

CALIFORNIA COASTAL COMMISSION

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 49th Day: 9/19/03
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 Staff: AJP-LB
 Staff Report: 11/18/03
 Hearing Date: 12/10-12/03
 Commission Action:

TH 20c**STAFF REPORT: REGULAR CALENDAR****APPLICATION NUMBER:** 5-03-270**APPLICANT:** Community Corporation of Santa Monica**PROJECT LOCATION:** 2209 Main Street, Santa Monica

PROJECT DESCRIPTION: Construction of a three and four story, 43,043 square foot, 44 unit affordable family housing development, including approximately 1,800 square feet of street level retail use, and 82 parking spaces within 1 ½ levels of subterranean parking.

Lot Area:	27,054 sq. ft.
Building Coverage:	12,879 sq. ft.
Pavement Coverage:	9,238 sq. ft.
Landscape Coverage:	4,937 sq. ft.
Parking Spaces:	82
Zoning:	CM-2 & OP-2
Ht above final grade:	37 ft.

LOCAL APPROVALS RECEIVED: City of Santa Monica Approval in Concept**SUBSTANTIVE FILE DOCUMENTS:** Santa Monica certified Land Use Plan**SUMMARY OF STAFF RECOMMENDATION:**

Staff recommends **APPROVAL** with special conditions on the basis that the project, as conditioned, conforms with the public access and resource protection policies of the Coastal Act. Special Conditions include, public parking signage, water quality, and a future improvements condition placing the applicant on notice that any change to the proposed project will require a permit or amendment.

RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. MOTION, STAFF RECOMMENDATION AND RESOLUTION FOR 5-03-270:

Staff recommends that the Commission make the following motion and adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit #5-03-270 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a permit, subject to the conditions below, for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the provisions of Chapter 3 of the California Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a local coastal program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/ or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternative that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. **SPECIAL CONDITIONS**

1. **Future Development**

This permit is only for the development described in coastal development permit No. 5-03-270. Except as provided in Public Resources Code section 30610 and applicable regulations, any future development as defined in PRC section 30610, including, but not limited to, a change in the density or intensity of use land, or change from the project description, as proposed by the applicant, shall require an amendment to Permit No. 5-03-270 from the California Coastal Commission or shall require an additional coastal development permit from the California Coastal Commission or from the applicable certified local government.

2. **Public Signage**

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant will submit, for the review and written approval of the Executive Director, a signage plan showing the size, wording and location of signs. The signage shall be located in conspicuous locations along the Main Street frontage and near the entrance of the parking area, informing the public of the availability and location of the public parking.

The permittee shall undertake the development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. **Water Quality Standards**

With the acceptance of this permit the applicant agrees to comply with all applicable City of Santa Monica water quality requirements as required under the City's Municipal Code that are in effect at the time of approval of this permit.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. Project Description and Location

The applicant proposes to construct a three and four story, 43,043 square foot, 44 unit (1 to 4 bedrooms) affordable family housing development, including approximately 1,800 square feet of street level retail use, and 82 parking spaces within 1 ½ levels of subterranean parking.

The project will consist of four buildings around an open courtyard with open walkways connecting the buildings. Buildings on the western portion of the site contain four stories, and 37'-6" above finished grade, while the eastern portion will be three stories and 29'-10" above finished grade. Retail space will be located along the full frontage along Main Street.

The low income units will be deed-restricted by the City for rental to low income families whose incomes do not exceed 80% of the area median income, based on the median income of approximately \$56,400 for a four-person household based on current HUD income estimates. According to the applicant, as additional financing is obtained, additional income restrictions will likely be placed on the property, therefore, dropping the qualifying income levels lower.

The proposed site is located on the east side of the intersection of Main Street and Pacific Street, in the City of Santa Monica (see Exhibit #2 & 3). The proposed project will occupy approximately 12,878 square feet of the 27,054 square foot lot, or approximately 47% of the site.

The site is currently vacant. The surrounding area is developed with single and multi-story commercial and residential buildings. Development on the north side of Pacific Street consists of a one and two-story apartment building. Immediately to the east and adjacent to the property is a 30-foot high apartment building. Adjacent to the property to the south is a 15-foot high retail building. To the west, across Main Street is a 37 foot high office building.

The applicant, Community Corporation of Santa Monica, is community-based non-profit corporation, that develops and manages affordable housing in the Los Angeles metropolitan area, primarily in the City of Santa Monica. They have developed or assisted in developing over 1,300 units on over 70 properties and manages about 1,100 units of its own properties.

The South Coast District Office has received four letters in support of the project. The letters are attached as Exhibit No. 7.

B. Parking

Section 30252 of the Coastal Act states in Part:

The location and amount of new development should maintain and enhance public access to the coast by... (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation...

In addition, policy #20 of the Santa Monica certified Land Use Plan states in part that:

New development shall provide adequate parking to meet all demands created by the development...

Through past Commission permit action the Commission has established for multi-family residential development a parking ratio of 2 parking spaces per unit, plus 1 guest parking space per every seven units. For retail space the Commission has required 1 space per 225 square feet. Based on this parking ratio, the 44-unit project would require 94 parking spaces and the 1,800 square feet of retail would require 8 spaces, for a total of 102 parking spaces. However, because the project will be a low-income housing project (less than 80% of average median income) it is expected that the parking demand will be less than market rate residential.

The Commission, in past permit actions, has found that under certain circumstances the parking demand generated by residential projects that provide low-income housing is less than that generated by market-rate units. The Commission has found that with the location of bus stops, service routes, shopping areas, and medical facilities within close proximity to senior and low income housing projects there would be greater use of public transportation and less demand for car ownership for such development.

In past Commission permit actions, the Commission has approved six housing projects over the past thirteen years in the City of Santa Monica with reduced parking. These past projects include three senior citizen housing projects, single-room occupancy housing projects, one housing project for tenants with HIV/Aids, and a low-income family housing project.

In 1988, the Commission approved a senior citizen housing project [#5-88-187 (Santa Monica RHF Housing Inc.)]. The project was located at 1121-1135 3rd Street. The project consisted of 72-unit senior citizen units with 27 parking spaces reserved for tenants. The project was deficient 127 parking spaces based on the parking standard of 2 spaces per unit established by the Commission through past Commission permit action. The project provided .37 parking spaces per unit. The Commission found that the low-income senior housing project was in close proximity to the downtown area and main public transit lines and the low-income tenants would require less parking than market rate residential.

In 1991, the Commission approved two single room occupancy (SRO) housing projects [#5-91-325 (Community Corp.); #5-91-843 (Step Up Housing)]. Permit #5-91-325 was for

a mixed use project with 43 SRO units. Permit #5-91-843 was for a 36 unit SRO project. Both projects were located in the City's Downtown Parking District. Parking within the Parking District is provided by six parking structures. Projects within the District are not required to provide on-site parking. However, the parking supply within the district must be adequate to support the demand generated by existing and new development that do not provide on-site parking. Because of the proximity of the District to the beach and other coastal recreational destinations, such as Palisades Park and the Pier, the adequate provision of parking within the District is important in maintaining available parking in the area for beach and recreational users. In both projects the Commission found that single-room occupancy units, because of their small size, are rented to one person, and typically are rented to persons with low or moderate incomes and to senior citizens. As such, the parking demand is less than that of full size market rate residential units. Therefore, the Commission approved the two SRO projects with a parking ratio of .5 parking spaces per unit, consistent with the City's approval.

