

CALIFORNIA COASTAL COMMISSION

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**W21f**

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STAFF REPORT: REGULAR CALENDAR

Application No.: 5-18-0767

Applicant: City of Santa Monica

Agent: Amelia Feichtner

Project Location: 1840 4th Street, Santa Monica, Los Angeles County
 (APNs: 4290013901 & 4290013902)

Project Description: Replacement of 644 parking spaces in the Civic Center surface public parking lot with: an approx. 105,933 sq. ft. multi-purpose sports field synthetic turf; an approx. 515 sq. ft., 12.33-ft. high modular restroom building; new curb cut along 4th Street; 14 bicycle stalls; and landscaping and pedestrian improvements. The propose project also includes the removal of an additional 52 parking spaces to accommodate a fire lane.

Staff Recommendation: Approval with conditions

SUMMARY OF STAFF RECOMMENDATION

The project site is 3.81-acres currently developed with a large surface parking lot (“Civic Lot”). The subject site is located approximately ¼-mile inland of the beach, and within the City of Santa Monica’s Auditorium Special Use District (“District”) in the Civic Center Specific Plan (“CCSP”) area. The project site is owned and operated by City.

The proposed project includes the removal of 644 parking spaces to accommodate a multi-purpose sports field, modular restroom building and landscaping and pedestrian improvements (hereinafter “Civic Auditorium Park”), as well as the removal of 52 parking spaces to accommodate a new fire lane that would serve the Commission-approved Early Childhood Lab School (“ECLS”). The proposed Civic Auditorium Park would include both passive and active elements, including a sports field, public restroom, and walking paths. These elements would result in additional low-cost recreational opportunities for visitors and residents, consistent with recreation policies of the Coastal Act. The field for the Civic Auditorium Park is intended to primarily serve youth sports

leagues, which would primarily benefit residents from the surrounding areas; however, both residents and visitors could utilize the passive elements of the park.

The primary issues raised by the proposed development are concerns regarding the removal of a large portion of the Civic Lot and potential impacts to public coastal access. As previously mentioned, the proposed project would displace 696¹ (or 644 + 52) public parking spaces within the Civic Lot. In addition, the proposed Civic Auditorium Park is anticipated to generate new parking demand, which is expected to vary but is projected to be approximately 103 parking spaces on weekday evenings and weekends. Although 14 bicycle stalls are proposed, the applicant is not proposing any new or replacement parking spaces.

A parking study and a memorandum were prepared by Walker Consultants dated May 31, 2018 and July 31, 2018, respectively, for the proposed project. The parking study provides a comprehensive analysis of the utilization of the parking facilities in the CCSP area (Civic Lot and Civic Garage) and other public parking structures/lots located in the Santa Monica Coastal Zone. Walker's analysis of utilization of the Civic Lot and Civic Garage ("Civic Parking Facilities") and other nearby City-owned public parking facilities outside of the CCSP area, demonstrates that there is sufficient parking resources available within a reasonable walking distance of the project site (i.e. Parking Structures 5-8, Lot 29, KEC), and other transportation resources, to adequately mitigate the proposed reduction in parking and the anticipated increase in parking demand by visitors of the Civic Auditorium Park. Furthermore, the report includes recommendations for implementation of Transportation Demand Management ("TDM") measures and options to ensure proper continued reasonable access to the CCSP area. Therefore, in this particular case, the proposed project is not expected to adversely impact public coastal access.

Staff is recommending **APPROVAL** of the proposed coastal development permit with special conditions to assure that the proposed project is consistent with the Chapter 3 policies of the Coastal Act. The conditions are: **1)** transportation and parking demand management and monitoring program; **2)** restrictions on parking permits and passes for uses in Civic Center; **3)** best management practices; **4)** drought-tolerant, non-invasive landscaping; and **5)** permit compliance.

Section 30600(c) of the Coastal Act provides for the issuance of coastal development permits directly by the Commission in regions where the local government having jurisdiction does not have a certified Local Coastal Program. The City of Santa Monica only has a certified Land Use Plan and has not exercised the options provided in 30600(b) or 30600.5 to issue its own permits. The Civic Center is an area of deferred certification in the LUP. The Civic Center Specific Plan has not been reviewed or approved by the Commission and therefore, does not serve as guidance. Therefore, the Coastal Commission is the permit issuing entity and the standard of review is Chapter 3 of the Coastal Act. Thus, any relevant policies of the certified Land Use Plan may be used for guidance.

¹ It should be noted that the project plans submitted for this coastal development permit application are strictly illustrative of the

TABLE OF CONTENTS

I. MOTION AND RESOLUTION.....4

II. STANDARD CONDITIONS4

III. SPECIAL CONDITIONS.....5

IV. FINDINGS AND DECLARATIONS:.....7

 A. PROJECT DESCRIPTION AND LOCATION.....7

 B. SITE BACKGROUND8

 C. PUBLIC ACCESS.....9

 D. DEVELOPMENT.....16

 E. VISUAL RESOURCES.....18

 F. WATER QUALITY.....18

 G. LOCAL COASTAL PROGRAM.....19

 H. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA).....20

APPENDICES

Appendix A – Substantive File Documents

EXHIBITS

Exhibit 1 – Project Location

Exhibit 2 – Project Plans

Exhibit 3 – Letter of Support

I. MOTION AND RESOLUTION

Staff recommends that the Commission **approve** the permit application with special conditions.

