

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
301 E. Ocean Blvd., Suite 300
Long Beach, CA 90802-4830
(562) 590-5071



F15c

Filed: 10/10/25
90th Day: 01/08/26
Staff: D. Cortez -LB
Staff Report: 11/27/25
Hearing Date: 12/12/25

STAFF REPORT: REGULAR CALENDAR

Application No: 5-25-0502

Applicant(s): EAH Housing

Project Location: 1318 – 1320 4th Street, Santa Monica, Los Angeles County (APNs: 429-101-9200, 429-101-2901)

Project Description: Construction of a six-story, 75-ft. tall, 184,786 sq. ft. mixed use structure with 120 affordable rental units for low-income households on upper floors, 18,300 sq. ft. of commercial space on the ground floor, and two levels of subterranean parking, on two vacant lots with a cumulative 30,008 sq. ft. area. The project includes landscaping, drainage improvements, and grading of 26,000 cu. yds. of cut and no fill.

Staff Recommendation: Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

The project site consists of two rectangular lots measuring approximately 22,484 sq. ft. and 7,504 sq. ft., providing a cumulative area of 29,988 sq. ft., located at 1318 and 1320 4th Street in the City of Santa Monica, approximately 0.28 miles (three blocks) east of the inland extent of Santa Monica State Beach and approximately 380 feet from the Third Street Promenade. The site is currently a vacant paved lot owned by the City of Santa Monica and used as a pickleball court.

The applicants propose construction of a six-story, 75-foot-tall, 184,786-square-foot, mixed-use building containing 122 rental units, including 120 affordable units for low-income households and two unrestricted manager's units. The project also includes a

18,300-square-foot ground-floor grocery store, community rooms and offices for resident services, and two levels of subterranean parking. The parking garage will provide 127 vehicle parking spaces, including 56 commercial spaces and 58 residential spaces, along with three stalls reserved for onsite office use and other spaces reserved for accessible, loading, and utility parking uses. A total of 102 bicycle parking spaces will also be provided. The project will incorporate electric vehicle (EV) infrastructure, including 50 percent EV-ready and 15 percent EV-capable stalls.

Based upon communications with the Santa Monica city staff, this project qualifies for streamlined ministerial approval process for eligible affordable housing development projects enacted by AB 2011 (Wicks, 2022) as amended by AB 2243 (Wicks, 2024). In addition, the project is not located within an area of the coastal zone that is excluded under clause (i), (ii), (iii), or (v) of subparagraph (A) of paragraph (6) of subdivision (a) of Section 65913.4. Thus, pursuant to Government Code 65912.114(e), regulatory review for a coastal development permit is limited to the objective standards of the certified Santa Monica Land Use Plan (LUP).

The project site is designated Downtown Core—Downtown Commercial in the City's certified LUP. This designation allows a broad range of uses including retail, visitor-serving commercial, and residential uses, and limits development to a maximum of six stories, 84 feet in height, and a 3.5 floor area ratio (FAR) with site review. The proposed FAR and height comply with this limitation.

The project has limited potential to affect coastal resources given its inland location and existing urban context. The site is located approximately 1,160 feet inland of the coastal bluffs and 0.28 miles from Santa Monica State Beach, well outside areas currently subject to coastal flooding, wave run-up, or erosion. Potential coastal resource impacts are primarily limited to short-term construction activity and runoff that could indirectly affect coastal water quality, as well as potential public access impacts from the residential and commercial activation of the site.

Because this is an affordable housing project, the applicants are seeking a waiver of the application fees for this coastal development permit. The project provides 120 extremely-low income and low-income affordable units in an expensive part of the coastal zone, all of which will be income-restricted. Therefore, 100% of the application fees for this project were waived by the Executive Director.

Construction of the proposed development is anticipated to begin in late 2026 and continue through early 2029, with an estimated construction duration of approximately 28 months. The temporary recreational use of the site was not designated or protected in the certified LUP, and its removal will not result in the loss of any existing coastal recreation facilities. During construction, all work will occur within the boundaries of the subject parcel. Limited sidewalk closures along Fourth Street will be required to accommodate construction ingress and egress and will be implemented under City-approved traffic control permits. These closures will not obstruct coastal access routes or recreational use within the coastal zone.

