between 75,000 and 90,000 square feet to be processed with a Development Review Permit.

The above recommended and potential changes were reviewed and categorized in Table 1 as follows:

- Text and format changes to address typographical errors
- Clarifications to language in the DCP;
- Revisions to the City's process and administration;
- Changes that related to City timing for implementation;
- General deletions
- Changes that represent refinement of existing policies and/or language in the Draft DCP

None of these changes would have any impact on the physical environment described in the Final EIR.

The remaining changes to the Draft DCP, which are not clarifying or administrative in nature, may have some limited potential to alter the analysis in the EIR and thus warrant further discussion. These changes include:

- Inclusion of the Big Blue Bus site into the Gateway Master Plan;
- Deletion of parking minimums and keeping parking maximums;
- Bonuses and process incentives for 100% affordable housing projects;
- Establishing 130 feet as the maximum height for the Established Large Sites overlay district and removing voter approval;
- Location of public parking supply
- Employee transportation allowance; and
- Reduction in height and FAR within the Wilshire Transition district.

However, as described below, these revisions would not result in new or greater physical environmental impacts and would not result in any substantial changes to the severity of the impacts described in the Final EIR.

Table 1. Changes to the DCP

	Description	Recommended Change No.
Text and format changes (to fix typos, formatting, grammar, renumbering, nonmenclature, referencing, or eliminate duplication)	These changes provide clerical corrections for formatting, spelling, typos, renumbering, or references.	1, 2, 4, 8, 19, 23, 40, 53, 54, 74, 76, 79, 83, 87, 95, 98, 111, 130, 141, 150, 161, 163, 164, 189, 190, 193, 195, 196, 211, 214, 231, 233, 234, 237, 275
Changes that clarify language in the Plan	These changes are intended to clarify the language in the Plan. Would not materially change the policy, action, or program. As such, these changes would not result in physical environmental impacts that would be different from those described in the Final Program EIR.	7, 9, 11, 13, 14, 16, 18, 22, 24, 30, 31, 32, 33, 34, 36, 37, 39, 42, 43, 44, 45, 46, 51, 52, 56, 57, 58, 59, 60, 64, 65, 66, 78, 84, 85, 90, 94, 97, 102, 104, 106, 108, 112, 118, 119, 121, 122, 125, 128, 129, 131, 132, 135, 136, 137, 139, 140, 146, 148, 153, 155, 160,162, 165, 167, 169, 170, 172, 173, 175, 178, 179, 181, 182, 183, 184,192, 194, 201, 204, 209, 215, 216, 218, 220, 222, 228, 235, 248, 249, 251, 256, 259, 260, 261, 262, 266, 268, 269, 270, 271
Changes that relate to City process and administration	These changes relate to the City's administrative procedures, such as how projects are to be processed under the Plan. No physical impacts on the environment would occur as a result of these changes.	5, 6, 10, 12, 15, 21, 25, 41, 47, 48, 50, 62, 63, 67, 68, 72, 73, 107, 120, 124, 151, 152, 202, 203, 205, 206, 207, 272, 273, 274, Potential Change Nos. 1 and 3
Changes that related to City timing for implementation	These changes address the timing/priority for implementation of the action in the Plan. These changes would not result in physical environment impacts that would be different from those described in the Final Program EIR	61, 75, 77, 80, 81, 82, 86, 88, 89, 91, 93, 96, 99, 100, 101, 103, 105, 109, 110, 114, 133, 134, 142, 143, 147, 154, 157, 158, 159, 166, 168, 171, 174, 176, 177, 180, 185, 186, 245
General deletions	These changes would remove a proposed action, policy, or program from the Plan. Based on the nature of the actions, policies, and programs recommended for deletion, these changes would not result in physical environmental impacts that would be greater than those described in the Final Program EIR.	38, 49, 55, 123, 138, 144, 145, 149, 156, 188, 265
Changes in policy or standards that would not result in greater physical environmental impacts	These changes address policies or requirements to a building's design– would not increase the intensity (FAR) or height of a building use on a site. These changes would not result in environmental impacts that would be greater than those described in the Final Program EIR.	20, 26, 27, 28, 29, 35, 187, 191, 197, 198, 199, 200, 213, 217, 219, 221, 223, 224, 225, 226, 227, 229, 230, 232, 236, 238, 239, 240, 241, 246, 247, 250, 252, 253, 254, 255, 257, 258, 263,264, 267
Changes that need further discussion	Please see additional discussion below.	3, 17, 69, 70, 71, 92, 113, 115, 116, 117, 126, 127, 208, 210, 212, 242, 243, 244

Notes: See attachment A for a complete list of Planning Commission and City Staff recommended changes to the Draft DCP.

3.2 Additional Discussion of Changes to the Draft DCP that are Relevant to the EIR

Change No. 3, 70, and 71 - Addition of Big Blue Bus site as a Gateway Master Plan site

The inclusion of the Big Blue Bus site into the Gateway Master Plan would not change the analysis of the EIR since the EIR already accounted for the development of the site as a Gateway Master Plan site. The EIR analysis incorporated the potential development of this site at the maximum FAR of 4.0 and height of 84 feet, including the circulation improvements associated with it. This change would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

Change No. 3: Add BBB site to Table 2A.1 Gateway Master Plan Sites

Table 2A.1 Gateway Master Plan Sites

GATEWAY SITES
120 Colorado Avenue (Wyndham)
302 Colorado Avenue (Sears)
402 Colorado Avenue/1640 5th Street (Downtown Station Site)
1334 5 th Street (Big Blue Bus Site)

Change No. 70: Add entirety of Big Blue Bus site to Gateway Master Plan area by deleting a portion of a sentence.

The study area includes the area between Colorado Avenue and the I-10 freeway from Ocean Avenue to 75th Street. ~~tree and a portion of the Big Blue Bus site.~~

Change No. 71: Add entirety of Big Blue Bus site to Gateway Master Plan area.

