ADDENDUM TO CERTIFIED PLAN HERMOSA ENVIRONMENTAL IMPACT REPORT

HOUSING-ELEMENT RELATED GENERAL PLAN MAP CHANGE, ZONING MAP CHANGE, ZOING TEXT AMENDMENT

CITY OF HERMOSA BEACH

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1. INTRODUCTION

The City of Hermosa Beach has adopted a revised 2021-2029 Hermosa Beach Housing Element Update ("Housing Element"), one of the required elements of the City's PLAN Hermosa and Coastal Land Use Plan ("PLAN Hermosa"). The City adopted the 2021-2029 Housing Element on December 21, 2021. The adopted revision responds to comments from California State Department of Housing and Community Development (HCD). As part of the revision, the City is required to amend other portions of PLAN Hermosa for consistency, as well as adopt zoning changes to implement the Housing Element. The Housing Element establishes programs, policies, and actions to accommodate an additional 608 dwelling units to satisfy the City's Regional Housing Needs Assessment allocation, as mandated by the State, improve affordability, reduce constraints to housing production, and promote fair housing. In adherence with State law, the City proposes to amend the Zoning Ordinance (Map and Text) to effectuate the Housing Element. The City also proposes to amend the General Plan Map for consistency with Zoning Changes. The most significant of these changes is to allow mixed use or residential development in lieu of non-residential uses on a series of non-residential parcels. This Addendum assesses whether the impacts generated by associated PLAN Hermosa changes and zoning changes to effectuate the Housing Element would create any new or substantially greater significant impacts than those that were assessed in the PLAN Hermosa Environmental Impact Report ("PLAN Hermosa EIR").

The Housing Element-related actions and the environmental analysis are informed by several components of the planning process including:

- California State law requirement for the City to adopt a compliant Housing Element along with zoning changes necessary to implement the Housing Element;
- Community outreach and decision-maker input, through study sessions and workshops, which
 informed the project objectives, main policy direction, and key improvements of the Housing
 Element, as described in the Project Description below.
- Updated Traffic Impact Analysis, consisting of a Vehicle Miles Traveled (VMT) analysis and qualitative comparable Level of Service (LOS) analysis.

The PLAN Hermosa EIR analyzed whether implementation of the goals, policies, and programs of PLAN Hermosa would result in significant impacts to the environment and imposed mitigation measures to reduce these significant impacts. Implementation of the goals, policies, and programs of the Housing Element do not alter the analyses or conclusions of the PLAN Hermosa EIR. This Addendum finds that the proposed Zoning Ordinance and General Plan changes to implement the Housing Element would not result in any new or substantially greater significant impacts than those which were identified and assessed in the PLAN Hermosa EIR.

This Addendum also demonstrates that the PLAN Hermosa policies and programs—that serve to avoid or minimize potential impacts for each of the defined impacts of the PLAN Hermosa EIR, along with the PLAN Hermosa EIR's mitigation measures which reduce significant impacts—would continue to be implemented as part of this Project. Consequently, and as per California Environmental Quality Act ("CEQA") Guidelines sections 15162 and 15164, a subsequent EIR is not required for the Project and the City Council may adopt this Addendum in fulfillment of its obligations under CEQA.

2. CEQA REQUIREMENTS FOR AN EIR ADDENDUM

If changes to a project or its circumstances occur or new information becomes available after adoption of an EIR, the lead agency may: (1) prepare a subsequent EIR if the criteria of State CEQA Guidelines section 15162(a) are met (see below) or (2) prepare an Addendum. (State CEQA Guidelines, 15162(a), 15164(a).) When only some changes or additions are necessary and none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred, CEQA allows the lead agency to prepare and adopt an Addendum. (State CEQA Guidelines, 15164(a).)

Under Section 15162, a subsequent EIR need not be prepared unless the lead agency determines one or more of the following:

- 1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of any new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Thus, if the Housing Element-related changes would not result in any of the circumstances listed in Section 15162 (i.e., no new or substantially greater significant impacts), an Addendum to the PLAN Hermosa EIR is appropriate. As demonstrated in the analysis herein and concluded in Chapter 5, this assessment concludes that an Addendum to the PLAN Hermosa EIR is appropriate.

Certified PLAN Hermosa EIR

The City of Hermosa Beach certified an EIR for the PLAN Hermosa Update (State Clearinghouse No. 2015081009) in August 2017. The PLAN Hermosa EIR concluded that, at a program level, the impacts of future development and policies included in the PLAN Hermosa would all be reduced to less-than-

significant levels given the policies and programs of the PLAN Hermosa and mitigations in the PLAN Hermosa EIR, except for:

- Air Quality impacts due to short-term emissions during construction of development that could ensue under PLAN Hermosa and cumulative construction and operational emissions that could affect the greater region's ability to attain ambient air quality standards.
- Cultural Resources impacts, on a project basis and cumulatively in the region, that could cause a substantial change to historic resources due to anticipated future development.
- Transportation impacts due to three intersections and one roadway segment exceeding level of service (LOS) performance standards, on a project basis and in the cumulative condition.

Mitigation measures and policies were included to reduce these significant impacts. However, no feasible mitigation measures were identified for these impacts that could reduce impacts to less-than-significant levels. Therefore, the City Council approved a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 when certifying the PLAN Hermosa EIR to explain why the PLAN Hermosa was being approved, despite significant and unavoidable impacts to air quality, as well as roadway segments, intersections.

Purpose of the EIR Addendum

Per CEQA Guidelines Section 15164(a), the lead agency may prepare an Addendum to a previously certified EIR if some changes are necessary but none of the conditions described in CEQA Guidelines Section 15162, calling for the preparation of a subsequent EIR, have occurred. This Addendum evaluates whether the actions associated with the Housing Element proposes any changes to the approved PLAN Hermosa that would result in any new or substantially more adverse significant effects or require any new mitigation measures not identified in the General EIR. Ultimately, as discussed in the Conclusion in Chapter 5, this Addendum finds that a subsequent EIR is not warranted.

3. PROJECT DESCRIPTION

Background and Context

The adopted revised 2021-2029 Housing Element replaces the existing Housing Element in PLAN Hermosa, the City's comprehensive plan. The Housing Element establishes programs, policies, and actions to: further the goal of accommodating projected housing demand, as mandated by the State; increase housing production to meet this demand; improve housing affordability; preserve existing affordable housing; improve the safety, quality and condition of existing housing; facilitate the development of housing for all income levels and household types, including special needs populations; improve the livability of all residents; and promote fair housing.

The Regional Housing Needs Assessment (RHNA) allocation for Hermosa Beach calls for 558 dwelling units, at a range of income levels. Additionally, State regulations require that an adequate inventory of Housing Element sites be available throughout the Housing Element planning period to ensure that RHNA allocation for each income level remains available. This has resulted in jurisdictions including a buffer of residential development capacity to prepare for this requirement. The Hermosa Beach 2021-2029 Housing Element calls for 608 units in total to satisfy the RHNA allocation. This represents a net increase of 308 dwelling units over what was evaluated in the PLAN Hermosa EIR and within a shorter

time frame: 2021-2029 for the Housing Element compared to a plan horizon of 2035 in PLAN Hermosa. The Housing Element includes implementation plans and programs, one of which requires that changes to the jurisdiction's zoning ordinance be completed prior to certification to allow for development capacity in the Housing Element to be realized. The zoning changes, along with associated General Plan changes for consistency, collectively form and are herein referred to in this document as the "Project".

The Project would maintain existing City height and development standards (including the existing floor area ratios as established in PLAN Hermosa) but would allow residential uses in certain Housing Element sites where only non-residential uses are currently permitted.

Specifically, to effectuate the Housing Element, the following actions are proposed.

- 1) A General Plan Amendment to change the General Plan Map to redesignate nine St. Cross Episcopal church parcels [1900 Monterey Boulevard, 1908 Monterey Boulevard, 1914 Monterey Boulevard, 1730 Loma Drive, 1734 Loma Drive, 1854 Loma Drive, 1902 Loma Drive, 4183-016-037 (Private Parking Lot), 4183-016-038 (Private Parking Lot)], as MDR Medium Density Residential.
- 2) Zoning Text Amendment (TA-23-02) consisting of:
 - a. Update definitions and regulations for Special Housing Types to align with State law and California Department of Housing and Community Development (HCD) comments. The following Special Housing Types were added or revised in the Zoning Code:
 - i. Low Barrier Navigation Centers. This term is being introduced to the Zoning Code and is included in Section 17.04 (Definitions) and added as a permitted use in the C-1, C-2 and C-3 zones (Section 17.26.030).
 - ii. Emergency Shelters. The existing definition, located in Section 17.04, was revised and the process was relocated to a more appropriate location in the Zoning Code (17.42.210). The parking standards (17.44.020) were modified to include parking for staff, and the use was expanded to the R-3 zone. All of the changes made were to be incompliance with State law.
 - iii. Supportive and Transitional Housing.
 - 1. The Supportive Housing definition was updated and the Transitional Housing definition was replaced to be in compliance with State law.
 - 2. Outdated terms were revised to reflect the new term Supportive and Transitional Housing as a permitted use in all residential zones.
 - 3. The use and process were expanded to be permitted in the Commercial zones depending on the size of the operation (17.26.030)
 - 4. The parking standards were updated to align with the parking requirements for a residential use.
 - 5. Two new sections were created (17.42.220 and 17.42.230) to provide process for Large Residential Care Facilities and Supportive Housing.
 - iv. Residential Care Facilities. Large and Small Residential Care Facilities and Residential Facility, Assisted Living are replacing Medical Care Facility and definitions are being added to Section 17.04. These uses will be permitted within the Residential and

Commercial zones and the permit and operation requirements are being added in Section 17.42.230. Parking standards are reflected in 17.44.020.

- b. Create New Zone R2-A Medium Density Residential Zone (22), a zoning district similar to the City's existing R2 zoning, but with a specified minimum density of 22 dwelling units per acre and a maximum density of 25 dwelling units per acre. Existing R2 zoning allows for development of up to 25 dwelling units per acre. This new zone, titled R2-A – Medium Density Residential (22) is proposed as Chapter 17.13.
- c. Update the M-1 Light Manufacturing Zone. PLAN Hermosa, adopted in 2017, designated the geographical area of the current M-1 zoning district as Creative Light Industrial. This designation is intended to create a suitable environment for small businesses that rely on manufacturing or production to operate, but also to foster new innovation and creative economic activity.
 - i. Amend 17.28.010 (M-1 Specific purposes). In the M-1 zoning district, the City proposed to update the Zoning Ordinance language to reflect the lighter nature of the Creative Industrial use and also to decrease the subjectivity of language that was used in PLAN Hermosa. Amend Section 17.28.030 (M-1 Standards and limitations):
 - ii. Retain the 35-foot height limit, but remove a two-story limit to facilitate residential development in accordance with the Sites Inventory.
 - iii. Remove language related to oil and gas operations.
 - iv. Amend Section 17.28.020 (M-1 Permitted uses.) to allow work/live configurations as long as they are integral to a creative industrial use, in line with PLAN Hermosa.
- d. Create a new zone called Public Facility (PF), Section 17.29, to align with PLAN Hermosa. The proposed PF zone includes permitted uses and development standards that support appropriate land uses such as government facilities, institutions, and certain qualified residential uses needed to implement the Housing Element Sites Inventory sites.
- e. Create a Housing Element Sites Inventory Overlay (--HE) to identify Housing Element sites and to enable tracking. This entails adding the (--HE) designation to existing zoning (for example, a property zoned C-3 would be zoned C-3-HE to identify it as a Housing Element Sites Inventory site). The –HE Overlay establishes a formal procedure to monitor for the No Net Loss of capacity for accommodating the RHNA, pursuant to Senate Bill 166. The following amendments are proposed:
 - Amend 17.39.030 (Minimum Density) to clarify that (--HE) minimum residential density criteria is an obligation of the City to ensure that adequate sites remain to accommodate the City's RHNA allocation.
 - ii. Add 17.39.060 (Short term rentals prohibited) to prohibit short term rentals on any residential unit created on a site zoned (--HE).
 - iii. Establish replacement housing requirements when redevelopment occurs on RHNA sites where existing units occupied by or deed-restricted for lower income households are demolished.
 - iv. Add 17.39.050 (Land Value Recapture for Affordable Housing), which would require a fee for residential or mixed-use development any non-residentially-zoned parcel,

with exemptions if project proposals meet minimum percentages of affordable units. The proposed thresholds are: 10% very low income; 15% low income; or 20% moderate-income levels. The LVR Program would also allow for combination of different levels of affordability, and could be pro-rated if the project includes fewer affordable units than the minimum percentage.

