ADDENDUM TO INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION
(SCH No. 2011061047)

SANTA MONICA PIER EMERGENCY GANGWAY
& PHASE 4 STRUCTURAL UPGRADE PROJECT

Submitted to:
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1.0 INTRODUCTION

This environmental document is an Addendum to the Santa Monica Pier Emergency Gangway and Phase 4 Structural Upgrade Project Initial Study/Mitigated Negative Declaration ([IS/MND] State Clearinghouse No. 2011061047), adopted in August 2011 by the City of Santa Monica. Since adoption of the IS/MND, changes to the timing and location of construction activities for the previously Approved Project have been proposed, thus requiring further environmental analysis. The proposed changes to construction activities are addressed in this Addendum. As demonstrated in this IS/MND, the IS/MND continues to serve as the appropriate document addressing the environmental impacts of these improvements pursuant to California Environmental Quality Act (CEQA).

1.1 BACKGROUND

The IS/MND was prepared to address construction-level and operational impacts of the proposed improvements to the Santa Monica Pier, including replacement of remaining timber piles with concrete piles and installation of the floating dock and emergency gangway. The IS/MND evaluated potential environmental effects on aesthetics, agriculture and forestry resources, air quality, biological resources, construction effects, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, neighborhood effects, noise, population and housing, public services, recreation, shadows, transportation/traffic, utilities and service systems, and mandatory findings of significance. All impacts in the IS/MND have been mitigated to below a level of significance through implementation of mitigation measures.

Since adoption of the IS/MND, the specific location and timing of some construction activities under the Approved Project were further refined to reflect input from construction contractors proposing to implement the improvements. Furthermore, the proposed changes were also considered in response to issues raised by adjacent business owners, which expressed concern regarding Pier accessibility for the public, and particularly business patrons, during construction activities. These refinements are described in Section 2.0 of this document and are the subject of this Addendum.

1.2 PURPOSE OF ADDENDUM TO THE IS/MND

When a proposed project is changed or there are changes in environmental setting, a determination must be made by the Lead Agency as to whether an Addendum or Subsequent EIR or MND is prepared. CEQA Guidelines Sections 15162 and 15164 sets forth criteria to assess which environmental document is appropriate. The criteria for determining whether an Addendum or Subsequent MND is prepared are outlined below. If the criteria below are true, then an Addendum is the appropriate document:

- No new significant impacts will result from the project or from new mitigation measures.
- No substantial increase in the severity of environmental impact will occur.
- No new feasible alternatives or mitigation measures that would reduce impacts previously found not to be feasible have, in fact, been found to be feasible.

Based upon the information provided in Section 3.0 of this document, the changes to the Approved Project will not result in new significant impacts or substantially increase the severity of impacts
previously identified in the IS/MND, and there are no previously infeasible alternatives that are now feasible. None of the other factors set forth in Section 15162(a)(3) are present.

Therefore, an Addendum is appropriate, and this Addendum has been prepared to address the environmental effects of the refinements to the project.

1.3 CONCLUSIONS

This Addendum addresses the environmental effects associated only with refinements/enhancements to the Approved Project that have occurred since adoption of the IS/MND. The conclusions of the analysis in this Addendum remain consistent with those made in the IS/MND. No new significant impacts will result, and no substantial increase in severity of impacts will result from those previously identified in the IS/MND.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

The project site is located on the Santa Monica Municipal Pier at the western edge of the City of Santa Monica, at the western terminus of Colorado Avenue near the intersection of Colorado Avenue and Ocean Avenue. The site is bounded by Santa Monica State Beach, the beach bike path, and Pacific Coast Highway to the east and the Pacific Ocean to the south, west, and north.

