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STAFF REPORT: CONSENT CALENDAR

Application Number: 5-24-0218

Applicant: City of Santa Monica

Agent: Carolyn Goves, Dudek

Location: Santa Monica Pier Bridge, Santa Monica, Los Angeles County

Project Description: Construct an in-kind replacement bridge with the same alignment and profile as the existing bridge; widen the bridge deck by 5 feet to construct a raised sidewalk on the new bridge deck and improve pedestrian access; and upgrade the bridge rails to visually permeable Type 85 and Type 85SW.

Staff Recommendation: Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

The City of Santa Monica (City), with financial and technical support from the California Department of Transportation (Caltrans), proposes to replace the Santa Monica Pier Bridge (Pier Bridge) along Ocean Avenue near Santa Monica State Beach in Los Angeles. The primary purpose of the project is to ensure the safety and reliability of the Pier Bridge by replacing the existing bridge, which is seismically unsafe and has concrete that is cracked, delaminated, and broken off in many locations along the length of the bridge, exposing reinforcing steel to both saltwater and air and accelerating corrosion. Commission staff is recommending approval of a Coastal Development Permit for the proposed project, with **six special conditions** to ensure consistency with

the public access, visual resources, biological resources, hazards, and water quality policies of the Coastal Act, including: 1) construction requirements; 2) final Public Outreach Plan final; 3) Stormwater Pollution Prevention Plan; 4) biological monitoring requirements; 5) coastal hazards risk; and 6) liability for attorney's fees.

As conditioned, staff recommends that the Commission find that the proposed project will conform with Chapter 3 of the Coastal Act, which is the standard of review because Santa Monica does not have a certified Local Coastal Program.

The motion to approve the CDP application is on **Page 4**. The special conditions begin on **Page 5**.

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I. MOTION AND RESOLUTION

Motion:

I move that the Commission approve the coastal development permit applications included on the consent calendar in accordance with the staff recommendations.

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves Coastal Development Permit Number 5-24-0218 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 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

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 an 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

This permit is granted subject to the following special conditions:

- 1. Construction Requirements.** The Permittee shall undertake construction in accordance with the following construction requirements:
 - a. Construction Areas.** Areas within which construction activities and staging are approved to take place by this CDP shall be minimized in size and shall be sited and designed to minimize impacts on coastal views and to the extent feasible public access to Santa Monica State Beach (including safe multimodal access through and/or around the project site). Construction (including but not limited to storage of materials and/or equipment) is prohibited on the beach and outside of the defined construction, staging, and storage areas.
 - b. Construction Methods and Timing.** Methods shall be used to keep the construction areas separated from public recreational use areas, including using unobtrusive fencing or equivalent measures to delineate construction areas.
 - c. Construction Best Management Practices (BMPs)**
 - i.** No construction material, debris, or waste shall be placed or stored where it may enter the sandy beach, storm water drainages, or be subject to wind, rain, or other erosion or dispersion. Any debris resulting from construction activities shall be removed immediately. Any debris inadvertently discharged into coastal waters shall be recovered immediately and disposed of consistent with the requirements of this CDP.
 - ii.** Any fueling and maintenance of construction equipment shall occur within upland areas outside of designated staging areas. Mechanized heavy equipment and other vehicles used during the construction process shall not be refueled or washed within 100 feet of coastal waters. If refueling or washing must occur within 100 feet of coastal waters, the area must be surrounded by barriers to prevent discharge.
 - iii.** Fuels, lubricants, and solvents shall not be allowed to enter coastal waters or the sandy beach. Hazardous materials management equipment including oil containment booms and absorbent pads shall be available immediately on-hand at the project site, and a registered first-response, professional hazardous materials clean-up/remediation service shall be locally available

on call. Any accidental spill shall be rapidly contained and cleaned up.