Motion:

*I move that the Commission **approve** Coastal Development Permit No. 5-18-0767 pursuant to the staff recommendation.*

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:

The Commission hereby approves a Coastal Development Permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the 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 alternatives that will substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following 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 on which the Commission voted on the application. 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. Transportation and Parking Demand Management and Monitoring Program

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for review and written approval by the Executive Director, a Transportation and Parking Demand Management Program and Monitoring Program, which shall incorporate transportation and parking demand management measures to reduce the demand of the current Civic Center Lot and Parking Garage which shall include, but not be limited to, recommendations included in the *Analysis and Recommendations for Parking Management* dated May 31, 2018 and *Coastal Access Analysis* dated July 31, 2018 prepared by Walker Consultants.
- B. **Monitoring.** After construction of the proposed Civic Auditorium Park, the City shall implement a parking monitoring program for the Civic Center Lot and Parking Garage. The parking monitoring program shall consist of surveys conducted for each day (including during daytime hours of peak usage) during a one-week period during summer for a period of 5 years beginning from the date that the sports field is completed and shall be submitted annually to the Executive Director for review. If automobile parking surveys demonstrate that peak use parking occupancy exceeds 90% of total on parking spaces, the City shall obtain an amendment to this coastal development permit to implement additional alternative transportation demand measures.

2. Parking Permits/Passes.

By acceptance of this permit, the permittee agrees that City-issued parking permits, contracts, and passes for any of the City-owned and operated beach parking lots to support uses in the Civic Center Specific Plan area is prohibited.

3. Storage of Construction Materials, Mechanized Equipment and Removal of

Construction Debris. By acceptance of this permit, the permittee agrees to comply with the following construction-related requirements:

- (a) No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion.
- (b) No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers.
- (c) Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24 hours of completion of the project.

- (d) Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters.
- (e) All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day.
- (f) The applicant(s) shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction.
- (g) Debris shall be disposed of at a legal disposal site or recycled at a recycling facility. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required.
- (h) All stock piles and construction materials shall be covered, enclosed on all sides, shall be located as far away as possible from drain inlets and any waterway, and shall not be stored in contact with the soil.
- (i) Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems.
- (j) The discharge of any hazardous materials into any receiving waters shall be prohibited.
- (k) Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible.
- (l) Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity.
- (m) All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

4. Landscaping – Drought Tolerant, Non-Invasive Plants.

- A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, in a form and content acceptable to the Executive Director, two (2) sets of revised landscaping plans, which shall include and be consistent with the following:
 - i. Vegetated landscaped areas shall only consist of native plants or non-native drought tolerant plants, which are non-invasive. No plant species listed as problematic and/or invasive by the California Native Plant Society

(<http://www.CNPS.org/>), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (<http://www.cal-ipc.org/>), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a “noxious weed” by the State of California or the U.S. Federal Government shall be utilized within the property. *All plants shall be low water use plants* as identified by California Department of Water Resources (See: <http://www.water.ca.gov/wateruseefficiency/docs/wucols00.pdf> and <http://ucanr.edu/sites/WUCOLS/files/183488.pdf>).

ii. Use of reclaimed water for irrigation is encouraged. If using potable water for irrigation, only drip or microspray irrigation systems may be used. Other water conservation measures shall be considered, such as weather based irrigation controllers.

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

5. **Permit Compliance.** All development must occur in strict compliance with the proposal as set forth in the application, subject to any special conditions imposed herein. Any deviation from the approved plans must be submitted for review by the Executive Director to determine whether an amendment to this Coastal Development Permit No. 5-18-0767 is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations.

IV. FINDINGS AND DECLARATIONS:

A. PROJECT DESCRIPTION AND LOCATION

The City of Santa Monica is proposing to replace 644 public parking spaces with: an approximately 105,933-square-foot multi-purpose sports field; an approximately 515-square-foot, 12.33-foot high modular restroom building; six (6) 60-foot high LED athletic field lights; 16-foot high ball containment netting; perimeter fence; signage; new curb cut along 4th Street; 14 bicycle stalls; and landscaping and pedestrian improvements (hereinafter “Civic Auditorium Park”) ([Exhibit 2](#)). The field for the Civic Auditorium Park will be a synthetic turf field, and is intended to serve the organized sports groups in the City, as well as Santa Monica High School during the weekdays, and general members of the public when the field is not in use by organized sports groups with local permits. Signage is proposed to indicate the operational hours (dawn to dusk) and to clarify when that the field must be yielded to groups with City-issued permits.

The proposed project also includes the removal of an additional 52 public parking spaces to accommodate a new fire lane that would serve a Commission-approved Early Childhood Lab School (CDP No. 5-16-1033) that would abut the proposed Civic Auditorium Park.

The project site is approximately 166,000 square feet² (or 3.81 acres). The project site is located in the southerly portion of an existing large surface parking lot (“Civic Lot”) in the City of Santa

² (154,000 square feet for the Civic Auditorium Park) + (12,000 square feet for the fire lane) = 166,000 square feet

Monica's ("City") Auditorium Special Use District ("District"), and is approximately ¼-mile inland of the beach ([Exhibit 1](#)). The District is bounded by Pico Boulevard on the south, Fourth Street on the east, Main Street on the west, and Civic Center Drive on the north. The District is within the City larger Civic Center Specific Plan ("CCSP") area, which encompasses a number of areas including a total of five special use districts and is bounded by Pico Boulevard on the south, Fourth Street on the east, Ocean Avenue on the west, and Colorado Avenue on the north. The project site is surrounded by surface parking spaces, the Civic Auditorium, Early Childhood Lab School construction site, Civic Garage structure, the Santa Monica Courthouse, 4th Street, and Santa Monica High School located across 4th street. The project site is owned and operated by the City.

