

**CALIFORNIA COASTAL COMMISSION**

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



# W13a

Filed: 06/03/2025  
180<sup>th</sup> Day: 11/30/2025  
Staff: D. Cortez  
Staff Report: 06/26/2025  
Hearing Date: 07/09/2025

## STAFF REPORT: REGULAR CALENDAR

**Application No.:** 5-24-0853

**Applicants:** City of Santa Monica

**Agent:** The Bay Foundation (Attn: Tom Ford)

**Project Location:** Santa Monica State Beach, perpendicular to San Vicente Boulevard, and spans south proximal to the south beach park playground, Santa Monica, Los Angeles County.

**Project Description:** Installation of 38.5 acres of foredune and back dune habitat along 3 miles of coastline in the City of Santa Monica on the public beach as Phase 3 of a living shoreline project. Includes native dune planting, public access pathways, and monitoring to enhance wildlife habitat and coastal resilience.

**Staff Recommendation:** Approval with conditions

## SUMMARY OF STAFF RECOMMENDATION

Staff recommends approval, as conditioned, for the City of Santa Monica and The Bay Foundation to implement Phase 3 of a living shoreline project at Santa Monica State Beach, located in the City of Santa Monica, Los Angeles County. The proposed project consists of the installation of approximately 38.5 acres of new foredune and back dune habitat across Santa Monica State Beach through a phased and passive dune creation approach. This project builds upon the 3.25-acre pilot project (Phase 1) and the 5-acre restoration (Phase 2), creating a connected dune system that stretches from the border of Will Rogers State Beach at the north to the border of Venice Beach at the south and will result in approximately 19% of the City's beach being dedicated to native dune habitat. As refined, the proposed dune area now includes 31.45 acres north of the Santa Monica Pier and 7.10 acres south of the pier.

The project site spans a popular and heavily visited public beach that also serves as a potential habitat area for sensitive species such as the western snowy plover and California grunion. The proposed living shoreline project is a soft, nature-based alternative to traditional shoreline armoring, intended to improve coastal resilience, enhance biodiversity, and promote natural shoreline processes.

The proposed project includes hand-seeding and planting of native dune species, supported by the installation of low-profile, 3-foot-high fencing along three sides of each dune polygon, with open ocean-facing edges to maintain access to recreational beach users. Dune polygons have been designed to avoid major shoreline access routes from parking lots, beach facilities, and volleyball courts. In addition, north-south angled paths are incorporated to reduce wind-driven sand transport and maintain open corridors to the ocean.

The main issue before the Commission is preservation of public access to the shoreline and coastal related recreational opportunities on the sand balanced with the creation of new beach dune habitat. The proposed living shoreline project offers significant benefits, including enhancing coastal resilience by reducing the erosion and loss of beach sand, creating and supporting native dune habitat for sensitive plant and wildlife species, and promoting natural shoreline processes. By establishing vegetated dune systems that can trap and retain sand, the project helps stabilize the beach profile and buffer inland areas from storm surges and sea level rise. In doing so, the project not only restores ecological function to a highly altered urban beach but also provides a soft, adaptive alternative to traditional hard shoreline armoring. As a potential added benefit, the project may slow erosion and buffer nearby beach areas from wave energy, providing long-term protection for public recreational resources. The dunes will be part of the dynamic sand-sharing system that supports shoreline equilibrium between dunes, beach, and offshore bars. The project has been designed to protect public access to and across the beach and avoids impacts to established recreational areas such as the beach trail, volleyball courts, etc.

The proposed project is intended to address coastal hazard risk while protecting and enhancing other coastal resources, including public beach access and recreation, natural shoreline habitat, and visual character. While the living shoreline results in the partial occupation of beach previously available for unrestricted recreation, it has been designed to preserve public access routes and minimize interference with active recreation zones. Although access into vegetated dune polygons will be discouraged in order to allow habitat to establish, public access will not be prohibited.

Staff is recommending that the project be conditioned to avoid or minimize potential impacts to public access, coastal hazards, biological and visual resources, and to ensure proper implementation of the habitat creation goals. Although the project is expected to enhance native dune habitat and promote coastal resilience, it will occupy public beach space and is located in a dynamic coastal environment that may be subject to erosion, flooding, and sea level rise. Therefore, **Special Condition 1** is required, which states that the applicants shall assume the risks of developing in a hazardous coastal zone and waive any future liability claims against the Commission for damage or injury from such hazards. In order to provide an opportunity to evaluate the long-term effectiveness of the dune

creation and make any necessary adjustments, **Special Condition 2** limits the term of the development authorization to five (5) years. **Special Condition 3** requires the applicants to submit a final dune habitat creation and management plan that includes implementation methods, maintenance, monitoring, and use of the revised native plant palette refined by Commission ecologists. To ensure public access is preserved, **Special Condition 4** requires that a shore-side sandy buffer be maintained for lateral access, and a 25 ft. wide vertical access trail be provided through the habitat area; fencing and signage must be designed to avoid obstructing access and may be adjusted as needed. Thus, as conditioned, staff recommends the Commission find the project consistent with Chapter 3 of the Coastal Act and **approve** the project. The motion and resolution are found on page 5.