Across the Pier to the southeast from the project site are the Pier deck parking area and the Santa Monica Police sub-station, with the National Historic Landmark Looff Hippodrome (Carousel) building and restaurants slightly further east. There are no developments directly east of the project site aside from the Bubba Gump Shrimp Company restaurant (which is a three-story structure on the north side of the Pier with the first floor at beach-level), and as such the site is visible from a number of vantage points, including the Pier entrance along Ocean Avenue at Colorado Avenue and along Pacific Coast Highway. To the southeast are several restaurant, retail, and recreational uses, including the Playland Arcade and Pacific Park, which is an amusement park. The location of the construction project in relation to Pacific Park has not changed. To the west of the project site at the western end of the Pier are several food service and retail uses, including El Mariasol Restaurant, a fishing pier, and the Santa Monica Harbor Patrol office.

2.2 PROJECT MODIFICATIONS SINCE IS/MND ADOPTION

The IS/MND for the Approved Project describes the complete demolition of the existing 363’x36’ section of the Santa Monica Municipal Pier (i.e., the portion of the Pier affected by the Phase 4 Upgrades) and replacing it with a new pier consisting of concrete piles, concrete pile caps, concrete tie beams, timber stringers, timber decking, metal railings, and a new wooden utility catwalk underneath the center of the pier, which is specifically what the construction plans included in the bidding documents for the Approved Project describe.

The IS/MND provides details of construction phasing which were developed while the Project design was in its preliminary stage. The IS/MND describes (as shown in Figure 7 of the IS/MND) a phasing method of construction that consists of building a temporary construction access trestle along the north side of the Pier, and assumes a three-stage construction plan consisting of splitting the pier lengthwise and demolishing and building the pier in two separate 363-foot by 18-foot
sections. Figure 7 provided that "this staging plan is conceptual. The contractor shall prepare his own plan to construct new pier section while maintaining vehicular, utility, and public access to the western end of the Municipal Pier."

Consistent with the MND, the City’s bidding documents and construction plans prepared by URS Corporation subsequent to adoption of the IS/MND and approval of the project do not dictate the sequence construction phasing, and further indicates that the construction trestle to the north of the Pier optional. This provided contractors with the option to use the existing pier to stage construction equipment, thus reducing the cost of construction. Additionally, the potential removal of the Approved Project’s construction trestle removes the need for direct beach access and associated need to obtain the requisite beach access permit from Los Angeles County.

The bidding documents and construction plans do, however, call for a pedestrian trestle on the south side of the Pier in order to maintain access to the end of the pier during construction. The City left the exact phasing, means, and methods of construction up to the bidding contractor. However, after a meeting with adjacent business owners an addendum to the bidding documents was issued to require improved public access to on-Pier businesses throughout construction. The City’s preferred contractor has proposed a construction phasing method that will adhere to this requirement and would consist of using the existing Pier for construction equipment instead of using a construction trestle, as a cost saving measure. The proposed phasing is shown in the attached exhibits. The revised phasing of construction and new trestle location constitute the only substantive changes to the Proposed Project. As such, the Proposed Project, inclusive of the revised construction plan/phasing, is herein referred to as the "Modified Project."

The construction plans (attached hereto and labeled Exhibits SP‐1 and SP‐2) indicate the provision of a “Temporary Pedestrian Access Path” through parts of the adjacent retail and amusement park leased area. The plans call for the altering of parts of the adjacent leased area to help allow additional pedestrians to maintain access to affected businesses. These alterations to the adjacent business owners’ leased areas would only be done with written permission from the affected owners. The 15-foot pedestrian access (as required by the IS/MND) will remain available as shown in the attached exhibits; it should be noted that the pedestrian access described in the IS/MND included both the Municipal Pier and Newcomb Pier. It should also be noted that Exhibits SP-1 and SP-2 indicate that the existing access route along the southern and western edges of the Newcomb Pier (west of the Pier parking lot) is designated as a “vehicle access path,” though this right-of-way would be utilized for temporary pedestrian access during construction activities, while also providing emergency vehicle access, as necessary.

3.0 ENVIRONMENTAL ANALYSIS

As explained in Section 1.0, this comparative analysis has been undertaken pursuant to the provisions of CEQA Sections 15162 and 15164 to provide the City with the factual basis for determining whether any changes in the project, any changes in circumstances, or any new information since the IS/MND was certified require additional environmental review or preparation of a Subsequent MND or EIR to the IS/MND previously prepared.