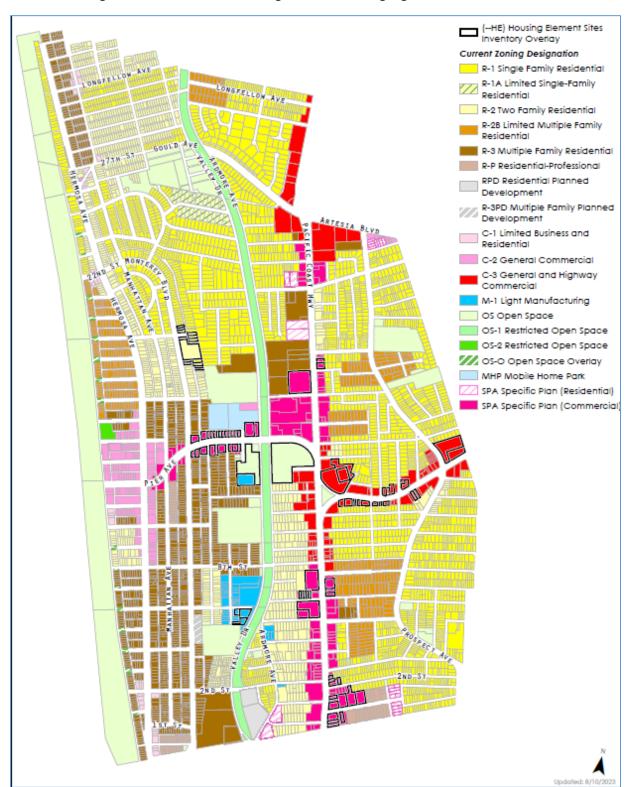
- f. Amend the Zoning Ordinance to revise and broaden mixed-use development (including residential uses) to C-2, C-3, SPA-7, SPA-8, and SPA-11 RHNA Sites Inventory sites with an allowable residential density of 25.1-33 units per acre, and residential or work/live in the M-1 zone.
 - i. Include clarifying language around sidewalks, walkways and vehicular and bicycle parking.
 - ii. Clarify confusing exception categories, remove ambiguous language, update setbacks, building design guidelines and building height standards.
 - iii. Expand long-term bicycle storage for residential and non-residential uses, including regulations and revise standards.
- g. Revise Density Bonus regulations (17.42.100) to align with State law, which has been updated numerous times since the City adopted regulations in 2013. The revisions largely refer to State law, to remain consistent should State law be revised again.
- h. Restructure the lot consolidation provisions to apply to density bonus projects. Currently, the lot consolidation provisions are located in Section 17.42.170. completely separately from the density bonus provisions in Section 17.42.100. Since the Housing Element intends for these two provisions to be coordinated, the lot consolidation provisions are proposed to be relocated into the density bonus provisions (17.42.100).
- Create Work/Live Definition and Development Standards. Section 17.42.250 has been added to outline development standards for work/live configurations now allowed in the M-1 zoning district. Standards include permitted non-residential uses and floor plan and design configurations.
- j. Revise Work/Live provisions to prioritize the current permitted uses in the M-1 zone, with a residential component being an accessory to the primary permitted use.
- k. Building Design Guidelines. Section 17.42.260 has been added to provide guidelines on new building articulation and design standards. All mixed use and non-residential buildings will be subject to these design criteria to ensure development engages the street, creates visual interest and avoids a monolithic appearance.
- I. Section 17.44.020 (Off-street parking Residential uses.) and Section 17.44.030 (Off-street parking Commercial and business uses.) was amended to include the following:
 - i. Tier multi-family parking requirements in multiple-family dwellings (developments with 3 units or more) by changing the requirement from 2 spaces per unit to:

Zero to 1-bedroom:
 Two-bedroom:
 spaces
 Three-bedroom:
 spaces

- ii. Incorporate parking maximum requirements for affordable and senior housing, as required by State law.
- iii. Add parking standards for Special Housing Types.
- iv. Allow mixed-use developments to submit for Parking Plans with a fee waiver to encourage sharing parking supply between daytime and evening uses.
- m. Revise the reasonable accommodation procedure (Section 17.42.120) to be objective and predictable. Some notable changes include removing any discretionary action requirements, including the Community Development Director or designee as the reviewing body for reasonable accommodation applications with objective criteria.
- n. Amend the findings for Administrative Use Permit (Chapter 17.55), which is used to review Special Housing Types, to be objective. Special Housing Types such as Emergency Shelters, Low Barrier Navigation Center, Residential Care Facilities, and Supportive Housing for up to 50 units are now subject to an Administrative Use Permit and reflected in the 17.26.030 Commercial Use Table.
- o. Update the Conditional Use Permit process (Chapter 17.56) to include objective findings and move Criteria for Review from Chapter 17.40 to the appropriate section.
- p. Revise the Precise Development Permit (PDP) (Chapter 17.58) process and add objective standards to minimize constraints on housing development. The proposed review tier is as follows:
 - i. Exempt from PDP:
 - 1. Less than 1,500 square foot addition or remodel in any zone.
 - 2. Single Family (1 unit) residential projects.
 - 3. Projects including 2 dwelling units or more with an affordability or senior unit component.
 - ii. PDP Planning Commission Level:
 - 1. 2 dwelling units or more that do not have an affordability component.
 - 2. Non-residential projects
- 3) Zoning Map Changes (ZC 23-01)
 - a. Designate sites as (--HE) Housing Element Sites Inventory sites on the Zoning Map (locations shown on map).
 - b. Change zoning for fifteen St. Cross Episcopal church parcels [1732 Monterey Boulevard, 1736 Monterey Boulevard, 1818 Monterey Boulevard, 302 19th Street, 1900 Monterey Boulevard, 1908 Monterey Boulevard, 1914 Monterey Boulevard, 1718 Loma Drive, 1722 Loma Drive, 1730 Loma Drive, 1734 Loma Drive, 1854 Loma Drive, 1902 Loma Drive, Parking Lot (4183-016-037), Parking Lot (4183-016-038).] to R2A Medium Density Residential (22) to align with the Housing Element Sites Inventory to allow realization of capacity; and
 - c. Change zoning on Civic Center sites to Public Facility to align with their General Plan designation of Public Facility.

Project Location

The Project encompasses the entire City of Hermosa Beach, consistent with the plan boundaries of PLAN Hermosa. The Figure below shows the Housing Element sites highlighted.



The PLAN Hermosa EIR identified 10,110 dwelling units and 2.1 million sq. ft. of non-residential floor area in 2015. The PLAN Hermosa EIR assumed an additional 300 dwelling units and 630,400 sq. ft. of non-residential uses could be developed under PLAN Hermosa. This Project results in 308 additional dwelling units necessary to meet the RHNA and reduces the potential for non-residential uses to 281,882 sq. ft. since a portion of the new dwelling units will be accommodated in locations formerly identified for non-residential areas. This represents a shift in land use from commercial to residential floor area, resulting in a similar amount of development to what was projected in PLAN Hermosa.

This translates to an increase of approximately 600 residents to 21,000 residents compared to what was projected in the PLAN Hermosa EIR and a reduction of 1,000 to 6,200 jobs compared to what was projected in the PLAN Hermosa EIR.

Table 1: Housing Element Compared to PLAN Hermosa EIR Buildout

Policy Document	Housing Units	Residents	Commercial (sq. ft.)	Jobs
•				
Existing (2015)	10,110	19,800	2,106,400	5,700
PLAN Hermosa (Net New) (A)	+300	20,400	+630,400	7,200
Housing Element (Net Change) (B)	+608	21,000	-348,518	-1,000
Difference between PLAN and HE Projections (B-A)	+308	600	281,882	-6,200

Source: PLAN Hermosa EIR, p. 3.0-6-3.0-9, 4.12-1-4.12-2, Fehr & Peers Memorandum July 2023.

The impacts of the COVID pandemic changed the commuting patterns within Hermosa Beach. During the development of PLAN Hermosa, data showed that 95% of the City's population commuted outside the City for employment. Post-COVID, data is showing that this has decreased to 75%, since more residents have transitioned to working from home. For the purposes of the analysis, residential units are considered residential despite the increase in working from home.

4. IMPACT ANALYSIS

This chapter evaluates each topic addressed in the PLAN Hermosa EIR. The PLAN Hermosa EIR did not evaluate potential impacts on agricultural resources. This Addendum to the PLAN Hermosa EIR does not include this impact analysis section since there would be no change that would necessitate preparation of this sections. This chapter includes three new impact analysis sections—energy, wildfire and tribal resources—since these topics were added to CEQA Guidelines since certification of the PLAN Hermosa EIR.

4.1 Aesthetics and Visual Resources

The PLAN Hermosa EIR determined that development under PLAN Hermosa would not result in any significant impacts with regard to aesthetic resources, with implementation of PLAN Hermosa policies. The Project does not include any elements that exceed the scope of the PLAN Hermosa in terms of visual resources. Still, key features of the Project are evaluated below for potential significant impacts. Overall, the Project would allow a net increase of 308 dwelling units over what was evaluated in the PLAN Hermosa EIR, a portion of which would replace area that was identified for commercial floor area

in PLAN Hermosa. The Project would introduce housing on larger sites previously used for non-residential purposes, such as in C-2, C-3, SPA-7, SPA-8, and SPA-11 non-residential zones, within the scale of existing development standards. The Project also includes redesignating nine sites currently designated as low-density housing to medium density housing. However, new development will continue to be subject to existing design guidelines and standards, including regarding lighting, screening, and landscaping, that reduce visual impacts. The City's existing height limits for medium density housing is 30 feet, while height limits for low-density housing are 25 feet. The nine sites are not located on any designated scenic corridors.

Moreover, most projects (except for single family and renovations less than 1,500 square feet) would be subject to discretionary review with the Planning Commission to ensure visual resources are protected through compliance with applicable standards. Development under the Project would be required to meet PLAN Hermosa policies and zoning ordinance standards through the design of new housing, as specified in the following Land Use + Design Element policies through context-sensitive design and transitions between neighborhood scales.

PLAN Hermosa includes a discussion of scenic resources, consisting of views of the ocean as well as views of the Palos Verdes Peninsula to the south, the Santa Monica Bay and Santa Monica Mountains to the north, and the Los Angeles Basin and San Gabriel Mountains to the east and inland. The beach and The Strand provide some of the most expansive and uninterrupted scenic vistas. Other scenic vistas are best viewed from higher elevations along Pacific Coast Highway and Prospect Avenue.

There are no proposed changes to sites west of Hermosa Avenue, so there would be no impacts to any views from the Beach or The Strand. The viewpoints from Pacific Coast Highway and Prospect Avenue generally follow the alignments of roadways. There are no changes to alignments of roadways as part of the Housing Element changes. Furthermore, the Project does not propose to increase building height limits in any zone. Therefore, development facilitated under the Project compared to what is currently allowed would not substantially alter views, as most views are already fully or intermittently impeded by urban development, including mature trees and existing buildings.

Development facilitated by the Project would occur as redevelopment of existing built and underutilized sites. Development of underutilized parcels may result in new light sources, but they would likely be congruous with nearby light sources (e.g., lighting from residential windows). Furthermore, as the development facilitated by the project would be residential units, light from windows would be mostly filtered or obscured by window coverings. Light spillover from exterior residential lighting is typically blocked by adjacent structures or trees.

Because the Project would not include substantial changes that go beyond the scope of the PLAN Hermosa, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to aesthetics and visual resources during construction or operation of building projects associated with the Housing Element, and no further analysis in warranted.