Modify Illustration 3.13 Potential New Connections, Open Space and Pathways

Change No. 69, 116, and 117 - Removal of Parking Minimums and In-Lieu Parking District

City Council directed staff to eliminate minimum parking requirements within Downtown to prevent oversupply of parking, which would further discourage driving and advance the LUCE's goal of "No Net New P.M. Peak Hour Trips". Recent studies indicate that parking availability plays a strong role in influencing driving behavior.¹ Eliminating parking minimum requirements would have a significant effect on reducing vehicle trips. As such, this requirement is likely to further reduce the number of vehicle trips to/from the Downtown and associated traffic impacts as analyzed in the Final Program EIR. Furthermore, any fiscal loss in parking

¹ Chris McCahill and Norman Garrick, "Effects of Parking Provision on Automobile Use in Cities: Inferring Causality", Transportation Research Board, November 13, 2015; Petter Christiansen, "Parking Facilities and the Built Environment: Impacts on Travel Behavior", Transportation Research, January 2017; Zhan Guo, "Residential Street Parking and Car Ownership", Journal of the American Planning Association, Winter 2013; Rachel Weinberger, "Death by a thousand curb-cuts: Evidence on the effect of minimum parking requirements on the chose to drive", Transport Policy, March 2012; Kyle Gebhart, "Wasteful Parking Supply in East Harlem: An Analysis of Parking Occupancy and Mode Usage at East River Plaza in New York City", First Place, American Planning Association, Transportation Planning Division Competition, December 16, 2011

in-lieu fees would not have a material effect on the ability to implement TDM measures and were not relied upon to achieve LUCE trip reduction goals, including the goal of No Net New PM Peak Hour Trips. This change would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

Change No. 69: Delete reference to Parking In-Lieu Fee that was based on having a minimum parking requirement

Expanding In-Lieu Fee Parking District

~~Downtown pioneered an in lieu fee parking district in the 1980's, which was updated in 2013. The plan recommends expansion of the parking district to the new DCP. So new buildings and businesses could meet demand using shared parking instead of building single use parking spaces. Over the life of the Plan, the fees could generate seed money for at least one additional parking structure, depending on parking requirements. It is anticipated that approximately 800 additional parking spaces will need to be added to the public network to keep pace with land use changes that opt into the parking in lieu fee program. Most of this new parking should be built in peripheral locations to reduce vehicle trips into the center of the District. Caution should also guide new capital parking investments given the uncertain impact of driverless cars. Already rideshare companies are altering the amount of parking demand from trips to, from, and within Downtown.~~

Change No. 116 Delete action:

~~Action 3.5C Expand the parking in lieu fee district to reflect current Downtown boundaries with an appropriate fee and flexible expenditure plan.~~

Change No. 117 Delete action:

~~AM3.5D Provide flexibility in meeting required parking through unbundled parking, shared parking, in lieu fees and off site parking for changes of use in existing buildings.~~

Change No. 210 - FAR bonus for Housing Projects in Neighborhood Village

In order to incentivize the production of housing, the City Council provided staff with direction to modify the Draft DCP to include a FAR bonus of 0.25 FAR for housing projects in the Neighborhood Village District. The Final Program EIR analyzed a maximum building height of 60 feet and maximum FAR up to 3.25 for Tier 2 Projects with Housing within the Neighborhood Village district under Scenario B. Additionally, the Final Program EIR analyzed a maximum FAR of 4.0 within the Bayside Conservation District. However, the maximum FAR for the Bayside Conservation District proposed in the final Draft DCP is 3.5 (leaving 0.5 FAR to be reallocated). Therefore, the inclusion of a 0.25 FAR bonus for housing projects in the Neighborhood Village District would be offset by the 0.5 reduction in maximum FAR allowed in the Bayside Conservation District and would not result in an overall increase in development within the Downtown. Environmental impacts would be similar to those identified in the Final Program EIR. This change would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

	Neighborhood Village	Bayside Conservation
Final EIR		
Maximum FAR	3.25	4.0
Maximum Height	60 feet	84 feet

Proposed DCP		
Maximum FAR	3.5	3.5
Maximum Height	60 feet	60 feet

Change No. 210: Modify Table 4.2 Development Standards to increase FAR by 0.25 for Tier 2 Housing projects in the Neighborhood Village District

NV

Housing

Maximum FAR

Tier 2 –3.5

Maximum Building Height (ft.)

Tier 2 –60'

Change No. 17 and 212 - Height and FAR Bonus for 100% Affordable Housing Projects Districtwide

In order to incentivize the production of affordable housing, the City Council gave staff direction to modify the Draft DCP to give 100% affordable housing projects in the Downtown receive a height and FAR bonus of 10 feet and 0.5 FAR subject to a maximum height of 84 feet. As a result of this recommended change to the Draft DCP, there would be a slight increase in building height and FAR only for 100% affordable housing projects. Given that only a small fraction of future development projects are anticipated to be 100% affordable housing due to lack of government subsidy funding, these changes would not have a measurable effect on the overall bulk and scale of new structures within the sub-area. Further, these changes would not have an effect on the overall total development within the Downtown analyzed in the Final Program EIR, as this increase would be offset by the Final Program EIR's conservative analysis of the development standards for the Bayside Conservation District. As previously stated, the Final Program EIR analyzes the maximum FAR of 4.0 within the Bayside Conservation District; however, the maximum FAR for the District in the Draft DCP is 3.5. Accounting for the recommended increase in FAR of 0.25 for housing projects in the Neighborhood Village District, there would be still be 0.25 FAR to spare. In addition, the DCP's cap of 3.2 million square feet would ensure that overall development would not increase over what was analyzed for Scenario B of the EIR. Therefore, the inclusion of bonuses for 100% affordable housing projects in the Downtown would be offset and would not result in an overall increase in development within the Downtown. The bonus of 10 feet in height would also not result in significant increase in aesthetic impacts since this slight increase in height would only occur for 100% affordable housing projects (which would constitute only a fraction of future development in the Downtown). Environmental impacts would be similar to those identified in the Final Program EIR. This change would not result in any substantial new information (such as a new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

Change No. 17: Include narrative in Community, Culture, Prosperity (Chapter 2B) about Exemptions for 100% Affordable Housing Projects

Special Incentives for 100% Affordable Housing Projects

To incentivize the production of affordable housing, 100% Affordable projects are provided the following incentives districtwide:

- Administrative Approval for all projects regardless of number of units
- Height and FAR bonuses

Change No. 212: Modify Table 4.2 Development Standards to incorporate height and FAR bonus for 100% Affordable Housing Projects Districtwide