- iv. BMPs shall be implemented to control erosion from the disturbed area and prevent sediment and potential pollutants from entering coastal waters and/or the sandy beach.
- d. **Restoration.** All construction debris shall be removed. All public recreational access and use areas, and all beach access points impacted by construction activities shall be restored to their pre-construction condition or better within three days of completion of construction.
- e. **Construction Site Documents.** The Construction Plan shall require that copies of the signed CDP and the approved Construction Plan be maintained in a conspicuous location at the construction job site at all times and that such copies are available for public review on request. All persons involved with the construction shall be briefed on the content and meaning of the CDP and the approved Construction Plan, as well as the public review requirements applicable to them, prior to commencement of construction.
- f. **Construction Coordinator.** The Construction Plan shall require that a construction coordinator be designated as the point of contact during construction should questions arise regarding the construction in case of both regular inquiries and emergencies. The construction coordinator's contact information, i.e., address, phone numbers, email, etc., including, at a minimum, an email address and a telephone number that will be made available 24 hours a day for the duration of construction, shall be conspicuously posted at the job site where such contact information is readily visible from public viewing areas while still protecting public views as much as possible. This information shall indicate that the construction coordinator should be contacted in case of questions regarding the construction for both regular inquiries and emergencies. The construction coordinator shall record the name and contact information, i.e., address, email, phone number, etc., and nature of all complaints received regarding the construction and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry. Any complaints and all actions taken in response shall be summarized and provided to the Executive Director on at least a weekly basis.
- g. **Construction Specifications.** The construction specifications and materials shall include appropriate control provisions that require remediation for any work done inconsistent with the terms and conditions of this CDP.
- h. **Notification.** The Permittee shall notify staff of the Coastal Commission's South Coast District Office at least three working days in advance of commencement of construction, and immediately upon completion of construction. All requirements above and all requirements of the approved Construction Plan shall be

enforceable components of this CDP. The Permittee shall undertake development in accordance with this condition and the approved Construction Plan. Minor adjustments to the above requirements, as well as to the Executive Director-approved Construction Plan, which do not require a CDP amendment as determined by the Executive Director, may be allowed by the Executive Director if such adjustments: (1) are deemed reasonable and necessary; and (2) do not adversely impact coastal resources.

- i. **Construction Traffic Handling Plan.** The permittee agrees to adhere to the proposed Construction Traffic Management Plan, which requires extensive signage to be posted in the area during all stages of construction to direct and/or redirect pedestrian and vehicular traffic. The Construction Traffic Management Plan shall limit lane closures and the use of public access routes for construction staging or operations to the maximum extent feasible, and provide a detour for full and continuous access for pedestrians and bicyclists around the work area at all times.
2. **Final Public Outreach Plan.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit the Final Public Outreach Plan (Outreach Plan) to the Executive Director for review and written approval. The Outreach Plan shall be in substantial conformance with the Public Outreach Parking Plan Framework and provide detailed strategies and tools the Permittee will utilize to help inform the public of impacts and alternatives for vehicle and pedestrian access to Lot 1N and additional area lots during construction. The Permittee shall prepare all outreach materials in both English and Spanish.
3. **Final Stormwater Pollution Prevention Plan.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit two copies of the Final Stormwater Pollution Prevention Plan (SWPPP) to the Executive Director for review and written approval. The SWPPP shall include all housekeeping, source control, and treatment control best management practices (BMPs) that will be used during construction and shall be updated as needed to reflect progression and phasing of the project. The Permittee shall undertake development in accordance with the approved SWPPP. Minor adjustments to the approved SWPPP may be allowed by the Executive Director if such adjustments: (1) are deemed reasonable and necessary by the Executive Director; and (2) do not adversely impact coastal resources.
4. **Biological Monitoring, Avoidance, and Minimization Measures.** To avoid and minimize impacts to sensitive species and their habitats, the Permittee shall implement all biological monitoring, avoidance, and minimization measures detailed in the Final Environmental Impact Report and as supplemented with the following:
 - a. **Sensitive species monitoring.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall retain the services of a qualified