The Civic Center is an area of deferred certification in the LUP. The Civic Center Specific Plan has not been reviewed or approved by the Commission and therefore, does not serve as guidance. Therefore, the Coastal Commission is the permit issuing entity and the standard of review is Chapter 3 of the Coastal Act. Thus, any relevant policies of the certified Land Use Plan may be used for guidance.

B. SITE BACKGROUND

Historically, the Civic Lot served events conducted at the Civic Auditorium, which is a multi-purpose convention center that opened in 1958. In 2008, the Civic Garage in the Civic Center Core District of the CCSP area that abuts the Civic Lot was constructed, supplying 735³ new parking spaces in the Civic Center area. In 2013, the Civic Auditorium was closed due to needed renovations and earthquake-proofing. Since 2013, the Civic Auditorium has not been fully operational. Nevertheless, the East Wing of the auditorium is still available for limited public events and the Main Hall is available for limited events and film rentals that are not accessible to the general public.

Presently, the Civic Lot and Garage ("Civic Parking Facilities") serve limited events at the Civic Auditorium, as well as City services (i.e. City Hall, Santa Monica Courthouse, Public Safety Facility). The Civic Parking Facilities also serve certain coastal events (e.g. Twilight concert Series), Santa Monica High School staff and students through monthly passes, and the general public.

In 2017, the Coastal Commission authorized the removal of 230 public parking spaces at the Civic Lot to accommodate an Early Childhood Lab School ("ECLS") (CDP No. 5-16-1033), which is currently under construction. In 2017, the Coastal Commission also authorized improvements and an approximately 50,200-square-foot addition to the Santa Monica City Hall to accommodate the City Service Building ("CSB") in the CCSP area (CDP No. 5-17-0429). The Coastal Commission determined that the ECLS and CSB projects would not adversely affect public coastal access because the existing Civic Parking Facilities would provide sufficient parking spaces to mitigate for the assumed potential increases in parking demand (145 spaces) and reductions in existing public parking spaces (230 spaces). Both these projects are currently under construction.

Subsequent to the Commission's approval of the ECLS project in 2017, a more recent survey of the Civic Lot by the City has revealed that the demolition of an additional 52 parking spaces is required for the ECLS project to accommodate new fire lanes at the Civic Lot. The City indicated that the

³ The City of Santa Monica indicates that when the construction of the Civic Center Parking Garage was first approved, the plans stated that there would be 770 spaces. However, the number has recently been confirmed as 735 parking spaces.

site plans may have been based on an outdated site survey. Therefore, when the Commission approved the project in 2017, it appeared that the 52 additional spaces were included in the “230” estimate of total spaces to be removed. A coastal development permit is necessary for the authorization of the new fire lane and removal of an additional 52 parking spaces pursuant to the requirements of the Coastal Act and the California Code of Regulations. Therefore, the City of Santa Monica, the property owner of the Civic Lot, has incorporated the request for approval of the removal of the 52 additional public parking spaces from the Civic Lot to develop a new fire lane as part of the proposal subject to the application currently before the Commission (Application No. 5-18-0767); consequently, the correct number of parking spaces is accounted for in the Findings below.

C. PUBLIC ACCESS

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30213 of the Coastal Act states:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30252 of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Coastal Act Section 30210 requires the provision of maximum access and recreational opportunities, Coastal Act Section 30213 states that lower cost visitor and recreational facilities shall be protected and provided. Coastal Act Section 30252 requires that the location and amount of new development must maintain and enhance public access to the coast, such as by providing adequate parking facilities or providing substitute means of serving the development with public transportation.

The proposed Civic Auditorium Park would include both passive and active elements, including a sports field, public restroom, and walking paths. These elements would result in additional low-cost recreational opportunities for visitors and residents. The field for the Civic Auditorium Park is

intended to primarily serve youth sports leagues, which would primarily benefit residents from the surrounding areas; however, both residents and visitors could utilize the passive elements of the park.

The primary concern regarding the proposed project, however, is the potential for adverse impacts to public coastal access. The project site is located approximately ¼ -mile inland of the beach. Because of the project site's proximity to the State beach and its location in a public parking lot, development in the parking lot could adversely impact public access to the beach by reducing the parking supply near the coast. If the parking demand generated by development within the CCSP area exceeds the existing parking supply, visitors of the Civic Center uses could utilize the offsite parking that is needed to support general beachgoers, strollers, bicyclists, and joggers that depend on and use the parking that is available in the general vicinity of the coast. Therefore, in order to find that the proposed project is consistent with the access policies of the Coastal Act, the Commission must find that any increase in demand anticipated for the new use is adequately supported by the supply of parking available onsite or that the project is making other provisions to satisfy this transportation demand. In addition, it must find that a reduction in existing public parking spaces within the Coastal Zone will not impair public access to the coast.

Application to this Project

A parking study and memorandum were prepared for the proposed development by Walker Consultants dated May 31, 2018 and July 31, 2018, respectively. Preparation of the reports included reviewing existing City data and collecting new data to document and analyze current and future utilization of the Civic Parking Facilities and other public (and some private) parking facilities within the City of Santa Monica Coastal Zone; estimating the anticipated parking supply and demand for the proposed use; providing parking management recommendations that the City could implement to meet parking needs for users of the Civic Parking facilities. Walker Consultants received, extrapolated, and compiled data from February, April, June, July, August, September, October, and November of 2017 to understand utilization rates throughout varying times of the year, including the peak beach recreational periods.

It should be noted that the report references an inventory count of 970⁴ parking spaces for the Civic Lot, and an inventory count of 735 parking spaces for the Civic Garage. These numbers do not take into account the removal of 230 parking spaces from the Civic Lot authorized by the Coastal Commission to accommodate the ECLS project described in Section IV.B above.