	LT East	LT West	NV	BC (Prom)	BC (2 nd /4 th)	TA	OT	WT
FAR	2.75	3.25	4.0	3.25	4.0	4.0	3.25	2.75
Height	60'	70'	70'	70'	70'	84'	60'	60'

Change No. 242 – Affordable Housing Production Requirements

City Council gave staff direction to increase the affordable housing requirements for housing and mixed use Tier 2 and Tier 3 projects less than 75,000 sf. Establishing project requirements for on-site and off-site affordable housing is a procedural change that does not in and of itself result in new significant physical impacts on the environment. The DCP is consistent with the environmental impacts assessed in Scenario B, which analyzed a land use mix that is predominantly housing. The DCP has policies (LU4.1, 4.2, 4.3, 4.4; CCP1.1, 1.2, 1.3, 1.4, 1.5, 1.6) and actions (CCP1.1A, 1.2A, 1.2B, 1.3A) that are supportive of housing and provides process and development incentives for housing projects through a streamlined approval process and height and FAR bonuses compared to commercial projects. While there may be a possibility that this increase in inclusionary affordable housing requirements could result in developers choosing to proceed with commercial projects, this possibility is speculative given the development processing thresholds proposed for housing in the DCP compared to the lower development processing thresholds proposed for commercial development, which are designed to incentivize housing (e.g., the administrative approval threshold for commercial development is 10,000 sf and the development agreement threshold for commercial project is 30,000 square feet compared to the housing development thresholds proposed in Potential Change No. 3). Furthermore, it would be speculative to determine the land use outcome of these requirements due to a diversity of economic conditions, property ownership, and a wide variety of individual factors that can only be considered on a case-by-case basis. Therefore, the change in inclusionary affordable housing requirements will not result in new significant impacts.

Change No. 243 and 244 - Established Large Sites Approval Process

The City Council gave staff direction to modify the Draft DCP to establish a maximum height of 130 feet for the overlay district for the three Established Large Sites in Downtown and to remove the concept of voter approval for projects on the Established Large Sites and to also remove the concept of voter approval for Specific Plan Amendments. The overlay district would establish a maximum FAR of 3.0 for 1133 Ocean Ave, 4.0 for 101 Santa Monica Boulevard, 3.5 for 4th/5th and Arizona, with heights up to 130' for all three established large sites. The Final Program EIR analyzes the Established Large Sites at these respective FARs and a maximum height of 84 feet and acknowledges that the Draft DCP could establish an approval process for requests up to 130 feet, subject to additional environmental review, pursuant to CEQA. As previously described, impacts of development at the Established Large Sites have been thoroughly analyzed in the Final Program EIR with building heights of up to 84 feet. Impacts of development up to 130 feet at the Established Large Sites would remain consistent with the impacts described in the Final Program EIR. Specifically, changing the maximum height of these three Established Large Sites and the manner in which they are approved would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require

recirculation of the EIR. In order to clarify these potential impacts, changes EIR-1 through EIR-11 have been recommended in Section 4.0, *Changes to the EIR* (see also Attachment B).

Change No. 243: Clarify maximum height limits considered for Established Large Sites.

A. Height Limit. Projects on Established Large Sites may be authorized up to an absolute height limit of 130' subject to the following requirements:

Change No. 244: 9.10.080 ESTABLISHED LARGE SITES OVERLAY

Projects within the Established Large Sites Overlay will be processed as a development agreement. These projects must provide, at minimum, Tier 3 project requirements and community benefits. Additional onsite uses, features, fees, programs or benefits expected for these projects are described in Chapter 2, *Downtown Districts*. Projects within Established Large Sites shall only be required to comply with development standards for Height Limit, Maximum Floor Area, and Open Space as required by 9.10.080.

Height Limit. ~~The maximum height for the Downtown is 84'~~ Projects on Established Large Sites may be authorized up to an absolute height limit of 130' subject to the following requirements: Shall be processed through a development agreement

~~[OPTIONS FOR PUBLIC DISCUSSION]~~

~~OPTION A: Voter Approval required (may be changed with approval of Specific Plan Amendment by future Council)~~

~~OPTION B: Voter Approval as approved through ballot measure (will require placing ballot measure on special election or next general election)~~

~~OPTION C: Supermajority Approval of the City Council (requires Charter Amendment) Additional environmental review to the extent not analyzed in the Downtown Community Plan Final EIR. Shade and Shadow analysis of the project's impacts on adjacent uses Include in the application submittal comprehensive responses to how the project meets each of the priorities described in the Downtown Districts Chapter~~

Maximum Floor Area.

1133 Ocean Avenue shall have a maximum Floor Area Ratio of 3.0.
101 Santa Monica Boulevard shall have a maximum Floor Area Ratio of 4.0.
4th Street/Arizona Avenue shall have a maximum Floor Area Ratio of 3.5.

Open Space Requirements.

50% of total parcel area comprised of the following: 25% located at Ground Floor and 25% without a regulated location.

9.10.090 VOTER APPROVAL OF SPECIFIC PLAN AMENDMENTS.

[OPTIONS FOR PUBLIC DISCUSSION]

OPTION A: Specific Plan Amendments for building height or FAR within 7 years after the effective date of the Plan shall require voter approval (may be changed with approval of Specific Plan Amendment by future Council)

OPTION B: Specific Plan Amendments for building height or FAR within 7 years after the effective date of the Plan shall require voter approval as approved through ballot measure (will require placing ballot measure on special elections or next general election)

OPTION C: Specific Plan Amendments for building height or FAR within 7 years after the effective date of the Plan shall require supermajority approval of the Council (requires Charter Amendment)

Change No. 113, 115, 126 and 127 – Location of New Public Parking in the Downtown