biologist or environmental resources specialist (hereinafter, “environmental specialist”) with appropriate qualifications acceptable to the Executive Director, to monitor the site during construction activities and conduct surveys of sensitive species (including birds and terrestrial species) and to monitor all project operations. The Permittee shall submit the contact information and qualifications of all monitors with a description of their duties and their on-site schedule to the Executive Director for review and approval. For the purpose of this special condition, “sensitive species” shall be taken to mean any special-status wildlife species. Special-status species are species listed as: Endangered, Threatened, or Rare under the federal or state Endangered Species Acts; Candidate Species, California Fully Protected Species, and, pursuant to CEQA Guidelines Section 15380(d), all other species tracked by the California Natural Diversity Database (CNDDDB), which are considered by the California Department of Fish and Wildlife to be those species of greatest conservation concern (e.g. S1-S3 and G1-G3 Listed Species), and locally important species including: raptors, bats, wading birds, and the western snowy plover.

b. Nesting Bird Monitoring and Avoidance Plan. PRIOR TO

COMMENCEMENT OF CONSTRUCTION, the permittee shall submit to the Executive Director for review and written approval, a Nesting Bird Monitoring and Avoidance Plan that shall include but not be limited to the following provisions:

- i. If project activities must occur during bird nesting season (February 1 through August 31), a qualified biologist with experience conducting bird surveys shall survey for active nests of any federally or state listed threatened or endangered species, species of special concern, fully protected species, species with global rarity rankings of G1-G3 and/or state rarity rankings of S1-S3, or any species of raptor, bat, wading birds, or western snowy plover within 7 days prior to commencement of project activities, and once a week thereafter during construction, to detect any such activity within 500 feet of the project area.
- ii. If an active nest(s) of any of the above species is located within 300 feet of construction activities (500 feet for raptors), the qualified biologist shall halt construction activities to enable the permittee to employ best management practices (BMPs) to ensure that construction activities do not disturb or disrupt nesting activities.
- iii. Noise levels at active nest sites of any of the above species must not exceed 65 dB unless a noise study has determined that ambient noise in the immediate area exceeds that level. If this is the case, noise levels at the nest site must not exceed the ambient noise level measured. Noise-reducing BMPs may include using alternative equipment, equipment noise buffering, sound blankets, etc. Alternatively, construction activities and schedules may be adjusted to avoid active nest areas until the

respective young birds have fledged. Unrestricted construction activities may resume when no active nests remain in the construction area.

- iv. Results of nesting bird surveys, ambient noise studies, and any follow-up construction avoidance measures shall be documented in monthly reports by the qualified biologist and submitted to the Coastal Commission Executive Director throughout the bird breeding season.
5. **Assumption of Risk.** By acceptance of this CDP, the Permittee acknowledges and agrees, on behalf of itself and all successors and assigns, to all of the following: (a) that the site may be subject to coastal hazards, including but not limited to episodic and long-term shoreline retreat and coastal erosion, high seas, ocean waves, tsunamis, tidal scour, coastal flooding, fluvial flooding, landslides, bluff and geologic instability, bluff retreat, liquefaction, and the interaction of same, many of which may worsen with future sea level rise; (b) to assume the risks to the Permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (c) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (d) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.
6. **Liability for Costs and Attorneys' Fees.** The Permittee shall reimburse the Coastal Commission in full for all Coastal Commission costs and attorneys' fees (including but not limited to such costs/fees that are: (1) charged by the Office of the Attorney General; and/or (2) imposed by a court) that the Coastal Commission incurs in connection with the defense of any action brought by a party other than the Permittee against the Coastal Commission, its officers, employees, agents, successors and assigns challenging the approval or issuance of this CDP. By acceptance of the permit conditions, the applicant irrevocably agrees that this obligation, which is a contractual obligation, shall be continuing in nature and remain in full force and effect regardless of whether this permit approval is invalidated as the result of the litigation contemplated by this condition or otherwise changed in any way.