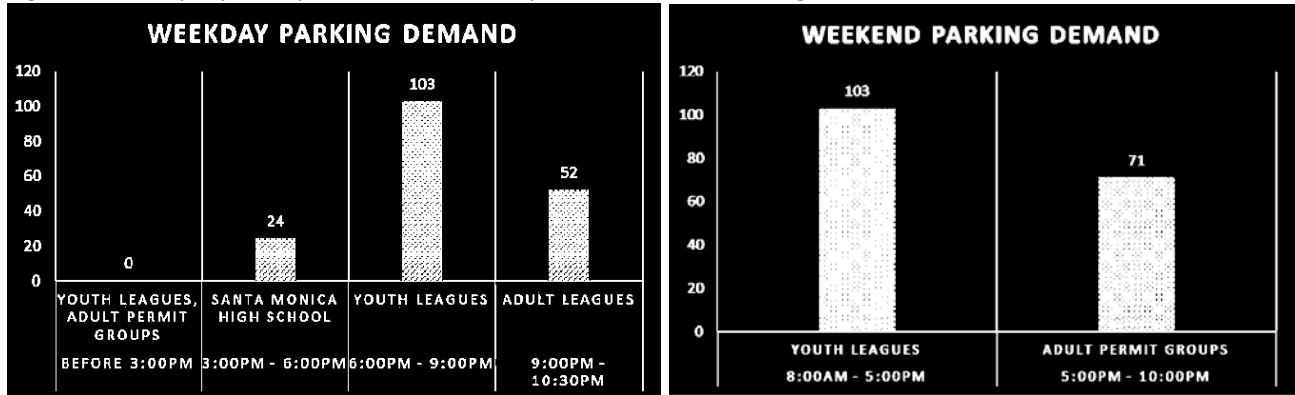
Reduced Parking and Projected Increase in Demand

The proposed project (Civic Auditorium Park + fire lane) includes the demolition of 3.81 acres of the Civic Lot, which will result in the removal of 696 (or 644 + 52) public parking spaces. In addition, the proposed Civic Auditorium Park is anticipated to generate new demand for parking.

⁴ In 2016-2017, during Commission staff's review of the coastal development permit application for the ECLS project (CDP No. 5-16-1033) and CSB project (CDP No. 5-17-0429), the City of Santa Monica indicated that the Civic Center surface lot provided 1,009 parking. However, the City states that the surface lot has been restriped over time, which led to an inaccurate estimate of total inventory. More recently, the City's confirmed that surface lot only contained 970 parking spaces.

Parking demand for the proposed Civic Auditorium Park is expected to vary over the course of a day, week, and year. This is due in part to field programming. The following figures below summarize the expected weekday and weekend parking demand for users of the field.

Figure 2: Multipurpose Sports Field Weekday and Weekend Parking Demand:



(Source: Walker Consultants, 2018)

As summarized by Figure 2 above, during weekdays, the sports field is expected to serve youth/student groups (and occasional adult groups) before 3:00 PM; primarily Santa Monica High School between 3:00PM -6:00 PM; youth leagues between 6:00 PM -9:00 PM; and adult permit groups between 9:00 PM -10:30 PM. Based on Walker’s parking analysis, the use of the field by Santa Monica High School will generate minimal to no parking demand before 3:00 PM on a weekday; during this time, nearly all student and staff are assumed to already be parked on the Santa Monica High School campus or at the Civic Parking Facilities. Use of the field before 3:00 PM on a weekday by occasional adult groups formed by site-adjacent employees already in the area would generate a similar demand. Between 3:00PM -6:00 PM on a weekday, the field is expected to increase parking demand by 24 parking spaces. Parking demand for the field is expected to peak at approximately 103 parking spaces on weekday between 6:00 PM -9:00 PM. During this time the youth leagues, as well as spectators, parents/guardians, and coaches, are expected to occupy the entire field. Between 9:00PM -10:30 PM on a weekday, the estimated parking demand for the field is 52 parking spaces.

Figure 2 also summarizes the anticipated increases in parking demand for the proposed Civic Auditorium Park during weekends. The sports field is expected to serve youth leagues between 8:00 AM -5:00 PM, generating a parking demand of approximately 103 spaces, and adult permit groups 5:00 PM -10:00 PM, generating a parking demand of 71 spaces.

As for yearly variations in demand, since the youth leagues are expected to generate the highest demand, parking demand is expected to decrease considerably when school is not in session and youth leagues are not expected to occupy the sports field, from mid-June until mid-August.

In any case, the most conservative approach is to analyze the anticipated total reduction of parking spaces and the projected *peak* increase in parking demand. In this case, the proposed project will displace/remove 696 public parking spaces and the projected peak demand for the proposed Civic Auditorium Park is 103 parking spaces on weekday evenings and weekends.

In addition, because the inventory counts for the Civic Lot and Garage do not account for the removal of 230 parking spaces for the ECLS project (CDP No. 5-16-1033), the removal of the 230 spaces from the Civic Lot must also be counted against the Civic Lot inventory (970 spaces) and Civic Garage inventory (735 spaces). This means that the total reduction of parking spaces expected to occur at the Civic Lot is 926 (or 696 + 230) parking spaces.

Furthermore, the increase in parking demand (145 spaces) assumed for the ECLS project and CSB project (CDP No. 5-17-0429) must also be taken into account and counted against the Civic Parking Facilities “current” capacity. This means that the total anticipated increase in parking demand in the CCSP area is 333± (or 103 + 230) parking spaces.