As described in Section 2.0, Project Description, refinements to the project’s construction details have occurred since preparation of the IS/MND. Because of this, new analysis for impacts within the project area is provided in this Addendum. The environmental analysis provided in the IS/MND
remains current and applicable to the proposed project in areas unaffected by the design refinements for the environmental topics, as listed below:

- **Aesthetics:** The proposed design refinements would not result in additional impacts to aesthetic resources beyond those identified in the IS/MND. The IS/MND identified impacts to views from public areas located inland and at a higher elevation than the Pier, and mitigation was proposed to screen temporary construction activities from view to the extent feasible. Despite the proposed change in the specific location and timing of construction activities, the overall nature and intensity of construction would not be substantially different than under the Approved Project, and all construction activities would occur within the project site (including identified staging areas), as was also evaluated in the IS/MND. Therefore, the mitigation identified in the IS/MND for aesthetics impacts remains applicable to the modified construction plan. No new mitigation measures are required for the construction refinements.

- **Agriculture and Forestry Resources:** The design refinements would not result in additional impacts to agriculture beyond those identified in the IS/MND because there are no prime, unique, or statewide important farmlands in the project study area. The IS/MND did not identify any impacts to agricultural uses; therefore, mitigation was not required. No new mitigation measures are required for the proposed refinements.

- **Air Quality:** The proposed construction refinements would not result in additional impacts to air quality beyond those identified in the IS/MND. The background conditions, construction equipment mix, and works hours identified in the IS/MND have not notably changed and the proposed refinements would not result in any operational changes to the Pier once constructed. The modifications to the construction plan would not substantially change the intensity or duration of total construction activities identified in the IS/MND. Therefore, as described in the IS/MND, the proposed project would not exceed any South Coast Air Quality Management District (SCAQMD) standards or contribute to air quality deterioration beyond SCAQMD projections. As was the case for the Approved Project, impacts would be less than significant and no mitigation measures are required.

- **Biological Resources:** The modified construction process could alter the timing and location of construction activities, but would not increase impacts to biological resources, either directly or indirectly. In fact, the Modified Project would serve to reduce some impacts, which are related to the temporary steel trestle proposed under the Approved Project. The proposed trestle under the Approved Project would have been constructed on the north side of the existing Pier along the entire length of the Phase 4 structural upgrades (i.e., from approximately Bent 62 at the western end and Bent 39 on the eastern end with a construction vehicle access ramp leading down to the beach); however, under the Modified Project, the steel trestle would be constructed on the south side of the Pier, but would only be approximately one-third the length of that required for the Approved Project. The substantial reduction in the trestle footprint under the Modified Project would reduce impacts to biological resources given the reduced duration of installation and removal for the trestle (and associated pile driving activities) and the lack of construction vehicle access to the beach. Furthermore, should construction activities of the Modified Project overlap the grunion spawning season, the mitigation measures identified in the IS/MND (i.e., monitoring) would apply and be implemented. Additional conditions were imposed by the Department of Fish and Game which this Modified must adhere to. Therefore, the Modified Project would reduce potential direct and indirect impacts to biological resources, including impacts to grunion during spawning
season, though mitigation measures provided in the IS/MND would still be necessary to reduce impacts to less than significant.

- **Construction Effects**: As noted in the impact discussion for each respective environmental issue, the proposed modifications to the construction plan would not result in increased impacts beyond those identified in the IS/MND. Specifically, the Modified Project would alter the location of the temporary trestle to the south side of the Municipal Pier, which would serve to reduce the length of the temporary structure relative to the proposed trestle located on the north side of the Pier, and further, would reduce the duration of construction activities most proximate to other on-Pier uses (i.e., Pacific Park amusement park and retail uses) from approximately six (6) months to approximately three (3) months. The Modified Project would therefore reduce potential impacts associated with the installation and removal of the larger temporary trestle structure (as originally proposed) and construction-related effects on adjacent land uses.