IV. FINDINGS AND DECLARATIONS

A. PROJECT LOCATION AND DESCRIPTION

Project Location and History

The project area is in the southwestern portion of Los Angeles County, in the City of Santa Monica (City). The project site is the Santa Monica Pier Bridge (Pier Bridge) ([Exhibit 1](#)). The Pier Bridge is a critical piece of infrastructure for the Santa Monica Pier (Pier) as it provides direct public access from the downtown Santa Monica area including the Downtown Station for the Los Angeles County Metropolitan Transportation Authority (Metro) Exposition (Expo or E) Line. It also provides direct public access to Santa Monica State Beach. The Pier was constructed in 1909, and an amusement park on the Pier, Pacific Park, opened in 1996. The Pier and Pacific Park are iconic tourist attractions, drawing millions of visitors annually. The Pier Bridge was constructed in 1939 and connects the iconic Santa Monica Pier to the intersection of Ocean Avenue and Colorado Avenue within the downtown district of the City, allowing vehicular and bicycle traffic and pedestrians to span several local streets.

Project Description

The City, with financial and technical support from the California Department of Transportation (Caltrans), proposes to replace the existing 39. ft. wide and 488 ft. long Santa Monica Pier Bridge. The replacement Pier Bridge would maintain the same height (descending 36 ft. from Ocean Ave. to the Pier) and length but would be widened by 5 ft. The purpose of the proposed replacement bridge is to provide a seismically safe bridge for continued and enhanced vehicular, bicycle, and pedestrian use of the Pier.

Project elements include the widened bridge deck, including eastbound and westbound vehicular traffic lanes, a sidewalk, bridge barriers, and hand railings. The replacement bridge would feature reversed path locations: vehicles and bicycles would use a 20-foot-wide roadway on the north side of the bridge, and pedestrians would use a wider 15-foot-wide raised sidewalk on the south side of the bridge ([Exhibit 2](#)). The bridge railings will be upgraded to meet current safety standards and guidelines. The new bridge railings will be Caltrans Type 85 and Type 85SW with an open aesthetic look providing an upgrade to the visual quality of the area. The Pier deck itself will be widened to the north by 5 feet to align with the slightly wider new bridge. The walkway on the Pier in front of the businesses along Colorado Ave. will be widened to the new road location, adding approximately 18 feet of additional pedestrian walkway and providing a wider landing area for pedestrians coming off the 15-foot wide bridge sidewalk. All pier structure modifications would either be reconstructed or replaced in kind to maintain the historic character of the pier ([Exhibit 4](#)). The historic pier sign would be removed during construction, relocated approximately 10 feet north of its existing location, and elevated to provide a minimum vertical clearance of 17'-0".

Construction is proposed to start in late 2025 and last approximately 24 months. The temporary bridge construction, bridge removal, and foundation construction along Moomat Ahiko Way and Appian Way would then occur from January through April of 2026.

Standard of Review

In August 1992, the Commission certified the land use portion of the City of Santa Monica's Local Coastal Program (LCP). However, the City does not have a certified Implementation Plan and therefore does not have a fully certified LCP. Thus, the standard of review for this project is the Coastal Act, and the certified LUP may be used as guidance.

Public Access

The Pier Bridge serves as the primary access route for pedestrians and bicyclists as they travel to the Pier and Santa Monica State Beach. Additionally, it provides the only vehicular access route to the Pier for vendors, vehicles accessing the Pier for special events, Pier businesses, public Pier deck parking, maintenance staff, and emergency vehicles. The Pier Bridge is essential to the function of the Pier as it provides direct public access from the downtown Santa Monica area including the Downtown Station for the Expo Line. Since completion of the Expo Line and Colorado Esplanade in May 2016, pedestrian and bicyclist use of the Pier Bridge has dramatically increased. Currently, pedestrians using the Pier Bridge utilize a smaller space carved out of the existing roadway and protected by K rail, rather than a designated walkway. Cyclists would continue to use the vehicular ramp to ride onto the pier or choose to dismount and walk on the new wider pedestrian sidewalk. The Colorado Esplanade converted Colorado Avenue into a multi-modal street with both a wide pedestrian walkway and a Class IV two-way cycle track on the south side of the street. Furthermore, the City plans to improve bicycle access between the Pier and the Marvin Braude Beach Bike Trail (Beach Bike Trail) below the pier. As part of a separate future project, the City is proposing to construct a direct bicycle ramp between the Pier and the Beach Bike Trail. The proposed Pier Bridge replacement project would be designed to allow construction of this important future multi-modal access project.