The Downtown has an inventory of over 10,000 existing publicly available parking spaces in a combination of public parking structures, private parking facilities, and on-street parking spaces. A considerable amount of time was devoted to the discussion of parking in the Downtown during the Planning Commission and City Council hearings. During the Planning Commission hearings of May 18, 2017 and May 31, 2017, the Planning Commission and City Staff discussed potential options to address changing parking needs and maximize the use and efficiency of public and private parking spaces within the Downtown. The City Council endorsed not allowing any new parking spaces in the Bayside Conservation District (with the exception of replacement public parking at the 4th/5th Arizona site) and providing parking entirely outside this sub-area. The intent of this change is to further enhance the community character and walkability within the Bayside Conservation District, which is considered the economic heart of the City. This is consistent with the DCP’s overall goal of “managing parking so that peripheral parking is incentivized for long-term parkers.” In conjunction with the other DCP policies to manage parking, including the policy to maximize the use of existing private parking inventory in the Downtown, this change would serve to minimize vehicle miles traveled into the Downtown and increase pedestrian trips in the Downtown. This change would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

Change No. 113. Removed Action

~~Action AM3.4B Locate public parking facilities at the periphery of the district to reduce trip distance and congestion in the Downtown core.~~

Change No. 115. Removed Action

~~AM3.5B Invest in maintenance of the existing public parking supply to extend its useful life.~~

Change No. 126: Add New Action AM3.6G:

Publicly provided parking shall be built entirely outside of the Bayside Conservation District, including building sites that are partially within the District. Replacement of public parking spaces may be included in the 4th/5th Arizona site before the existing parking is removed.

Lead Agency: PCD

Timeframe: Ongoing

Change No. 127. Add New Action AM3.6H

Pursue the reduction of 600 public parking spaces in the Bayside Conservation District by 2027.

Lead Agency: PCD

Timeframe: Long-Term

Change No. 92 - 100% Employee Transportation Allowance Programs

Implementation of the 100 percent transportation allowance programs would incentivize employees to utilize alternative modes of transportation including Big Blue Bus (BBB), Expo LRT, etc. The Draft DCP required all new Tier 2 and non-negotiated Tier 3 Projects to provide a transportation allowance of at least 75 and 100 percent respectively, of the cost of a regional transit pass (increase to 100 percent subsidy program on large sites). City Staff recommended a change requiring all new residential and non-residential development to implement a 100 percent transportation allowance program to further advance the LUCE's goal of "No Net New P.M. Peak Hour Trips" and achieve the average vehicle ridership targets required by the City's Transportation Demand Management (TDM) Ordinance. As such, this requirement is likely to further reduce the number of employee-related vehicle trips to/from the Downtown and associated traffic impacts as analyzed in the Final Program EIR. This change would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

Change No. 92. Require transportation allowance for employees.

Action AM2.1F: Require all new development to implement 100 percent employee transportation allowance programs

Lead Agency: PCD

Supporting Agencies: Metro, BBB, TMO

Timeframe: Short Term

Change No. 208 - Reduction in Height and FAR within the Wilshire Transition

City Staff recommendations to further reduce the height and FAR standards within the Wilshire Transition (Wilshire Boulevard) sub-area would result in reduced scale and density for Tier 2 projects in this area relative to the Draft DCP. As the Final Program EIR analyzes a greater height and density allowance in this sub-area, aesthetic impacts are conservative. Furthermore, impacts that are dependent on the forecasted amount of future land use change (i.e., air quality, noise, traffic, public services, utilities, GHG, energy, etc.) would be less than analyzed within the Final Program EIR. This change would not result in any substantial new information (such as new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

Change 206. Modify Table 4.2 to clarify WT FAR and Height

WT FAR, Tier 2: ~~2.25~~ 1.75
WT FAR, Tier 2 – with Housing 2.25
WT Height, Tier 2: ~~50~~ 40'
WT Height, Tier 2 – with Housing 50'

Potential Change No. 2 - Height and FAR for Housing Project at 201 Wilshire Blvd.

Additionally, there is a potential change to allow parcels in the Wilshire Transition District that (a) front on Wilshire Boulevard, (b) are not adjacent to a residentially-zoned parcel, and (c) are designated Downtown Core under the LUCE to have a Tier 2 maximum height of 60 feet and 2.75 FAR. This additional height and FAR would only occur for one parcel (201 Wilshire), and as such, would not have a measurable effect on the character of Wilshire Boulevard.

Further, this would not have an effect on the overall total development within the Downtown analyzed in the Final Program EIR, as this increase would be offset by the Final Program EIR's conservative analysis of the development standards for the Bayside Conservation District. As previously stated, the Final Program EIR analyzes the maximum FAR of 4.0 within the Bayside Conservation District; however, the maximum FAR for the District in the Draft DCP is 3.5. Accounting for the recommended increase in FAR of 0.25 for housing projects in the Neighborhood Village District, there would be still be 0.25 FAR to spare. In addition, the DCP's cap of 3.2 million square feet would ensure that overall development would not increase over what was analyzed for Scenario B of the EIR. Therefore, the minor increase in height and FAR for 201 Wilshire Blvd. would be offset and would not result in an overall increase in development within the Downtown. The bonus of 10 feet in height would also not result in significant increase in aesthetic impacts since this slight increase in height would only occur for one parcel on Wilshire. Environmental impacts would be similar to those identified in the Final Program EIR. This change would not result in any substantial new information (such as a new significant impact or substantially more severe impact) that would affect the analysis of impacts in the EIR or would require recirculation of the EIR.

4.0 MINOR CHANGES TO THE FINAL EIR

As shown in greater detail in Attachment B, there are 11 clarifications to the text of the EIR that have been deemed necessary subsequent to the issuance of the Final EIR. Each of these changes pertain to the maximum building height of 130 feet for Established Large Sites. These changes would not materially affect the analysis within the Final EIR as described. Further, these clarifications do not constitute a substantial change nor do they create new significant impacts that were not included in the Final EIR analysis. As such, these changes would not trigger a need for recirculation, consistent with Section 15088.5 of the CEQA Guidelines.

5.0 CONCLUSIONS

None of the changes to the DCP that have been endorsed by Council since the issuance of the Final EIR would result in environmental effects that would substantially alter or change the analysis in the Program EIR or trigger the requirement for full or partial recirculation of the EIR as set forth in CEQA Guidelines Section 15088.5, as shown above. Incorporation of these recommended changes to the Draft DCP would not represent new significant information such that recirculation of the EIR or the preparation of additional environmental analysis is required. All potential environmental impacts of the DCP are adequately analyzed/acknowledged in the EIR in compliance with CEQA.