5-25-0502 (EAH Housing)

Commission staff recommends **approval** of the project with one special condition: **1)** provision of affordable units. As proposed and conditioned, Commission staff recommends the Commission find the project consistent with the objective standards of the Santa Monica LUP. The motion and resolution can be found on page 5.

TABLE OF CONTENTS

I. MOTION AND RESOLUTION	5
II. STANDARD CONDITIONS	5
III. SPECIAL CONDITIONS.....	6
IV. FINDINGS AND DECLARATIONS	6
A. PROJECT LOCATION & DESCRIPTION	6
B. DEVELOPMENT	9
C. PUBLIC ACCESS	11
D. WATER QUALITY & MARINE RESOURCES.....	13
E. CULTURAL RESOURCES	14
F. LOCAL COASTAL PROGRAM (LCP).....	15
G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA).....	15
APPENDIX A - SUBSTANTIVE FILE DOCUMENTS.....	17

EXHIBITS

Exhibit 1 – Vicinity Map

Exhibit 2 – Project Plans

Exhibit 3 – Santa Monica Certified LUP Map

I. MOTION AND RESOLUTION

Motion:

I move that the Commission **approve** Coastal Development Permit No. 5-25-0502 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 the Coastal Development Permit for the proposed project 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. 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 five 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

This permit is granted subject to the following special conditions:

1. Provision of Affordable Units.

- a. By acceptance of this permit, the permittee and all successors and assigns agree that the 120 affordable units onsite shall be maintained as “Affordable Units,” meaning units restricted to households earning no more than 30%-60% of Average Median Income, for the life of the development and consistent with the affordability requirements imposed by public funding sources.
- b. The applicants shall provide, in a form and content acceptable to the Executive Director, a written agreement, executed by the applicants and property owner (the City), incorporating the terms of this condition. Such agreement shall not be required to be recorded senior to, or otherwise impair, any lender’s security interest.

IV. FINDINGS AND DECLARATIONS

A. PROJECT LOCATION & DESCRIPTION

The project site consists of two rectangular lots measuring approximately 22,484 sq. ft. and 7,504 sq. ft., providing a cumulative area of 29,988 sq. ft., located at 1318 4th Street in the City of Santa Monica, Los Angeles County ([Exhibit 1](#)). The two lots were previously tied together when the site served as a public parking structure. The applicant proposes to record a lot-tie agreement with the City to allow construction of a single development spanning both lots. This action would not result in a formal lot merger. The project site is located approximately 0.28 miles east of Santa Monica State Beach and approximately 380 feet west of the visitor-serving Third Street Promenade.

The subject lots are located within the Downtown Overlay District and designated Downtown Commercial by the certified Land Use Plan (LUP) ([Exhibit 3](#)), which allows for the proposed mixed-use. The site falls within subarea 5 of the LUP. The surrounding downtown area is characterized by a mix of office, residential, commercial, and visitor-serving uses. The two subject lots previously contained a multi-level public parking structure that provided 337 parking spaces and was demolished pursuant to Coastal Development Permit No. 5-20-0248. Removal of the former structure has rendered the site vacant and available for redevelopment.

The applicants propose to construct a new, six-story, 75-ft. tall, 128,249 sq. ft. multi-family residential structure with 120 affordable rental units restricted to households with incomes between 30-60% of the Area Median Income (AMI).¹ The U.S. Department of Housing and Urban Development defines 30% AMI as “Extremely Low Income”, and 60% AMI as “Low

¹ The Area Median Income (AMI) is the midpoint of a region’s income distribution – half of families in a region (such as Santa Monica) earn more than the median and half earn less than the median. (Ref. <https://metro council.org/Handbook/Files/Resources/Fact-Sheet/HOUSING/Area-Median-Income-and-Housing-Affordability.aspx>)

Income. The project will include the following composition of bedrooms and affordability ranges.

Table 1. Proposed number of units per affordability and number of bedrooms.