In 1995, the Commission approved a 25-unit affordable housing project serving HIV positive/AIDS challenged individuals, with 25 parking spaces [5-96-062 (Project New Hope)]. The applicant submitted evidence showing that similar housing projects required less parking than typical market rate housing projects. Furthermore, the project was within close proximity to bus stops, shopping areas and medical facilities which would help ensure greater use of public transportation.

In 1996, the Commission approved a 20-unit low income residential building, with a 34 car subterranean parking garage [5-96-229 (Community Corporation of Santa Monica), a parking ratio of 1.7 parking spaces per unit. The project was located on Pico Boulevard and over a 1/2 mile from the beach. In 1999, the Commission approved a 66-unit low-income senior citizen housing development with 30 residential parking spaces), a parking ratio of .45 parking spaces per unit [(5-99-458 (Community Corporation))]. The project was located on Fourth Street between Wilshire Boulevard and California Avenue. In both cases, the projects were within close proximity to major bus routes and shopping areas and medical facilities that the Commission found would help reduce the need for vehicle ownership.

In this particular permit application, the applicant has submitted a parking analysis (Linscott, Law & Greenspan, dated July 30, 2003) showing that tenants in similar low income family housing projects, located in the general area, are less likely to own cars than higher income persons. The analysis examined four separate low-income family housing projects (not including any low income senior citizen housing), one of which was approved by the Commission (CDP No. 5-96-229). The analysis included surveys of the parking lots during the early morning hours (between 2:00 a.m. and 4:00 a.m.) and questionnaires for the tenants to determine the number of cars in each household. Based on the survey, the average parking rate (spaces per unit) was 1.23 based on the use survey, and 1.37 based on the total number of cars owned at each project. For the project approved by the Commission (CDP No. 5-96-229), which consisted of 20-unit low income units and 34 parking spaces, the Commission approved parking ratio was 1.7 parking spaces per unit. According to the survey, the parking rate, based on actual use, is

1.20 for the 20-unit project, and the ratio based on the questionnaire of number of cars owned is 1.45. Using either the figures derived from field surveys of the parking lots, or tenant questionnaires, for all four of the projects included in the analysis, the parking demand was below the number of parking spaces provided at each project (See Parking Analysis, Exhibit No. 6).

Other studies, conducted for low-income senior citizen housing also show that parking demand is less for low income senior citizen housing. One of the studies was conducted by the Housing Division of the City of Santa Monica. The City surveyed their own 585 affordable senior citizen and disabled housing units located throughout the City of Santa Monica. The ratio of vehicles per unit varied from 26 to .43, with an average of .31. The report also indicated that among various senior HUD-assisted projects in southern California, the average number of spaces per unit was .32. Furthermore, a survey conducted by the City of Los Angeles Housing Department (April 1993) of senior housing developments in Los Angeles indicates that the average parking occupancy is .31 for senior housing. Menorah Housing Foundation, surveyed 9 separate senior housing developments, a total of 613 units, that they developed throughout Los Angeles County. The survey shows that the average number of spaces per unit is .36 (see Exhibit #7).

In the proposed low-income housing project the applicant will provide residential parking at a total ratio of 1.86 (82 spaces per 44 units). The amount of parking provided by this housing project exceeds the average parking ratio for similar projects surveyed in the general area, including the project approved by the Commission.

Furthermore, the project is located near public transportation lines, with bus service along Main Street, and is within close proximity to the City's downtown commercial area. Therefore, necessary shopping areas, medical facilities and transportation facilities for tenants of this project are within close proximity or within easy access which will help reduce the need of vehicle ownership. Based on the parking studies submitted, the location of the project site, and on past Commission permit action, the proposed 82 parking spaces for the 44-unit low-income housing project, with an additional 8 spaces for the 1,800 square feet of retail space, provided at the standard retail ratio of 1 space per 225 square feet, there will be sufficient parking to support the demand generated by the development.

However, any change from the proposed low-income rental units to higher income rentals, or to a market rate residential project, would constitute "development", as defined in Section 30106, and may have an impact on the parking demand generated by the project. Therefore, to ensure that these units remain as low-income rental units for the life of the project as approved by this permit, or any conversion of these units to a higher income requirement would require a coastal permit, with approval findings that demonstrate that parking impacts on coastal access or recreation are mitigated, condition number 1 requires an amendment to this coastal permit for any change from the project description as proposed by the applicant. Furthermore, to ensure that the general public is aware of the availability of public parking within the subterranean parking structure, Special Condition No. 2 requires the applicant to place signs on the exterior portion of the building notifying

the public of location and availability of the public parking. The applicant shall submit a signage plan, for the review and approval of the Executive Director, showing the location, size and wording to be used.

The Commission, therefore, finds that only as conditioned will the project not adversely impact coastal access and will be consistent with Section 30252 of the Coastal Act and with the applicable policies of the City's certified LUP.

C. Development

Section 30250 of the Coastal Act states in part that:

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have a significant adverse effects, either individually or cumulatively, on coastal resources.

Section 30251 of the Coastal Act states in part that:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

The proposed project is located on the eastern side of Main Street and is approximately 1/4 mile from the beach. Main Street has evolved over the years from small scale neighborhood serving retail uses to trendy restaurants, art galleries, specialty-retail establishments and offices over ground floor retail. The City's certified LUP states that:

Main Street is the closest commercially zoned area to the South Beach area, and has evolved during the past two decades from a commercial street of low-intensity development to a specialty shopping and visitor serving area. There has been a marked increase in the number of restaurants, art galleries, antique, and specialty-retail establishments, and traffic. Most of this activity is concentrated south of Ocean Park Boulevard. Recent development north of Ocean Park Boulevard includes offices over ground floor retail, furniture and accessory showrooms, gymnasiums and dance studios, and some restaurants...

Policy #116 of the LUP states:

In conformance with the Zoning Ordinance provisions, Main Street shall provide neighborhood commercial uses along with visitor serving retail uses. New development which significantly impacts coastal access or other coastal resources in an adverse way

shall not be allowed. Residential uses may be allowed in mixed-use development provided that no portion of the residential use is located on the ground floor fronting Main Street.

Policy #117 of the LUP states:

Development on Main Street shall comply with the CM2, CM3, and CM4 District Standards.

The proposed project will consist of 44 units of residential development with 1,800 square feet of visitor-serving commercial on the ground floor fronting Main Street.

North Main Street is generally characterized by one and two story developments with a few three-story buildings. The proposed project has been designed to be compatible with the development in the surrounding area. The building design is articulated to break up the massing of the building to conform to the pattern of surrounding development and will include landscaping to help further breakup the massing.

The proposed height, bulk and location of the project will not have an adverse impact on coastal views or scenic resources. The proposed project is located approximately two blocks from the Santa Monica beach and because of the project's location and existing development between the project site and the ocean, the proposed buildings will not interfere with any public coastal views or scenic resources. The Commission, therefore, finds that the proposed project will be compatible with the character and scale of the surrounding uses and with Sections 30250 and 30251 of the Coastal Act.

