

CALIFORNIA COASTAL COMMISSION

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Th14h

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STAFF REPORT: REGULAR CALENDAR

Application No.: 5-20-0397

Applicant: SVBSM LLC

Agent: Harding Larmore Kutcher and Kozal LLP

Location: 1401 Ocean Avenue, Santa Monica, Los Angeles County (APN: 4291-015-030)

Project Description: Change use of 12,170 sq. ft. of office space on the third floor and 3,530 sq. ft. rooftop area in a 47,171 sq. ft. commercial building to a 15,700 sq. ft. membership restaurant.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The proposed project is the change in use of 12,170 sq. ft. of existing office space and 3,530 sq. ft. of rooftop area in an existing 47,171 sq. ft. commercial building to a 15,700 sq. ft. membership restaurant. The project site is located at 1401 Ocean Avenue, 300, Santa Monica in Los Angeles County.

The subject site is currently developed with a three-story, 47,171 sq. ft. commercial building. The proposed development involves converting the current third floor office space and rooftop area to a membership restaurant. The membership restaurant consists of various rooms that all serve food and drink that members will have access

to, including the dining room, the Lounge Dining area, the Library, the Presentation Room, the main bar/dining counter, and the rooftop terrace. The applicant contends that the membership aspect of the restaurant is an essential part of the business model for the proposed development and that the establishment of the restaurant at this location is to create a community where all people are treated equally regardless of sexual orientation, gender, race, age or other affiliation, and to minimize financial barriers to entry. The applicant asserts that the membership fee for the restaurant will not be prohibitively high and has estimated (although has not finalized) that the monthly dues will be approximately \$150-\$350 per month. The applicant has committed to providing an inclusive and non-discriminatory environment; establishing a committee of members who will focus on creating a diverse membership base including an outreach and advertisement effort to reach a broad group of persons, including persons from minority groups; encouraging members to bring guests to the restaurant; and an affordable membership option for individuals which would allow "in-kind" payments such as contributing a skill (i.e., singing monthly at the restaurant) instead of paying the membership fee. Additionally, the applicant has indicated that they will donate restaurant space to a local non-profit once-a-week, with a preference for non-profits representing marginalized groups, without requiring any of the non-profit's staff or members to be members of the restaurant. To ensure that the applicant adheres to a strict non-discriminatory policy, **Special Condition 1** requires the applicant to adhere to a statement of non-discrimination.

Because the property is being leased, the Commission imposes **Special Condition 5** requiring the applicants to record a Deed and Lease Restriction acknowledging that, pursuant to this permit (CDP No. 5-20-0397), the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property.

The building has an existing subterranean parking garage with 209 parking spaces. The proposed change from office to restaurant use will increase parking demand by 29 spaces. The parking study submitted by the applicant demonstrates that there is available parking in the subterranean parking structure to accommodate the increase of 29 parking spaces projected by the proposed development. Additionally, there are two public parking structures within 1,000 feet of the proposed development which provide approximately 1,400 parking spaces. As conditioned, the proposed project will not adversely impact coastal access or the availability of on-street parking near the proposed development.

The Commission's standard of review for the proposed development is Chapter 3 of the Coastal Act and the certified Land Use Plan (LUP) for Santa Monica provides guidance.

Commission staff recommends that the Commission **APPROVE** coastal development permit application **5-20-0397**, as conditioned. The motion to carry out the staff recommendation is on **page 4** of the staff report.

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EXHIBITS

[Exhibit 1 – Vicinity Map and Project Site](#)

[Exhibit 2 – Project Plans](#)

[Exhibit 3 – Applicant’s Commitment to Non-Discrimination](#)

[Exhibit 4 – Plan to Donate Restaurant Space to Non-Profits](#)

[Exhibit 5 – Parking Demand Study](#)

I. MOTION AND RESOLUTION

Motion:

I move that the Commission approve Coastal Development Permit No. 5-20-0397 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 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 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 applicant 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 applicant to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. **Statement of Non-Discrimination.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director proof that its bylaws, or other type of governing document if no bylaws exist, include the following prohibition on the discrimination of membership eligibility: “The membership restaurant shall not discriminate on the basis of sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, sexual orientation, socioeconomic group or place of residence in its outreach efforts, membership, activities or operations.”

No changes to the language required under this condition shall be made in the permittee’s governing document unless such changes are authorized through an amendment to this coastal development permit or through a new coastal development permit, if legally required. The requirement for this non-discrimination policy shall remain in effect during the life of this project.

2. **Landscaping-Drought Tolerant, Non-Invasive Plants.** 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>).