	30% AMI Units	60% AMI Units	Total Units
Studio	44	0	44 studio units
1-Bedroom	6	9	15 one-bedroom units
2-Bedrooms	4	26	30 two-bedroom units
3-Bedrooms	4	27	31 three-bedroom units
	58 units at 30% AMI	62 units at 60% AMI	120 total units

The proposed development will provide a 1,220 sq. ft. communal space for residents to hold meetings or events, an 850 sq. ft. play area for children, onsite laundry facilities, and an open-air courtyard in the center of the development ([Exhibit 2](#)). A two-level subterranean parking level will provide 127 vehicle parking spaces and 172 long-term bicycle parking spaces, in addition to six short-term bicycle spaces. The applicants propose 26,000 cy. of cut for construction of the sub-surface parking garage and no fill.

The proposed affordable housing development at 1318 and 1320 4th Street was initiated by the City of Santa Monica to redevelop the site formerly occupied by the Downtown Municipal Parking Structure 3 (“PS3”) into a 100% affordable housing project. The former six-story public parking structure provided 337 parking spaces and was demolished pursuant to Coastal Development Permit No. 5-20-0248. The City pursued demolition of the aging structure to facilitate construction of an affordable housing development consistent with the City’s Housing Element and Downtown Community Plan goals to increase affordable and supportive housing opportunities in the downtown area.

The PS3 site was identified in the City’s Housing Element as a suitable location for affordable housing development due to its City ownership, proximity to transit, and adjacency to employment, commercial, and community services. On January 11, 2022, the Santa Monica City Council selected EAH, Inc. as the project developer and authorized

negotiation of an Exclusive Negotiating Agreement for a mixed-use affordable and permanent supportive housing project. Following a community outreach process between November 2022 and April 2023, the City Council approved a preferred development concept on May 10, 2024, consisting of a six-story mixed-use building with 122 units- 53 reserved for households earning up to 30% of area median income (AMI), 67 reserved for households earning up to 60% AMI, and two unrestricted manager units- along with two levels of subterranean parking and ground-floor commercial space. Fifty of the residential units are designated as permanent supportive housing (PSH) units to be operated in partnership with The People Concern (TPC), a Santa Monica-based supportive services provider.

The City executed a Disposition and Development Agreement (DDA) (Contract No. 11634) with 1318 4th Street L.P. to govern the financing, construction, and long-term operation of the project. The DDA provides for two long-term ground leases- one for the residential portion and one for the commercial portion of the project- under which the developer will construct and operate the improvements on City-owned land. The DDA and related regulatory agreement require that all 120 affordable units remain affordable for at least 55 years, consistent with California Tax Credit Allocation Committee (CTCAC) standards, and that Permanent Supportive Housing (PSH) units be fully furnished and supported with on-site resident services provided by The People Concern (TPC). The DDA further requires that the two manager's units remain occupied by on-site management staff, that EAH Housing maintain long-term ownership, operation, and maintenance responsibilities, and that any transfer of leasehold interest be subject to City approval. The DDA also requires that the ground-floor commercial space operate as a full-service grocery store consistent with the City's Downtown land use objectives, that the project achieve LEED Gold or equivalent certification, and that construction comply with local hire and prevailing wage requirements. EAH Housing must submit annual compliance reports verifying continued affordability, supportive services, and ongoing maintenance in accordance with the DDA and regulatory agreement.

The development will also provide resident amenities including common rooms, laundry facilities, bicycle storage, landscaped open space, and an outdoor children's play area. The two-level subterranean garage will provide 127 parking spaces reserved for residents and staff. The project is consistent with the Downtown Commercial Land Use Designation of the certified Land Use Plan (LUP), which allows residential, retail, and visitor-serving uses, and implements the Downtown Community Plan's goals to increase housing affordability, expand supportive housing availability, and promote equitable, mixed-use infill development in the urban core. The ground floor of the development will include an 18,300 sq. ft. full-service grocery market fronting 4th Street. The ground floor will also include a residential lobby, mail room, property management offices, and a copier/print room located along the east side of the building adjacent to the residential lobby. The market will have a loading dock accessed from 3rd Court Alley. One level of parking will be accessed via 4th Street dedicated to commercial use and the other via 3rd Court reserved for residents. Additional features include a locker room with showers and bicycle storage facilities for grocery employees, 102 bicycle parking spaces for residents, and retention of existing mature street trees along 4th Street.