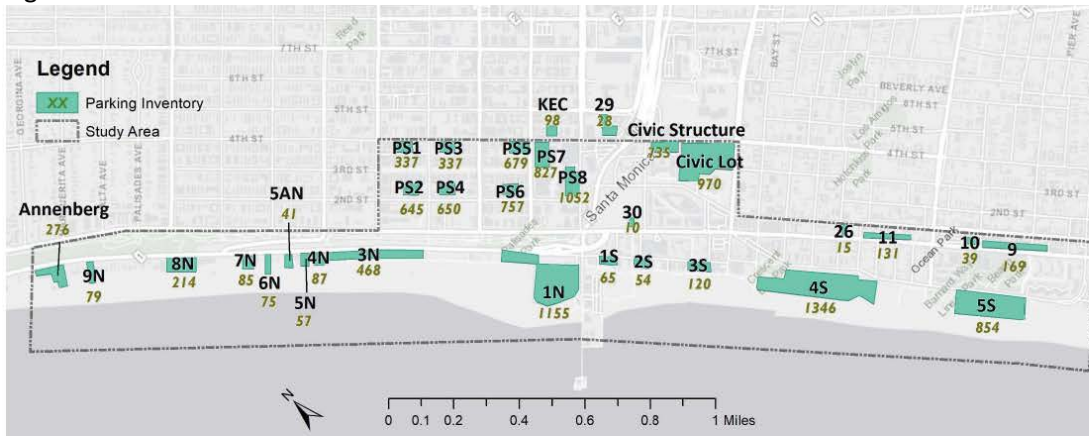
Coastal Access Impact Analysis

In 1993, the City of Santa Monica adopted a Civic Center Specific Plan, which established a land use and urban design framework for future development in the CCSP area, including the project presently before the Commission, past Commission-approved projects (e.g. CDP Nos. 5-17-0429 & 5-16-1033), and other plans for future development in the CCSP area; this plan has not been submitted to or certified by the Coastal Commission. Originally, the 1993 Civic Center Specific Plan established that an underground parking structure would be constructed underneath the Civic Lot to mitigate for the planned removal of parking spaces from the Civic Lot to accommodate the future development of the Civic Auditorium Park, and to serve development in the CCSP area. Presently, however, only approximately 14 bicycle stalls would be provided for visitors to the proposed Civic Auditorium Park and no new or replacement parking spaces are proposed.

Therefore, to find that the proposed project cumulatively with recent past Commission action is consistent with the access policies of the Coastal Act the Commission must consider if the proposed 696-space reduction in public parking spaces will impair public access to the coast. In addition, it must consider if the projected 103 space increase in demand is adequately supported by parking resources available onsite or that the project includes other measures and provisions to satisfy this transportation demand, including public transportation

The parking study prepared by Walker Consultants (“Walker”) includes a comprehensive analysis on utilization of parking in the “Study Area”, which includes not only the Civic Parking Facilities but also other public parking structures and lots located in the Santa Monica Coastal Zone (see Figure 1 below).

Figure 1: Public Off-street Inventories



(Source: City of Santa Monica; Walker Consultants, 2018)

Utilization data of the Civic Parking Facilities and other public parking located within a reasonable walking distance to the CCSP area is shown in Table 1 below.

Table 1: Number of Spaces Identified Available during Typical Weekday in January, Summer Weekend in June, and Busy August Weekday at the Civic Parking Facilities and nearby non-beach Public Parking Facilities

Parking Facility	Inventory	Percent Occupancy (Design Day ⁵ : Weekday in January at 2pm)	Available Spaces (Design Day: Weekday in January at 2pm)	Percent Occupancy (Design Day: Summer Weekend at 2pm)	Available Spaces (Design Day: Summer Weekend at 2pm)	Percent Occupancy (Typical Weekday in August at 2pm)	Available Spaces (Typical Weekday in August at 2pm)
Civic Center							
Civic lot	970	52%	464	31%	667	38%	597
Civic Garage	735	69%	227	37%	462	56%	322
<i>Total</i>	1705	59%	691	34%	1129	46%	919
Downtown/Main Street							
Lot 29	28	18%	23	2%	28	16%	24
PS5	679	46%	364	58%	286	58%	286
PS6	757	47%	398	63%	281	71%	223
PS7	827	53%	386	77%	188	63%	306
PS8	1,052	37%	658	76%	252	51%	520
KEC	98	74%	25	14%	84	72%	27
<i>Total</i>	3441	46%	1854	67%	1119	60%	1386

(Data: City of Santa Monica; Walker Consultants, 2018)

Based on occupancy data, utilization of the parking facilities listed in Table 1 appears to vary at different times of the week and year. The minimum number of parking spaces available (unoccupied) in the Civic Parking Facilities during a typical summer weekend is 1129± spaces. If the Civic Lot supply is reduced by a total of 926 parking spaces (230 previously approved to be removed and the 696 proposed for removal as part of this project), a surplus of 203± spaces is expected during a typical summer weekend. Therefore, on a typical summer weekend, the Civic Parking Facilities is expected to have a sufficient supply of parking to accommodate a removal of the 230 spaces already approved and the 696 parking spaces for the development of the sports field from the CCSP area. Thus, as proposed, the project is not expected to result in potential adverse impacts to public parking for beach users during peak-use summer months.