3. **Bird Strike Prevention.**

A. Ocean-front deck railing systems, fences, screen walls and gates subject to this permit shall use materials designed to minimize bird-strikes with the deck railing, fence, or gate. Such materials may consist, all or in part, of wood; wrought iron; frosted or partially-frosted glass, Plexiglas or other visually permeable barriers that are designed to prevent creation of a bird strike hazard. Clear glass or Plexiglas shall not be installed unless they contain UV-reflective glazing that is visible to birds or appliqués (e.g. stickers/decals) designed to reduce bird-strikes by reducing reflectivity and transparency are also used. Any appliqués used shall be

installed to provide coverage consistent with manufacturer specifications (e.g. one appliqué for every 3 ft. by 3 ft. area) and the recommendations of the Executive Director. Use of opaque or partially opaque materials is preferred to clean glass or Plexiglas and appliqués. All materials and appliqués shall be maintained throughout the life of the development to ensure continued effectiveness at addressing bird strikes and shall be maintained at a minimum in accordance with manufacturer specifications and as recommended by the Executive Director.

B. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the permittee shall submit final revised plans showing the location, design, height and materials of fences, screen walls and gates for the review and approval of the Executive Director. Said plans shall reflect the requirements of this special condition.

C. The permittee shall undertake development in accordance with the approval final plans. Any proposed changes to the approved final plans 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 legally required.

4. **Future Development.** This permit is only for the development described in CDP No. 5-20-0397, which converts office space and rooftop area to a membership restaurant with all rooms of the proposed development used for restaurant purposes. Pursuant to Title 14 of the California Code of Regulations Section 13253(b)(6), the exemptions otherwise provided in Public Resources Code Section 30610(b) shall not apply to the development governed by CDP No. 5-20-0397. Accordingly, any future improvements to the membership restaurant on the third floor and rooftop, and any other future improvements including but not limited to repair and maintenance identified as requiring a permit in Public Resources Code Section 30610(d) and Title 14 of the California Code of Regulations Sections 13252(a)-(b), shall require an amendment to CDP No. 5-20-0397 from the Commission or shall require an additional CDP from the Commission or from the applicable certified local government.
5. **Deed and Lease Restriction.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the landowner(s) and lessor have executed and recorded against the parcel(s) governed by this permit a deed and lease restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed and lease restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed and lease restriction shall also indicate that, in the event of an extinguishment or termination of the lease restriction for any reason, the terms and conditions of this

permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

IV. FINDINGS AND DECLARATIONS

A. Project Location and Description

The project site is located at 1401 Ocean Avenue in the City of Santa Monica ([Exhibit 1](#)). The lot is zoned as Residential – Visitor Commercial in the certified Land Use Plan. Public access to a sandy beach is located approximately 1,000 feet southwest of the project site, via one of the pedestrian bridges that traverses Pacific Coast Highway.

The subject site is currently developed with a three-story, 47,171 sq. ft. commercial building. The proposed development will take place on the third floor and on the rooftop area of the commercial building where the applicant proposes to convert approximately 12,170 sq. ft. of third floor office space and 3,530 sq. ft. of rooftop area into restaurant space ([Exhibit 2](#)). The third floor will not increase in floor area and will receive a new interior build-out for the restaurant use, including reconfiguration of the interior walls, but no impact to the exterior walls. The renovations will incorporate the existing patio/balcony into the restaurant without any increase in the patio/balcony's size. An elevator will connect the third floor to the rooftop dining area. The rooftop deck will convert approximately 3,530 sq. ft. of existing roof space into restaurant use. A glass guardrail will be added to the rooftop deck for safety and windbreak. The rooftop deck will not exceed the height of the existing rooftop mechanical equipment, so it will not expand any existing view obstruction.

The proposed project will be used for restaurant purposes. The majority of the third-floor space includes typical dining and bar seating ([Exhibit 2](#)). There will also be three additional rooms in which members can eat, drink and gather with others. The first of the three rooms is the Lounge Dining area which will provide full food and beverage service with a more relaxed environment than a traditional restaurant dining area. The Lounge Dining area will feature several booths and seating providing a space that will serve food and beverages and can also be used for live music and entertainment. The second room is the Library, which will have full food and beverage service and will provide a quieter space for members to get together to dine. The applicant contends that the Library's layout will encourage community gathering, discussion and socializing around the fireplace in addition to providing a quieter space to read. This space will also accommodate non-profit meetings, member gatherings, board meetings, committee meetings, employee meetings, etc. The third room is the Presentation Room which the applicant contends is space for members seeking to communicate with a larger audience while eating and drinking. The Presentation Room will have full food and beverage service along with a projector, screen and built-in equipment for easy use by presenters. The applicant contends that the Presentation Room will also accommodate larger board meetings, restaurant committee meetings and employee meetings. All rooms will be used for restaurant purposes. Additionally, the

applicant has indicated that they will donate restaurant space to a local non-profit once-a-week, with a preference for non-profits representing marginalized groups, without requiring any of the non-profit's staff or members to be members of the restaurant.