## TABLE OF CONTENTS

### Contents

<b>I. MOTION AND RESOLUTION</b> .....	<b>5</b>
<b>II. STANDARD CONDITIONS:</b> .....	<b>5</b>
<b>III. SPECIAL CONDITIONS:</b> .....	<b>6</b>
<b>IV. FINDINGS AND DECLARATIONS:</b> .....	<b>9</b>
A. PROJECT DESCRIPTION & LOCATION .....	9
B. PUBLIC ACCESS AND RECREATION .....	10
D. HAZARDS.....	14
C. VISUAL RESOURCES.....	16
E. BIOLOGICAL AND MARINE RESOURCES .....	17
F. LOCAL COASTAL PROGRAM (LCP).....	20
G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) .....	20

### 5APPENDICES

Appendix A - Substantive File Documents

### EXHIBITS

- Exhibit 1 – Project Location
- Exhibit 2 – Site Plan
- Exhibit 3 – Project Renderings
- Exhibit 4 – Phase 1 & 2 Success
- Exhibit 5 – Letters of Support

## I. MOTION AND RESOLUTION

### Motion:

*I move that the Commission **approve** Coastal Development Permit No. 5-24-0853 pursuant to the staff recommendation.*

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

### Resolution:

*The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that 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 extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of 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. **Assumption of Risk, Waiver of Liability and Indemnity.**

- A. By acceptance of this permit, the applicants acknowledge and agree (i) that the site may be subject to hazards from flooding, sea level rise, erosion and wave uprush; (ii) to assume the risks to the applicants and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) 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 (iv) 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.
- B. PRIOR TO ISSUANCE OF COASTAL DEVELOPMENT PERMIT, the applicants shall submit a written agreement, in a form and content acceptable to the Executive Director, incorporating all of the above terms of this condition.

2. **Development Authorization Period.** This CDP authorizes the approved development on a temporary basis for a period of five (5) years from the date of Commission action (i.e., until July 09, 2030). After such time, the authorization for continuation and/or retention of the approved fencing, signage, and active management of the dune habitat shall cease, unless the applicants submit an amendment to this permit, or new Coastal Development Permit application to the Commission, and that amendment or permit is approved, thereby extending the time period for the development. The dune habitat created pursuant to this permit may remain in place.

#### 3. **Dune Habitat Creation and Signage Plan.**

- I. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit, for the review and written approval of the Executive Director, a landscaping plan prepared by a qualified biologist or licensed landscape architect and a public access fencing and signage plan. The plans shall include the following:
  - A. **Dune Habitat Area Footprint.** The Phase 3 dune habitat areas shall be located within designated polygons along Santa Monica State Beach, each ranging from approximately 10 to 13 acres, and shall be designed to preserve a shore-side sandy beach buffer between the seaward edge of the habitat and the mean high

tide line, consistent with Special Condition 4, to ensure continued lateral public access across the project reach. The final configuration of each polygon footprint shall be reviewed and approved by the Executive Director prior to installation.

- B. **Dune Planting.** The dune habitat creation plan shall include a planting plan using native coastal strand and southern foredune plant species (plant palette) including source of plant material and plant installation methods. The plant palette shall be made up exclusively of native plants appropriate to the habitats and region, grown from seeds or vegetative materials obtained from the site or from an appropriate nearby beach location to maintain the genetic integrity of the area. No horticultural varieties, and no coastal bluff species shall be used. The plan shall also include an exhibit that shows the planned locations, numbers, and spacing of the individual plant species, i.e. that depicts their distribution and abundance across the dune area.
- C. **Driftwood.** No local driftwood shall be collected within the dune restoration areas until after the conclusion of the 2026-2027 rainy season. Any initial placement of driftwood following this period shall avoid the use of burned wood. Driftwood may be sourced from other southern California beaches located south of Santa Monica during the above period, provided it is free of invasive species and compatible with the native dune habitat. The use of building material- including, but not limited to, dimensional lumber, plywood, treated wood, or wood containing nails, screws, or other hardware- shall be prohibited. Driftwood placement, where proposed, shall be used to mimic natural wrack accumulation patterns.
- D. **Sand Fencing.** Discontinuous sand fencing shall be temporarily employed to facilitate the establishment of dune hummocks. No sand fencing shall be installed on the seaward perimeter of the dune area. In addition to sand fencing, the design shall include strategic placement of native dune vegetation for dune hummock establishment. Temporary sand fencing and strategic planting, rather than mechanized equipment, shall be employed to establish a natural pattern of dune hummocks. The sand fencing shall be no more than 36 inches in height and designed to be removable in the event of wave uprush.
- E. **Post and Rope Fencing.** Discontinuous post and rope fencing shall be installed to demarcate public access paths between and through dune habitat sites. The post and rope fence shall be no more than 36 inches in height and designed to be removable in the event of wave uprush.
- F. **Signage.** The plan shall include the provision for the installation of signage to be incorporated into the design of the fencing, adequate to inform the public of their right to utilize all public access areas on site, including the designated pedestrian pathways, the lateral portion of the sandy beach at the seaward-most limits of the dune habitat areas, and all areas of the beach and ocean outside of the habitat polygons. Signage already installed as part of Phases 1 and 2 shall be, where necessary, updated or supplemented for Phase 3. For Phase 3, all signage and all QR code content shall be made available in multiple languages, including English and Spanish at a minimum, and shall be updated and maintained by the applicants for the duration of the project.