However, the minimum number of parking spaces available in the Civic Parking Facilities during a typical busy August weekday is 919± spaces. If the Civic Lot supply is reduced by a total of 926 parking spaces, a deficit of 7± spaces is expected during a typical busy August weekday. In addition, percent occupancy of the Civic Lot and Garage peaks on a typical winter weekday, with only a minimum of 691± unoccupied parking spaces available. Consequently, if the Civic Lot

⁵ Urban Land Institute’s Shared Parking Model recommends sizing a mixed-use parking system for the 85th percentile demand; this is to prevent hundreds or thousands of parking spaces to sit vacant for most of the year, which would be the case if a parking system is designed for the absolute peak demand. Therefore, Walker’s design days referenced in the Table 1 represent the 85th percentile demand for the Civic Center (January), and for the entire “Study Area” (summer in June).

supply is reduced by a total of 874 parking spaces, a deficit of 235± spaces is expected in winter. Therefore, on a typical winter weekday and August weekday, the Civic Parking Facilities are *not* expected to have a sufficient supply of parking.

Based on the results above, it is evident that the *primary* users of the Civic Parking Facilities are Courthouse and City employees and visitors accessing City services (i.e. City Hall, Santa Monica Courthouse, Public Safety Facility) in the CCSP area, as demonstrated by weekdays experiencing higher parking demand than weekends in the Civic Lot and Structure. This is also supported by the fact that the demand for parking at the Civic Lot and Garage peaks during the winter weekdays rather than summer weekdays. In addition, Walker’s indicates that the majority of Civic Lot parkers are contract monthly parkers based on validation data. Approximately 722 monthly parkers have been identified as currently parking in the Civic Parking Facilities.

With regard to increases in demand for parking for new uses in the CCSP area, if the Civic Lot supply is reduced by a total of 874 parking spaces, the Civic Parking Facilities will not have enough parking spaces at any time of the year to support an the increase in demand of 103± parking spaces, regardless of any estimated surplus. Subtracting a total of 333± (cumulatively between the recently approved projects and the proposed project) against the estimated surpluses/deficits calculated above establishes that a deficit of 130±⁶ parking spaces is anticipated at the Civic Parking Facilities during a typical summer weekend, a deficit of 340±⁷ parking spaces during a typical busy August weekday, and a deficit of 568±⁸ (or 235 + 333) parking spaces during a winter weekday.

In any case, to address the potential deficits, Walker recommends implementation of Transportation Demand Management (“TDM”) measures for users of the Civic Center parking facilities, including relocating some of the monthly parkers to other non-beach parking facilities in proximity to the CCSP area, as needed. For instance, on a winter weekday, when the deficit is projected to 516± parking spaces, the City should be relocating as many monthly parkers necessary to other non-beach parking facilities to mitigate for this deficit. The non-beach public parking facilities located within a reasonable walking distance of the CCSP area include: Lot 29, Municipal Downtown Parking Structures 5-8, and the Ken Edwards Center (KEC) garage (see Figure 1). Combined, these facilities hold 1845± open spaces during a typical winter weekday, 1119± open spaces during a typical summer weekend, and 1386± open spaces during a typical busy August weekday, demonstrating that parking is available in nearby public facilities. Therefore, there is sufficient parking capacity in the surrounding area to mitigate the projected deficits detailed above.

It should be noted that the Downtown Municipal Parking Structures 1-8 were constructed in the Downtown Business Parking Assessment District prior to the passage of the Coastal Act. Historically, the Coastal Commission has recognized this district and the intended purpose of the eight municipal parking structures, which is to serve the commercial and visitor-serving uses in the Downtown Business Parking Assessment District (“Downtown District”). By serving the commercial and visitor serving uses in the Downtown District, the eight parking structures help minimize or prevent the consumption of public on-street parking spaces and parking spaces in

⁶ Summer Weekend surplus (+203) minus assumed increase in demand for Civic Auditorium Park, ECLS, and CSB (333): 203 – 333 = -130

⁷ August Weekday deficit (-7) minus assumed increase in demand for Civic Auditorium Park, ECLS, and CSB (333): -7 – 333 = -340

⁸ Winter Weekday deficit (-235) minus assumed increase in demand for Civic Auditorium Park, ECLS, and CSB (333): -235 – 333 = -568

beach parking lots; and consequently, ensure that parking spaces in the near the beach are available for use by public beachgoers. However, Parking Structure 1-8 were not intended to provide contract monthly parking. Nevertheless, based on the parking utilization data that has been provided, it appears that there is a surplus of parking spaces in the Downtown Business Parking Assessment District. Therefore, relocating some of the Civic Lot and Garage monthly parkers to Parking Structures 5-8 is not anticipated to have an adverse impact to public coastal access.

Other TDM measures recommended by Walker include, but are not limited to: setting priorities for the best use of remaining Civic Center parking facilities; continuing to implement the City's efforts to reduce single-occupancy vehicle trips by, for instance, encouraging employees to use alternative modes of transportation and allowing employees to telework from home. Walker suggests that short-term parkers (typically visitors) should get priority at the Civic Parking Facilities. Furthermore, implementation of TDMs at the CCSP area and the downtown area is ideal because this area is transit-oriented. Therefore, frequent public transit serves are available adjacent to the project site, consistent with Section 30252 of the Coastal Act. For instance, there are several Big Blue Bus stops within the vicinity of the project site. In addition, there are several private or semi-public shuttles available to those traveling between downtown and CCSP areas. Furthermore, the Metro Expo Line station is less 1/3-mile from the project site. Moreover, on June 12, 2018, the City approved a 16-month Shared Mobility Pilot Program, establishing a public bike (electric and non-electric) and electric scooter shared system to provide more low-emission mobility options within the City's Coastal Zone, which will help alleviate some of the anticipated demand at the CCSP and Downtown areas.