The LUP for Santa Monica was effectively certified on September 15, 1992, upon the City's adoption of the Commission's suggested modifications, excluding the area west of Ocean Avenue and Neilson Way (Beach Overlay District). The City does not yet have a certified Implementation Plan.

B. DEVELOPMENT

Certified LUP Policy 58 states, in relevant part:

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located [...] contiguous with [...] existing developed areas able to accommodate it [...]

Certified LUP policy 54:

The City shall comply with the requirements of the Mello Act (Government Code Sections 65590) in the production of dwelling units for persons and families of Low and moderate income in new housing developments located within the coastal zone.

Certified LUP Policy 70 states: Downtown- Core Area

Allowable uses shall include retail, pedestrian oriented, visitor-serving commercial, public parking and other complementary uses (such as hotels, offices, cultural facilities, restaurants, social services, and housing).

Certified LUP Policy 71 states: Downtown- Core Area

Development in the Downtown Core shall not exceed 6 stories, 84 feet, 3.5 F.A.R. Floor area devoted to residential uses shall be discounted by 50 percent.

Residential Density

The certified LUP directs new residential and commercial development to be located contiguous with existing developed areas, and the project is located within the developed areas in the Downtown. The certified LUP also recognizes the importance of providing housing opportunities for persons and families of low and moderate income within the coastal zone. Policy 54 requires the City to comply with the Mello Act and facilitate the production of affordable housing as part of new development in the coastal zone. Ensuring that lower-income households can reside in coastal communities supports social and economic diversity, reduces commute distances for workers employed in the coastal zone, and promotes equitable access to coastal resources. Developing affordable housing in established, transit-served areas such as Downtown Santa Monica therefore advances both the community's housing objectives and the LUP's directions to concentrate residential uses where they can be accommodated.

As summarized in Table 1 above, the project proposes construction of 120 affordable dwelling units: 58 units provided for 30% AMI households and 62 units provided for 60% AMI households. As required by the City's regulatory and ground lease agreements, the 120 affordable units will be subject to long-term affordability restrictions for a minimum of 55 years, consistent with the requirements of the project's public funding sources. The applicant has secured a 55-year ground lease from the City, with the option of two 22-year extensions for a potential total term of 99 years, ensuring long-term operation of the site as affordable housing. While the Commission has, in past actions, required that affordable units be maintained for the life of the development, **Special Condition 1** requires compliance with the affordability requirements for the life of the development, without impacting the affordability requirements imposed by public funding sources.

Policy 70, Policy 71 and Map No. 14 of the certified LUP designate the project site as Downtown Core- Downtown Commercial. This designation allows for a broad range of uses including retail, pedestrian oriented visitor-serving commercial, public parking uses and other complementary uses (such as hotels, offices, cultural facilities, restaurants, social services, and housing). The ground floor of the development will include a full-service grocery market facing 4th Street, which is consistent with the Downtown Commercial land use designation and its emphasis on a mix of residential, retail, and visitor-serving uses. Incorporating a grocery market at this location enhances community-serving amenities within the coastal zone, supports the pedestrian-oriented character of the Downtown Core, and aligns with the certified LUP's direction for mixed-use development in this district. The proposed 122-unit residential development, including 120 affordable units and two unrestricted manager's units, is located within the Downtown Core (Subarea 5 between Colorado Avenue and Wilshire Boulevard) where the certified LUP limits development to a maximum of six stories, 84 feet in height, and a 3.5 floor area ratio (F.A.R.), with floor area devoted to residential uses discounted by 50 percent.

The proposed project will be developed on two combined lots and will include five levels of housing above a subterranean parking garage and a commercial use. The proposed building provides an average of 424 sq. ft. for each studio unit, 596 sq. ft. for each one-bedroom unit, 826 sq. ft. for each two-bedroom unit, and 1,041 sq. ft. for each three-bedroom unit ([Exhibit 2](#)). The building's design incorporates upper-level step-backs, varying roof heights, and a central 3,138 open-air courtyard to break up massing, enhance natural light and ventilation, and ensure compatibility with the surrounding downtown context. Additional open space will be provided through a 354 sq. ft. south terrace on the podium level, a 739 sq. ft. community terrace on the podium level, 312 sq. ft. of light courts on the podium level, and a 442 sq. ft. west-facing terrace on the fifth residential floor. The project will also include onsite amenities such as laundry facilities, a 1,220 sq. ft. communal room for resident meetings and events, and a 710 sq. ft. children's play area. The site is located within one mile of several public transportation options, including the Downtown Santa Monica Expo Line station (0.8 miles away) and a Metro bus stop (0.3 miles away), and provides adequate onsite vehicle and bicycle parking for residents, as discussed in the subsection below. The proposed project meets the use, height, and FAR limits (including application of the 50% residential floor-area discount) established in the