Attachment A
Downtown Community Plan Addenda Sheet

Attachment B Changes to the Final EIR

The following changes have been made to the Final Program Environmental Impact Report (EIR). These changes are not significant in that they do not alter the level of significance of any impact addressed within the Final Program EIR or create new impacts that were not included in the Final Program EIR analysis. To show the revisions included in this errata, any text to be deleted from the Final Program EIR is reflected in ~~strike through~~ and new text to be added is shown in underline. (Single ~~strike through~~ and underline depict the changes to the Draft Program EIR that were originally incorporated into the Final Program EIR.)

EIR-1: Global Revision

~~Four~~Three Established Large Sites have been identified in the Downtown that are capable of providing significant community benefits. Subject to a defined process (e.g., DA), these Established Large Sites would have the opportunity to achieve a maximum height of 84 feet and greater FARs than their underlying sub-area FARs. Further, the proposed DCP could allow for development on these Established Large Sites up to 130 feet with a public approval process and additional environmental review pursuant to CEQA.

EIR-2: Section 3.3, Aesthetics and Shade, Shadows, and Solar Access, Page 3.3-31 through 3.3-32

East-west streets in the Downtown such as Santa Monica Boulevard or Wilshire Boulevard and Colorado Avenue provide channelized westward-looking views of Palisades Park, Pacific Ocean, and the Santa Monica Pier, particularly from locations west of 2nd or 3rd Streets. Additionally, on clear days, viewers standing along east-west streets may have limited occasional eastward-looking views of the distant San Gabriel Mountains, particularly from locations located east of 6th Street. These public views are typically framed by existing buildings up to seven stories with occasional glimpses across limited surface parking areas. While building setbacks vary along these view corridors, the effect of urban development along these streets focuses views along the existing street grid. Many of these potential views are also obstructed by existing taller buildings and street trees. Therefore, potential development ~~buildings (with maximum permitted heights of between 50 and 84 feet, depending on location,~~ under the proposed Downtown Specific Plan-Community Plan would not diminish views of scenic vistas along east-west streets (with maximum permitted heights of between 50 and 84 feet, depending on location, and up to 130 feet at the Established Large Sites with a public approval process and additional CEQA analysis, as necessary). Adjacent to the I-10 freeway and near the ~~future~~ Downtown Station for the Expo LRT, maximum permitted buildings of up to 84 feet in the Transit Adjacent subarea would not significantly diminish scenic views. Colorado Avenue would continue to provide channelized views of the Santa Monica Pier.

EIR-3: Section 3.3, Aesthetics and Shade, Shadows, and Solar Access, Page 3.3-47

KVL-3: Entrance to Santa Monica Pier (Ocean Avenue and Colorado Avenue): The view from the entrance of the Santa Monica Pier at Colorado Avenue includes an oblique view looking north along Ocean Avenue, which includes an eclectic mix of varied scale buildings along the east side of Ocean Avenue, with taller buildings as a backdrop such as the 15-story Pacific Plaza building. Between 2nd Street and Ocean Avenue, the proposed Downtown Specific Plan-Community Plan would establish a maximum permitted building height of up to 50 feet in height, which is a modest change from the varied skyline profile of existing structures along Ocean Avenue. The two Established Large Sites on Ocean Avenue (101 Santa Monica Boulevard site [Ocean

Hotel] and 1133 Ocean Avenue/101 Wilshire [Miramar site]) would be permitted to a maximum height of 84 feet with the provision of significant community benefits set forth in a DA.¹⁰ These Established Large Sites could also be developed to a maximum height of 130 feet with a public approval process and additional CEQA-compliant analyses, as necessary. Building profile changes are anticipated to be limited to a few sites since many existing buildings in this area already exceed the maximum permitted building height of the proposed Downtown ~~Specific Plan~~ Community Plan and are unlikely to redevelop. Additionally, because of the width of Ocean Avenue and green space in Palisades Park, new buildings, including new developments at the two Established Large Sites within this sub-area, would cause very limited decreases in public views of open sky from this viewpoint. Further, the Downtown ~~Specific Plan~~ Community Plan proposes development standards and guidelines such as stepbacks and building modulation to reduce the appearance of building mass and height. Moreover, public realm improvements including the Downtown ~~Specific Plan~~ Community Plan's proposed Ocean Avenue signature sidewalk project, as well as significant new landscaping as called for by the proposed Downtown ~~Specific Plan~~ Community Plan would improve the view from this location. Therefore, implementation of the proposed Downtown ~~Specific Plan~~ Community Plan would result in a modest change in the view from this location.

EIR-4: Section 3.3, Aesthetics and Shade, Shadows, and Solar Access, Page 3.3-48 through Page 3.3-49

KVL-4: Ocean Avenue and Wilshire Boulevard: The view from the Ocean Avenue at Wilshire Boulevard looking southeast includes an oblique view along Ocean Avenue of some of the tallest buildings in the City, such as the 17-story 1221 Ocean Avenue Building and Pacific Plaza building. The large scenic palms fronting these structures and open sky views along Ocean Avenue are subordinate to the views of the tall office buildings in the foreground. As described above for KVL-3, new buildings with a maximum permitted building height of up to 50 feet would represent a modest change from the existing varied skyline profile of Ocean Avenue. The two Established Large Sites on Ocean Avenue (101 Santa Monica Boulevard [Ocean Hotel] and 1133 Ocean Avenue/101 Wilshire [Miramar site]) would be permitted to a maximum height of 84 feet, with the provision of significant community benefits set forth in a DA. These Established Large Sites could also be developed to a maximum height of 130 feet with a public approval process and additional CEQA-compliant analyses, as necessary. Building profile changes are anticipated to be limited to a few sites since many existing buildings in this area of the Downtown already exceed the maximum permitted building height of the proposed Downtown ~~Specific Plan~~ Community Plan and are unlikely to redevelop. Additionally, because of the width of Ocean Avenue and green space in Palisades Park, new buildings, including new developments at the two Established Large Sites within this sub-area, would cause very limited decreases in views of open sky from this viewpoint. Further, the proposed Downtown ~~Specific Plan~~ Community Plan proposes development standards and guidelines such as stepbacks and building modulation to reduce the appearance of building mass and height. Moreover, public realm improvements including the Downtown ~~Specific Plan~~ Community Plan's proposed Ocean Avenue signature sidewalk project, as well as significant new landscaping as called for by the proposed Downtown ~~Specific Plan~~ Community Plan would improve the view from this location. The proposed Downtown ~~Specific Plan~~ Community Plan would not affect westward views of the Pacific Ocean and would not create significant changes to the aesthetic character of this boulevard from this view location.