At least one educational sign shall be placed near or adjacent to the Santa Monica Pier polygon(s) that includes a clear infographic illustrating the project's goals, design, and ecological significance to help educate the high volume of beachgoers in that area.

All signs shall be designed to blend in with the surrounding natural environment and shall not detract from the character of the beach setting. Signs that become subject to erosion, damage, or visual degradation shall be promptly relocated or replaced. The signage plan shall show the location, size, design, and content of all signs, which shall not exceed 24 inches by 36 inches in dimension.

No signs shall be posted on the sandy beach unless specifically authorized by the approved signage plan, a separate coastal development permit, or an amendment to this coastal permit, unless the Executive Director determines that no permit or amendment is required. The signs may indicate that the areas within the project site are sensitive dune habitat. In no instance shall signs be posted prohibiting public coastal access.

- G. **Maintenance.** The plan shall include provisions for on-going maintenance and/or management of the dune habitat – beach enhancement area for the term of this coastal development permit, including procedures for removing and relocating the fencing and signage during predicted storm events that may threaten the integrity of the fence or create a potential public safety hazard. Maintenance authorized under this CDP shall be done by hand.

- II. The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

4. **Public Access.** By acceptance of this permit, the applicants acknowledge and agree that the shore-side buffer area of sandy beach, providing public lateral access along the shoreline, shall extend seaward from the seaward most limit of dune vegetation to the maximum wave uprush limit and shall be passable at all times. Public lateral access and passive recreational use over the entirety of the area running parallel to the shore and extending landward from the ambulatory mean high tide line shall be maintained at all times by the landward re-location of vertical sand fencing and post-and-rope fencing on the upcoast and downcoast sides of the proposed foredune habitat area if the beach area seaward of the first line of dune vegetation is impassible due to consistent high tides, formation of a steep scarp, or some other reason, in which case the public shall be able to pass and repass along the toe of the seaward most dune formation.

If there are any temporary or permanent impacts to public access, the applicant shall inform the Executive Director immediately and shall provide a summary of actions taken.

The approval of this permit shall not constitute a waiver of any public rights that

exist on the property. The permittee shall not use this permit as evidence of a waiver of any public rights that may exist on the property now or in the future.

#### **IV. FINDINGS AND DECLARATIONS:**

##### **A. PROJECT DESCRIPTION & LOCATION**

The project site consists of approximately 38.55 acres of public sandy beach along the City of Santa Monica's coastline ([Exhibit 1](#)). The applicants, the City of Santa Monica and The Bay Foundation propose to implement a passive dune habitat creation project that will install foredune and backdune vegetation across two major segments of the Santa Monica State Beach: approximately 31.45 acres north of the Santa Monica Pier and 7.10 acres south of the Pier ([Exhibit 2](#)). The project is part of a multi-phase initiative to convert approximately 38.5 acres of beach- approximately 19% of the City's total beach area- into native dune habitat and wildlife-supporting vegetation. Combined with the previously authorized 3.25- acre pilot project and the 5- acre Phase 2 project, the cumulative dune area would account for nearly 22% of the total beach footprint.

The project site spans much of the publicly accessible beach within the City of Santa Monica, both north and south of the Santa Monica Pier. The beach is located between the first public road (Pacific Coast Highway) and the sea and runs adjacent to the Ocean Front Walk bike path ([Exhibit 2](#)). The proposed dune polygons are oriented seaward of active use areas, such as volleyball courts, lifeguard towers, and public accessways, and are spaced to maintain lateral and vertical beach access. Polygon spacing has been maximized in several locations to preserve high-traffic entry corridors. The portion of the site north of the Pier lies generally between San Vicente Boulevard and the northern boundary of the Santa Monica Beach Pier Parking, while the southern portion lies south of the pier and spans south proximal to the south beach park playground.

The proposed project is described as habitat "creation" rather than "restoration" due to the artificial nature of the site. Santa Monica State Beach had been subject to decades of artificial nourishment and fill placement, meaning that the current beach was not historically occupied by native dune systems. As such, the project seeks to establish a functioning dune habitat on an artificially widened beach substrate.