The existing Pier Bridge will be closed to public access during demolition and reconstruction. However, pedestrian access between the Pier and the Ocean Avenue/Colorado Avenue intersection will be maintained through construction of a temporary pedestrian bridge immediately adjacent to and south of the existing Pier Bridge. A temporary vehicle ramp will also be constructed from Lot 1 North (Lot 1N) to the Pier parking area ([Exhibit 5](#)). The applicant has prepared a Construction Traffic Handling Plan, submitted as part of the project plans, wherein extensive signage will be posted in the area during all stages of construction to direct and/or redirect pedestrian and vehicular traffic. By adhering to this Plan, the applicant will ensure that public access to the Pier is maintained during construction. **Special Condition 1(i)** requires

the applicant to adhere to that plan. To keep the public informed about Project construction and any associated temporary closures or detours the City has developed a Public Outreach Parking Plan Framework (Public Outreach Plan). To ensure success of the Public Outreach Plan, consultants will assist the City with public outreach, in both English and Spanish, throughout construction. Therefore, the Commission imposes **Special Condition 2** which requires the applicant to submit the Final Public Outreach Parking Plan to the Executive Director for review and written approval. Most importantly, the Pier itself will be open during the entirety of the Pier Bridge reconstruction project.

During construction, approximately 365 spaces in Lot 1N will be used for staging and temporarily unavailable to the public. However, the public will continue to generally have access to public parking in Lot 1N (1,081 remaining spaces) and on the Pier itself (277 spaces). There are also numerous parking spaces in the area that allow for public access to the Pier. Additionally, the City undertook a Parking Study prepared by Walker Associates on February 7, 2024, which concluded that over 1300 parking spaces located adjacent to the Pier Bridge and in the immediate coastal area will be still available during peak parking demand, even when accounting for the temporary loss of the 365 spaces ([Exhibit 6](#)). Upon project completion, there will be no permanent impacts to parking.

Regarding lane closures surrounding the project site, Moomat Ahiko Way will be temporarily closed: 1) in the northbound (on-ramp) direction only for approximately 30 days, 2) in both directions for an additional approximately 40 days, and 3) in the southbound (off-ramp) direction only for approximately 36 days. Construction activities during these closures will include bridge demolition, new bridge foundations, median barriers, and new bridge girder erection. During these closures traffic will be detoured using City streets including California Incline. Appian Way will be temporarily closed for approximately 10 days in order to perform bridge demolition and new bridge foundations. During the temporary closures access to Parking Lot 1N will only be from Pacific Coast Highway. Lastly, the Beach Bike Trail will not be fully closed during construction. Pedestrian and bike traffic will be shifted to share one side of the path under the pier, with delineators separating direction traffic. These temporary closures will be during working hours only. If it does become necessary to close one direction of the Beach Bike Trail, the southbound direction will continue to use the trail, and northbound will be detoured along the path south of the pier to Ocean Front Walk.

Special Condition 1(a) requires staging areas to be confined to those approved by the project plans and for multimodal access to Santa Monica State Beach and the Santa Monica Pier to be maintained throughout the duration of construction and **Special Condition 1(e)** requires the applicant to keep the construction areas separated from public recreational use areas.

Overall, the project will provide a net benefit to public access by improving pedestrian access across the bridge, ensuring multimodal access, and improving the reliability and

safety of access to the recreational area on the Pier. As conditioned, the project minimizes public access impacts from construction.

Visual Resources

The proposed Pier bridge will appear visually similar to the existing bridge. However, the bridge's deck will be slightly wider to accommodate an expanded 15-foot-wide sidewalk and to meet modern safety standards. New bridge railings (Caltrans Type 85 and Type 85SW) will replace the existing railings to meet current safety standards. The proposed railings are frequently used in the coastal zone, have an open aesthetic look, and would improve the overall scenic and visual quality of the Pier Bridge. The Pier deck will be slightly widened to the north to match the 5ft. wider new Pier Bridge. All Pier structure modifications would either be reconstructed or replaced in kind to maintain the historic character of the pier ([Exhibit 4](#)). Only the minimal number of light poles will be installed along the bridge, as required for public safety and security. The number of poles and style of lighting has been intentionally designed to minimize visual impediments while maintaining adequate safety. Additionally, on the current pedestrian bridge, public pedestrian access is protected by unsightly K Rail, and the new proposed bridge with a protected pedestrian sidewalk will be a visual improvement.