EIR-5: Aesthetics and Shade, Shadows, and Solar Access, Page 3.3-51 through 3.3-52

KVL-7: *3rd Street and Wilshire Boulevard*: This view from 3rd Street looking west along Wilshire Boulevard includes views of existing tall office buildings, including the Searise Office Tower at 233 Wilshire Boulevard, as well as some one- to three-story retail/restaurant buildings in the foreground with the Palisades Park, 100 Wilshire office building, and the Miramar Hotel in the background. For the area west of Wilshire Boulevard, the proposed Downtown ~~Specific Plan~~ Community Plan would establish maximum building heights of 50 feet similar to the heights permitted in the adjacent R3 Wilmont residential district. The 1133 Ocean Avenue/101 Wilshire (Miramar) Established Large Site could have a maximum permitted height of 84 feet with the provision of significant community benefits set forth in a DA; however, with a public approval process and the preparation of additional CEQA-compliant analysis as necessary, this site could be developed to a height of 130 feet. Nevertheless, this height would be slightly lower than the existing height of the 105-foot-tall Ocean Tower with 135-foot tall elevator tower extension currently on the property.¹¹ As such, building profile would not dramatically change under the proposed Downtown ~~Specific Plan~~ Community Plan. Further, the Plan proposes development standards and design guidelines such as stepbacks and building modulation to maximize access to light and air, and ensure a smooth transition to the residential uses to the north. Moreover, public realm improvements including the Downtown ~~Specific Plan~~ Community Plan's proposed Ocean Avenue signature sidewalk project, as well as significant new landscaping as called for by the proposed Downtown ~~Specific Plan~~ Community Plan would improve the view from this location. Building setbacks would be increased and associated sidewalk widths would be widened to 15 feet and the public realm would be improved with new landscaping and pedestrian amenities under the proposed Downtown ~~Specific Plan~~ Community Plan. Channelized views of the Palisades Park as well as the statue as framed by the buildings would remain available down the Wilshire Boulevard corridor. In general, the enhancements to the public realm as well as the Downtown ~~Specific Plan~~ Community Plan's proposed development standards and design guidelines would result in improvements to the view of Wilshire Boulevard.

EIR-6: Section 3.3, Aesthetics and Shade, Shadows, and Solar Access, Page 3.3-63 through 3.3-64

Potential shading effects of new buildings within Downtown would vary widely depending upon location, time of day and year, surrounding use (e.g., surface parking and height of existing structures), and building design (i.e., height, mass) of a particular proposed project. In the City of Santa Monica, shadow effects are magnified during the winter, when the sun's lower position in the sky creates longer shadows. Winter is also when maximum solar access is more crucial to solar energy and passive heat production. As such, for the purposes of this EIR analysis, Winter Solstice is considered the most severe condition for potential shade, shadows, and solar access effects. ~~For example, a~~ According to the accepted shadow length multipliers for the City of Los Angeles, an 84-foot tall building would create morning and afternoon shadows that would reach approximately 254.5 feet in length during the Winter Solstice; the same building would create shadows that would reach approximately 183.1 feet at the same times during the Summer Solstice (City of Los Angeles 2006). ~~Winter is also when maximum solar access is more crucial to solar energy and passive heat production. For the purposes of this EIR analysis, Winter Solstice is considered the most severe condition for potential shade, shadows, and solar access effects.~~

Within the Downtown, shadows are cast in a clockwise direction from west/northwest to east/northeast from approximately 7:00 A.M. to 4:00 P.M. or later depending on the time of the year. As such, shadows would be greatest where new taller buildings would replace surface parking or lower scale buildings in proximity to shadow-sensitive uses that are located to the north and east. The size, massing, and scale of buildings would be increased under Scenario A than under Scenario B of the proposed Downtown ~~Specific Plan~~ Community Plan.

Plan. Scenario B includes the incorporation of specific design standards, such as building frontage standards, which would reduce shadow effects and maximize access to light and air.

For various sites in the Downtown, shade and shadow effects are expected to generally occur within one block to the north and east of a particular building throughout the day and would be more pronounced (i.e., longer) during the winter when the sun rises lower in the sky.

Scenario B of the proposed Downtown ~~Specific Plan~~Community Plan includes design standards such as building frontage standards, which would reduce the potential shade, shadows, and solar access effects and maximize access to light and air. Due to the application of design standards that address access to light and air, Scenario B would result in reduced shade, shadows, and solar access effects relative to Scenario A.

While the standards included in the proposed Downtown ~~Specific Plan~~Community Plan would reduce shadow effects and maximize access to light and air for the majority of new buildings, some new projects would cast increased shadows on shadow sensitive uses due to the compact urban environment of the Downtown and the prevalence of shadow sensitive uses interspersed throughout the Downtown District. This could include developments at the three Established Large Sites, which could reach maximum heights of up to 130 feet with a public approval process and additional CEQA-compliant analyses, as necessary. Because the precise location and design of these individual projects that could potentially occur is not definitively known at this time, it is conservatively concluded that nearby sensitive uses could experience some shading. However, the Downtown is classified as a transit priority area under the provisions of Senate Bill (SB) 743² – as shown on the SCAG (2016) Transit Priority Area Map – with infill residential, mixed-use, residential, and employment center development; therefore, aesthetic and shade, shadows, and solar access impacts would be considered less than significant and analyses of these impacts of projects within the Downtown are not required pursuant to CEQA.