The passive dune creation project will not involve sand deposition or significant site preparation. Instead, the applicants propose the installation of 3 ft. high perimeter fencing, left open at the ocean-facing side, and the broadcast of native dune plant seed using hand-held spreaders. Seeds will be lightly raked into the sand to reduce wind dispersal and seed predation by birds. Vegetation will be established using hand-sown seed and planted container stock. The proposed palette includes beach evening primrose (*Camissoniopsis cheiranthifolia*), red sand verbena (*Abronia maritima*), pink sand verbena (*Abronia umbellata*), beach bur (*Ambrosia chamissonis*), beach saltbush (*Atriplex leucophylla*), and dune buckwheat (*Eriogonum parvifolium*), as well as species suitable for backdune and transitional dune edge environments such as California sagebrush (*Artemisia californica*), bush sunflower (*Encelia californica*), and deerweed (*Acmispon*

*glaber*) ([Exhibit 4](#)). Irrigation is not proposed. All planting is anticipated to occur during the fall and winter months to take advantage of natural precipitation. Small vegetated dune hummocks are anticipated to form naturally over time if vegetation establishes successfully, with an expected maximum height of 1-3 ft.

Fencing will be limited to three sides of each dune polygon using 3 ft. high t-posts with sand fencing; the ocean-facing perimeter of each polygon will remain open to allow continued recreational access to the beach and free movement of birds and other wildlife ([Exhibit 3](#)). The fencing is intended to delineate dune areas and assist with plant establishment. Interpretive signage will be attached to fencing, but no free-standing signs are proposed. To accommodate public access, the proposed project includes a network of public pathways. Each primary access corridor will be a minimum of 25 ft. wide and pass through or between the dune polygons. One exception is the ceremonial Native American medicine wheel feature, which includes four cardinaly oriented 10 ft. wide trails ([Exhibit 3](#)).

Phases 1 & 2 ([Exhibit 4](#)) of the Santa Monica Beach Dune Restoration Project have demonstrated the effectiveness of nature-based solutions in restoring coastal ecosystems and enhancing public and ecological value. Phase 1 restored 3 acres of native dune habitat through restricted beach grooming, native plantings, and post-and-rope fencing. Building on this success, Phase 2 added an additional 5 acres south of the Annenberg Community Beach House. Both phases improved habitat conditions for native wildlife, including the federally threatened Western Snowy Plover, which successfully nested at the pilot site for the first time in the Los Angeles region in nearly 70 years. These projects also enhanced the beach's visual landscape, increased public engagement through educational signage and outreach, and provided a natural buffer against sea level rise and erosion, earning broad support from stakeholders and the local community.

The South Coast District office received letters of support for the proposed project from public agencies and environmental organizations (letters attached; see [Exhibit 5](#)).

## **B. PUBLIC ACCESS AND RECREATION**

Section 30210 of the Coastal Act states:

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

Section 30211 of the Coastal Act 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 30213 of the Coastal Act states, in part:

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

Section 30220 of the Coastal Act states:

*Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.*

Section 30221 of the Coastal Act 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.*

The Santa Monica certified LUP includes the following policies:

*32. Continuous pedestrian access to and along the shoreline shall be provided at all times, except in cases of emergency*

*36. Lateral Beach Access. Lateral access along the beach is a public right; no attempts to prohibit or interfere with the public's lawful use of the beach area shall be allowed. Accessways shall be maintained for public use at all times unless temporary closure is required for maintenance, repair or public safety.*

*38. Public Vertical Access. Public vertical access to the beach shall be provided at intervals sufficient to provide maximum public access. The need for vertical access shall be evaluated as part of any new development on Palisades Beach Road.*

*45. In support of developing tourism based on environmental education, the City shall work with the National Park Service and/or other agencies, and organizations to integrate public environmental education efforts with programs of the Santa Monica Mountains National Recreation Area, or other appropriate programs supporting the protection of terrestrial or marine environments within the local region.*

Environmental Justice

Section 30013 of the Coastal Act states:

*The Legislature further finds and declares that in order to advance the principles of environmental justice and equality, subdivision (a) of Section 11135 of the*

*Government Code and subdivision (e) of Section 65040.12 of the Government Code apply to the commission and all public agencies implementing the provisions of this division. As required by Section 11135 of the Government Code, no person in the State of California, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, or disability, shall be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination, under any program or activity that is conducted, operated, or administered pursuant to this division, is funded directly by the state for purposes of this division, or receives any financial assistance from the state pursuant to this division.*

The proposed project site is located on a broad, approximately 400-foot-wide beach within the far north and south portions of Santa Monica State Beach (“SMS Beach”) and is situated entirely seaward of the existing lateral public bicycle path (Ocean Front Walk), which runs along the landward edge of the beach ([Exhibit 2](#)). SMS Beach and the adjacent Santa Monica Pier (“Pier”) are among the most heavily used public beach areas in the region. Ocean Front Walk provides high volumes of bicycle and pedestrian access and is a vital component of public coastal mobility along the shoreline. These beach areas are especially accessible to many low-income inland communities, as it is in proximity to major public transit options (most notably, the LA Metro’s E line).