D. Control of Polluted Runoff

Section 30230 states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The proposed project poses a potential source of pollution due to contaminated runoff from the proposed parking lot and other hardscape. The City, to mitigate potential impacts for all development, has adopted an Urban Runoff Ordinance. The ordinance requires projects to incorporate best management practices with extensive recommendations and measures to reduce or prevent contaminants from running off the site. The City requires all new development to achieve twenty- percent reduction of the projected runoff for the site and the use of oil and water separators or clarifiers to remove petroleum-based contaminants and other pollutants. The City's Best Management Practices are designed to treat, infiltrate or filter the amount of stormwater runoff up to the 85% percentile for a 24 hour storm event. Furthermore, the City has a new state-of-the-art stormwater treatment facility that treats all dry weather storm runoff. Runoff from all new development is directed to existing stormdrains, which direct stormwater to the treatment facility.

Coastal Commission water quality staff has previously reviewed the City of Santa Monica's water quality standards for similar projects and have determined that the City's standards are consistent with standards imposed by the Commission. To ensure that the development complies with the City requirements, a special condition is necessary that requires the applicant to agree to comply with the water quality requirements of the City. The Commission, therefore, finds that, as conditioned, the development will be consistent with Section 30230 and 30231 of the Coastal Act.

E. Local Coastal Program

Section 30604(a) of the Coastal Act states that:

Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).

In August 1992, the Commission certified, with suggested modifications, the land use plan portion of the City of Santa Monica's Local Coastal Program, excluding the area west of Ocean Avenue and Neilson Way (Beach Overlay District), and the Santa Monica Pier. On September 15, 1992, the City of Santa Monica accepted the LUP with suggested modifications.

The subject site is suitable for residential and commercial development as proposed. As proposed the project will not adversely impact coastal resources or access. The Commission, therefore, finds that the proposed project will be consistent with the Chapter 3 policies of the Coastal Act and will not prejudice the ability of the City to prepare implementation for a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

F. CEQA

Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

There are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the proposed project is found consistent with CEQA and the policies of the Coastal Act.



EXHIBIT NO. *I*

Application Number
5-03-270
Vicinity Map

California Coastal Commission

VELES AREA

SCALE
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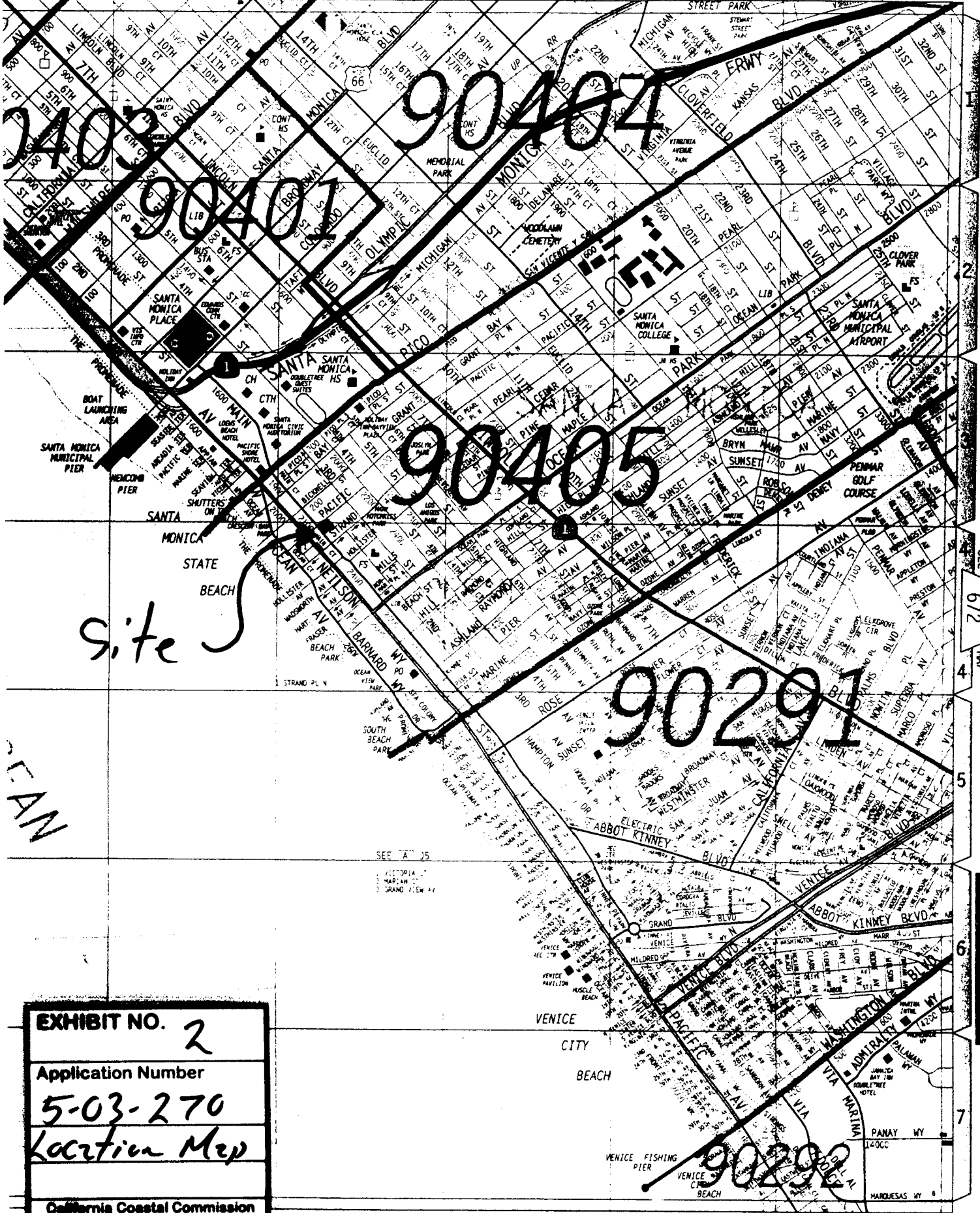
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 South Coast Region
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 COASTAL COMMISSION

HUNTINGTON BI

Channel
 O C E A

SEE 631 MAP

671



ZIP
SEE 672 MAP

EXHIBIT NO.	2
Application Number	5-03-270
Location Map	<i>Location Map</i>
California Coastal Commission	

4289 16
SCALE 1" = 80'