Therefore, in order to ensure that parking on site is adequate to serve the surrounding Civic Center uses and will not result in adverse impacts to parking for beach users, Special Condition 1 requires the applicant to submit, for review and written approval by the Executive Director, a Transportation and Parking Demand Management Program and Monitoring Program, which shall incorporate transportation and parking demand management measures to reduce the demand of the current Civic Center Lot and Parking Garage which shall include, but not be limited to, recommendations included in the *Analysis and Recommendations for Parking Management* dated May 31, 2018 and *Coastal Access Analysis* dated July 31, 2018 prepared by Walker Consultants.

In addition, a parking monitoring program is necessary to manage the demand associated with the Field and other uses in the CCSP area, and to monitor and assess how successful the City will be in shifting the parking demand from the Civic Lot to other nearby public parking facilities as indicated above. Therefore, **Special Condition 1** also requires the City to implement a parking monitoring program for the Civic Center Lot and Parking Garage. The parking monitoring program shall consist of surveys conducted for each day (including during daytime hours of peak usage) during a one-week period during summer for a period of 5 years beginning from the date that the sports field is completed and shall be submitted annually to the Executive Director for review. If automobile parking surveys demonstrate that peak use parking occupancy exceeds 90% of total on parking spaces, the City shall obtain an amendment to this coastal development permit to implement additional alternative transportation demand measures.

Conclusion

Based on Walker's analysis of utilization of the Civic Parking Facilities and other nearby City-owned public parking facilities, it appears that there are sufficient non-beach parking resources available within a reasonable walking distance of the project site (i.e. Parking Structures 5 through

8, and Lot 29). Therefore, if adequate transportation and parking demand managements measure are implemented to help mitigate the proposed reduction in parking and anticipated increase in parking demand if parking management measures, the proposed project, as conditioned, can be found consistent with the Chapter 3 policies of the Coastal Act.

In addition, the Commission imposes **Special Condition 2**, which prohibits the City to parking permits, contracts, and passes for any of the City-owned and operated beach parking lots to support uses in the Civic Center Specific Plan area.

Therefore, while a substantial reduction in the number of parking spaces at the Civic Parking Facilities will occur, and increases in the parking demand are expected, the Civic Parking Facilities and a number of non-beach public parking spaces within walking distance to the CCSP area can continue to be relied upon for public parking without adversely affecting public coastal access, and are adequate to support the future uses associated with the proposed Civic Auditorium Park and the previously approved ECLS and CSB projects. Furthermore, based on the applicant's parking study, the expected parking demand for the Civic Auditorium Park is projected to peak in the winter months, and to decrease during the summer months when demand for access to the coast is generally at its highest. Even if the parking demand for the Civic Parking Facilities it at its peak during a typical winter weekday in January, approximately 3,766 parking spaces are anticipated to be available for coastal access in the beach lots, and during a typical summer weekend in June, approximately 1,705 parking spaces are anticipated to be available for coastal access in the beach lots. In addition, the proposed development will provide public low-cost recreational opportunities within the Coastal Zone consistent with past Commission action and with the recreation policies of the Coastal Act. Therefore, the Commission finds that, as conditioned, the proposed development is consistent with Sections 30210, 30213, and 30252 of the Coastal Act.

D. DEVELOPMENT

Section 30250 of the Coastal Act states:

Location; existing developed area: (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 significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing 37 developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas. (c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors. Section 30252 of the Coastal Act states:

Section 30252 of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing

commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Section 30253 of the Coastal Act states (in part):

New development shall do all of the following ... (d) Minimize energy consumption and vehicle miles traveled.

As explained above, the CCSP area has recently undergone several recent development approvals for projects that will remove parking spaces. Section 30250 of the Coastal Act requires development to be located in areas where it will not have cumulative impacts on coastal resources. The development of a park in an urban city would likely not have an impact on coastal resources; however, the proposed development will remove a significant amount of public parking, which in and of itself is not a coastal resource; however, the parking provided by the Civic Parking Facilities ensure that there will be adequate access to the coastal zone area of Santa Monica. The Commission can consider if the removal of this parking, in combination with the other recent changes to the CCSP area, will have negative cumulative effects on the supply of parking, and if that decrease in supply would have an impact on coastal access. The Commission may also consider future planned changes to the CCSP area that may remove additional parking.

While the Civic Center Specific Plan is not a certified document, it does plan for additional changes to the CCSP area in the future. Regarding future development within the CCSP area, the City is currently planning the future rehabilitation and expansion of the Civic Auditorium within the Auditorium Special Use District. In the parking study, Walker provided peak parking demand projections for the renovated Civic Auditorium. The projections range between 850+ to 950+ parking spaces.

In addition, the City has submitted a new coastal development permit application (CDP Application No. 5-19-0017) for the construction of the City's Sustainable Water Infrastructure ("SWIP"), an underground water treatment facility, under the Civic Lot. Review of this application is pending. However, the City has indicated that following the completion of the SWIP project and reconfiguration of the remainder 44 Civic Lot parking spaces, at least approximately 75-85 parking spaces are expected to remain at the Civic Lot.

For any future development in the CCSP area the City will need to continue to evaluate the success of TDM programs and to assess parking demand to ensure that there is sufficient parking supply in the CCSP area and in other non-beach public parking structures/lots in the Coastal Zone to mitigate for any proposed future increase in demand and/or displacement of parking to avoid any adverse impacts to public coastal access.

As explained above, the cumulative impacts of the removal of parking from the Civic Center, to date, has not been shown to impact coastal resources or public access to the coast. However, as

conditioned to provide on-going monitoring of the parking supply, the proposed project can be found consistent with Section 30250.