- **Cultural Resources**: The Modified Project would not result in changes to the Pier's operational characteristics once constructed, and the overall physical impacts to cultural resources (including historic structures/other resources on the Pier) during construction would not be materially different than under the Approved Project. Although the specific timing and location of certain construction activities would be altered under the Modified Project, the extent and intensity of construction activities would not vary substantially relative to that evaluated in the IS/MND, and mitigation measures prescribed in the IS/MND would still be applicable and necessary to reduce the significance of impacts under the Modified Project.

- **Geology and Soils**: The proposed refinements would not result in substantially different geophysical impacts beyond those identified in the IS/MND. While the Modified Project involves proposed changes to the timing and location of some construction activities, these changes do not represent a substantial deviation from the project analyzed in the IS/MND, and the conclusions of the IS/MND remain valid. Compliance with applicable code standards and seismic requirements identified in the IS/MND will reduce geotechnical concerns to below a level of significance.

- **Greenhouse Gas Emissions**: The Modified Project would result in a similar (or potentially reduced) duration and intensity of construction activities relative to the Approved Project, and both the Approved Project and Modified Project would be operationally identical. As such, the proposed construction modifications would not result in an increase in greenhouse gas emissions or related impacts to global climate change or conflicts with applicable climate change plans, policies, or regulations.

- **Hazards and Hazardous Materials**: The Modified Project would not increase risks related to hazards or hazardous materials relative to the Approved Project. The proposed construction phasing would not require additional construction equipment or increased use of such equipment, and the demolition and removal of existing Pier facilities would still require mitigation to address potential hazards associated with asbestos-containing materials, lead-based paint residues, and timber preservatives, as applicable. As with the Approved Project, the Modified Project would provide access of at least 15 feet in width along the south side of the Pier to ensure that emergency access is available during construction activities. Given the similarity in overall construction activities and identical operational characteristics, the Modified Project would not result in new or greater impacts in this regard.
- **Hydrology and Water Quality:** The Modified Project would be required, as under the Approved Project, to comply with all applicable water quality regulations during and following construction activities. As is the case with the Approved Project, compliance with stormwater regulations would preclude the potential for significant impacts to receiving water bodies, including Santa Monica Bay and the Pacific Ocean.

- **Land Use and Planning:** The Modified Project would require the same entitlements, permits, and/or other approvals as the Approved Project, with the exception of a permit from Los Angeles County to allow construction equipment to utilize Santa Monica State Beach for construction access, which would only be required under the Approved Project. Additionally, while the Modified Project would relocate construction access and staging areas relative to the Approved Project, such changes would not result in notably increased adverse impacts on adjacent land uses, as the overall proximity and intensity of construction activities would not be substantially different than under the Approved Project. The Modified Project is consistent with the Coastal Development Permit by the California Coastal Commission and must be followed.

- **Mineral Resources:** The proposed refinements would not result in additional impacts to mineral resources beyond those identified in the IS/MND and because the project site is not located within an area of known mineral resources, either of regional or local value, the IS/MND did not identify any impacts to mineral resources; therefore, mitigation was not required. No new mitigation measures are required for the changes to the Approved Project.

- **Neighborhood Effects:** Project-related construction activities under the Modified Project would be substantially similar to those under the Approved Project, such that no measurable change in effects on nearby neighborhoods would occur. As noted in the various impact discussions in this Section, the Modified Project would alter the specific location and timing of construction activities within the project site boundaries, but would not otherwise affect the overall nature, intensity, or duration of the project such that impacts would vary substantially from those evaluated in the IS/MND.

- **Noise:** The Modified Project would not result in additional impacts to noise beyond those identified in the IS/MND. The proposed construction phasing would not result in design or operational changes to the project site or surrounding area from that analyzed in the IS/MND. Despite the minor modifications to the location and timing of construction activities under the Modified Project, the overall intensity, equipment mix, duration, and proximity to sensitive receptors would not be notably different than under the Approved Project. As such, while mitigation would still be necessary to address short-term noise increases in the project area, no new mitigation measures are required for the Modified Project.

- **Population and Housing:** The Modified Project would not have any effect on population, housing, or employment in the City or region at large, as is the case for the Approved Project. No adverse impacts would occur in this regard.