certified LUP, and because the site is not located within a scenic view corridor identified on Map No. 13, the proposed height will not affect any existing coastal views.

In summary, the proposed project maximizes the provision of affordable housing on a City-owned infill site while maintaining adequate living space, onsite amenities, and access to public transportation for residents. Locating 100 percent affordable and supportive housing within the urbanized downtown area- within walking distance of employment, services, and transit, the proposed development is consistent with the objective standards of the certified LUP. If the proposed development were to cease providing the affordable housing in the future, the Commission's review would have considered the Coastal Act policies applicable to a market-rate housing project. Such a change could alter the project's consistency with the coastal resource protection policies of Chapter 3 of the Coastal Act and LUP, including public access policies, or if the residential units were converted to hotel units in the future, that would alter the project's ability to comply with the Floor Area Ratio requirements of the LUP, creating a non-conforming condition, and would present many other potential inconsistencies with the Chapter 3 policies of the Coastal Act. Any modification from the approved low-income and supportive housing units to higher-income or market-rate units (or any other use) would constitute a change in the approved development and could affect public access conditions in the surrounding Downtown Core. As the project has only been analyzed for consistency with objective standards of the certified LUP rather all coastal resource protection policies of Chapter 3 of the Coastal Act and the LUP, it is appropriate to ensure that it remains affordable housing for the life of the development. To ensure that the project remains consistent with the assumptions underlying the limited objective LUP-based analysis, **Special Condition 1** requires the applicants, through acceptance of this permit, to maintain the 120 affordable units for the life of the development authorized by this permit.

Conclusion

The project will provide affordable housing in an existing developed area of the coastal zone with adequate infrastructure to support the increased housing density; and, as proposed, the project conforms with the relevant objective standards of certified LUP policies.

C. PUBLIC ACCESS

Certified LUP Policy 16 states:

Parking facilities in new commercial, office, and mixed-use developments, including conversions of existing structures with ten or more parking spaces, shall be required to be available for public use during hours when the public beach parking lots are open and when the business is not in operation, which may include weekends, major holidays and evenings. The development shall be required to conspicuously advertise the availability of general public access parking with appropriate signing. A fee may be charged for parking so long as it does not exceed the rate in effect at the public beach parking lots. If a mixed-use development contains residential uses, the residential parking spaces shall not be required to be available for public use.

Certified LUP Policy 20 states (in part):

...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...

Certified LUP Policy 26 states:

New development with ten or more parking spaces shall provide [...] secure space for bicycle storage.

The area surrounding the project site is a well-established visitor-serving district that includes Santa Monica State Beach, Palisades Park, and the Third Street Promenade. Public access to the beach is available approximately 1,140 feet west of the project site via Arizona Avenue, which connects to the California Incline pedestrian pathway and a public beach parking lot. Palisades Park is located approximately 1,160 feet west of the site, and the Third Street Promenade is located less than 400 feet to the east. According to City GIS layers² the project is within half a mile of two major transit stops, and, thus, parking cannot be required pursuant to AB 2097. The project is located on a fully urbanized block served by existing sidewalks, bicycle facilities, public transit routes, and nearby municipal parking structures. The proposed development does not include any encroachments into the public right-of-way and does not alter or obstruct any existing pedestrian, bicycle, or vehicular access routes to the coast.