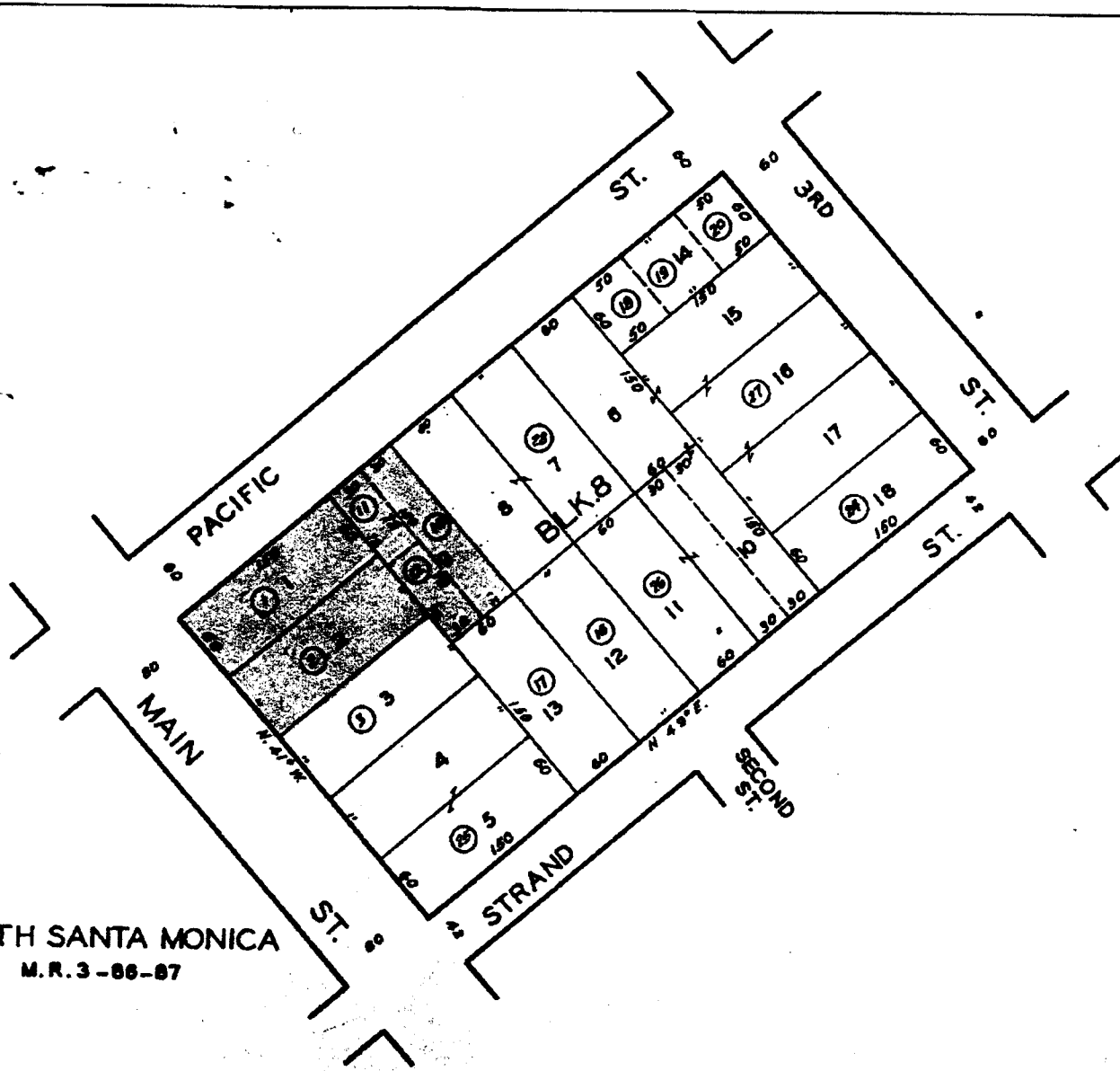


EXHIBIT NO. **3**

Application Number
5-03-270

Parcel Map

California Coastal Commission

SOUTH SANTA MONICA
M.R. 3-86-87

COPY
8604

FOR PREV. ASSMT. SEE 327-27

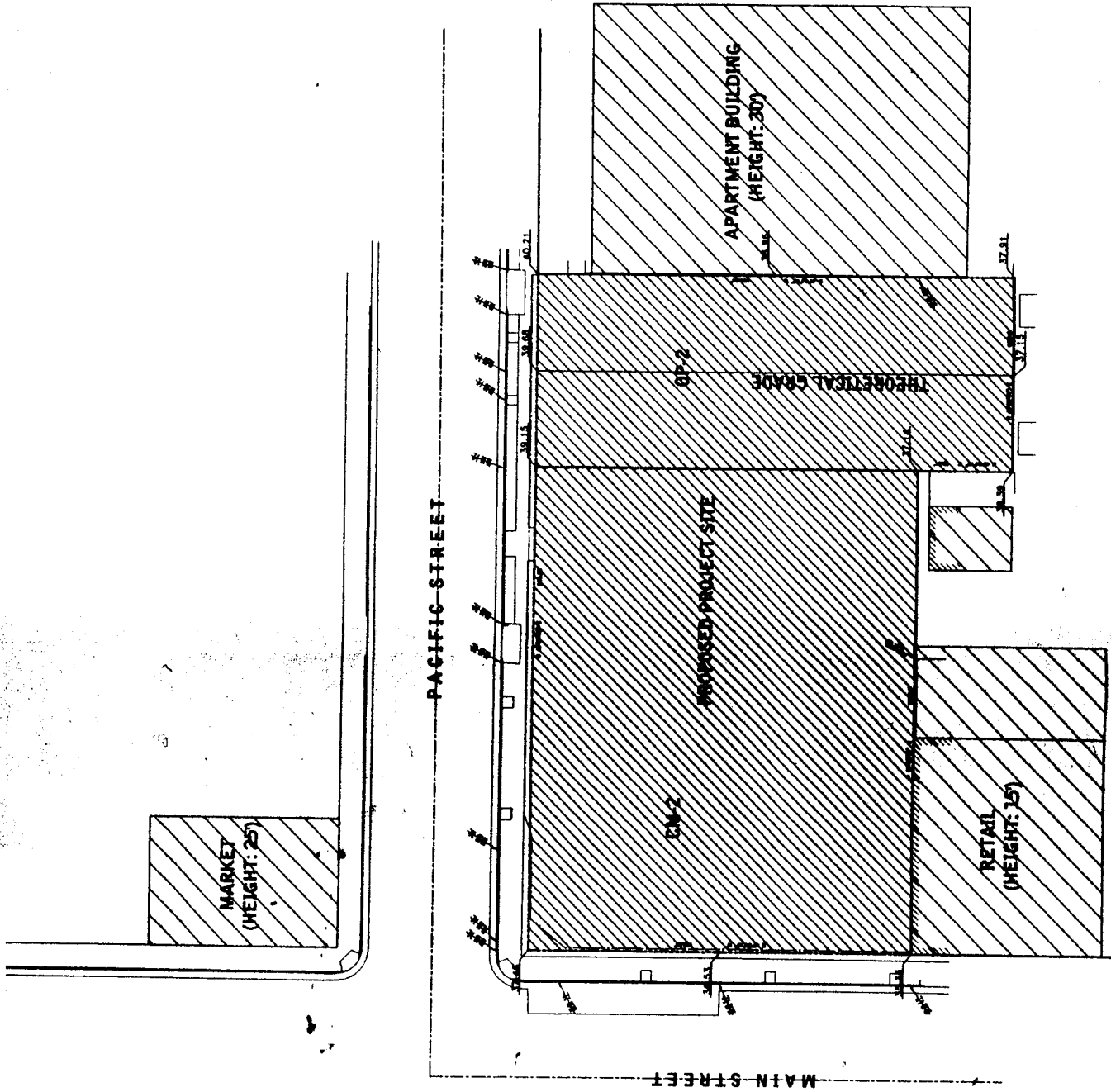
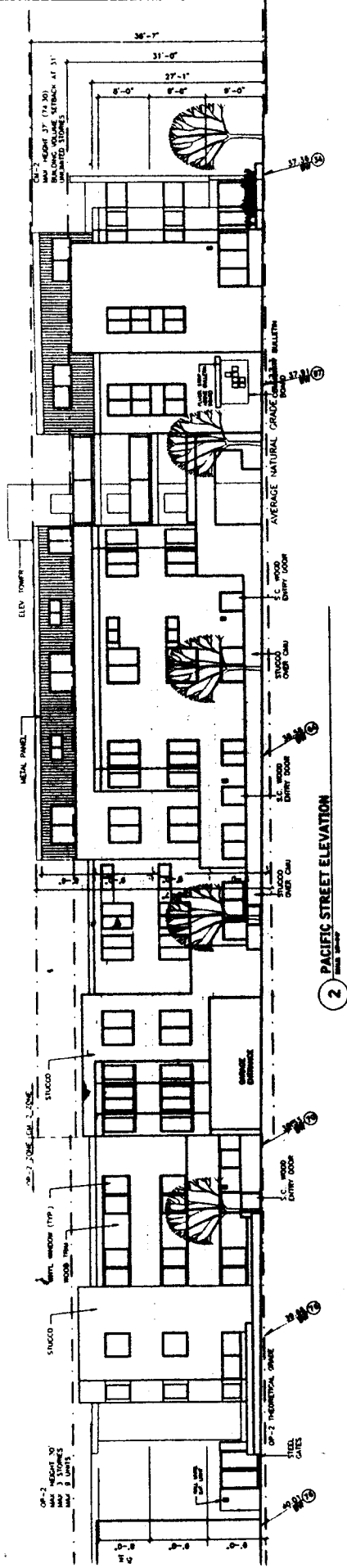
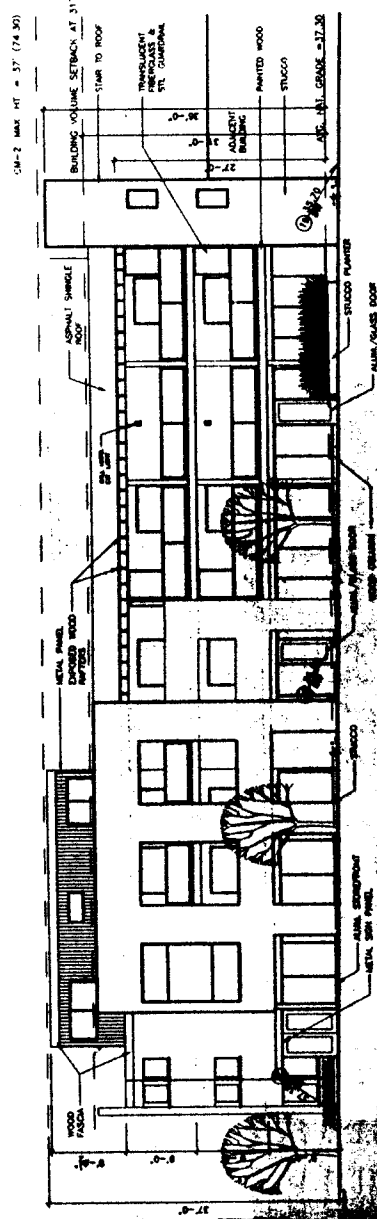