Lastly, construction staging would not substantially degrade the existing visual character or quality of the site because the impact would be temporary, and construction vehicles would not substantially impede views of the coast. This proposal is reinforced by **Special Condition 1(a)**, which requires the City to maintain the visual quality of the coast by restricting construction vehicle, equipment, and material storage to approved areas within Lot1N.

Overall, the project will make only a minor visual change to the bridge, improve the visual quality of the bridge overall when complete, and construction impacts are minimized.

Biological Resources and Water Quality

During construction, temporary and permanent erosion and sediment controls will be used to minimize impacts to water quality. Stormwater management for the site will be protected by implementing a Storm Water Pollution Prevention Plan (SWPPP), and **Special Condition 3** requires the SWPPP to be submitted prior to commencement of construction. The contractor is required to have a certified Qualified SWPPP Preparer/Qualified Stormwater Developer prepare and oversee implementation of all temporary construction site best management practices (BMPs) during the project. The City will implement standard construction methods, waste management procedures, and stormwater BMPs as required by **Special Condition 1(c)** to reduce or eliminate temporary water quality impacts during construction.

The Project occurs in an area adjacent to where sensitive species are known to occur, including various species of bats, raptors, wading birds, and the federally listed as threatened western snowy plover. Seventeen (17) trees will be removed to accommodate Project construction. Of the 17 trees, three palm trees are proposed to be removed to accommodate the shifted location for the Santa Monica Pier Sign. Ten palm trees will be removed due to construction impacts where slopes need to be excavated to construct foundations. Four additional nonnative peppermint trees (*agonis flexuosa*) will be removed adjacent to the parking lot entrance, west of Appian Way, to accommodate bridge construction. Because these trees are not a rare or sensitive species, they are not considered ESHA themselves. However, prior to removal, **Special Condition 4(a)** requires all trees and vegetation to be surveyed for sensitive species and locally important species including: raptors, bats, and wading birds. Pre-construction surveys for the western snowy plover will also occur on sandy beach areas adjacent to the project site. Additionally, **Special Condition 4(b)** requires the applicant to avoid and minimize impacts to sensitive species and their habitats, including by reducing the decibel level of construction to 65dB if an active nest is discovered during construction. Upon completion of construction, all trees removed will be replaced with non-invasive palm trees typical to landscaped areas in California, for a total of 17. Two palm trees will be replanted west of the Pier Sign. A lack of space and Pier Sign footing conflicts prevent the planting of additional palms near this location. The ten palm trees removed to accommodate excavation will be replaced at their preconstruction locations, and the four peppermint trees will be replaced with five palm trees. Proposed palm trees would replace all removed trees, resulting in no loss of potential bird nesting habitat.

Regarding lighting, only the minimal number of light poles will be installed along the bridge, as required for public safety and security. The number of poles and style of lighting has been intentionally designed to minimize visual impediments while maintaining adequate safety.

Hazards

To minimize seismic risks, the City designed the proposed bridge in accordance with Caltrans' Seismic Design Criteria. This approach is intended to ensure minimal probability of collapse during an extreme event, and to ensure that any damage is minimal, evidently visible, and repairable. Additionally, the City submitted a Coastal Hazard Analysis dated December 19, 2023 for the proposed project. The study used the best available science and modeling data, and project elements were analyzed for potential impacts from erosion, tidal flooding, and storm events including tsunamis. The Coastal Hazard Analysis concluded that the Pier Bridge was not considered vulnerable or sensitive to shoreline erosion under the studied scenarios. Under a 100-year storm flooding scenario with Sea Level Rise (SLR), the area beneath the Pier Bridge would experience flooding, extending further landward with each increment of SLR until eventually reaching Ocean Front Walk under the 6.6-ft SLR scenario. The superstructure of the Pier Bridge will be elevated above these hazards, although the supporting piles and other at-grade infrastructure including roads and parking lots have

the potential to flood at ground level. Per the Coastal Hazards Analysis, deep foundation piles associated with the replacement Pier Bridge would not be at risk to these hazards ([Exhibit 7](#)).