The project site is not located between the first public road and the sea and it is located approximately 500 feet from the inland extent of the nearest sandy beach.

B. Public Access and Recreation

The Coastal Act requires that high priority be given to public access to and recreational uses and activities along the coast. In addition, the Coastal Act requires that oceanfront land suitable for recreational use be protected for recreational use and development. Coastal Act Sections 30210-30223 protect public access and recreation. In particular:

Section 30210 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 30211 states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 states:

Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected...

Section 30213 states:

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

Section 30221 states:

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public

or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30223 states:

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

The Santa Monica LUP, which is used as guidance for determining consistency with the Coastal Act, includes policies to maximize public access and recreation, including parking. In particular:

Policy 20 of the LUP states, in pertinent part:

New development shall provide adequate parking to meet all demands created by the development. With the exception of development within the Third Street Assessment District and at the Santa Monica Pier, required off-street parking spaces shall be located on the parcel or building site...

Policy 31 of the LUP states:

Visitor-serving commercial, recreational facilities designed to enhance public opportunities for coastal recreation and Coastal Dependent development and uses shall have priority over residential or general commercial development. Land in upland subareas necessary to support coastal recreational uses shall be reserved for such uses.

Policy 64 of the LUP states:

Ocean Avenue, south of California Avenue to Colorado Avenue shall accommodate new visitor-serving uses including hotels, restaurants, commercial recreational uses, visitor serving retail uses. Residential uses and office development may be permitted except at the ground floor street frontage. Residential development shall provide adequate on-site support and guest parking to prevent adverse impact on public access to Palisades Park.

The proposed project will change the current private use of the third-floor office space and rooftop area into a new visitor-serving use where one currently does not exist, thereby increasing coastal public access and recreational opportunities.

As part of the proposed project, the applicant is proposing to create membership fees that are not prohibitively high and has estimated (although the fees have not been confirmed yet) that the monthly dues will be approximately \$150-\$350 per month. The applicant has also committed to providing an inclusive and non-discriminatory environment ([Exhibit 3](#)). The applicant will do this by establishing a committee of member-peers who will focus on creating a diverse membership base including an

outreach and advertisement effort to reach a broad group of persons, including persons from minority groups. Additionally, members may bring any guests that they want to the restaurant. One of the ways the applicant proposes to provide affordable memberships is to allow for “in-kind” payments for individuals with contributory skills (i.e, singing monthly at the restaurant) instead of paying the membership fee. In addition, the applicant contends that employees will be permitted to dine at the restaurant without obtaining memberships, subject to availability.

Furthermore, the applicant will donate restaurant space to a local non-profit once-a-week (Sunday evenings), with a preference for marginalized groups, without requiring any of the non-profit's staff or members to be members of the restaurant. Additionally, at least once-a-month, the applicant will provide an additional day or evening for a local non-profit to use the space. Thus, the applicant is proposing to provide space, free of charge, to a local non-profit at least 5 times a month. The applicant contends that marginalized groups will be specifically targeted to receive this donation, but all non-profits will be eligible. ([Exhibit 4](#)).

The Commission finds that the proposed project will result in improved public recreation opportunities within the commercial building, since the existing space is a non-visitor serving use (office space and unutilized rooftop area), consistent with Policy 31 of the LUP. In this case, the proposed development provides a visitor-serving commercial, recreational facility which enhances opportunities for the public to access coastal recreation. To ensure maximum access to the membership restaurant, **Special Condition 1** requires the applicant to submit its bylaws, or an amendment to its bylaws if necessary, that expressly provides that it will not discriminate on the basis sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, sexual orientation, place of residence or socioeconomic group in its outreach efforts, membership, activities or operations.

The proposed development would convert existing office space to restaurant space (12,170 sq. ft.) and convert an existing rooftop area to restaurant space. In total, the project will provide 12,350 sq. ft of restaurant dining area. The City of Santa Monica's Certified Land Use Plan does not have parking requirements for the proposed development. The applicant used the City of Santa Monica's parking standards to determine parking demand as a result of the proposed development. Under the City's parking standards, one parking space is required for each 1,000 square feet of office floor area and one space for each 300 sq. ft. of restaurant floor area. Thus, the standards would require 12 parking spaces for the existing office use and 41 parking spaces for the proposed restaurant use. Since the proposed development will eliminate the office use, the 12 parking spaces will no longer be required, thus requiring only 29 parking spaces. Therefore, the City's parking standards predicts that the proposed project would generate the need for 29 additional parking spaces.