EXHIBIT NO. 4
Application Number 5-03-270
Site Plan
California Coastal Commission



2 PACIFIC STREET ELEVATION



1 MAIN STREET ELEVATION

EXHIBIT NO. 5
Application Number
5-03-270
Elevations
California Coastal Commission

ENGINEERS & PLANNERS ■ TRAFFIC, TRANSPORTATION, PARKING

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July 30, 2003

Ms. Robin Raida
Community Corporation of Santa Monica
1423 Second Street, Suite B
Santa Monica, California 90401

REFERENCE: 1-033359-1


SUBJECT: Parking Analysis for the Proposed 2209 Main Street Affordable Housing Project
City of Santa Monica, California

Dear Ms. Raida:

As requested, Linscott, Law & Greenspan, Engineers has prepared this parking analysis for the proposed Community Corporation of Santa Monica (CCSM) Affordable Housing project located at 2209 Main Street in the City of Santa Monica. The parking study has been prepared in order to determine if the proposed parking supply meets the forecast peak parking demand following completion and occupancy of the proposed project.

Briefly, it is concluded that the proposed parking supply will adequately accommodate the peak parking demand expected to be generated by the proposed project, based on the existing parking demand characteristics determined from surveys conducted at existing affordable housing projects in the vicinity.

This letter provides a description of the proposed project; a review of applicable parking guidelines from the California Coastal Commission and other relevant jurisdictions; a summary of parking demand surveys conducted at existing affordable housing projects; a forecast of the parking demand for the proposed project; and a conclusion regarding the ability of the proposed parking supply to accommodate the forecast peak parking demand expected to be generated by the proposed affordable housing project.

EXHIBIT NO. <i>C</i>
APPLICATION NO. <i>5-03-270</i>
<i>Parking Analysis</i>
 California Coastal Commission

Proposed Project Description and Parking Calculation per City Code

The project site is located at 2209 Main Street, between Pacific Street and Strand Street in the City of Santa Monica. The vicinity map is displayed in Figure 1. The proposed project will consist of the development of 44 dwelling units of affordable housing, including 4 one-bedroom units, 16 two-bedroom units, 21 three-bedroom units and 3 four-bedroom units. In addition, approximately 1,780 square feet of retail space is planned on the project site. The project includes a total of 82 parking spaces on-site, with eight spaces designated for commercial use and 74 spaces designated for residents.

The project site is located in the hub of many activities/amenities. The project site is located within approximately 1/4 to 1/2 mile (within walking distance) from numerous parks and schools, the Ocean Park Library, a grocery store, a health care clinic, and other various commercial businesses. The site is currently accessible via public transportation as it is served by three lines of the Santa Monica Big Blue Bus (Lines 1,8 and 10), which stop directly in front of the project site and provide transit service along Main Street. The Santa Monica Big Blue Bus connects residents to Downtown Santa Monica, Downtown Los Angeles, and West Los Angeles/UCLA. The Tide Shuttle is also available and provides connections to many local destinations including both Main Street and the Arizona Avenue Farmer's Market, the Santa Monica Place Mall and Third Street Promenade. In addition, a designated bike lane is provided along the Main Street project frontage.

A summary of the project parking standards based on the rates provided by the California Coastal Commission (CCC) Parking Guidelines are displayed in Table 1 located at the end of this report. It is important to note that the Coastal Commission Parking Guidelines do not provide a distinct parking rate for affordable housing projects. Therefore, the CCC Parking Guidelines parking rate applicable to the 2209 Main Street project would be the same as if the project were to provide "market rate" rental units. As shown in Table 1, the parking standard for the project (per the Guidelines) is calculated to be 102 parking spaces. The proposed project is planned to provide 82 parking spaces, thus, a 20 space "deficit" in the required parking supply would occur based on this calculation.