In conclusion, the replacement Pier Bridge has been designed to be safe from coastal hazards and SLR over its anticipated lifespan.

Though the City has designed the proposed bridge to reduce vulnerability to coastal hazards, it is not possible to remove all associated risk associated with the uncertainties of natural hazards. **Special Condition 5** requires the City to assume the risks of flooding and geologic hazards to the Pier Bridge. As stated above, the City acknowledges that the proposed bridge location is subject to potential seismic risks, including potential tsunamis. The condition stipulates that the Commission is not liable for damage as a result of approving the permit for development and requires the City of Santa Monica to indemnify the Commission in the event that third parties bring an action against the Commission as a result of the failure of the development to withstand the hazards.

B. PUBLIC ACCESS AND RECREATION

The proposed development will not affect the public's ability to gain access to, and/or to make use of, the coast and nearby recreational facilities. Therefore, as proposed the development conforms with Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act.

C. VISUAL RESOURCES

The proposed project's overall visual impact will be minor and visually unobtrusive and will be mitigated by the visual enhancements provided by the improved bridge railings, upgraded pedestrian sidewalk area, and replanting of landscaped trees. As a result, the Commission finds that the project, as submitted, is consistent with Section 30251 of the Coastal Act.

D. BIOLOGICAL RESOURCES AND WATER QUALITY

The proposed development has a potential for a discharge of polluted runoff from the project site into coastal waters. The development, as proposed and as conditioned, incorporates design features to minimize the effect of construction and post-construction activities on the marine environment. These design features include, but are not limited to, the appropriate management of equipment and construction materials, reducing runoff through the use of permeable surfaces, the use of non-invasive drought tolerant vegetation to reduce and treat the runoff discharged from the site, and for the use of post-construction best management practices to minimize the project's adverse impact on coastal waters. The proposed development also has

the potential to impact nesting birds. However, as described above, biological monitoring and replanting of landscaped palm trees suitable for bird nesting are proposed. Therefore, the Commission finds that the proposed development, as conditioned, conforms with 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.

E. COASTAL HAZARDS

Commission finds that the proposed project, as conditioned, will minimize risk to life and property from hazards, assure stability and structural integrity, and will neither create nor contribute significantly to erosion, geologic instability, or destruction of the surrounding area. As conditioned, the Commission finds that the development conforms to the requirements of Sections 30253 and 30270 of the Coastal Act regarding the siting of development in hazardous locations.

F. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Caltrans and the City of Santa Monica, acting as the lead agencies under CEQA, adopted an Environmental Impact Report with a Finding of No Significant Impact for the project in May 2023. The Coastal Commission's review and analysis of land use proposals has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of environmental review under CEQA (Section 15251(c)). Section 13096 of Title 14 of the California Code of Regulations requires that a specific finding be made in conjunction with CDP applications showing the application to be consistent with any applicable requirements of CEQA. Public Resources Code, Section 21080.5(d)(2)(A) 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 that the activity may have on the environment.

The Commission has reviewed the relevant coastal resource issues of the proposed project and has identified appropriate and necessary modifications to address adverse impacts to such coastal resources. All above findings are incorporated herein in their entirety by reference. As such, there are no additional feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse environmental effects, individual and cumulative, that approval of the proposed project, as conditioned, will have on the environment within the meaning of CEQA. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

APPENDIX A – Substantive File Documents¹

- Caltrans and City of Santa Monica, *Recirculated Final Environmental Impact Report/Environmental Assessment with Finding of No Significant Impact, May 2023*

¹ These documents are available for review in the Commission's South Coast District office in Long Beach.