4.2 Air Quality

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would have significant and unavoidable air quality impacts even with implementation of mitigation measures, because some

projects implemented pursuant to PLAN Hermosa would have the potential to generate daily construction emissions that exceed the South Coast Air Quality Management District (SCAQMD) thresholds of significance. The Project would not make this impact more severe. The Project would increase population and reduce employment beyond levels anticipated by the PLAN Hermosa, resulted in a similar amount of development projected in the PLAN Hermosa. The Project would not result in additional vehicle trips and therefore would not result in any vehicle emissions above and beyond what was evaluated in the PLAN Hermosa EIR.

At the time of preparation of the PLAN Hermosa EIR in 2017, the applicable air quality management plan for the SCAQMD was the 2012 Air Quality Management Plan (AQMP). SCAQMD adopted the current version of the AQMP in December 2022. This 2022 AQMP is based on most recent assumptions for vehicle emissions and demographic updates, among other changes.

Since, the Project is consistent with the growth assumptions of PLAN Hermosa, though with an increase in residents and decrease in jobs/workers, it would be consistent with the growth assumptions in the 2022 AQMP and the overall uses would be similar to the PLAN Hermosa, as analyzed and discussed in the certified PLAN Hermosa EIR.

The 2022 AQMP control strategy includes a variety of implementation approaches such as regulation, accelerated deployment of available cleaner technologies, best management practices, co-benefits from existing programs (e.g., climate, energy efficiency), and incentives.

Compared to PLAN Hermosa, the Project proposes allowing dwelling units to replace floor area designated for commercial uses. This shift is expected to promote a diverse mix of uses, which may reduce vehicle trips between residential uses and retail or employment uses. Further, the Sites Inventory sites are expected to improve accessibility of public transit to nearby residential uses, thus reducing vehicle miles traveled by approximately 2%. This increase in density and the location of the Housing Element sites near transit and service areas encourages land use policies to ensure more compact, connected, and multimodal development, and supports reduced trip generation, trip lengths, and greater ability to utilize alternative modes.

Most of the control measures in the 2022 AQMP are applicable to industrial stationary sources, or are implemented at a regional level, and not directly applicable to individual land development projects contemplated in the Project. Potentially applicable control measures are shown in Table 2, along with a brief analysis of how future development must or will be compliant with these measures. As noted in Table 2, this analysis does not identify any inconsistencies.

Table 2: Potentially Applicable Control Measures (2022 AQMP)

Control Measure				
Number and Name	Consistency Analysis			
SCAQMD Control Measures				
R-CMB-01 through R-	Individual residential projects that are developed pursuant to the Project will			
CMB-04: Residential	primarily be in the form of new construction and to a lesser extent			
	rehabilitation. Consistent with current Building Code and SCAQMD			

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¹ South Coast Air Quality Management District, 2022. 2022 Air Quality Management Plan. Adopted December 2, 2022.

Combustion Source	requirements, whether new construction or rehabilitation, building systems for							
Measures	water heaters, space heating, cooking devices, and other residential appliances							
	will be higher efficiency and low or zero emissions (i.e., electric) compared to							
	the status quo of existing residences.							
EGM-01: Emission	Consistent with current Building Code and SCAQMD requirements, building							
Reductions from New	systems and appliances will be higher efficient and low or zero emissions (i.e.,							
Development and	electric) compared to the status quo of existing residences.							
Redevelopment								
EGM-03: Emission	Individual residential projects that are developed pursuant to the Project would							
Reductions from Clean	be required to follow all local, regional, and State air quality requirements							
Construction Policy	which would limit impacts to air quality during construction.							
Southern California Ass	Southern California Association of Governments' Regional Transportation							
Plan/Sustainable Comn	nunities Strategy and Transportation Control Measures							
Focus Growth Near	The Project implements the Housing Element, which locates dwelling units							
Destinations and	within existing commercial areas, which may reduce vehicle trips between							
Mobility Options	residential uses and retail or employment uses and is expected to improve							
	accessibility of public transit to nearby residential uses, thus reducing vehicle							
	miles traveled.							
Promote Diverse	The Project implements the Housing Element, which supports dwelling units in							
Housing Choices	areas which are in and close to non-residential areas, furthering the housing							
	choices within the City. Currently, housing is permitted in residential only							
	zones, which are not integrated with services and retail. The Project would							
	expand areas within the City where housing can be developed.							

Projects resulting from implementing the Housing Element must be consistent with the 2022 AQMP. Any potential project-specific short- and long-term impacts to air quality would be assessed at the time the projects are proposed. Furthermore, individual projects would be subject to federal, State, and local ambient air quality standards. The Project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards of emission reductions specified in the AQMP.

Construction of projects associated with the Housing Element would involve a temporary generation of emissions associated with equipment and vehicles used for demolition, grading, and construction of the infrastructure and development projects, as anticipated by the PLAN Hermosa and PLAN Hermosa EIR. Construction emissions would occur intermittently on individual projects and over a period of many years. Moreover, construction projects would be required to follow all local, regional, and State air quality requirements which would limit impacts to air quality during construction. This level of construction was anticipated by the buildout estimated for in the PLAN Hermosa and therefore does not represent a more severe impact.

In summary, this Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result with regard to air quality because no additional construction, operational, or vehicular emissions would occur as a result of the Project.

4.3 Biological Resources

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts with regard to biological resources, with implementation of mitigation measures and PLAN Hermosa policies. Two special-status wildlife species (California least tern and western snowy plover) have the potential to occur in the beach habitats. The PLAN Hermosa EIR includes Mitigation Measure 4.3-1 which requires preconstruction surveys during times of roosting. However, Housing Element sites inventory sites are not located within this area. Moreover, the Project proposes housing only on underutilized urban areas. There are no greenfield locations within the City. The Project does not include any elements that exceed the scope of the PLAN Hermosa, only that housing would replace existing or planned non-residential uses on sites where development is currently permitted.

The Project would be subject to all PLAN Hermosa policies and State and federal requirements with respect to protection of biological resources. Bird strikes can increase with building height and increased amounts of glazing. However, the maximum building heights in the City's zoning district is not proposed to change compared to existing conditions.

PLAN Hermosa includes urban forestry policies under Policy 10.1 to expand the urban forest. Development of new housing and related site improvements may have some beneficial impacts by increasing the number of street trees, which could provide some limited increases in habitat for birds. Additionally, redevelopment may have some beneficial impacts by reducing the amount of impervious surfaces through compliance with stormwater management requirements, which could provide some incremental reductions in runoff to Santa Monica Bay, which is a jurisdictional water of the United States.

As a result, the Project does not include elements that go beyond the scope of the PLAN Hermosa. In conclusion, no new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result with regard to biological resources during operation or construction of building project associated with the Housing Element.

4.4 Cultural Resources

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would have significant and unavoidable cultural resources impact even with implementation of mitigation measures, because of the potential to cause substantial change to the significant of historic resources. Additionally, the PLAN Hermosa EIR identified potentially cumulatively considerable impacts on paleontological resources due to ground-disturbing construction activities.

The City of Hermosa Beach adopted a preservation ordinance in 1998, which outlines the landmark designation criteria, the nomination and application requirements for local landmarks, and the certificate of appropriateness requirements. Under the City's current policies and preservation ordinance, only resources that are officially listed federal, state, or local landmarks are protected. However, the City does not have a comprehensive list of potentially eligible historic properties over 45 years old. Future development projects pursuant to PLAN Hermosa and the proposed Project could lead to the demolition of historic or potential eligible resources. The Land Use + Design Element of PLAN Hermosa lists a number of policies to encourage and strengthen historic preservation in the city, including Policies 10.1 through 10.10. These regulations help reduce potential impacts to historical

resources. The Hermosa Beach Community Center site located at 710 Pier Avenue is listed on the Housing Element Sites Inventory list. The Community Center building is a designated historic landmark. However, the grounds and other remaining land are not. The City's historic presentation ordinance requires a Certificate of Appropriateness for any modifications to historic structures. Furthermore, there is currently no proposed for foreseeable removal of any designated historic structure contemplated in the Project; therefore, designated historical buildings would not be affected by the proposed Project.

Similar to what was assumed in the PLAN Hermosa EIR, although development under the proposed Project would occur on non-vacant and underutilized sites in previously disturbed areas, ground-disturbing activities such as earthmoving and excavation could still potentially damage unrecorded archaeological resources in subsurface soils within housing sites. However, implementation action LAND USE-21 requires archaeological investigations, as necessary, by a qualified archaeologist for projects subject to CEQA. This includes ground-disturbing activities for areas not previously surveyed and/or that are determined sensitive for cultural resources. This mitigation would require preparation and implementation of a treatment plan if buried resources would be affected by a proposed project.

In summary, the Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects with regard to cultural or historic resources during construction or operation of building projects associated with the Housing Element.

4.5 Energy

The PLAN Hermosa EIR evaluated energy resources within the Utilities section of the EIR prior to the December 2018 CEQA Guidelines update. Since that time, the issue area of energy has become a new resource category in Appendix G of the CEQA Guidelines. Additionally, the PLAN Hermosa EIR did include a discussion of energy in the context of the Utilities impact analysis and energy resource efficiency in the analysis of greenhouse gas emissions and air quality.

Proposed projects will likely require new electric, gas, and communications services including, but not limited to, new transformers and upgrades to existing lines, including upsizing. Potential impacts will need to be vetted with each utility provider based on the actual project proposed. These utility requirements are standard for development projects throughout the region. They are typically short segments of improvements (typically no more than a block at a time) and can be achieved with a short timeframe, sometimes in coordination with other joint trench activities. Therefore, they do not represent a level of construction that would cause significant environmental effects.

The Significant Irreversible Environmental Effects section (page 5.0-2) of the PLAN Hermosa EIR states that "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely." Further, it concludes that "PLAN Hermosa would allow and continue urban development in the city. Returning Hermosa Beach to a less urban and developed condition would not be feasible given the degree of disturbance, the urbanization of the area, long-term historical urban use, and the level of capital investment." Implementation of the Project would not result in any significant increase in dependence on non-renewable energy resources or in substantial increases in peak or base-period energy use beyond what was described in the PLAN Hermosa.

Further, future development under the Project would be required to comply with all applicable building and design requirements, including those set forth in Title 24 related to energy conservation. Additionally, projects would be required to comply with the local requirements in the Municipal Code and the sustainability and energy reduction policies of the PLAN Hermosa.

Future development under the Project would be expected to incorporate features that help the City meet this commitment. The construction and operation of development under the Project would involve the use of nonrenewable resources. However, compliance with applicable standards and regulations and implementation of PLAN Hermosa and Housing Element policies would minimize the use of nonrenewable resources to the maximum extent practicable. As such, the Project would not represent a large commitment of nonrenewable resources in comparison to a business as usual scenario.

This Addendum considers two additional potential impacts from Appendix G and concludes that the project would have a less than significant impact to energy resources.

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction associated with the Project was generally assumed under the PLAN Hermosa, including development projects and related infrastructure. The increase in the amount of housing units that may be built as a result of the Project would not have a substantive effect on energy consumption, since new units will be in place of building floor area previously allowed for non-residential development. Moreover, these additional dwelling units would be offset by a loss of commercial floor area that had been projected in PLAN Hermosa and evaluated in the PLAN Hermosa EIR.

Construction would result in short-term consumption of energy from the use of construction equipment and related construction activities. Energy use during construction would be primarily from fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction would be temporary in nature, and construction equipment used would be typical of construction projects in the region. The California Green Building Standards Code includes specific requirements related to recycling, construction materials, and energy efficiency standards that would apply to construction of the proposed project to minimize wasteful, inefficient, and unnecessary energy consumption.

Both PLAN Hermosa and the Project envision a higher-density mixed-use land use pattern that is intended to reduce vehicle trip lengths and subsequent transportation energy use. Individual projects built as a result of PLAN Hermosa and the Project would consume natural gas and electricity for building heating and power, lighting, and water conveyance. Individual projects built as a result of the Project would also increase the number of natural gas- and electricity consuming uses above those existing in the city. Project energy consumed would represent an incremental increase in energy usage compared to existing energy use in Hermosa Beach. Moreover, development projects implemented under the Project would be required to implement energy-efficient components under Title 24 to reduce energy demand.

Therefore, construction and operation under the Project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy and this impact would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City is involved in a number of efforts to reduce GHG emissions. The City Council adopted the first Sustainability Plan for Hermosa Beach in 2011. The Sustainability Plan describes community and municipal GHG emissions, compares future emissions to the AB 32 emissions reduction target (15 percent below 2005 levels), and outlines a series of strategies and actions to reduce GHG emissions.