Comparison to Other Parking Code Standards

Research was conducted regarding parking requirements for residential land uses in coastal jurisdictions and nearby communities such as Santa Monica and Los Angeles and is summarized in Table 2. The parking rates from the various jurisdictions, including the Coastal Commission, were applied to the proposed project at 2209 Main Street for comparison purposes. It should be noted that the City of Los Angeles Planning and Zoning Code requirements for market rate residential projects are significantly lower than those of the City of Santa Monica and the California Coastal Commission.

As shown in Table 2, the City of Santa Monica provides distinct parking rates for affordable housing and market rate multi-family projects. The parking required for the project has been calculated under both Santa Monica rates for comparison purposes. The on-site parking supply for the project (82 spaces) satisfies the City of Santa Monica affordable housing plus retail parking requirements (78.7 spaces).

It should also be noted that the proposed parking supply (82 spaces) exceeds the City of Los Angeles Code market rate residential and retail parking requirements (64.6 spaces).

Parking Surveys

As shown in Table 1, the project's proposed parking supply is calculated to be deficient with respect to the current Coastal Commission Parking Guidelines. However, as previously noted, the Coastal Commission Guidelines do not distinguish between parking at affordable housing projects as compared to market rate residential projects. It is reasonable to assume that the parking demand at affordable housing projects, particularly in urban areas such as Santa Monica, would be lower as compared to market rate residential projects. This forecast is based on the relatively lower levels of car ownership with affordable housing projects as well as a greater proportion of trips made by walking, bicycling, and taking public transit. To support this assertion, the peak parking demand was documented at four existing affordable housing projects located in the Santa Monica area.

To document current parking demand patterns, surveys were conducted at the following existing affordable housing sites considered to have similar characteristics as the proposed project:

- 1144 5th Street (32 units, 55 parking spaces)
- 708 Pico Boulevard (20 units, 34 parking spaces)
- 815 Ashland Avenue (45 units, 75 parking spaces)
- OP-43 (43 units, 72 parking spaces)

It should be noted that the four survey sites mentioned above are all only residential projects and commercial uses do not exist at these sites.

The on-site parking spaces allocated for residents at the four survey sites are assigned to each unit. In general, units with a greater number of bedrooms are assigned a higher number of parking spaces (e.g., a three-bedroom unit would likely be assigned two parking spaces while a one-bedroom unit would generally be assigned one parking space). Other factors that determine the assignment of the on-site parking spaces at the four survey sites include resident seniority as well as the overall supply and demand for parking at each location.

The residents of the existing affordable housing sites were asked to fill out questionnaires which inquired about the number of drivers and the number of operable cars in their household. This information was then summarized and the parking demand (total number of cars owned by the residents) for each location was then determined. Table 3 presents the empirical rates derived by dividing the parking demand by the number of total units at each site. The average "spaces per dwelling unit" parking demand ratio between the four sites is 1.37 spaces per dwelling unit. To provide a conservative (i.e., "worst case") analysis, the parking demand forecast for the proposed project at 2209 Main Street was prepared using a parking ratio of 1.5 parking spaces per dwelling unit, which corresponds to the highest resident parking demand rate noted at the four sites (observed at 1144 5th Street site).

Actual field studies at the four existing affordable housing sites were also conducted. The surveys were performed on a hourly basis between 2:00 AM and 4:00 AM on July 23, 2003. The number of vacant parking spaces in each of the sites was counted and summarized. The parking demand (the number of parking spaces occupied) for each location was then determined. Table 4 presents the empirical rates derived by dividing the measured/observed parking demand by the number of total units at each site. The average "spaces per unit" parking ratio between the four sites is 1.23 parking spaces per dwelling unit. It should be noted that this parking ratio is significantly lower than the parking ratio derived from the resident questionnaires.

Parking Demand Forecast

A parking demand forecast was prepared for the proposed affordable housing project at 2209 Main Street to address the adequacy of the proposed parking supply. The parking demand forecast was prepared using the following factors:

- For resident parking, the parking ratio of 1.5 spaces per unit was utilized as derived from the parking demand surveys of the four existing affordable housing sites.
- For guest parking, the Coastal Commission parking ratio of 1 space for every 7 units was utilized.
- For retail parking, the Coastal Commission parking ratio of 1 space for every 225 square feet of floor area was utilized.

The parking calculation shown below reflects application of the calculated parking demand rate for the residential units, as well as the rates from the Coastal Commission Parking Guidelines for guest spaces and for commercial space. It should be noted that this calculation assumes 100% occupancy of all units at the project site.

• Residential (residents):	$44 \text{ DU} \times 1.50 =$	66 Spaces
• Residential (guest):	$44 \text{ DU} \div 7 = 6.286 =$	6 Spaces
• Commercial (retail):	$1,780 \text{ SF} \div 225 = 7.911 =$	<u>8 Spaces</u>
• Total		80 Spaces

As shown above, the project is forecast to generate a peak demand of 80 parking spaces. Therefore, the 82 on-site parking spaces proposed for the site are expected to be adequate to accommodate the peak demand.

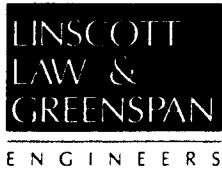
Based on the provision for adequate on-site parking at the 2209 Main Street project, no increase in the demand for on-street parking spaces in the vicinity of the site is anticipated. To further ensure that the project does not contribute to the demand for on-street parking, we understand that the project will voluntarily impose a deed restriction that prevents residents of the project from applying for City permits to utilize the on-street parking spaces on a long-term basis (i.e., preferential parking permits).

In addition, due to the proximity of the project site to Beach Lots 4 and 5 South, a review of the parking count data provided by the City of Santa Monica was conducted. A total of 1,509 parking spaces and 874 parking spaces are provided in these lots, respectively. June, 2003, parking counts indicate a 38% and a 77% occupancy at Beach Lot 4 South during a typical Saturday and Sunday, respectively. Similarly, Beach Lot 5 South had an occupancy of 54% on Saturday and 84% occupancy on Sunday. Based on this information, it was determined that the parking supply at these lots are adequate to accommodate beach patrons and no beach parking overflow is anticipated at the project site.

Summary

A parking demand analysis was conducted for the proposed affordable housing project located at 2209 Main Street, between Pacific Street and Strand Street in the City of Santa Monica. Based on the California Coastal Commission Parking Guidelines, a "shortage" of parking spaces at the facility is calculated. However, parking surveys conducted at existing affordable housing sites indicate that the actual number of parking spaces needed to accommodate the peak demand would be less as compared to the parking rates contained in the Guidelines.

The parking demand forecast for the project was prepared based on the documented parking demand surveys at four existing similar affordable housing project sites. Based on the parking supply-demand analysis, a peak parking demand of 80 spaces for the affordable housing project is estimated. With an on-site parking supply of 82 spaces, sufficient parking will be provided to meet the projected parking demand for the affordable housing project when fully occupied.



Ms. Robin Raida
Community Corporation of Santa Monica
July 30, 2003
Page Six

We appreciate the opportunity to work with you on this project. Should there be any questions regarding this parking analysis, please call me at 626.796.2322.