EIR-7: Section 3.3., Aesthetics and Shade, Shadows, and Solar Access, Page 3.3-65

Land use changes anticipated to occur under the proposed Downtown ~~Specific Plan~~Community Plan, including development of the three Established Large Sites up to 130 feet with a public approval process and additional CEQA-compliant analysis, would ~~in general,~~ contribute to cumulative shading effects in the Downtown. Pending development proposals with building height exceeding the established maximum height restrictions within the DCP (e.g., the Miramar Hotel Development Agreement Application) would have an increased potential to result in shading impacts within the Downtown. As previously discussed, potential new multi-story buildings anticipated to occur in the Downtown under Scenarios A and B would result in new shadows that could shade some nearby sensitive uses. However, the LUCE adopted neighborhood protection goals to direct land use changes away from the City's residential neighborhoods and toward transit-rich areas, such as the Downtown District, to protect the character of existing neighborhoods. As a result of focusing land use changes within the Downtown, the proposed Downtown ~~Specific Plan~~Community Plan would limit or avoid shadow effects on the City's established residential neighborhoods. Thus, while new shade and shadow effects would occur within the Downtown and other Expo LRT areas, overall shade,

² "Transit priority area" is defined as an area within 0.5-mile of a major transit stop that is existing or planned. 4th Street includes a number of existing major transit stops (defined as the "intersection of two or more major bus routes with a frequency of service intervals of 15 minutes or less during the AM and PM peak commute periods"), at Wilshire, Arizona, Santa Monica, Broadway, and Colorado Avenue. In addition, the Downtown is served by the Expo LRT with a station at 4th Street and Colorado Avenue.

shadows, and solar access would remain largely unchanged throughout most of the City. Further, since the Downtown is considered a transit priority with infill residential, mixed-use, residential, and employment center development under CEQA, aesthetic impacts including shade, shadows, and solar access effects, are not considered significant impacts on the environment.

EIR-8: Section 3.12, Land Use and Planning, Table 3.12-6, Policy LU1.3, Page 3.12-40

Additionally, the DCP's proposed maximum height of up to ~~84~~130 feet (with a public approval process and additional CEQA-compliant analysis) at the Miramar Established Large Site at the corner of Ocean and Wilshire would be less than the surrounding buildings in the immediate vicinity including the adjacent 13-story, 150-foot Santa Monica Bay Tower, which is located in the immediate vicinity at the intersection of California and Ocean Avenue as well as other high rise buildings located near Wilshire, including the 160 foot First Federal Bank Building at 401 Wilshire, the Huntley Hotel, and the 233 Wilshire Office Building. ~~Additionally, the proposed maximum height of 84 feet at the Miramar Established Large Site would represent an improvement from the existing 105-foot Ocean Tower Building that currently exists at the site. Additionally, while the maximum building height could reach 130 feet (with a public approval process and additional CEQA-compliant analysis),~~ the proposed Downtown Community Plan includes development standards and design guidelines that prescribe minimum stepbacks for new building abutting any residentially zoned parcel, which would transition the building envelope design down from its maximum height to abutting residential neighborhoods. These development standards, design guidelines, and stepback requirements are intended to address aesthetic and land use issues, including maintaining a clear transition between the Downtown and adjacent residential neighborhoods, prevent a uniform building height of 130 feet at the Established Large Sites, ensure compatibility with adjacent uses and avoid adverse aesthetic changes.

EIR-9: Section 3.12, Land Use and Planning, Table 3.12-6, Policy D1.6, Page 3.12-50

At the Miramar Established Large Site, maximum height could be ~~84~~ 130 feet (with a public approval process and additional CEQA-compliant analysis), ~~(as compared to the 105-foot Ocean Tower that currently exists on that site).~~ However, as described for Policy LU1.3 ~~the~~ DCP's development standards as well as design guidelines addressing building modulation and stepbacks would ensure that new land uses occurring on these boulevards provide a smooth transition to the residential neighborhoods to the east and north. Additionally, the proposed Downtown Community Plan includes development standards and design guidelines that prescribe minimum stepbacks for new building abutting any residentially zoned parcel, which would transition the building envelope design down to abutting residential neighborhoods. These development standards, design guidelines, and stepback requirements are intended to address aesthetic and land use issues, including maintaining a clear transition between the Downtown and adjacent residential neighborhoods and would ensure compatibility with adjacent uses and avoid adverse aesthetic changes.

EIR-11: Section 3.13, Neighborhood Effects, Page 3.13-12

As analyzed in Section 3.3, *Aesthetics and Shade, Shadows, and Solar Access*, land use changes anticipated to occur under the proposed Downtown ~~Specific Plan~~Community Plan would potentially result in the construction of new mixed use buildings up to 50 to 84 feet in height depending on sub-area. Within the three Established Large Sites, new buildings could be constructed to a maximum of 130 feet in height with a public

approval process and additional CEQA analysis, as necessary. Over the life of the plan through 2030, the relative composition of buildings within Downtown would change as new buildings replace older buildings and/or surface parking lots. Development standards and design guidelines in the proposed Downtown ~~Specific Plan~~Community Plan would ensure that new buildings incorporate transparent and visually interesting active ground floors, public realm improvements including outdoor seating areas and installation of wider landscaped sidewalks, and new public open space. Additionally, the proposed Downtown ~~Specific Plan~~Community Plan would address the transition of the Wilshire and Lincoln Boulevards to adjacent residential neighborhoods through development standards related to building height and Floor Area Ratios (FARs). Specifically, along the Mixed-Use Boulevard, building height would be limited to a maximum of 60 feet and along the Wilshire Boulevard Transition Area, building height would be limited to a maximum height of 50 feet. These development standards as well as design guidelines addressing building modulation and stepback would ensure that new land uses occurring on these boulevards provide a smooth transition to the residential neighborhoods to the east and north. Development at the three Established Large Sites could reach maximum heights of up to 130 feet with a public approval process and additional CEQA-compliant analyses, as necessary. However, the proposed Downtown Community Plan includes development standards and design guidelines that prescribe minimum setbacks for new building abutting any residentially zoned parcel, which would transition the building envelope design down from its maximum height to abutting residential neighborhoods. These development standards, design guidelines, and setback requirements are intended to address aesthetic and land use issues, including maintaining a clear transition between the Downtown and adjacent residential neighborhoods, and would prevent a uniform building height of 130 feet at the Established Large Sites ensuring compatibility with adjacent uses and avoiding adverse aesthetic changes. Therefore, the proposed Downtown ~~Specific Plan~~Community Plan would not substantially degrade the existing visual character or quality of the surrounding residential neighborhoods. Additionally, in accordance to CEQA, Section 21099 (amended by Senate Bill [SB] 743), all aesthetic impacts of infill mixed-use projects located within transit priority areas shall not be considered significant, therefore, the aesthetic effects of the proposed Downtown ~~Specific Plan~~Community Plan would be *less than significant*.