The proposed dune habitat areas are immediately bounded by sandy beach, the sea, the public bicycle path on the landward side, and multiple lifeguard towers along the project extent ([Exhibit 2](#)).

As detailed above, the project has been carefully designed to preserve public access and minimize interference with active recreational use. Dune habitat will be installed in non-continuous polygons that are spaced to maintain wide corridors of lateral shoreline access and to avoid conflicts with major beach entrances, lifeguard facilities, and recreational infrastructure such as volleyball courts. The applicant worked with Commission staff to adjust the project so that polygon orientation and dimensions have been modified to reduce depth and create wider gaps between installations. These adjustments address public concerns regarding crowding and circulation.

Although the project will occupy sandy beach area and result in a reconfiguration of recreational space, the applicants have incorporated a shore-side buffer between the dunes and the ocean. This buffer will vary in width from 7 feet to more than 49 feet depending on seasonal changes in beach profile and tidal activity. This design ensures that the beach will remain passable even during high tides and storm events, and fencing may be adjusted as necessary to maintain the required access corridors.

SMS Beach is one of the most highly used recreational shorelines in California, drawing both local residents and millions of annual visitors. Use of the northern and southern ends of the beach is generally less intense than areas immediately adjacent to the Pier. The selected project locations take advantage of these lower-use areas and avoid proximity to concentrated public facilities such as restrooms, concessions, and major parking lots, while remaining close enough to be publicly visible and accessible. For example, parking is

located approximately 800 feet north and 1,300 feet east of the northern project boundary along Pacific Coast Highway, with the nearest restrooms located at the Annenberg Community Beach House.

The Commission recognizes that any development seaward of the first public road may impact lateral and vertical beach access. However, the applicants have justified the location based on ecological function and scientific research goals. Proximity to the shoreline is considered essential for capturing aeolian sand, retaining wrack, and evaluating dune performance in response to sea level rise and storm surge. The project area is also near a temporary enclosure for western snowy plover (*Charadrius nivosus*), a state species of special concern, located approximately 1,640 feet downcoast, suggesting the potential for beneficial wildlife interactions once vegetation is established. Importantly, the landward edge of the dune polygons will be set back approximately 100 feet from Ocean Front Walk to avoid interfering with possible future expansions of pedestrian and bicycle infrastructure. The City has indicated that this buffer will preserve space for potential improvements to circulation and safety in this area of the beach, which currently lacks a dedicated pedestrian pathway.

In response to public input and to further promote public use and awareness, the applicants propose a central sandy trail through each major dune polygon. These trails will be approximately 25 feet wide and delineated with 3-foot post and rope fencing to guide pedestrian traffic. Educational signage will be installed on fencing perimeters to inform the public of the ecological purpose of the dunes and to encourage respectful use of the space without restricting access.

Although the project will reallocate recreational beach sand space, the proposed layout ensures that surrounding beach areas—including the intertidal zone, adjacent sandy beach, and the corridors between dune polygons—will remain fully accessible to the public. As a potential added benefit, the project may slow erosion and buffer nearby beach areas from wave energy, providing long-term protection for public recreational resources. The dunes will be part of the dynamic sand-sharing system that supports shoreline equilibrium between dunes, beach, and offshore bars.

Given the popularity and high accessibility of these beach areas for inland visitors, it is important to note that language presents a barrier for many individuals from communities who have limited English language proficiency.<sup>1</sup> These communities would benefit from signage that affirmatively supports beach access and education regarding the habitat creation taking place. In order to promote equitable access and to ensure clarity and enforceability, **Special Condition 3** requires a Public Access Fencing and Signage Plan that makes all signage and QR code destinations available in multiple languages. Moreover, the Plan specifies signage content, size, and placement to inform the public of their rights while identifying sensitive dune areas. Signs that restrict lawful access will not be permitted.

---

<sup>1</sup> In the City of Los Angeles, nearly a quarter of the population aged 5 years and older are considered to speak English less than "very well". [American Community Survey](#), (2015-2019) pulled from Healthy Places Index.

**Special Condition 4** requires that the applicants adjust fencing if public access along the seaward dune edge becomes impassable due to high tides, ensuring that beachgoers can continue to traverse the shoreline. Furthermore, **Special Condition 2** limits the permit authorization to five years to allow for mid-project evaluation of public access impacts.

As conditioned, the project will protect and maintain public access to and along the shoreline consistent with the public access and recreation policies of Chapter 3 of the Coastal Act and the City of Santa Monica LUP while allowing for innovative nature-based adaptation to climate change and enhanced recreational and educational opportunities.