The project site is located less than one block from Parking Structure No. 5, a public parking facility on 4th Street north of Broadway that provides multi-level parking for downtown visitors and retail patrons. Although the Downtown Parking Assessment District is primarily intended to support commercial demand, the proposed development provides its own on-site parking supply. The project includes a two-level subterranean parking garage consisting of Level P1 dedicated to commercial parking and Level P2 dedicated to residential parking. A total of 127 vehicle parking spaces will be provided- 56 spaces on Level P1 for the 18,300-square-foot ground-floor grocery store and other commercial uses, and 58 residential spaces on Level P2 reserved for tenants and onsite staff, along with three spaces for onsite office use. The residential parking supply includes eleven spaces for the 44 studio units, 22 spaces for the 15 one-bedroom units, 16 spaces for the 30 two-bedroom units, six spaces for the 31 three-bedroom units, and two shared guest spaces. The project provides residential and commercial parking onsite consistent with certified LUP Policy 20, which requires that new development provide off-street.

²

https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.santamonica.gov%2Fsever%2Frest%2Fservices%2FTransit_Priority_Area%2FFeatureServer%2F2&source=sd

The garage will also provide two standard accessible spaces and one van-accessible space. Electric vehicle (EV) infrastructure will be installed consistent with state and local requirements, including EV-ready and EV-capable spaces. Bicycle parking and storage will be provided consistent with LUP Policy 26, including 102 secure long-term bicycle parking spaces for residents and commercial employees, consistent with LUP Policy 26. In addition, the DDA requires the applicant to provide residents who do not own vehicles with transit passes or shared mobility memberships for 55 years following project completion.

D. WATER QUALITY & MARINE RESOURCES

Construction in the coastal zone has the potential to impact water quality and marine resources, and the Commission imposes conditions on development where necessary to ensure their protection consistent with applicable Chapter 3 and LUP policies. In this situation, Commission has not identified relevant objective LUP policies related to such resources that apply to this project. Nevertheless, the Commission reviewed the project for potential impacts to these resources but has not proposed any special conditions related to these resources given the lack of applicable objective LUP policies. The project site is currently a vacant, paved lot that does not include any landscaped or permeable surfaces. The project includes multiple planter boxes, landscaped terraces, and podium-level courtyards, which will increase the overall pervious surface area onsite and provide limited opportunities for water infiltration and stormwater treatment.

The proposed project includes excavation of approximately 26,000 cubic yards of soil for construction of two subterranean parking levels. The applicant's geotechnical consultant, Geocon West, Inc., prepared a technical report dated December 4, 2024, which indicates that the highest historical groundwater elevation is approximately 40 feet below grade and the current groundwater level is approximately 74 feet below grade. The proposed excavation depth (approximately 22 feet below grade) will therefore maintain a substantial buffer of at least 18 feet above the historically highest groundwater level, and no dewatering measures are proposed. As such, the project is highly unlikely to result in groundwater intrusion, contamination, or interference with surface water flow.

During construction, the project will be subject to the City's standard erosion and sediment control requirements, which include implementing construction Best Management Practices (BMPs) to prevent the discharge of pollutants into the municipal storm drain system. These measures include maintaining covered stockpiles, designating fueling and equipment-maintenance areas, containing construction debris, and ensuring that materials are not stored in areas where they could enter storm drains. Compliance with these requirements will minimize the potential for erosion, sedimentation, or polluted runoff during construction and will ensure that the project does not result in significant adverse effects on water quality or marine resources.

Post-construction, the project will incorporate Low Impact Development (LID) and stormwater management features consistent with the City of Santa Monica's Urban Runoff Pollution Ordinance and standard engineering requirements. These features include flow-through planters, subsurface treatment units, and drought-tolerant landscaping that together reduce runoff volume, promote onsite filtration, and improve water quality prior to

discharge into the storm drain system. These measures are intended to ensure that, once operational, the project will minimize the potential for polluted runoff and support the long-term protection of water quality and marine biological productivity.

E. CULTURAL RESOURCES

Development in the coastal zone has the potential to impact cultural resources, and the Commission imposes conditions on development where necessary to ensure their protection consistent with applicable Chapter 3 and LUP policies. In this situation, Commission has not identified relevant objective LUP policies related to such resources that apply to this project. Nevertheless, the Commission reviewed the project for potential impacts to these resources but has not proposed any special conditions related to these resources given the lack of applicable objective LUP policies. Government Code section 65912.111(h), as amended by AB 2243, requires that, for a project on a vacant site to be eligible for the streamlined review, the site “does not contain tribal cultural resources, as defined by Section 21074 of the Public Resources Code, that could be affected by the development that were found pursuant to a consultation as described by Section 21080.3.1 of the Public Resources Code and the effects of which cannot be mitigated pursuant to the process described in Section 21080.3.2 of the Public Resources Code.”