In 2015, the City of Hermosa Beach codified a local goal to become a carbon neutral municipal organization no later than 2020 through adoption of the Municipal Carbon Neutral Plan. This plan sets the City up to demonstrate environmental leadership at the municipal level and identifies carbon reduction programs and initiatives to achieve the carbon neutral goal.

The City of Hermosa Beach adopted an Energy Efficiency Climate Action Plan (CAP) in 2015 to inventory existing energy use and greenhouse gas emissions and identify energy use reduction goals and policies to improve energy efficiency, create new green jobs, and improve the community's quality of life.

The PLAN Hermosa EIR reconciles GHG reduction goals based on timelines of State executive orders with the PLAN Hermosa buildout time horizon of 2040, and identifies the following target: the minimum equivalent GHG reduction needed to be consistent with long-term state targets would be 60 percent below 1990 levels by 2040, which equates to 66 percent below 2005 levels. Further, Mitigation Measures 4.6-1b from the PLAN Hermosa EIR sets targets for each 5-year interval through 2040. For example, the mitigation measure targets an interim reduction goal of 49 percent below 2005 levels by 2030, the closest target to the end of the Housing Element period.

The PLAN Hermosa EIR analyzes compliance with the State AB32 and Climate Change Scoping Plan, Sustainability Plan and Municipal Carbon Neutral Plan regarding energy efficiency and reduction in energy use within the chapter on greenhouse gas emissions. It concludes that the PLAN Hermosa is generally consistent with adopted policies and that it would further implement these policies through additional PLAN Hermosa policies. PLAN Hermosa includes numerous policies to encourage sustainable land use development, including reducing commute dependence, increasing the amount of renewable energy generated within the city, and improving efficiency and conservation of energy.

Compared to the PLAN Hermosa, the Project increases the number of residential units and decreased planned commercial floor area, resulting in a similar amount of development. As it is generally consistent with the PLAN Hermosa, the Project would be consistent with these policy documents. The Housing Element furthers PLAN Hermosa and energy reduction policies regarding energy efficiency through building code requirements, higher-density mixed-use land use patterns, and reduced automobile dependence. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and this impact would be less than significant.

Conclusion

Although the PLAN Hermosa EIR does not address energy as a separate topic, this analysis concludes that the Project would not result in a new significant impact in this resource area because of the Project's consistency with the City of Hermosa Beach adopted policies and energy-efficient measures required by local and State codes. Therefore, no new mitigation measures are warranted, and this issue does not require further study.

4.6 Geology, Soils, and Seismicity

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts with regard to geology, soils, or seismicity. Implementation of PLAN Hermosa policies and compliance with local and California Building Code regulations would reduce exposure of people and structures to seismic hazards, soil erosion, and unstable or expansive soils.

The primary seismic hazards in Hermosa Beach are fault ground ruptures and ground shaking. Secondary seismic hazards include liquefaction, lateral spreading, differential settlement, landslide-induced earthquakes, and subsidence. Requirements in the Hermosa Beach Municipal Code and Building Code requirements would ensure that construction, grading, and related activities meet California Building Code standards. The City requires developers to submit a geotechnical report before starting construction on new buildings. The geotechnical reports ensure that new developments appropriately consider and design geological, soil, and seismic safety conditions for each project site. The addition residential uses in existing commercial locations anticipated under the Project would not alter the level of development anticipated under the PLAN Hermosa or the construction typologies.

As a result, the Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to geology and soils during construction or operation of buildings associated with the Housing Element. No further analysis in warranted.

4.7 Greenhouse Gas Emissions

A core objective in the development of PLAN Hermosa was to identify policies to reduce greenhouse gas (GHG) emissions and set Hermosa Beach on a path to a low- carbon future. However, the PLAN Hermosa EIR concluded that PLAN Hermosa could result in GHG emissions in excess of long-term 2040 GHG targets and therefore could result in a significant impact. Cumulative development would contribute to global climate change through GHG emissions from transportation, energy, water/wastewater, and waste generation, and other off-road equipment. PLAN Hermosa includes numerous policies related to land use, transportation, and energy, to reduce the potential impact. Additionally, the PLAN Hermosa EIR includes three mitigation measures to complete the actions of the City's Climate Action Plan, reevaluate the GHG emissions inventory and progress toward targets every five years, and make revisions PLAN Hermosa and/or the Climate Action Plan to prescribe additional policies or programs if the City is not meeting interim targets. With implementation of these mitigation measures, the PLAN Hermosa EIR concluded that the impact would be reduced to less than significant levels and that the impact would not be cumulatively considerable. The PLAN Hermosa EIR determined that the PLAN Hermosa would be

generally consistent with many of the principal goals and objectives in the State and local plans, including the City's Climate Action Plan.

The Project is consistent with the GHG-reduction actions under the PLAN Hermosa and therefore generally consistent with SCAQMD's Air Quality Management Plan and City's Climate Action Plan and other adopted policies for GHG reduction. The Project may further GHG emissions reduction efforts by encouraging a more mixed-use land use pattern that may reduce automobile dependence by located residential uses within commercial areas. There are no related GHG impacts that are specific to the Housing Element Sites Inventory or design that give rise to significant impacts that are more severe than or have not already been identified in the PLAN Hermosa EIR. The increase in the amount of housing units that may be built as a result of the Project would not have a substantive effect on the potential impacts to GHG emissions, since new units will be in the form of infill development and would be offset by a reduction in planned commercial floor area.

Further, California emissions standards continue to become stricter, calling for reductions in carbon dioxide emissions from new vehicles. Governor Gavin Newsom issued an executive order in September 2020 requiring sales of all new passenger vehicles be zero-emission by 2035, which would further reduce vehicle emissions resulting from implementation of the Project.

As a result, the Project would not include any elements that go beyond the scope of PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to greenhouse gas emissions during construction or operation of building projects associated with the Housing Element. No further study is warranted.

4.8 Hazards and Hazardous Materials

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts with regard to hazards and hazardous materials with implementation of mitigation measures. There is only one location of known contamination in Hermosa Beach, the City's Maintenance Yard. A mitigation measure in the PLAN Hermosa EIR requires a health risk assessment and remedial action plan for any development activities that encroach upon the City's Maintenance Yard. The City's Maintenance Yard is not one of the Housing Element sites inventory sites and none of the listed sites encroach upon the Maintenance Yard.

The Project does not propose any additional development that would create hazards, beyond what was anticipated in the PLAN Hermosa. The use or transport of hazardous materials would not occur as a result of the Project beyond what was contemplated in the PLAN Hermosa.

There are no sites within the City of Hermosa Beach on the hazardous materials databases compiled pursuant to Government Code Section 65962.5 (Cortese List).

Development must comply with PLAN Hermosa policies and federal and State regulations regarding demolition and site preparation/cleanup. Further, existing regulations and mitigation measures in the PLAN Hermosa EIR stipulate requirements in the event of accidental release of hazardous materials.

These regulations would ensure that impacts to the public and the environment are reduced to less than significant levels. The Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the

severity of previously identified significant effects to hazards and hazardous materials during construction or operation of building projects associated with the Housing Element. No further study is warranted.

4.9 Hydrology and Water Quality

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts with regard to hydrology and water quality. There are no potable surface water resources in the City. However, Hermosa Beach and Santa Monica Bay are designated as "water quality—limited" for impairments under federal Clean Water Act Section 303(d), indicating that these water bodies are not reasonably expected to attain or maintain water quality standards due to impairments without additional regulation. State and regional agency regulations and permitting aim to reduce stormwater runoff and pollutants. Further, the City has implemented several projects to reduce and minimize pollutants in stormwater, as stated in the PLAN Hermosa EIR. In terms of flooding, as shown in the PLAN Hermosa and PLAN Hermosa EIR, the entire urban area of the city, east of the beaches, is outside the 100-year flood area. Coastal flooding is exacerbated by storm surge and high tides, as well as the potential for sea level rise. PLAN Hermosa includes various policies and requirements to reduce potential flooding and protect structures and human life.

These policies include managing the storm drain infrastructure to reduce runoff and flood impacts, which is discussed further in Section 4.16: Utilities and Service Systems.

The increase in density and additional housing units would not have a substantive effect on the potential impacts to hydrology and water quality. Development is primarily expected to result from redevelopment of existing underutilized sites, the majority of which are covered by impervious surfaces—a combination of buildings and surface parking. Redevelopment projects would need to meet current stormwater regulations for stormwater management. Although these measures may not reduce the overall impervious surface area substantially, they are expected to better manage runoff during storm events, which may reduce potential flooding and improve water quality. The Project further enables development described in the PLAN Hermosa whose effects on stormwater, groundwater, water quality, erosion, and flooding have been evaluated in the PLAN Hermosa EIR.

The Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to hydrology and water quality during construction or operation of building projects associated with the Housing Element, and no further analysis in warranted.

4.10 Land Use and Planning

The PLAN Hermosa EIR determined that development under PLAN Hermosa would not result in any significant impacts with regard to land use and planning. The Project would not physically divide an established community. Currently, the various residential areas within the City are divided by major arterial corridors developed with commercial and vehicular-oriented uses. The inclusion of residential uses along commercial corridors will further the integration of the various residential uses. The Sites Inventory includes 79 parcels, comprising 29 sites, that are along commercial corridors and eligible for mixed use or residential development.

The Project also includes amendments to the PLAN Hermosa land use map for nine (9) parcels on the Sites Inventory list which currently function along with six (6) other parcels as part of the St. Cross Episcopal Church. The 15 parcels of St. Cross Episcopal Church comprise Sites 1 and 2 on the Sites Inventory List. The site is located within a residential area. The Project will redesignate these nine parcels from Low-Density Residential to and Medium Density Residential to match the designation of the other six parcels, in order to support the Housing Element development capacity. The Project will amend the associated zoning designations for all 15 parcels to R2A – Medium Density Residential 22 to bring alignment between the Zoning District map and PLAN Hermosa land use plan.

Lastly, the project includes rezoning six (6) parcels currently comprising the Hermosa Beach Civic Center as Public Facility to align with the General Plan designation of Public Facility. Two of the sites are listed on the Housing Element Sites Inventory list. Residential uses would be included as one of the permitted uses within the Public Facility zone.

Collectively, all changes proposed by the Project implement the Housing Element, which is part of PLAN Hermosa. As such, all actions are internally consistent. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Planning Area, nor conflict with any applicable habitat conservation plan. Rather, the Project helps support the goals and policies of the PLAN Hermosa with respect to generating mixed-use development.

The Project implements the Housing Element and accommodates an additional 308 housing units compared to what was assumed in PLAN Hermosa. A portion of these housing units would replace what could have built out as commercial uses, so the net change in overall development anticipated by PLAN Hermosa is minimal. As a result, the Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to land use during construction or operation of building projects associated with the Housing Element. No further analysis is warranted.

4.11 Mineral Resources

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts to mineral resources. According to the PLAN Hermosa EIR, the entire city is designated as Mineral Resource Zone 3 (MRZ-3) land. The MRZ-3 classification indicates areas of undetermined mineral resource significance. Although mineral resources may be present, the presence or absence of resources is considered speculative because of a lack of available data. PLAN Hermosa does not include policies or implementation actions addressing mineral resources. The Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to mineral resources during construction or operation of building projects associated with the Housing Element. No further analysis is warranted.

4.12 Noise and Vibration

The PLAN Hermosa EIR concluded that PLAN Hermosa would result in significant vibration impacts during construction, but that these impacts could be reduced to less than significant levels with implementation of mitigations measures. PLAN Hermosa would guide future development and reuse

projects in the city in a manner that may expose persons to or generate noise levels in excess of the standards established in the General Plan, Zoning Ordinance, or Noise Ordinance or in applicable standards of other agencies. However, the PLAN Hermosa EIR found that PLAN Hermosa policies and implementation actions would reduce this impact to less than significant levels.