## **D. HAZARDS**

Section 30253 of the Coastal Act states, in relevant part:

*New development shall:*

*(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*

*(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The proposed project site is located on a sandy beach within the Santa Monica State Beach ("SMS Beach"), adjacent to the jurisdictional boundary of Los Angeles County's Will Rogers State Beach. The applicants are proposing Phase 3 that includes the creation of 38.55 acres of foredune and backdune habitat on the public sandy beach. The proposed dune habitat area on-site will generally consist of an approximately 164 ft. (50 m.) wide and 541 ft. (165 m.) long footprint and will extend seaward towards the intertidal waterline. Between the dune habitat area and the ocean water, a shore-side buffer consisting of intertidal dry/wet sand is proposed to remain with a length of approximately 541 ft. (165 m.) and a width that will vary from approximately 7 ft. (2 m.) to greater than 49 ft. (15 m.) depending on seasonal beach face slope variation and tidal influences.

Because the project site is immediately adjacent to intertidally wet sand, it is apparent that a wide sandy beach will not afford the proposed dune habitat protection from wave and flooding hazards. Consequently, projected sea level rise and a series of significant storms, or an El Nino year, have the potential to degrade the proposed dune habitat.

For instance, sea level has been rising slightly for many years. In the Santa Monica Bay area, the historic rate of sea level rise, based on tide gauge records, has been 1.8 mm/yr. or about 7 inches per century.<sup>2</sup> Recent satellite measurements have detected global sea

---

<sup>2</sup> Lyles, S.D., L.E. Hickman and H.A. Debaugh (1988) *Sea Level Variations for the United States 1855 – 1986*. Rockville, MD: National Ocean Service.

level rise from 1993 to present of 3 mm/yr. or a significant increase above the historic trend observed from tide gauges. Recent observations of sea level along parts of the California coast have shown some anomalous trends; however, there is a growing body of evidence that there has been a slight increase in global temperature and that an accelerated rate of sea level rise can be expected to accompany this increase in temperature. Sea level rise is expected to increase significantly throughout the 21<sup>st</sup> century, and some coastal experts have indicated that sea level rise of 3 to 5 feet or more could occur by the year 2100.<sup>3</sup> Mean water level affects shoreline erosion in several ways, and an increase in the average sea level will exacerbate all these conditions.

On the California coast the effect of a rise in sea level will be the landward migration of the intersection of the ocean with the shore. On a relatively flat beach, with a slope of 40:1, a simple geometric model of the coast indicated that every centimeter of sea level rise will result in a 40-centimeter landward movement of the ocean/beach interface. Accompanying this rise in sea level will be increased wave heights and wave energy. Along much of the California coast, the bottom depth controls the nearshore wave heights, with bigger waves occurring in deeper water. Since wave energy increases with the square of the wave height, a small increase in wave height can cause a significant increase in wave energy and wave damage.

It should be noted, however, that the applicants — the City of Santa Monica and The Bay Foundation — are aware of the potential coastal hazard risks associated with the proposed Phase 3 project areas. Similar to the previous phases, portions of the Phase 3 dune polygons are intentionally located adjacent to the shoreline. This placement is a critical component of the continued implementation of this pilot project, which remains experimental in nature and is intended to evaluate the ecological and protective functions of restored coastal dune systems. The goal of Phase 3 is to expand the living shoreline approach along 3 miles of Santa Monica State Beach, allowing for broader scientific evaluation of the dune habitat's ability to buffer against sea level rise, storm surge, and wave erosion. By situating the restored dune areas at the dynamic interface between land and sea, the project can provide essential data on the performance and resilience of “soft” shoreline protection measures.

This phase of the pilot continues to serve as an alternative to traditional “hard” coastal armoring structures, such as seawalls, revetments, and groins, which are known to have adverse impacts on shoreline dynamics, sand supply, public access, and visual resources. In contrast, the Phase 3 dune creation aims to use passive, low-impact methods—including strategic native vegetation planting and temporary fencing—to reintroduce natural landforms that can help dissipate wave energy, retain sand, and restore native habitats. The applicants will collect physical data including beach slope, shoreline

---

<sup>3</sup> Cayan, D.R., M. Tyree, M. Dettinger, H. Hidalgo, T. Das, E. Maurer, P. Bromirski, N. Graham, and R.E. Flick, 2009. *Climate Change Scenarios and Sea Level Estimates for the California 2008 Climate Change Scenarios Assessment*, Draft Paper, CEC-500-2009-014-D, 62 pp, <http://www.energy.ca.gov/2009publications/CEC-500-2009-014/CEC-500-2009-014-D.pdf>.

movement, and dune morphology to assess site changes over time and to compare the performance of restored areas to surrounding unrestored beach zones.

As with the earlier phases, the Phase 3 site is also subject to potential risks, including wave attack, seasonal erosion, flooding, and long-term sea level rise. While the applicants propose to monitor and maintain the site for a 10-year period, the development authorization under this permit is limited to 5 years pursuant to **Special Condition 2**. This term allows the Commission the opportunity to reassess the risk to life and property to assure consistency with Section 30253.