Very truly yours,
LINSOTT, LAW & GREENSPAN, ENGINEERS

Clare M. Sok-Jager FOR

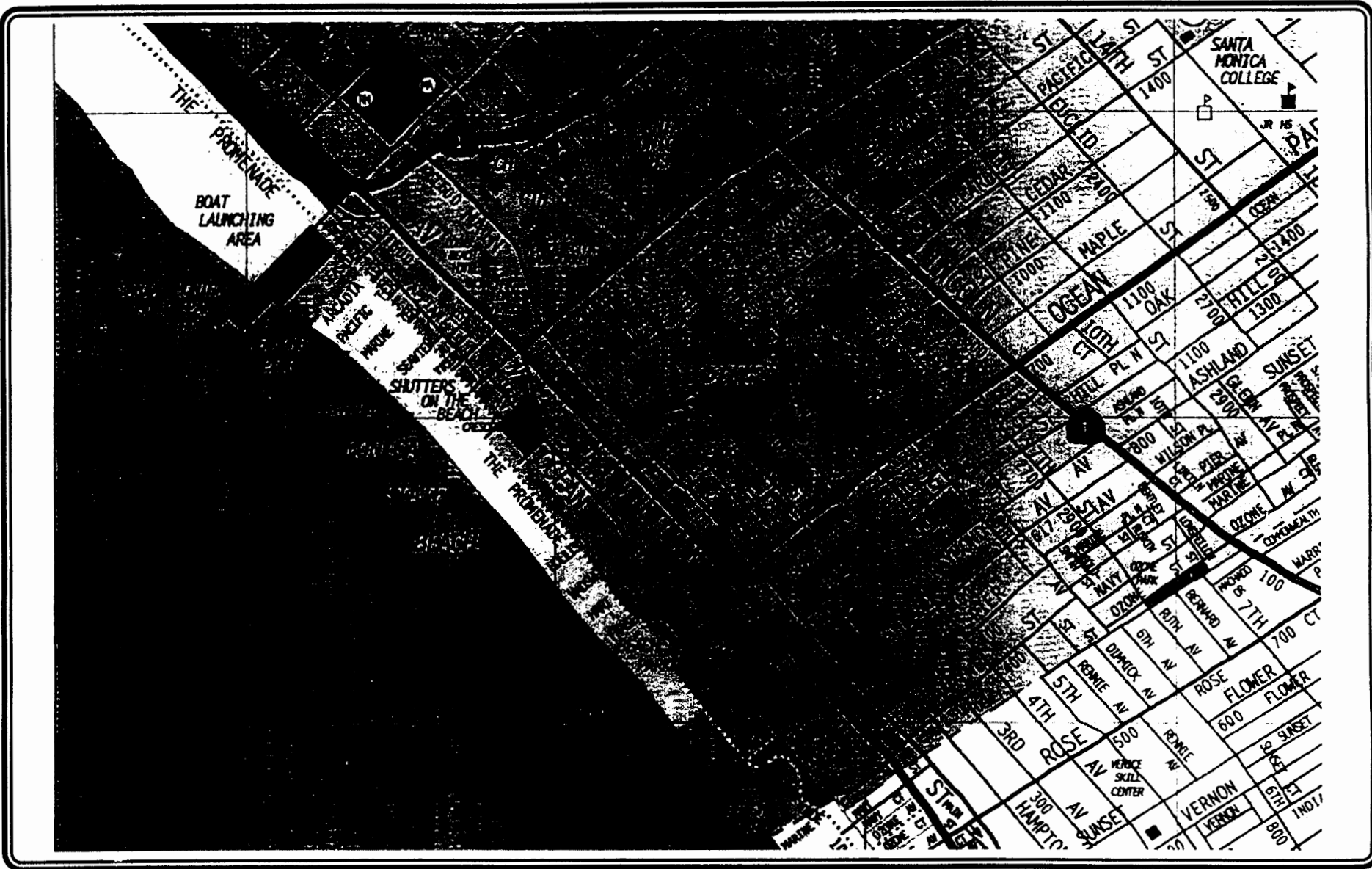
David S. Shender, P.E.
Principal

Attachments

FSB/DSS:ci

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MAP SOURCE: THOMAS BROS. GUIDE

**LINSCOTT
LAW &
GREENSPAN**
ENGINEERS



NOT TO SCALE

FIGURE 1 VICINITY MAP

2209 MAIN STREET AFFORDABLE HOUSING PROJECT

**Table 1
CALIFORNIA COASTAL COMMISSION PARKING GUIDELINES [1]
2209 Main Street Affordable Housing Project**

30-Jul-2003

Land Use	Size	Parking Rate	No. of Required Parking Spaces
Residential			
Tenant	44 DU	2 spaces per dwelling unit	88.0
Guest		1 guest space per 7 units	6.3
Subtotal	44 DU		94.3
Retail	1,780 SF	1 space per 225 SF	7.9
TOTAL PARKING SPACES PER GUIDELINES:			102.2

[1] Source: Regional Interpretive Guidelines, South Coast Region, Los Angeles County, California Coastal Commission, October 14, 1980.

**Table 2
PARKING STANDARDS COMPARISON
2209 Main Street Affordable Housing Project**

Agency/City	Land Use	Parking Rate	No. of Spaces
California Coastal Commission [1]	Residential	2 per dwelling unit	88.0
	Multi-Family - Guest	1 per 7 dwelling units	6.3
	Commercial (General Retail)	1 per 225 square feet	<u>7.9</u>
			102.2
City of Santa Monica [2] Affordable Housing Parking Rates	Multi-Family (Studio)	1 space per unit	0.0
	Multi-Family (1-Bedroom)	1 space per unit	4.0
	Multi-Family (2 or more bedrooms)	1.5 space per unit	60.0
	Multi-Family (Visitor)	1 per 5 units	8.8
	Commercial (General Retail)	1 per 300 square feet	<u>5.9</u>
			78.7
City of Santa Monica [2] "Market Rate" Parking Rates	Multi-Family (Studio)	1 space per unit	0.0
	Multi-Family (1-Bedroom)	1.5 space per unit	6.0
	Multi-Family (2 or more bedrooms)	2 spaces per unit	80.0
	Multi-Family (Visitor)	1 per 5 units	8.8
	Commercial (General Retail)	1 per 300 square feet	<u>5.9</u>
			100.7
City of Los Angeles [3]	Multi-Family (< 3-Bedroom)	1 space per unit	20.0
	Multi-Family (= 3-Bedroom)	1.5 space per unit	31.5
	Multi-Family (> 3-Bedroom)	2 space per unit	6.0
	Commercial (General Retail)	1 per 250 square feet	<u>7.1</u>
			64.6

[1] Source: Regional Interpretive Guidelines, South Coast Region, Los Angeles County, California Coastal Commission, October 14, 1980.

Note that the Coastal Commission does not provide distinct parking rates for affordable housing projects.

[2] Source: City of Santa Monica Municipal Code, May, 2003.

[3] Source: City of Los Angeles Planning and Zoning Code, July, 1996. Note that the City of Los Angeles does not provide distinct parking rates for affordable housing projects.