These noise and vibration impacts may persist with implementation of the Project. Similar to PLAN Hermosa, the Project may generate construction noise related to development on private property. Construction may include noise and vibration producing equipment in order to construct foundations and vertical structures. The Project proposes an increase in the number of dwelling units that could be achieved compared to PLAN Hermosa's estimate, balanced in part by a reduction of planned commercial floor area. No change in construction types are proposed, that would generate additional noise, since existing height limits will be maintained. The shift to redevelopment of larger sites may allow for larger projects with somewhat longer construction timelines. However, the Municipal Code regulates construction hours to minimize construction noise impacts at adjacent receptors.

The Project allows for more residential uses in some areas of the city than currently permitted. Most sites in the Sites Inventory are located within existing commercial corridors that allow for convenient access to goods and services. Under full buildout of the Housing Element, 308 additional units could be developed compared to buildout estimated in PLAN Hermosa.

Replacing approximately 348,518 square feet of non-residential development with 608 additional residential units results in a slight reduction of overall daily vehicle trips by approximately 300 (1% reduction) and daily vehicle miles traveled (VMT) by 6,000 (2% reduction).

Without an increase in vehicle trips or vehicle miles, new development would not incrementally increase the exposure of land uses along roadways to traffic noise.

In summary, the Project would not include any elements that go beyond the scope of the PLAN Hermosa and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects to noise during construction or operation of building projects associated with the Housing Element, and no further analysis in warranted.

4.13 Population and Housing

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts with regard to population and housing. The Housing Element would not induce substantial unexpected population growth that is not adequately planned for, nor displace substantial numbers of housing units or people, or necessitate construction of replacement housing elsewhere.

The Housing Element plans for 608 dwelling units by 2029. In comparison, PLAN Hermosa assumed only 300 units by 2035. The city is already largely built out, such that development will come in the form of redevelopment, primarily of commercial property and of floor area that PLAN Hermosa envisioned as commercial development. This tradeoff between residential and commercial development does not require additional roads, facilities, or utilities, as described in this Addendum, that would generate growth inducing impacts that are not planned for. Some existing residential units may be redeveloped to make way for higher density housing. All redeveloped units are required to be replaced on a 1:1 or greater basis. Moreover, replacement requirements would be regulated by local and State law.

The city is already well served by utility and transportation infrastructure. PLAN Hermosa describes policy requirements for infrastructure improvements commensurate with development. Moreover, the Project Description and further analysis in 4.14 Public Services, Community Facilities, and Utilities describe the Housing Element policies and improvements to water, sewer, stormwater, and other services that may be required to accommodate the level of development identified in the Housing Element. The growth inducement represented by these improvements provide for infill development where it has already been planned for and studied, whether for residential or commercial growth.

As a result, the Project would not include any elements that go beyond the scope of the PLAN Hermosa and proposes an amount of housing development that is comparable to what is allowed by the PLAN Hermosa and analyzed in the PLAN Hermosa EIR. Thus, no new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result with regard to this impact, and no further analysis in warranted.

4.14 Public Services, Community Facilities, and Utilities

The PLAN Hermosa EIR determined that development under the PLAN Hermosa would not result in any significant impacts with regard to public services, community facilities, and utilities. The Project proposes 308 more dwelling units than anticipated in PLAN Hermosa, and approximately 600 residents, but fewer permanent jobs compared to what was accounted for in the PLAN Hermosa. This increased residential population would have an incremental effect on fire and police services and facilities, schools, libraries, and utilities, and would be partially offset by reductions in expected commercial floor area.

City Facilities, Police and Fire

During the preparation of the PLAN Hermosa EIR, the Civic Facilities Strategic Plan was exploring various scenarios for renovation and/or redevelopment of City facilities, including the Public Safety Center. The increase in population under the Project is not anticipated to have an effect on libraries or civic facilities, beyond what was evaluated in the PLAN Hermosa EIR.

As of 2023, the City is currently working with a real estate analysis firm to determine potential public private-partnership for redevelopment of City sites to accommodate City facilities and public safety facilities. The Housing Element Sites Inventory identifies two Civic Center sites which could potentially accommodate affordable housing development. However, the Public Facility General Plan designation prioritizes the use of properties for public/civic purposes. PLAN Hermosa policies aim to meet increases in police and fire service demand as a result of development associated with the PLAN Hermosa.

Additionally, current regulations require Fire and Police Department review of major development projects to ensure that they meet code requirements and emergency response needs. In general, Building and Fire Codes require new development to build in additional safety features, such as fire sprinklers and ladder access, that reduce burdens on emergency responders.

Schools

As stated in the PLAN Hermosa EIR, the current enrollment at Hermosa Valley and Hermosa View schools exceed the permanent capacities and will continue to exceed permanent capacities over the next 10 years. During the preparation of the PLAN Hermosa EIR, the Hermosa Beach City School District (HBCSD) was preparing a Long Range Facilities Master Plan, which examined options for providing

additional classroom and recreational facility space. In 2016, the Hermosa Beach community passed Measure S, a \$59 million facilities improvement bond, to fund school improvements. As of 2023, major renovations and modernization projects have been completed at Hermosa View. Hermosa Vista (formerly Hermosa North) school was reconstructed. With the completion of these projects, the District will have the capacity to house student enrollment forecasted for the next twenty years. There were insufficient bond funds to improve Hermosa Valley school. For all other schools in the districts serving the City, capacity impacts are mitigated by contributions to development impact fees, according to the PLAN Hermosa EIR.

According to a 2021 Developer Fee Study prepared for the Hermosa Beach City School District, the student generation rate is 0.5 students per unit. The Developer Fee Study made further assumptions, including 556 units of forecasted growth (based on the then-RHNA, which has since been amended to 558), and an assumed average size of a residential unit at 2,100 square feet. This equated to a total of 1,167,600 square feet of residential development. With the Project implementation of up to 608 units to accommodate the RHNA allocation, this would equate to 304 potential new students from the 608 net new housing units in the Housing Element, an increase of approximately 25 students over the number considered in the PLAN Hermosa. This is generally accommodated by PLAN Hermosa and the PLAN Hermosa EIR, which identifies sufficient existing capacity to serve additional students through the payment of development impacts fees to address capacity issues and through HBCSD's planning efforts, respectively.

Parks and Open Space

Hermosa Beach does not have an established goal or standard for open space or parkland. However, the Quimby Act requires 5.0 acres per 1,000 residents. With PLAN Hermosa, the ratio of parkland per resident would be approximately 5.2 acres per 1,000 residents, slightly above the standard set under the Quimby Act. The Project could generate approximately 600 additional residents compared to what was evaluated in the PLAN Hermosa, but 1,000 fewer jobs and workers. As a result, the Housing Element would not generate substantially more population than what was identified in the PLAN Hermosa and is not anticipated to have a greater impact on parks and recreation services.

Water

Hermosa Beach is located in the California Water Service Company's (Cal Water) Hermosa-Redondo District. The PLAN Hermosa EIR evaluated the potential impacts of development on water supply and concluded that there was sufficient capacity to serve this increase in demand. The PLAN Hermosa EIR also concluded that existing water treatment infrastructure was sufficient to accommodate development anticipated under the PLAN Hermosa. Improvements under the proposed Project could require replacement with larger diameter pipes. Potential environmental impacts that could result from pipeline improvements would be project specific and are generally limited to upgrades within the project frontage.

New or expanded local water distribution facilities would require permitting and review in accordance with CEQA, which would ensure environmental impacts are disclosed and addressed in the environmental analysis. The Project would generate approximately 600 additional residents compared to what was evaluated in the PLAN Hermosa, but 1,000 fewer jobs and workers and therefore is similar to the amount of development assumed in the PLAN Hermosa EIR. Moreover, new construction implemented under the Project would be required to implement water conservation components of the

Building Code to reduce potable water demand. Therefore, no further impact to these services and facilities are anticipated.

Sewer

The City of Hermosa Beach provides wastewater collection services in the City. The effluent collected by sewer lines is discharged into the Sanitation Districts of Los Angeles County (LACSD) trunk lines. The LACSD trunk lines flow to the Joint Water Pollution Control Plant (JWPCP), located in Carson. The JWPCP is one of the largest wastewater plants in the world and is the largest of the LACSD wastewater treatment plants. The PLAN Hermosa EIR evaluated the potential impacts of new development on sewer capacity and concluded that there was sufficient capacity to serve this increase in demand.

The Housing Element could generate approximately 600 additional residents compared to what was evaluated in the PLAN Hermosa, but 1,000 fewer jobs and workers and therefore is similar to the amount of development assumed in the PLAN Hermosa EIR. Therefore, no further impact to these services and facilities are anticipated.

Stormwater

Urban runoff (stormwater) flows from inland locations in the city to the Pacific Ocean through a network of underground drainage pipes. The underground storm drain system is discontinuous, and in some areas of the city storm runoff flows on the surface of streets. Minor localized street flooding is common throughout many areas of the city. Most of the deficiencies are in the western part of the city: the Valley Drive/Ardmore Drive area, along Hermosa Avenue, and the Gould Avenue/27th Street area. The majority of the Housing Element Sites Inventory Sites are concentrated along existing commercial corridors on Aviation Boulevard, Pier Avenue (upper), and Pacific Coast Highway, away from areas with storm drain deficiencies.

The PLAN Hermosa EIR evaluated the potential impacts of new development on stormwater runoff and storm drain infrastructure and concluded that there was sufficient capacity to serve the increase in demand. New residential development proposed under the Project will occur through infill and redevelopment activities that would occur in areas which are already urbanized. Redevelopment activities may provide opportunities to create new pervious surfaces to facilitate groundwater infiltration through new greenspace, landscaping, or use of porous pavements. Current regulations require Public Works Department review of development projects to ensure that they meet Municipal Code requirements for storm drainage. Incorporation of stormwater management facilities would reduce drainage loads through the stormwater system. The City's Low-Impact Development (LID) Ordinance requires these types of pervious surfaces for qualifying projects.

The Project could generate approximately 600 additional residents compared to what was evaluated in the PLAN Hermosa, but 1,000 fewer jobs and workers and therefore is similar to the amount of development assumed in the PLAN Hermosa EIR. Therefore, no further impact to these services and facilities are anticipated.

Solid Waste

The PLAN Hermosa EIR concluded that the County's landfills would have sufficient capacity to accommodate PLAN Hermosa's solid waste disposal needs through at least 2033. With the applicable State and local regulations in place, buildout of the PLAN Hermosa would not result in a significant impact with regard to landfill capacity. The Project could generate approximately 600 additional

residents compared to what was evaluated in the PLAN Hermosa, but 1,000 fewer jobs and workers and therefore is similar to the amount of development assumed in the PLAN Hermosa EIR. Furthermore, solid waste is expected to decrease over time as the diversion rate (to compost and recycling) increases. Therefore, no further impact to these services and facilities are anticipated.

Conclusion

PLAN Hermosa policies would continue to apply to development allowable under the Project, and thus would not strain public services or utilities. No new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result with regard to this impact during operation or construction of building projects associated with the Housing Element, and no further analysis is warranted.

4.15 Transportation and Traffic

Background

The PLAN Hermosa EIR identified potential traffic impacts due to intersections operating at unacceptable levels of service. The PLAN Hermosa EIR identified five street segments where level of service (LOS) is already below adopted standards at LOS E and/or LOS F under existing (2015) conditions:

- 1. Pacific Coast Highway between Artesia Boulevard and Aviation Boulevard
- 2. Pacific Coast Highway between Aviation Boulevard and 2nd Street
- 3. Artesia Boulevard between Pacific Coast Highway and Prospect Avenue
- 4. Aviation Boulevard between Pacific Coast Highway and Prospect Avenue
- 5. Herondo Street between Hermosa Avenue and Valley Drive

The remaining 15 selected street segments operate at LOS D or better—acceptable levels. With implementation of PLAN Hermosa, 4 of the 20 analyzed street segments are anticipated to operate below the LOS D standard under PLAN Hermosa traffic conditions, but just one segment, represents a significant impact because three of the segments already operate at LOS D or below:

6. Prospect Avenue between Aviation Boulevard and 2nd Street

Under existing (2015) traffic conditions, all analyzed intersections currently operate at or above the target LOS D standard of acceptable conditions. However, the PLAN Hermosa EIR identified three intersections where level of service (LOS) would be reduced to unacceptable levels of service as a result of PLAN Hermosa.