The applicants have indicated that if dune habitat is lost or significantly impacted by coastal events during the term of the permit, they would consider implementing remediation measures such as re-establishing sand fencing and reseedling with native vegetation, in coordination with Commission staff. The overall objective remains to document the natural evolution and durability of these restored dune habitats under real-world conditions, thereby informing future adaptation strategies and restoration planning across the region.

Given the applicants' decision to proceed with Phase 3 in a high-energy coastal environment, the applicants must assume the risks inherent to such development. Therefore, in accordance with Section 30253, **Special Condition 1** requires the applicants to acknowledge these risks and waive any future claims of liability against the Commission for damage to life or property resulting from hazards such as wave attack, flooding, or erosion.

To ensure that the proposed project is consistent with Section 30253 of the Coastal Act, and to ensure that the proposed project does not result in future adverse effects to coastal processes, the Commission imposes **Special Conditions 1 & 2**. As conditioned, the Commission finds that the proposed project is consistent with Coastal Act Section 30253.

## **C. VISUAL RESOURCES**

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

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

Major scenic resources in the City of Santa Monica are identified in the City's Local Coastal Land Use Plan and the City's Scenic Corridor Element. Scenic resources include the coastline, beach and bay, natural habitat areas, the Santa Monica Pier, Pacific Palisades bluff, and the Santa Monica Mountains and canyons. The project site is located on the beach, and the area provides beachgoers, pedestrians, and bicyclists views of

these scenic resources. Viewpoints from the surrounding area include the beach, the bike path on the beach, the ocean, bluffs and landward development.

The applicants are proposing a continuation and expansion of a passive dune creation project along SMS Beach. For the implementation of Phase 3, two types of fencing are being proposed. As in Phases 1 and 2, the perimeter of each dune polygon will be delineated with t-posts and 3-foot-high sand fencing on three sides, while the ocean-facing side will remain unfenced to allow continued public access to the beach and ocean. The sand fencing is necessary to support natural sand accumulation and vegetation establishment and to clearly delineate sensitive dune habitat areas.

In addition to perimeter fencing, the applicants propose the installation of post and rope fencing to delineate designated access paths throughout the project area. These include vertical access trails approximately 25 feet wide, as well as narrower features such as a ceremonial medicine wheel with 10-foot-wide cardinal direction pathways. These features are designed to provide clear pedestrian circulation while minimizing disturbance to the developing habitat.

As viewed from Ocean Front Walk and from other vantage points along the beach, the fencing and dune formations will not obstruct views to and along the ocean. The 3-foot maximum height of the fencing, its visually permeable design, low growing vegetation, and the non-continuous layout of dune polygons across the site will prevent impacts to coastal views. The sand fencing is temporary. The applicants have indicated that sand fencing may be removed over time as dune features become self-sustaining. **Special Condition 2** requires that prior to the expiration of the development authorization (five years from the date of Commission action), the applicants or successor in interest shall submit a complete coastal development permit application or amendment request for reauthorization. This will provide the Commission an opportunity to reassess any visual impacts associated with project and make any necessary adjustments.

As with the prior phases, the establishment of dune vegetation is expected to result in the gradual formation of natural hummocks reaching a maximum height of approximately 1 to 3 feet. These hummocks are not anticipated to significantly obstruct ocean views and are expected to visually blend into the broader beach landscape. Additionally, the City of Santa Monica identifies natural habitat areas as scenic resources in its Local Coastal Land Use Plan and Scenic Corridor Element. As such, the restored dune landscape may enhance the visual quality of the beach by reintroducing native habitat features, as successfully demonstrated in Phase 1 and Phase 2, where the established dune areas contributed to a more natural and visually appealing coastal environment.

As conditioned, the Commission finds that the proposed project has been designed to protect ocean and coastal views, consistent with the visual resource protection policies of the City's certified Local Coastal Land Use Plan and Section 30251 of the Coastal Act.

## **E. BIOLOGICAL AND MARINE 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 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 that:

*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 Coastal Act policies identified above require the protection of marine and biological resources and environmentally sensitive habitat areas.

The applicants propose to create approximately 38.5 acres of foredune and back dune habitat along Santa Monica State Beach through a phased approach, with implementation occurring in four geographic dune areas spaced along roughly 5 km (3.1 mi) of coastline. Each polygon area will generally range between 10 and 13 acres. The proposed native dune habitat creation will rely on passive methods and will not require sand import or major site preparation. Each polygon will be seeded with native dune species and managed for up to ten years.