Section 30252 requires development to maintain and enhance access to the coast by, in part, providing transit opportunities and providing adequate parking facilities or by providing substitute means of serving the development. Similarly, Section 30253 requires development to minimize consumption of energy and vehicle miles traveled. In this case, the City proposes to remove a significant number of parking spaces with the development of a sports field. The City of Santa Monica is uniquely served by public transit opportunities in the form of the Expo Line, as well as countless bus routes, and the City sponsored Bike Share program, as described in more detail above. As such, the new parking demand of the sports field can be adequately served by public transit, as a substitute means of providing for onsite parking, and the public transit that serve the sports field could reduce vehicle miles travelled, and therefore the project can be found consistent with Sections 30252 and 30253 of the Coastal Act.

E. VISUAL RESOURCES

Section 30251 of the Coastal Act states, in relevant part:

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 land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas...

Section 30251 of the Coastal Act requires that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. The proposed development will be located inland of the approximately 125,000-square-foot Santa Monica Civic Auditorium, a multi-story convention center. Consequently, the proposed development is not anticipated to adversely affect existing ocean views from public areas and is compatible with the character of the surrounding area. Therefore, the Commission finds the proposed development is consistent with Section 30251 of the Coastal Act.

F. WATER QUALITY

Section 30230 of the Coastal Act 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 of the Coastal Act 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.

Section 30232 of the Coastal Act states:

Oil and hazardous substance spills Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

Section 30230 of the Coastal Act requires that marine resources be maintained, enhanced, and where feasible, restored, and further requires that uses of the marine environment shall sustain the biological productivity of coastal waters. Section 30231 of the Coastal Act requires that the biological productivity and the quality of coastal waters be maintained, and where feasible, restored through measures aimed at reducing water resource impacts from proposed development. Section 30232 of the Coastal Act requires protection against the spillage of crude oil, gas, petroleum products, or hazardous materials in relation to any development.

Storage or placement of construction materials, debris, or waste in a location subject to erosion and dispersion or which may be discharged into coastal water via rain or wind would result in adverse impacts upon the marine environment that would reduce the biological productivity of coastal waters. Because the project site is located in close proximity to the coast and runoff from construction can impact the beach and ocean, the Commission imposes construction-related requirements and best management practices under **Special Condition 3** in order to minimize adverse construction-related impacts upon marine resources and for erosion control.

The City is proposing synthetic turf grass for the sports field. However, landscaping will be installed around the field. The Commission typically requires that all new landscaping comprise of only low water use, non-invasive plants (Low WUCOLS⁹ Ranking) as identified by the California Department of Water Resources. Therefore, the Commission imposes **Special Condition 4**, which requires the submittal of revised landscaping plants, and the installation of non-invasive, drought-tolerant vegetation (low water use plants only) and water-conservative irrigation systems.

Therefore, the Commission finds that, as conditioned to require construction-related requirements and best management practices and non-invasive drought tolerant landscaping the development will be consistent with Sections 30230, 30231 and 30232 of the Coastal Act.

G. LOCAL COASTAL PROGRAM

Coastal Act section 30604(a) states that, prior to certification of a local coastal program (“LCP”), a coastal development permit can only be issued upon a finding that the proposed development is in conformity with Chapter 3 of the Act and that the permitted development will not prejudice the

⁹ WUCOLS is the acronym for Water Use Classifications of Landscape Species.

ability of the local government to prepare an LCP that is in conformity with Chapter 3. In August 1992, the Commission certified, with suggested modifications, the land use plan portion of the City of Santa Monica's Local Coastal Program, except for the areas of deferred certification. On September 15, 1992, the City of Santa Monica accepted the LUP with suggested modifications.

Although the City of Santa Monica has a certified LUP, the project is located within one of the areas of deferred certification. As discussed above, the proposed development, as conditioned, is consistent with Chapter 3 of the Coastal Act. Therefore the Commission finds that approval of this project, as conditioned, will not prejudice the ability of the City of Santa Monica from preparing a total Local Coastal Program for the areas of deferred certification that conforms with and is adequate to carry out the Chapter 3 policies of the Coastal Act.

H. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096 of the Commission's 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)(A) 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 effect which the activity may have on the environment.

The development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. Special conditions imposed will mitigate adverse impacts to coastal resources and public access. The special conditions address the following issues: **1)** transportation and parking demand management and monitoring program; **2)** restrictions on parking permits and passes for uses in Civic Center; **3)** best management practices; **4)** drought-tolerant, non-invasive landscaping; and **5)** permit compliance. As conditioned, the Commission finds that there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect of the proposed project, that there are no remaining significant environmental impacts within the meaning of CEQA, and that the project is consistent with CEQA.

APPENDIX A- SUBSTANTIVE FILE DOCUMENTS

- City of Santa Monica certified Land Use Plan
- Coastal Development Permit No.5-16-1033 (ECLS)
- Coastal Development Permit No. 5-17-0429 (City Services Building)
- City of Santa Monica Civic Center Specific Plan
- Civic Center Specific Plan Comprehensive Update, Downtown Redevelopment Plan Amendment and Associated Development, Final EIR, SCH# 2003011074, October 2004.
- Fifth Addendum to the Civic Center Specific Plan EIR, April 2015
- Sixth Addendum to the Civic Center Specific Plan EIR, October 2016
- Seventh Addendum to the Civic Center Specific Plan EIR, April 2018
- *Analysis and Recommendations for Parking Management* prepared by Walker Consultants, May 31, 2018
- *Coastal Access Analysis* prepared by Walker Consultants, July 31, 2018