In addition, the applicants provided a parking demand study from Linscott, Law & Greenspan, Engineers which concluded that the projected parking demand increase from the proposed project could be fully accommodated for in the existing 209 parking

space subterranean parking garage on-site ([Exhibit 5](#)). The subterranean parking garage is a mix of valet and self-parking. According to the study, there are 47 – 99 parking spaces available on any given day, even at peak periods. Based on the data above, the subject site has adequate parking availability to accommodate any incremental increase in parking demand that may be generated by the proposed development (29 parking spaces), consistent with Policy 20 of the LUP.¹ Additionally, the applicant also submitted two letters: one from the building owner and one from the parking company owner which state that, based on their historical observations, that the subterranean parking garage on-site will be able to fully accommodate the projected project's parking demand increase of 29 spaces ([Exhibit 5](#)).

Additionally, there are two public parking structures within 1,000 feet of the proposed development. The City of Santa Monica Parking Structure 4 is located at 1321 Second Street, approximately 0.2 miles from the subject site, and provides 652 parking spaces. The parking study provided by the applicant shows that 78-248 parking spaces are available at any given time in Parking Structure 4. The other parking structure, Parking Structure 6, is located at 1433 Second Street, also approximately 0.2 miles from the subject site, and provides 747 parking spaces. The parking study shows that 202-441 parking spaces are available at any given time in Parking Structure 6. Thus, depending on the time of day, the two parking structures provide an additional 280-689 parking spaces located off site but within walking distance of the proposed development.

In addition, there is a bus stop immediately adjacent to the project site. The Metro Rapid Lines 704 and 733 connect the project site to Downtown Los Angeles and Line 534 connects the project site to West Malibu. The Santa Monica Big Blue Bus Route 8 connects the project site to Westwood and Route 9 connects the project site to the Pacific Palisades.

The proposed development will not affect the public's ability to gain access to, and/or to use the coast and nearby recreational facilities. As conditioned, the Commission finds that the development conforms with Coastal Act Sections 30210 through 30214 and Sections 30220 through 30223.

C. Biological Resources

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

¹ Linscott, Law & Greenspan, Engineers. Parking Demand Study for the Proposed Restaurant Project at 1401 Ocean Avenue, City of Santa Monica.

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.

The proposed development involves some minor landscaping on the rooftop area. The placement of any vegetation that is considered invasive which could supplant native vegetation is not proposed and is not part of the project description. Invasive plants have the potential to overcome native plants and spread quickly. Invasive plants are generally those identified by the California Invasive Plant Council (<http://www.cal-ipc.org/>) and California Native Plant Society (www.CNPS.org) in their publications. Furthermore, any plants in the landscape plan should only be drought tolerant to minimize the use of water (and preferably native to coastal Orange County). The term drought tolerant is equivalent to the terms 'low water use' and 'ultra-low water use' as defined and used by "A Guide to Estimating Irrigation Water Needs of Landscape Plantings in California" prepared by University of California Cooperative Extension and the California Department of Water Resources dated August 2000 available at <http://www.water.ca.gov/wateruseefficiency/docs/wucols00.pdf>).

In order to make sure that any onsite landscaping minimizes the use of water and the spread of invasive vegetation, **Special Condition 2** requires that all vegetated landscaped areas shall only consist of native plants or non-native drought tolerant plants, which are non-invasive.

Although not directly on the beach, the proposed development is located approximately 500 feet from the upland extent of Santa Monica Beach. Due to its location, there is a substantial risk of bird strikes; therefore, **Special Condition 3** is imposed to assure protection of avian species, a marine resource, requiring the applicant to use bird-safe glass for all structural elements.

The Commission finds that the proposed development, as conditioned, conforms to Sections 30230 and 30231 of the Coastal Act regarding the protection of water quality to promote the biological productivity of coastal waters and to protect human health.

D. Local Coastal Program (LCP)

Coastal Act section 30604(a) states that, prior to certification of an 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 ability of the local government to prepare an LCP that is in conformity with Chapter 3. The Land Use Plan (“LUP”) for Santa Monica was effectively certified on September 15, 1992 upon the City’s adoption of the Commission’s suggested modifications. The City does not yet have a certified Implementation Plan. Therefore, the Chapter 3 policies of the Coastal Act are the standard of review and the certified LUP is used as guidance. The proposed development is consistent with Chapter 3 of the Coastal Act. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

E. California Environmental Quality Act

Section 13096 of the Commission’s administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as modified 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 approval of a proposed development if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant impacts that the activity may have on the environment.

The City of Santa Monica determined the proposed project to be categorically exempt from CEQA (Class 3) on June 29, 2020. The project as conditioned herein incorporates measures necessary to avoid any significant environmental effects under the Coastal Act, and there are no less environmentally damaging feasible alternatives or mitigation measures. Therefore, the proposed project is consistent with CEQA.

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

Santa Monica Land Use Plan (1992)