The proposed plant palette for Phase 3 has been revised and refined by Coastal Commission ecologists, Dr. Jonna Engel and Kaylee Griffith, from earlier phases and will consist exclusively of native coastal strand and southern foredune species including, but not limited to: beach evening primrose (*Camissoniopsis cheiranthifolia*), red sand verbena (*Abronia maritima*), beach bursage (*Ambrosia chamissonis*), sea scale (*Atriplex leucophylla*), and pink sand verbena (*Abronia umbellata* var. *breviflora*), among others. All species have been selected for their ecological appropriateness and function as dune-building or stabilizing vegetation. Irrigation is not proposed. Seeding will occur during the fall and winter months to maximize germination success during the rainy season.

Initial implementation will consist of installing discontinuous sand fencing and rope-and-post perimeters to promote natural sand accumulation and seed retention. Seeds will be hand-broadcast using hand-held spreaders and gently raked into the surface to minimize loss due to wind or bird activity. Mechanized equipment will not be used. The Commission imposes **Special Condition 3** to ensure that only Commission-approved species are

planted and that sand fencing is temporary and limited in height, consistent with the creation of naturally forming dune hummocks over time.

Although Santa Monica State Beach does not currently support naturally occurring, self-sustaining dune systems, recent efforts have established small patches of restored dune habitat through the implementation of earlier phases of this project. Phase 1 (2016) and Phase 2 (2021) together restored approximately 8.25 acres of foredune habitat on SMS Beach, creating important vegetated areas using native coastal strand species. While these restored dune sites were not naturally formed, they demonstrate the viability of passive dune creation in highly urbanized beach environments and have provided critical insights for the design and adaptive management of the Phase 3 expansion. These earlier projects represent a significant step toward reintroducing native dune communities to a coastline that has long been altered by nourishment, compaction, and recreational development. The continued expansion through Phase 3 proposes to build on this foundation and aims to scale up habitat coverage and ecological functionality, contributing to the regional restoration of this highly threatened habitat type. The proposed project aims to passively recreate a functioning foredune habitat community that, once established, may support native invertebrates, birds, and plant species uniquely adapted to dynamic beach environments.

The project site is within the known range of the California grunion (*Leuresthes tenuis*), a small, silvery fish known for its rare spawning behavior on sandy beaches during nighttime high tides from March through August. The eggs are deposited in the sand and incubate for 10–15 days before hatching with the next series of high tides. Because of its specialized reproductive behavior and vulnerability to human disturbance, the California grunion is considered a species of special concern. Any ground disturbance during the spawning season, including raking or fencing, has the potential to harm incubating eggs. However, implementation activities for Phase 3 are scheduled for the fall/winter season, outside of the grunion spawning window. As such, the project is not anticipated to adversely affect grunion populations.

To maximize protection of marine resources and sensitive habitat, the Dune Habitat Plan includes hand-seeding and container planting of native coastal strand and southern foredune species sourced from local or nearby genetic stock, with no horticultural varieties or coastal bluff species allowed. Driftwood placement to mimic natural wrack patterns will be prohibited until after the 2026–2027 rainy season, and only clean, unburned driftwood from beaches south of Santa Monica may be used—construction debris, treated wood, or any material containing nails or hardware is strictly prohibited.

The proposed foredune habitat would be created and maintained in a manner that would sustain and enhance the biological productivity of coastal waters. As proposed and conditioned, the Commission finds that the project is consistent with Sections 30230 and 30231 of the Coastal Act regarding protection and enhancement of biological productivity and coastal water quality, and that it may contribute to long-term ecological restoration of a rare and declining habitat type within the Southern California coastal zone. The Commission, therefore, finds that, as conditioned, the proposed development will be consistent with Section 30230 and 30231 of the Coastal Act.

## **F. LOCAL COASTAL PROGRAM (LCP)**

Coastal Act section 30604(a) states that, prior to certification of a local coastal program (“LCP”), a coastal development permit can only be issued upon a finding that the proposed development is in conformity with Chapter 3 of the Act and that the permitted development will not prejudice the ability of the local government to prepare an LCP that is in conformity with Chapter 3. In August 1992, the Commission certified, with suggested modifications, the land use plan portion of the City of Santa Monica's Local Coastal Program, 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. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act. Approval of the project, as conditioned, will therefore 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.

## **G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

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

The findings above are incorporated herein by reference. The Commission also analyzed various alternative locations for the project but determined that they were either infeasible or would have greater environmental impacts. The development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. **Special Conditions** imposed will mitigate adverse impacts to coastal resources and public access. The **Special Conditions** address the following issues: **1)** an assumption of risk agreement to acknowledge inherent coastal hazards adjacent to the project; **2)** duration of permit with limited development authorization period; **3)** final dune habitat creation plan; and **4)** public access requirements. Therefore, the Commission finds that there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect of the proposed project and finds that the project is consistent with CEQA and the policies of the Coastal Act.

## **Appendix A - Substantive File Documents**

- Coastal Development Permit Application No. 5-16-0632
- Coastal Development Permit Application No. 5-06-0343-W: Temporary Western Snowy Plover Enclosure