A cultural resources assessment prepared for the project concludes that, although no known archaeological or paleontological resources have been recorded on the site, ground-disturbing activities could encounter previously unknown materials below the existing fill soils. To address this potential, the study recommends, and the applicant proposes, archaeological spot-checking during initial grading, with full-time archaeological monitoring if intact native soils are identified, followed by full-time paleontological monitoring once older alluvial deposits are reached. If any significant archaeological features, fossil materials, or human remains are discovered, work would halt in the immediate area and a formal discovery protocol—consistent with federal and state requirements, including notification of HUD, the State Office of Historic Preservation, county coroner, and the Native American Heritage Commission—would guide evaluation and treatment. These measures ensure that any inadvertent finds are properly identified and protected during construction. Consistent with the Commission’s Tribal Consultation Policy, staff sent consultation request letters to all Native American tribes, consistent with the Native American Heritage Commission contact list for the LA region. While Commission staff did receive one request for consultation, the additional follow-up attempts to schedule the consultation were not fruitful. In this area, in past consultations on similar projects, Native American tribal governments have recommended the presence of a Native American monitor during grading. The applicant has not proposed to have a Native American monitor present onsite. Because the standard of review is the objective standards of the LUP, without the policies of the Coastal Act, Native American monitoring cannot be required as a condition of approval.

F. LOCAL COASTAL PROGRAM (LCP)

Section 30604(a) of the Coastal Act states:

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

In light of recent state law, the standard of review for this project is consistency with the objective standards of the certified LUP.

In August 1992, the Commission certified, with suggested modifications, the LUP portion of the City of Santa Monica's LCP, excluding the area west of Ocean Avenue and Neilson way (Beach Overlay District). On September 15, 1992, the City of Santa Monica accepted the LUP with suggested modifications. In this case, pursuant to Government Code 65912.114(e), the Commission's review is limited to the objective standards of the certified Santa Monica LUP; thus, the project was not reviewed for conformance with all Chapter 3 or LUP coastal resource protections policies.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by findings showing the approval, as conditioned, 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.

In this case, the City of Santa Monica is the lead agency, and the Commission is a responsible agency for the purposes of CEQA. The City determined the project to be exempt from CEQA per Title 14, Section 15182 (Projects Pursuant to a Specific Plan) of the California Code of Regulations. Section 15182 states that residential projects are exempt from CEQA if the project is: A) located within a transit priority area as defined by Public Resources Code Section 21099(a)(7); B) consistent with a specific plan for which an environmental impact report was certified; and C) consistent with the overall policies of a planning strategy accepted by the State Air Resources Board as adequate to reduce greenhouse gas emissions. The City determined the project meets all criteria listed above.

The Commission's regulatory program for reviewing and granting coastal development permits has been certified by the Secretary for Natural Resources as the functional equivalent of CEQA (14 CCR §15251(c)). As discussed above, regulatory review of the coastal development permit for this project is limited to consistency with the objective standards of the certified LUP.

The findings in this staff report discuss the applicable objective standards of the LUP raised by the proposed project. The Commission incorporates these findings herein by reference. There are no feasible alternatives or feasible mitigation measures available, beyond those already required, that would substantially lessen any significant adverse impact that the activity, as conditioned, may have on the environment, and the project will not have any significant effect on the environment within the meaning of CEQA.

Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is consistent with the requirements of the objective standards of the LUP and conforms to CEQA, to the extent it applies.

APPENDIX A - SUBSTANTIVE FILE DOCUMENTS

Certified Santa Monica Land Use Plan (August 1992)

Geocon West, Inc., "Geotechnical Investigation" dated December 4, 2024.

Envicom Corporation, "Phase I Cultural Resource Assessment/Survey for the 1318 4th Street Affordable Supportive Housing Project, Santa Monica, California" dated October 2024

Fehr & Peers, "Parking & Loading Operations Plan" dated January 2025 parking study 2025