EIR-10: Section, 3.16, Public Services, Page 3.16-16 through Page 3.16-17

The addition of new buildings with a maximum height of up to 50 feet or 84 feet in height (up to 130 feet in height at the Established Large Sites with a public approval process and additional CEQA-compliant analyses, as necessary) is also a factor in response times under the proposed Downtown ~~Specific Plan~~Community Plan. For taller buildings, data has shown that emergency responders including firefighters may spend more time on a particular call since additional time will be spent navigating inside the building to respond to a particular incident (National Institute of Standards and Technology [NIST] 2013). Upon conclusion of the call, additional time will be required to exit the building and return to the vehicle before the firefighter actually becomes available to perform other duties. To maintain response times and response reliability in the existing service area for Fire Station No. 1 and Fire Station No. 2 while providing adequate service to new and existing development, it is anticipated that SMFD will reallocate staffing and other resources between fire stations (Clemo 2014).

In addition to response times and staffing considerations, the construction of new taller buildings in the Downtown may necessitate new fire protection equipment. The SMFD currently has one ladder truck with a 100 foot ladder, which is capable of servicing buildings up to 84 feet tall from a distance of 50 feet away. With this equipment, Fire Station No. 1 is currently adequately equipped to respond to calls for service to tall buildings in the Downtown. However, over the life of the proposed Downtown ~~Specific Plan~~Community Plan (i.e., through the year 2030), the addition of new buildings up to 84 feet in height ~~in the Downtown~~, and up to 130 feet in height within the Established Large Sites with a public approval process and additional CEQA-

compliant analysis, may necessitate either replacement of the existing ladder truck or purchase of an additional ladder truck or similar equipment (e.g., telesquirt fire apparatus) to fight fires in these taller buildings. The SMFD is funded through general fund revenues generated by property, sales, and transient occupancy taxes, all of which are expected to increase in proportion to new development in the Downtown, particularly retail commercial and hotel development. Such increased revenues would be available for the SMFD to expand resources as needed to meet changing demands. A 100-foot ladder truck would not be able to reach buildings of 130 feet in height; however, buildings of this height would be constructed to meet the National Fire Protection Association code, with ladders (i.e., stairs). In case of fire, firefighters would go up the stairs, plug their hoses into a standpipe located on each floor of the stairwell and fight the fire from the inside. It is also important to note that these standards, design guidelines, and setback requirements would be in place to address aesthetic and land use issues and would prevent a uniform building height of 130 feet at the Established Large Sites, ensure compatibility with adjacent uses and avoid adverse aesthetic changes.

In summary, the proposed Downtown ~~Specific Plan~~ Community Plan is not anticipated to necessitate the construction of a new or expanded fire protection facility that would result in physical environmental impacts. As previously discussed, the SMFD has already begun planning for construction of a new Fire Station No. 1 with additional space for expanded staff and equipment as well as improved amenities for the SMFD and the public. The environmental impacts of this new fire station have been fully analyzed in an adopted Mitigated Negative Declaration (State Clearinghouse No. 2012081025). Therefore, this impact would be less than significant. However, to further ensure that response times are not substantially affected, mitigation measure MM PS-1 is recommended.

EIR-11: Section, 3.16, Public Services, Page 3.16-33 through 3.16-34

Based on the City's generation factor of 0.08 school-aged students per household in the Downtown, future development allowed under the proposed Downtown Specific Community Plan would result in approximately 242 new school aged residents under Scenario A and 186 under Scenario B by 2030. Considering the 13 year life of the Plan (through 2030), the up to 242 new students generated by the Plan amounts to a nominal increase in enrollment, averaging up to 17 students per year. Depending on enrollment trends, the generation of up to 242 new school-aged residents in Downtown through 2030 may require increased classroom space, new teachers, and additional equipment at the three schools serving Downtown. Based on the City's calculations, the proposed Downtown Specific Community Plan could gradually increase the Santa Monica student population by 2.6 percent under Scenario A and 1.9 percent under Scenario B.

This projected long-term increase in school-aged children in Downtown may be tempered or reduced by the types of new residential units anticipated to be constructed within the Downtown and the resultant demographics of Downtown populations. Based on recent 2010 Census data, approximately 70 percent of Downtown households are single occupant and 30 percent have two or more occupants with only 5.2 percent having children (refer to Section 3.15, Population, Housing, and Employment). This current data, which shows low numbers of school-aged children in Downtown, may be related to an emphasis on the residential unit types that are less conducive to accommodating families (e.g., studios and one- and two-bedroom multi-family units) than traditional single-family homes. However, even considering the emphasis on the residential unit type, development under the proposed Downtown Specific Community Plan is expected to incrementally increase the demand for classroom space in the SMMUSD, particularly at the three Downtown-serving schools.

It is expected that new residential uses anticipated under the proposed Downtown Specific Community Plan has the potential to contribute additional students to Roosevelt Elementary, Lincoln Middle, and Santa Monica High schools. Based on a SMMUSD school capacity study (<http://www.erichallassociates.com/wp-content/uploads/2017/05/SMMUSD-EHA-Capacity-Study-October-1-2014.pdf>), these three schools meet the State and District capacity standards. Furthermore, Measure BB funds were recently used specifically for improvements at Lincoln Middle School which provides education for middle school students in the Downtown. The Lincoln Middle School Measure BB project included the installation of four relocatable classrooms, modernization of the former library into four new classrooms, two science labs, and a shared prep room. Measure BB funds were also used at Santa Monica High School for the replacement of the Science and Technology building with a more modernized building housing fifteen science labs equipped with state-of-the-art equipment. Additionally, at Lincoln Middle School and Santa Monica High School, SMMUSD would continue to adjust to increased enrollments through increased classroom size, conversion of other space to classroom uses, increased staffing levels, and use of traveling teachers as needed within existing campus properties. At Roosevelt Elementary School where the school is currently at capacity and does not have room for expansion, the SMMUSD would need to continue to adjust enrollment through similar means as available, or continue to overflow student to other neighboring schools. If there are no means for expanding Roosevelt Elementary school and the Downtown student population continues to increase, redrawing district individual school enrollment boundaries may become necessary.