- 1. Pacific Coast Highway and Artesia Boulevard (AM and PM peak hour)
- 2. Pacific Coast Highway and Aviation Boulevard (AM peak hour)
- 3. Manhattan Avenue and 27th Street (AM peak hour)

These street segment and intersection impacts were identified as significant and unavoidable impacts in the PLAN Hermosa EIR.

The PLAN Hermosa EIR applied the threshold of significance for transportation impacts that was based on Project-related change in volume to capacity (v/c) or delay, and intersection level of service (LOS) which were the CEQA transportation impact metrics in effect at the time that EIR was prepared.

LOS is no longer a CEQA transportation impact metric as a result of SB 743. However, for the purpose of this Addendum and to evaluate whether the Project would affect the prior findings of the PLAN Hermosa EIR, a comparable qualitative LOS analysis was prepared by Fehr & Peers in June 2023 to determine the potential impacts associated with buildout of the Housing Element.

Based on the detailed analysis of 13 intersections and 20 street segments, as detailed above, the PLAN Hermosa EIR concluded that the project (PLAN Hermosa) would result in significant transportation impacts at three intersections and one street segment:

Intersections

- Pacific Coast Highway & Artesia Boulevard
- Pacific Coast Highway & Aviation Boulevard
- Manhattan Avenue & 27th Street

Street Segments

Prospect Avenue from Aviation Boulevard to 2nd Street

For each significantly impacted location, there were physical limitations and policy conflicts which made mitigation infeasible and so the transportation impact at these locations were determined to be significant and unavoidable.

In order to evaluate whether the Project would be consistent with the transportation impact findings of the PLAN Hermosa EIR, the Southern California Association of Governments model was used to forecast segment and intersection turning movement volumes for the Addendum Project model run used to evaluate VMT.

Table 4.15-1 presents daily segment volumes for the Project compared with the PLAN Hermosa EIR. As shown in the table, the Project would have the same or lower daily volumes at 15 of the 20 study segments. Five segments are forecast to have a negligible increase in 100 additional vehicle trips per day with the Project. However, collectively across all 20 segments, taking into account those with reduced, increased and no change in forecast daily volumes, the Project would have slightly lower segment volumes in total compared with the PLAN Hermosa EIR. Therefore, it can be concluded that the Project would not result in any new or more severe significant transportation impacts on study segments than those of the PLAN Hermosa EIR.

Table 4.15-1. Addendum Project & PLAN Hermosa EIR Segment Volume Comparison

ID	Segment	Location	PLAN Hermosa EIR 2040 Forecast Daily Volumes	Addendum Project Housing Element 2040 Forecast Daily Volumes	Change in Forecast Daily Volumes Addendum Project	
1	Hermosa Ave	27th St to 22nd St	9,600	9,600	0	
2	Hermosa Ave	22nd St to 16th St	9,200	9,200	0	
3	Hermosa Ave	16th St to 8th St	12,100	12,100	0	
4	Hermosa Ave	8th St to Herondo St	10,300	10,200	-100	
5	Valley Dr	Gould Ave to Pier Ave	4,700	4,700	0	
6	Valley Dr	Pier Ave to 8th St	6,200	6,200	0	
7	Ardmore Ave	16th St to 11th St	4,000	4,000	0	
8	Ardmore Ave	8th St to 2nd St	2,900	2,900	0	
9	Pacific Coast Hwy	Artesia Blvd to Aviation Blvd	37,600	37,700	100	
10	Pacific Coast Hwy	Aviation Blvd to 2nd St	40,200	40,100	-100	
11	Prospect Ave	Artesia Blvd to Aviation Blvd	7,100	7,100	0	
12	Prospect Ave	Aviation Blvd to 2nd St	13,400	13,500	100	
13	Artesia Blvd	Pacific Coast Hwy to Prospect Ave	26,600	26,700	100	
14	Aviation Blvd	Pacific Coast Hwy to Prospect Ave	20,700	20,800	100	
15	Pier Ave	Hermosa Ave to Valley Dr	12,400	12,400	0	
16	Pier Ave	Ardmore Ave to Pacific Coast Hwy	13,500	13,400	-100	
17	Gould Ave	Ardmore Ave to Pacific Coast Hwy	11,200	11,000	-200	
18	8th St	Hermosa Ave to Valley Dr	2,500	2,400	-100	
19	8th St	Pacific Coast Hwy to Prospect Ave	200	200	0	
20	Herondo St	Hermosa Ave to Valley Dr	10,100	10,200	100	
Total			254,510	254,410	-100	

Table 4.15-2 presents AM and PM peak hour intersection turning movement volumes for the Project compared with the PLAN Hermosa EIR. As shown in the table, the Project would have the same or lower volumes at 11 of 13 study intersections during the AM peak hour, and 9 of 13 during the PM peak hour. Total turning movements across all 13 study intersections would be 50 lower in the AM peak hour with the Addendum Project, and a negligible 10 higher in the PM peak hour across all 13 study intersections. During the PM peak hour, no turning movements would increase more than a negligible 10 hourly trips. Therefore, it can be concluded that the Project would not result in any new or more severe significant transportation impacts on study intersections than those of the PLAN Hermosa EIR.

Table 4.15-1. Addendum Project & PLAN Hermosa EIR Segment Volume Comparison

i i		PLAN Hermosa EIR 2040 Forecast Total Intersection Turning Movement Volumes		2040 Forecast Total		Addendum Proiect	
	AM	PM	AM	PM	AM	PM	
	Peak	Peak	Peak	Peak	Peak	Peak	
	Hour	Hour	Hour	Hour	Hour	Hour	
1 - Hermosa Avenue & 13th Street	1,120	1,110	1,110	1,100	-10	-10	
2 - Hermosa Avenue & Pier Avenue	1,310	1,350	1,300	1,360	-10	10	
3 - Pacific Coast Highway & Artesia Boulevard	4,280	5,270	4,290	5,280	10	10	
4 - Pacific Coast Highway & Aviation Boulevard	3,660	3,900	3,650	3,900	-10	0	
5 - Pacific Coast Highway & Pier Avenue	2,960	3,470	2,970	3,480	10	10	
6 - Pacific Coast Highway & 2nd Street	3,280	3,280	3,260	3,270	-20	-10	
7 - Pacific Coast Highway & 16th Street	2,690	3,200	2,690	3,200	0	0	
8 - Pacific Coast Highway & 21st Street	2,730	3,370	2,730	3,370	0	0	
9 - Prospect Avenue & Artesia Boulevard	3,090	2,980	3,080	2,990	-10	10	
10 - Prospect Avenue & Aviation Boulevard	2,990	3,120	2,990	3,120	0	0	
11 - Prospect Avenue & Anita Street	2,980	2,900	2,970	2,890	-10	-10	
12 - Manhattan Avenue & Greenwich Avenue/27th Stree	1,610	1,430	1,610	1,430	0	0	
13 - Valley Drive & Gould Avenue	1,510	1,480	1,510	1,480	0	0	
Total	34,210	36,860	34,160	36,870	-50	10	

The analysis is included as Appendix A.

Methodology

The PLAN Hermosa EIR also evaluated vehicle miles traveled (VMT) for informational purposes only Since the certification of the PLAN Hermosa EIR, requirements for transportation analysis have changed from evaluation of LOS to VMT. The Governor's Office of Planning and Research (OPR) provides guidance on VMT analysis requirements and states that agencies may use screening thresholds to "quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.)"²

OPR's guidance on VMT specify a number of considerations that would apply to the Project. Projects that generate or attract fewer than 110 trips per day, generally may be assumed to cause a less-than-significant transportation impact. This threshold is normally evaluated by calculating the trip generation for the project (i.e., a certain number of residential units or an increase in commercial space) to provide evidence the resulting trip generation increase is below the threshold. In the case of this Project, there is an increase of 308 residential units and a reduction of 384,518 in commercial floor area compared to what was evaluated in the PLAN Hermosa and PLAN Hermosa EIR.

Findings

A VMT analysis was prepared by Fehr & Peers in June 2023 to determine the potential impacts associated with buildout of the Housing Element. The PLAN Hermosa EIR included an analysis of VMT for

² Technical Advisory on Evaluating Transportation Impacts In CEQA, Governor's Office of Planning and Research, Sacramento, CA, December, 2018.

informational purposes but did not determine the significance of transportation impacts on that basis because it was not required at the time. As a result of Senate Bill (SB) 743, the State Resources Agency added Section 15064.3 to the CEQA Guidelines on December 28, 2018. It states that vehicles miles traveled (VMT) is the appropriate measure of transportation impacts for projects subject to CEQA effective July 1, 2020.

In this study, VMT estimates for the Project were prepared to identify the change in VMT compared with the information in the PLAN Hermosa EIR. Because the project includes a mix of residential and non-residential land uses, rather than a single land use, the following analysis metrics were analyzed:

- **Total Vehicle Trips per Capita (per Service Population)** Total daily vehicle trips divided by the sum of residents and employees in the city.
- **Total VMT per Capita (per Service Population)** Total origin/destination VMT divided by the sum of residents and employees in the city.

Calculating Project VMT

Consistent with the PLAN Hermosa EIR, Fehr & Peers used the 2012 SCAG RTP/SCS model for the Project, with a 2040 forecast year. This model, prepared by SCAG in 2012, covers a six-county region across southern California. It is a trip-based, four-step model which calculates trip generation, trip distribution, mode split and trip assignment to estimate traffic volumes and VMT across the transportation network. The City of Hermosa Beach is represented by four Tier I transportation analysis zones (TAZs), which are coterminous with the city's boundaries.

To properly represent the Project in the model, Fehr & Peers modified the socio-economic data (SED) in the model to reflect the growth in socioeconomic data (SED) with the proposed Project. The City of Hermosa Beach provided Fehr & Peers with estimated increases in households and reductions in commercial square feet associated with the Project. The future mix of land uses was converted to SED using factors on persons per household and employment intensity in the model using the same factors as were used in the PLAN Hermosa EIR. Following these modifications, the future year model was run with the proposed land use changes.

Project VMT Results

Table 4.15-3 presents the VMT estimates for the Project compared with the PLAN Hermosa EIR for the following metrics:

- Resident Population, Employment and Households
- Total Vehicle Trips (VT)
- Total Vehicle Miles of Travel
- Total VMT per capita (the sum of residents and employees, also known as service population)

• Total Vehicle Trips per capita

As shown in **Table 4.15-3**, the Project is estimated to reduce overall daily vehicle trips by approximately 300 (1% reduction) and daily VMT by 6,000 (2% reduction) compared with the PLAN Hermosa EIR. Vehicle Trips per capita (service population) and VMT per capita (service population) would remain the same as the PLAN Hermosa EIR.

Based on this VMT analysis, the Project would not increase vehicle trips per capita, or vehicle miles traveled per capita above the level environmentally cleared by the PLAN Hermosa EIR. Therefore, it can be concluded that the transportation impacts associated with the Project would be consistent with those of the PLAN Hermosa EIR, and would not result in any new or more severe transportation impacts related to VMT.

Table 4.15-3. Future (2040) VMT Metrics with Proposed Housing Element

Scenario	2015 Existing	Year 2040 PLAN Hermosa EIR (Adopted)	Year 2040 Housing Element (Project)	Difference from Adopted Plan (#)	Diff from Adopted Plan (%t)
Population	19,800	20,400	21,000		
Employment	5,700	7,200	6,200		
Capita (Population + Employment)	25,500	27,600	27,200		
Vehicle Miles Travelled (VMT)	363,000	326,000	320,000	-6,000	-2%
Vehicle Trips Generated (VT)	38,700	34,200	33,900	-300	-1%
VMT / Capita	14.2	11.8	11.8	0	0%
VT / Capita	1.52	1.25	1.25	0	0%

Source: PLAN Hermosa Revised Draft Environmental Impact Report (August 2017) Table 4.14-15 on page 4.14-31 and Fehr & Peers, 2023.

PLAN Hermosa includes various policies aimed at developing an integrated multimodal transportation system with opportunities for travel by alternative modes, including walking, bicycling, and transit, and is supported by implementation actions intended to reduce vehicle auto trips associated with new developments; evaluating improvements to pedestrian amenities and safety; that will improve transit access and services; and that will improve bicycle facilities and services citywide. Moreover, the Project anticipates residential uses in locations currently allowed only for non-residential uses, creating a mixed use pattern that can help increase use of alternative travel modes.