**Table 3
SUMMARY OF PARKING DEMAND SURVEYS [1]
2209 Main Street Affordable Housing Project**

30-Jul-2003

Location	Size	No. of Cars Owned	Parking Rate
1144 5th Street	32 DU	48	1.50
708 Pico Boulevard	20 DU	29	1.45
815 Ashland Avenue	45 DU	61	1.36
OP-43	43 DU	51	1.19
AVERAGE PARKING RATE (Spaces per Unit)			1.37

[1] The parking accumulation surveys were conducted by the Community Corporation of Santa Monica (CCSM).

**Table 4
EMPIRICAL PARKING RATES DERIVED FROM EXISTING SITE SURVEYS [1]
2209 Main Street Affordable Housing Project**

30-Jul-2003

Location	Size	Number of Parking Spaces	Number of Vacant Spaces	Vacancy Percentage	Number of Occupied Spaces	Derived Parking Rate
1144 5th Street	32 DU	55	14	25%	41	1.28
708 Pico Boulevard	20 DU	34	10	29%	24	1.20
815 Ashland Avenue	45 DU	75	13	17%	62	1.38
OP-43	43 DU	72	26	36%	46	1.07
AVERAGE PARKING RATE (Spaces per Unit)						1.23

[1] The parking surveys were conducted by the Community Corporation of Santa Monica (CCSM) on July 23, 2003, between 2:00 AM and 4:00 AM.

JUDY ABDO
504 Pier Ave
Santa Monica, CA 90405

November 3, 2003

Coastal Commissioners
c/o Al Padilla
California Coastal Commission
South Coast Area
100 Dominguez, 10th Floor
Santa Monica, CA 90402

SUBJECT: MAIN AND PACIFIC PROJECT (APP # 5-03-270)

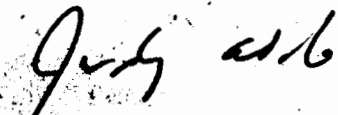
Dear Coastal Commissioners,

I am writing this letter in support of the proposed affordable housing project at the corner of Main Street and Pacific Street in Santa Monica. As a former mayor of Santa Monica, I am quite familiar with the need for affordable housing as well as the parking demands of our City. If approved, this project will provide 44 units of much needed family housing. Although more parking is always desired along Main Street and in the Ocean Park community, this project provides more than enough parking for both the residential and retail components. This project provides more spaces than our City parking standards require. The standards have withstood the test of time and have provided enough parking for the many affordable housing projects in Santa Monica.

In addition, this project will help to improve the jobs/housing balance in Santa Monica. By providing more affordable housing closer to employment centers, people will be less dependent on their cars and be able to take advantage of public transportation. This in turn will help the parking and traffic situation both locally and regionally.

I urge you to approve this project. Thank you for your support.

Sincerely,



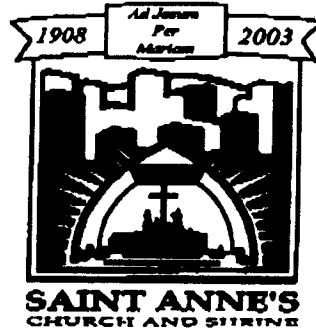
Judy Abdo

EXHIBIT NO. 7

APPLICATION NO.

5-03-270

Letter of Support



November 1, 2003

Commissioners
California Coastal Commission
c/o Al Padilla
South Coast District
200 Occangate, 10th Floor
P.O. Box 1450
Long Beach, CA 90801-1450

RE: 2209 Main Street, Santa Monica, California

To the California Coastal Commission:

I am writing in support of the project located at 2209 Main Street in Santa Monica. This development will provide 44 units for low income households.

As the Pastor of a 2000 family Catholic Parish, I see so many families in needs of good, safe housing. Many of our families have left the city due to lack of affordable housing. They may come back on Sunday for Church, but I can say they would prefer living in the city they left after decades living here.

I urge you to support this desperately needed affordable housing project.

Sincerely,

Fr. Michael D. Gutierrez,
Pastor

James Conn

November 4, 2003

Urban Strategy
Los Angeles Area
United Methodist
Church

California Coastal Commission
C/O: Al Padilla, So Coast Area
200 Oceangate, 10th Floor
Long Beach, CA 90802

RE: #5-03-270

230 Pacific Street
Nº 108
Santa Monica CA
90405
310.392.5757
Fax 310.392.6797

Dear Commissioners:

I am writing in support of the affordable housing project proposed for the corner of Pacific & Main Streets in Santa Monica by Community Corporation of Santa Monica.

My wife and I live immediately East of the project, and our apartment bedroom window will face the apartment building. As such, we will be one of the neighbors most affected by this development. The quality of our air, the warmth of the sun, and our view of the sky will all be impaired by this project. Nevertheless, we believe that something will be built at this site some day, and we think it should be affordable housing rather than more high-priced condos for affluent people. We are willing to suffer the inconvenience for the social good.

We also believe that affordable housing on this site two blocks from the ocean is exactly what the Coastal Commission was adopted to insure would happen. The beach and coastal living should be available to everyone, not just those with the income to buy it. We rent here because Santa Monica's rent control law makes our home affordable. But those units are becoming less and less available as apartments turn over and rents increase. Therefore the only way to insure that ocean front living will be affordable to all people is to build as many units as possible in the coastal zone. This is the last large parcel in the Ocean Park district of Santa Monica that could be used for this purpose.

I have personally surveyed the tenants in our building, and a clear majority supports this project. We urge the Commission to support this project as well.

Sincerely,



Rev. James Conn

Urban Strategy, United Methodist Church
Former Mayor, City of Santa Monica

CHURCH IN  OCEAN PARK
UNITED METHODIST

SANDRA M. RICHARDS, *Minister*

JUDY ABDO, *Administrator*

ELINOR GRAHAM, *Director of Music*

November 4, 2003

California Coastal Commission
c/o Al Padilla
South Coast District
200 Oceangate 10th floor
P.O. Box 1450
Long Beach, CA 90802

Dear Commissioners:

I am writing to you as a supporter of Community Corporation's proposed affordable housing project, to be built on the corner of Main and Pacific Streets, in Santa Monica's Ocean Park neighborhood.

As to specific Coastal Commission concerns, this project has included more parking that Santa Monica city codes require, and based on other Community Corporation projects we have every reason to believe that there will, in fact, be several unused spaces on a regular basis! Additionally, this project will improve coastal access in that those who could not normally afford Santa Monica's market rate rents and mortgages will be able to find affordable, desirable housing close to our beaches.

I am a current resident of Santa Monica, and I work in Santa Monica as a United Methodist Minister. Were I and my family not provided housing by the church, I could not afford to live here on my salary. Most of the folks who work in our shops, restaurants, and hotels cannot afford market rate housing. Community Corporation's efforts ensure that there are units available for those of us who have need of a less expensive option. This project has been through extensive community process, as well as several approval levels within the City of Santa Monica. It is well-planned, well-vetted, and most importantly, seriously needed in our neighborhood.

Thank you in advance for your thorough consideration of this project. I urge your approval!

Sincerely,



Reverend Sandie Richards

235 HILL STREET * SANTA MONICA, CA 90405

(310) 399-1631 * FAX (310) 399-5823