- **Public Services:** The proposed construction modifications would not result in additional impacts to public services/utilities beyond those identified in the IS/MND because they would not result in operational changes to the Pier beyond those evaluated in the IS/MND for the Approved Project. The IS/MND did not identify any potentially significant impacts to public
services; therefore, mitigation was not required. No new mitigation measures are required for the Modified Project.

- **Recreation:** The proposed construction modifications would not result in additional impacts to recreation beyond those identified in the IS/MND. The IS/MND did not identify any permanent impacts to recreational resources, and temporary impacts related to public access to the Pier and other public areas were determined to be less than significant; therefore, mitigation was not required. As the Modified Project would alter the location and means by which public access to the Pier is maintained relative to the Approved Project, such access would still be provided throughout project construction activities. As such, no new mitigation measures are required for the proposed refinements.

- **Shadows:** No operational impacts associated with shade or shadow effects would occur under the Modified Project, as is the case for the Approved Project. The Modified Project would result in a comparable type and number of construction equipment, and as such impacts related to shade/shadow effects from temporary construction activities would be similar to the Approved Project and less than significant.

- **Transportation/Traffic:** The Modified Project would not result in additional impacts to transportation/traffic beyond those identified in the IS/MND because the construction changes would only be temporary and would not adversely affect overall vehicular circulation either on- or off-site. The IS/MND did not identify any long-term impacts to transportation/traffic; therefore, mitigation was not required. One mitigation measure provided in the IS/MND regarding bicycle path accessibility would be applicable to the Modified Project and implemented as necessary to reduce impacts to less than significant. No new mitigation measures are required.

- **Utilities and Service Systems:** The Modified Project would not require or result in the construction or expansion of any public utilities beyond those required for the Approved Project. Temporary short-term and operational demands on public utilities or other infrastructure would not measurably change under the Modified Project and therefore impacts would be less than significant and no mitigation measures are required.

- **Mandatory Findings of Significance:** The potential impacts of the Modified Project with regard to biological resources, cultural resources, and direct and indirect effects on human beings would be comparable to the Approved Project, and potentially reduced with regard to biological resources given the reduction in temporary trestle footprint (and related construction activity) under the Modified Project. As impacts under the Modified Project would be similar to or reduced relative to the Approved Project, impacts would be less than significant in this regard and no mitigation measures are required.

### 3.1 CONCLUSIONS

Based on the information provided above, the proposed modifications to the Approved Project would not result in a measurable increase in environmental impacts over what was previously analyzed in the IS/MND. Although the specific location and timing of some impacts have changed, no new significant impacts have been identified, nor is the severity of newly identified impacts substantially greater than the conclusions of the IS/MND.
Based upon the evidence included in the above analysis, the Modified Project as described in Section 2.0 would not result in a substantial change in the conclusions and analysis included in the IS/MND.
PHASE 1 - SCOPE OF WORK
1. MOBILIZE 40 TON CRANE TO PED. TRESTLE LOCATION.
2. INSTALL PEDESTRIAN TRESTLE.
3. MOBILIZE 40 TON CRANE OFF PIER.
PHASE 2 - SCOPE OF WORK

1. DEMO ASPHALT AND PLATES.
2. MOBILIZE 90 TON CRANE.
3. DRIVE PILES (WESTERLY TO BENT 59)
4. DEMO PIER, CONSTRUCT CONCRETE SUBSTRUCTURE (3 STAGES).

PHASE 2 - CONSTRUCTION WEST OF BENT 45

LAYOUT PLAN

STAGING AREA

ADDITIONAL STAGING AREA (21' X 75')

WORK AREA

WORK AREA (4' X 25') - 4 WEEKS

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PIER - PHASE IV
ACCESS PLAN
PHASE 3 - SCOPE OF WORK

1. REMOBILIZE PILE HAMMER AND DRIVE PILES (EASTERLY TO BENT 41)
2. DEMO PIER, CONSTRUCT CONCRETE SUBSTRUCTURE (1 STAGE).
3. INSTALL STRINGERS, DECK, CATWALK & UTILITIES.

LAYOUT PLAN

1" = 40'-0"