Conclusion

Based on this analysis, the increase of residential units and reduction in jobs associated with the Project would not result in any new or substantially increased significant impact to traffic operations or safety in the area. No new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result with regard to this impact during operation or construction of building projects associated with the Housing Element, and no further analysis in warranted.

4.16 Tribal Cultural Resources

The PLAN Hermosa EIR fully evaluated potential impacts on tribal cultural resources in Section 4.4, Cultural Resources. The City of Hermosa Beach has also complied with Senate Bill (SB) 18 and Assembly Bill (AB) 52 consultation requirements. As described in the PLAN Hermosa EIR, archaeological sites have the potential to contain intact deposits of artifacts, associated features, and dietary remains that may be of cultural or religious importance to Native American groups. The PLAN Hermosa EIR (Impacts 4.1-1 and 4.1-2 on pp. 4.4-10 through 4.4-12) evaluated the potential for implementation of PLAN Hermosa to adversely affect Native American resources and human remains. As stated on page 4.4-11, no known archaeological resources (historic or prehistoric) have been recorded within the city. The Draft EIR noted that these findings, however, do not preclude the possibility of encountering undiscovered archaeological resources during construction, given the proven prehistoric and historic occupation of the region, the identification of surface and subsurface archaeological resources near the PLAN Hermosa planning area (e.g., Old Salt Lake and CA-LAN-1872), and the favorable natural conditions (e.g., Pacific Ocean) that would have attracted prehistoric and historic inhabitants to the area.

The PLAN Hermosa Implementation plan includes a provision that "All discretionary projects that include ground disturbance or excavation activities on previously undisturbed land shall be required to conduct archaeological investigations in accordance with CEQA regulations to determine if the project is sensitive for cultural resources. Additionally, as the Lead Agency for future discretionary projects, the City is required under AB 52 to notify tribal organizations of proposed projects and offer to consult with those tribal organizations that indicate interest. Following any tribal consultation or archaeological investigation, the City shall weigh and consider available evidence to determine whether there is a potential risk for disturbing or damaging any cultural or tribal resources and whether any precautionary measures can be required to reduce or eliminate that risk. Those precautions may include requiring construction workers to complete training on archaeological and tribal resources before any ground disturbance activity and/or requiring a qualified archaeologist or tribal representative to monitor some or all of the ground disturbance activities. The City shall require the preservation of discovered archaeologically significant resources (as determined based on city, state, and federal standards by a qualified professional) in place if feasible or provide mitigation (avoidance, excavation, documentation, curation, data recovery, or other appropriate measures) prior to further disturbance."

The Project does not result in any development where development is not currently allowable. As such, the Project will not cause a substantial adverse change in the significance of a tribal cultural resource as either a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe. Therefore, this issue does not require further study.

4.17 Wildfire

The PLAN Hermosa EIR did not address the issue of wildfire. Its publication preceded the December 2018 CEQA Guidelines update, which expanded CEQA by defining this issue area as a stand-alone resource category. The PLAN Hermosa EIR described the City's Emergency Operations Plan and Local Hazard Mitigation Plan, which provide operational procedures for responding to a variety of emergency conditions. The PLAN Hermosa EIR concluded that through PLAN Hermosa policy implementation and adherence to existing local and State regulations, PLAN Hermosa would not impair implementation or physically interfere with the Emergency Operations Plan.

The city as a whole is not located in or near state or local responsibility areas or lands classified as very high fire hazard severity zones, according to California Department of Forestry and Fire Protection (CAL FIRE).³ The Project does not propose improvements that would impair an adopted emergency response plan or emergency evacuation plan in that it does not permit development in any area that does not currently permit development. As such, the Project does not exacerbate wildfire risks or require installation of infrastructure that could exacerbate risk. Although the PLAN Hermosa EIR did not specifically address wildfire as a separate issue area, the entire City is located in an urbanized area outside a Very High Fire Hazard Severity Zone and would not result in a new significant impact. Therefore, no new mitigation measures are warranted, and this issue does not require further study.

5. CONCLUSION

The Project, which implements the City's adopted Housing Element, requires an Addendum to the PLAN Hermosa EIR pursuant to the California Environmental Quality Act Guidelines Section 15164 and the analyses contained in this study. An addendum to a previously adopted EIR may be prepared if only some changes or additions are necessary and none of the conditions described in Section 15162 requiring the preparation of a subsequent EIR have occurred. The CEQA Guidelines require that a brief explanation be provided to support the findings that no subsequent EIR is needed for further discretionary approval. These findings are described below:

<u>Required Finding #1</u>: No substantial changes are proposed to PLAN Hermosa which require major revisions of the previous EIR due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The physical and environmental circumstances under which the Project would be implemented have not substantially changed since the preparation of the PLAN Hermosa EIR. The Project, which implements the Housing Element, proposes 600 additional residential units, but would result in less commercial floor area and therefore results in a similar amount of development that was envisioned in PLAN Hermosa and analyzed in the PLAN Hermosa EIR. Therefore, the "project" evaluated in the PLAN Hermosa EIR has not materially changed. No substantial changes have occurred with respect to the circumstances under which the Project would implement the Housing Element that would require revisions of the PLAN Hermosa EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

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³ California Department of Forestry and Fire Protection (CAL FIRE). Los Angeles, CA State Responsibility Area (SRA). https://osfm.fire.ca.gov/media/cuxnqmcw/fhsz county sra 11x17 2022 losangeles ada.pdf

<u>Required Finding #2</u>: Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

No substantial changes have occurred with respect to the circumstances under which the Project would be implemented that would require revisions of the PLAN Hermosa EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The characteristics of the city, such as streets, development, uses, noise, and vehicle trips, are largely unchanged since preparation of the PLAN Hermosa and PLAN Hermosa EIR. The Project to implement the Housing Element is consistent with and endeavors to implement all of the PLAN Hermosa policies.

Required Finding #3: No new information of substantial importance has been provided that would indicate that the proposed project would result in one or more significant effects not discussed in the previous EIR. No previously examined significant effects would be substantially more severe than shown in the previous EIR. No mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative. No mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The Project proposes 608 additional residential units, but would result in less commercial floor area. This therefore results in a similar amount of development that was envisioned in PLAN Hermosa and analyzed in the PLAN Hermosa EIR. Therefore, on balance, the Project does not propose development that substantially differs from development not already anticipated and analyzed within the PLAN Hermosa EIR. Furthermore, no new information exists that would indicate that the Project would result in a new significant impact or an increase in the significance of a previously identified significant effect. Therefore, an Addendum to the PLAN Hermosa EIR would be appropriate under these criteria. As described in each of the environmental topics, the Project does not make more severe any of the significant and unavoidable impacts identified in the PLAN Hermosa EIR, as it does not generate substantially more development or other physical impacts that were not anticipated by the PLAN Hermosa or PLAN Hermosa EIR. Since the Project is generally consistent with the PLAN Hermosa, there are no additional mitigation measures appropriate for the Project that have not already been identified in the PLAN Hermosa EIR to reduce potential impacts.

Accordingly, and based on the findings and information contained in this study, the PLAN Hermosa EIR, and the CEQA statute and State CEQA Guidelines, including sections 15162 and 15164, the Project would not result in any additional effects on any environmental resources located on or near any Housing Element sites. The potential environmental effects of the Project have been adequately addressed in the PLAN Hermosa EIR, as modified by this Addendum.

6. APPENDIX

Appendix A: Transportation Analysis



Memorandum

Date: July 7, 2023

From: Carrie Tai, Director of Community Development, City of Hermosa Beach

From: Michael Kennedy, AICP & Netai Basu, AICP

Subject: Transportation Impact Analysis Consistency Finding for the

Hermosa Beach 2021-2029 Housing Element-Related Rezoning

LB21-0029.03

Introduction

This memorandum summarizes the evaluation of the potential transportation impacts associated with rezoning related to the City of Hermosa Beach 2021-2029 Housing Element.

The California Department of Housing and Community Development (HCD) has established that the 6th Cycle of the Housing Element for jurisdictions in the Southern California (SCAG) region will plan for the period of October 15, 2021 – October 15, 2029. SCAG completed a Regional Housing Needs Assessment (RHNA) which allocates 558 units to Hermosa Beach, comprised of 232 very low-income units, 127 low-income units, 106 moderate-income units, and 93 above moderate-income units. With the projected development of 64 accessory dwelling units (ADUs) over eight years, the City has a remaining RHNA obligation of 494 units (221 very low-income, 99 low-income, 102 moderate-income, and 72 above moderate-income units).

In 2017, the City of Hermosa Beach approved PLAN Hermosa, a major update to the City's General Plan and Coastal Land Use Plan that provides a future vision, policies and proposed actions to guide residents, decision-makers, City staff, project developers and businesses in the city. The City prepared the EIR that was approved by the City Council on August 22, 2017.

Following the preparation of the Housing Element, the City has determined that rezoning is necessary in order to fully accommodate the RHNA. The City is proposing changes in zoning on 89 parcels to promote the production of additional housing. As this constitutes a change to the growth projections for population, households, and jobs in the City of Hermosa Beach that were environmentally cleared in the PLAN Hermosa EIR, an addendum to that EIR is being prepared for these proposed rezoning changes associated with the implementation of the Housing Element. This memorandum evaluates the potential for this Addendum Project to generate new or



substantially more severe transportation impacts due to the rezoning based on the methodologies and thresholds of significance from the PLAN Hermosa EIR.

VMT Analysis Methodology

The PLAN Hermosa EIR included an analysis of VMT for informational purposes but did not determine the significance of transportation impacts on that basis because it was not required at the time. As a result of Senate Bill (SB) 743, the State Resources Agency added Section 15064.3 to the CEQA Guidelines on December 28, 2018. It states that vehicles miles traveled (VMT) is the appropriate measure of transportation impacts for projects subject to CEQA effective July 1, 2020.

In this study, VMT estimates for the Addendum Project were prepared to identify the change in VMT compared with the information in the PLAN Hermosa EIR. Because the project includes a mix of residential and non-residential land uses, rather than a single land use, the following analysis metrics were analyzed:

- **Total Vehicle Trips per Capita (per Service Population)** Total daily vehicle trips divided by the sum of residents and employees in the city.
- **Total VMT per Capita (per Service Population)** Total origin/destination VMT divided by the sum of residents and employees in the city.

Calculating Project VMT

Consistent with the PLAN Hermosa EIR, Fehr & Peers used the 2012 SCAG RTP/SCS model for the Addendum Project, with a 2040 forecast year. This model, prepared by SCAG in 2012, covers a six-county region across southern California. It is a trip-based, four-step model which calculates trip generation, trip distribution, mode split and trip assignment to estimate traffic volumes and VMT across the transportation network. The City of Hermosa Beach is represented by four Tier I transportation analysis zones (TAZs), which are coterminous with the city's boundaries.

To properly represent the Addendum Project in the model, Fehr & Peers modified the socio-economic data (SED) in the model to reflect the growth in socioeconomic data (SED) with the proposed rezoning. The City of Hermosa Beach provided Fehr & Peers with estimated increases in households and reductions in commercial square feet associated with the Addendum Project. The future mix of land uses was converted to SED using factors on persons per household and employment intensity in the model using the same factors as were used in the PLAN Hermosa EIR. Following these modifications, the future year model was run with the proposed land use changes.



Project VMT Results

Table 1 presents the VMT estimates for the Addendum Project compared with the PLAN Hermosa EIR for the following metrics:

- Resident Population, Employment and Households
- Total Vehicle Trips (VT)
- Total Vehicle Miles of Travel
- Total VMT per capita (the sum of residents and employees, also known as service population)
- Total Vehicle Trips per capita

As shown in **Table 1**, the Addendum Project is estimated to reduce overall daily vehicle trips by approximately 300 (1% reduction) and daily VMT by 6,000 (2% reduction) compared with the PLAN Hermosa EIR. Vehicle Trips per capita (service population) and VMT per capita (service population) would remain the same as the PLAN Hermosa EIR.

Based on this VMT analysis, the Addendum Project would not increase vehicle trips per capita, or vehicle miles traveled per capita above the level environmentally cleared by the PLAN Hermosa EIR. Therefore, it can be concluded that the transportation impacts associated with the Addendum Project would be consistent with those of the PLAN Hermosa EIR, and would not result in any new or more severe transportation impacts related to VMT.



Table 3. Future (2040) VMT Metrics with Proposed Housing Element

			•	•	
Scenario	2015 Existing	Year 2040 PLAN Hermosa EIR (Adopted)	Year 2040 Housing Element (Addendum Project)	Difference from Adopted Plan (#)	Diff from Adopted Plan (%t)
Population	19,800	20,400	21,000		
Employment	5,700	7,200	6,200		
Capita (Population + Employment)	25,500	27,600	27,200		
Vehicle Miles Travelled (VMT)	363,000	326,000	320,000	-6,000	-2%
Vehicle Trips Generated (VT)	38,700	34,200	33,900	-300	-1%
VMT / Capita	14.2	11.8	11.8	0	0%
VT / Capita	1.52	1.25	1.25	0	0%

Source: PLAN Hermosa Revised Draft Environmental Impact Report (August 2017) Table 4.14-15 on page 4.14-31 and Fehr & Peers, 2023.

Level of Service Impact Assessment

The PLAN Hermosa EIR applied the threshold of significance for transportation impacts that was based on project-related change in volume to capacity (v/c) or delay, and intersection level of service (LOS) which were the CEQA transportation impact metrics in effect at the time that EIR was prepared. As noted above, LOS is no longer a CEQA transportation impact metric as a result of SB 743.

Based on the detailed analysis of 13 intersections and 20 street segments, the PLAN Hermosa EIR concluded that the project (PLAN Hermosa) would result in significant transportation impacts at three intersections and one street segment:

Intersections

- o Pacific Coast Highway & Artesia Boulevard
- o Pacific Coast Highway & Aviation Boulevard
- Manhattan Avenue & 27th Street



• Street Segments

o Prospect Avenue from Aviation Boulevard to 2nd Street

For each significantly impacted location, there were physical limitations and policy conflicts which made mitigation infeasible and so the transportation impact at these locations were determined to be significant and unavoidable.

In order to evaluate whether the Addendum Project would be consistent with the transportation impact findings of the PLAN Hermosa EIR, the SCAG model was used to forecast segment and intersection turning movement volumes for the Addendum Project model run used to evaluate VMT.

Table 2 presents daily segment volumes for the Addendum Project compared with the PLAN Hermosa EIR. As shown in the table, the Addendum Project would have the same or lower daily volumes at 15 of the 20 study segments. Five segments are forecast to have a negligible increase in 100 additional vehicle trips per day with the Addendum Project. However, collectively across all 20 segments, taking into account those with reduced, increased and no change in forecast daily volumes, the Addendum Project would have slightly lower segment volumes in total compared with the Addendum project. Therefore, it can be concluded that the Addendum Project would not result in any new or more severe significant transportation impacts on study segments than those of the PLAN Hermosa EIR.

Table 3 presents AM and PM peak hour intersection turning movement volumes for the Addendum Project compared with the PLAN Hermosa EIR. As shown in the table, the Addendum Project would have the same or lower volumes at 11 of 13 study intersections during the AM peak hour, and 9 of 13 during the PM peak hour. Total turning movements across all 13 study intersections would be 50 lower in the AM peak hour with the Addendum Project, and a negligible 10 higher in the PM peak hour across all 13 study intersections. During the PM peak hour, no turning movements would increase more than a negligible 10 hourly trips. Therefore, it can be concluded that the Addendum Project would not result in any new or more severe significant transportation impacts on study intersections than those of the PLAN Hermosa EIR.

TABLE 2. ADDENDUM PROJECT & PLAN HERMOSA EIR SEGMENT VOLUME COMPARISON

ID	Segment	Location	PLAN Hermosa EIR 2040 Forecast Daily Volumes	Addendum Project Housing Element 2040 Forecast Daily Volumes	Change in Forecast Daily Volumes Addendum Project
1	Hermosa Ave	27th St to 22nd St	9,600	9,600	0
2	Hermosa Ave	22nd St to 16th St	9,200	9,200	0
3	Hermosa Ave	16th St to 8th St	12,100	12,100	0
4	Hermosa Ave	8th St to Herondo St	10,300	10,200	-100
5	Valley Dr	Gould Ave to Pier Ave	4,700	4,700	0
6	Valley Dr	Pier Ave to 8th St	6,200	6,200	0
7	Ardmore Ave	16th St to 11th St	4,000	4,000	0
8	Ardmore Ave	8th St to 2nd St	2,900	2,900	0
9	Pacific Coast Hwy	Artesia Blvd to Aviation Blvd	37,600	37,700	100
10	Pacific Coast Hwy	Aviation Blvd to 2nd St	40,200	40,100	-100
11	Prospect Ave	Artesia Blvd to Aviation Blvd	7,100	7,100	0
12	Prospect Ave	Aviation Blvd to 2nd St	13,400	13,500	100
13	Artesia Blvd	Pacific Coast Hwy to Prospect Ave	26,600	26,700	100
14	Aviation Blvd	Pacific Coast Hwy to Prospect Ave	20,700	20,800	100
15	Pier Ave	Hermosa Ave to Valley Dr	12,400	12,400	0
16	Pier Ave	Ardmore Ave to Pacific Coast Hwy	13,500	13,400	-100
17	Gould Ave	Ardmore Ave to Pacific Coast Hwy	11,200	11,000	-200
18	8th St	Hermosa Ave to Valley Dr	2,500	2,400	-100
19	8th St	Pacific Coast Hwy to Prospect Ave	200	200	0
20	Herondo St	Hermosa Ave to Valley Dr	10,100	10,200	100
Total			254,510	254,410	-100

TABLE 3. ADDENDUM PROJECT & PLAN HERMOSA EIR INTERSECTION TURNING MOVEMENT VOLUME COMPARISON

Intersection	PLAN Hermosa EIR 2040 Forecast Total Intersection Turning Movement Volumes		Untersection Turning		I Addendum Project II	
	AM	PM	AM	PM	AM	PM
	Peak	Peak	Peak	Peak	Peak	Peak
	Hour	Hour	Hour	Hour	Hour	Hour
1 - Hermosa Avenue & 13th Street	1,120	1,110	1,110	1,100	-10	-10
2 - Hermosa Avenue & Pier Avenue	1,310	1,350	1,300	1,360	-10	10
3 - Pacific Coast Highway & Artesia Boulevard	4,280	5,270	4,290	5,280	10	10
4 - Pacific Coast Highway & Aviation Boulevard	3,660	3,900	3,650	3,900	-10	0
5 - Pacific Coast Highway & Pier Avenue	2,960	3,470	2,970	3,480	10	10
6 - Pacific Coast Highway & 2nd Street	3,280	3,280	3,260	3,270	-20	-10
7 - Pacific Coast Highway & 16th Street	2,690	3,200	2,690	3,200	0	0
8 - Pacific Coast Highway & 21st Street	2,730	3,370	2,730	3,370	0	0
9 - Prospect Avenue & Artesia Boulevard	3,090	2,980	3,080	2,990	-10	10
10 - Prospect Avenue & Aviation Boulevard	2,990	3,120	2,990	3,120	0	0
11 - Prospect Avenue & Anita Street	2,980	2,900	2,970	2,890	-10	-10
12 - Manhattan Avenue & Greenwich Avenue/27th Stree	1,610	1,430	1,610	1,430	0	0
13 - Valley Drive & Gould Avenue	1,510	1,480	1,510	1,480	0	0
Total	34,210	36,860	34,160	36,870	-50	10



Memorandum

Date: September 19, 2023

To: Carrie Tai, Director of Community Development, City of Hermosa Beach

From: Michael Kennedy, AICP & Netai Basu, AICP

Subject: Attachment to Transportation Impact Analysis Consistency Finding for

the Hermosa Beach 2021-2029 Housing Element-Related Rezoning

LB21-0029.03

VMT Results

The following pages include the VMT model post-processor output tables for the 2015 baseline and 2040 PLAN Hermosa Future with Project scenario both from the PLAN Hermosa EIR. It also includes a model post-processor table for the 2040 Future with Project for the Housing Element Addendum. These post-processor worksheets were used to calculate the VMT and VT values in the previously published memo on July 7, 2023.



Attac	hment	A· V /	MT F	Peculte
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PLAN HERMOSA EIR - EXISTING (2015)

POP & EMP (ROUNDED)

Pop	19,800
Emp	5,700
Capita	25,500

VMT BY SPEED BIN (UNROUNDED)					
Speed	Int. VMT	Ext. VMt	Total VMT		
5	0	164	164		
10	16	2,335	2,352		
15	19	6,126	6,145		
20	24	11,043	11,067		
25	178	34,262	34,440		
30	833	88,591	89,424		
35	301	70,506	70,807		
40	0	17,537	17,537		
45	0	20,299	20,299		
50	0	20,311	20,311		
55	0	22,627	22,627		
60	0	17,922	17,922		
65	0	11,857	11,857		
70	0	33,967	33,967		
75	0	3,658	3,658		
80	0	0	0		
85	0	0	0		
SUM	1,371	361,204	362,576		

VMT/VT SUMMARY (UNROUNDED)					
Trips	Trips Internal External Total VMT				
VMT	1,371	361,204	362,576		
VT	2,431	36,274	38,704		

VMT/VT PER CAPITA SUMMARY (ROUNDED)					
Capita	VMT	VT	VMT/Cap	VT/Cap	
25,500	363,000	38,700	14.2	1.52	

PLAN HERMOSA EIR - FUTURE WITH PROJECT (2040)

POP & EMP (ROUNDED)

Pop	20,400
Emp	7,200
Capita	27,600

VMT BY SPEED BIN (UNROUNDED)					
Speed	Int. VMT	Ext. VMt	Total VMT		
5	0	159	159		
10	5	1,627	1,632		
15	18	6,142	6,160		
20	22	8,939	8,961		
25	52	26,101	26,153		
30	609	67,739	68,348		
35	806	104,961	105,767		
40	0	27,675	27,675		
45	0	22,984	22,984		
50	0	21,503	21,503		
55	0	18,328	18,328		
60	0	19,140	19,140		
65	0	12,098	12,098		
70	0	31,199	31,199		
75	0	4,175	4,175		
80	0	0	0		
85	0	0	0		
SUM	1,512	372,770	374,281		

VMT/VT SUMMARY (UNROUNDED)					
Trips	Trips Internal External Total VMT				
VMT	1,512	372,770	374,281		
VT	2,860	36,804	39,664		

VMT/VT PER CAPITA SUMMARY (UNROUNDED)					
Capita	VMT	VT			
27,600	374,281	39,664			

VMT/VT PER CAPITA SUMMARY WITH TDM (ROUNDED)					
Capita	VMT	VT	VMT/Cap	VT/Cap	TDM Factor
27,600	326,000	34,500	11.8	1.25	0.871

HOUSING ELEMENT ADDENDUM EIR - FUTURE WITH PROJECT (2040)

POP & EMP (ROUNDED)

Рор	21,000		
Emp	6,200		
Capita	27,200		

VMT BY SPEED BIN (UNROUNDED)				
Speed	Int. VMT	Ext. VMt	Total VMT	
5	165	22,865	23,030	
10	6	1,694	1,700	
15	16	5,588	5,605	
20	20	8,655	8,675	
25	50	24,329	24,379	
30	536	60,325	60,861	
35	671	91,326	91,997	
40	0	25,308	25,309	
45	0	21,677	21,677	
50	0	21,089	21,089	
55	0	17,825	17,825	
60	0	18,721	18,721	
65	0	11,888	11,888	
70	0	30,618	30,618	
75	0	4,165	4,165	
80	0	0	0	
85	0	0	0	
SUM	1,465	366,074	367,539	

VMT/VT SUMMARY (UNROUNDED)				
Trips Internal		External	Total VMT	
VMT	1,465	366,074	367,539	
VT	2,725	36,166	38,890	

VMT/VT PER CAPITA SUMMARY (UNROUNDED)				
Capita	VMT	VT		
27,200	367,539	38,890		

VMT/VT PER CAPITA SUMMARY WITH TDM					
Capita	VMT	VT	VMT/Cap	VT/Cap	TDM Factor
27,200	320,000	33,900	11.8	1.25	0.871