



U.S. Department of Housing and Urban Development

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The following Suggested Format was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, lenders, and nonprofits) who assist HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves.

Environmental Assessment

Project Information

Project Name: Tierra Apartments Affordable Senior Housing Project

Applicant/Grant Recipient: Hollywood Community Housing Corporation (HCHC)

Point of Contact: Ayala Scott, City of Santa Monica

HUD Preparer: Rachel Kwok, Environmental Planner, City of Santa Monica

Consultant (if applicable): Envicom Corporation (Attn. Laura Kaufman, VP/Dir. Environmental Services)

Direct Comments to: Ayala Scott, City of Santa Monica

Does this project involve over 200 lots, dwelling units, or beds?

- Yes (Project requires approval from the Environmental Clearance Officer (ECO))
- No

Funding Information

Grant Number	HUD Program	Funding Amount
	Project Based Vouchers (PBV)	\$18,921,600.00

The Application is for 40 one-bedroom apartments at 1211-1217 14th St./1402 Wilshire Blvd. of approximately \$946,080 annually for 20 years, with a total anticipated funding of \$18,921,600. The funding is based on the Fiscal Year 2025 Los Angeles-Long Beach-Glendale, CA HUD Metro Area Fair Market Rents (FMRs) for one-bedroom apartments. The contract rent and utility allowances are as follows:

-
- Number of Units: 40
 - Bedroom Size: 1
 - Contract Rent: \$1,971
 - Utility Allowance: \$110
 - Gross Rent: \$2,081

Estimated Total HUD Funded Amount: \$18,921,600.00

Estimated Total Project Cost: (HUD and non-HUD funds): \$77,694,371

Project Location:

Provide a street address or intersection for your project and validate the address using the button below. If the project affects a large area, such as an infrastructure or community services project, select a representative address and describe the project location in a narrative in the provided textbox. If the project location is sensitive, you may provide an alternative address, such as the address of your city hall or nonprofit in lieu of the exact location of the project.

1211-1217 14th Street and 1402 Wilshire Blvd (Los Angeles County Assessor Parcel Numbers: 4282-003-900, 4282-003-901; 4282-003-020)

Description of the Proposed Project [24 CFR 50.21 & 58.32]:

Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership.

HCHC proposes to develop the Tierra Apartments Affordable Housing Project (Tierra Apartments, or project) comprising 80 affordable housing units and two (2) managers units, which qualifies as a 100% senior affordable housing project. The project would be located at 1211-1217 14th Street and 1402 Wilshire Blvd, in the City of Santa Monica (or City) on approximately 0.58 acres. The SMHA has accepted HCHC’s PBV request, determining that the project meets the criteria for the program and approving an award of up to 40 PBVs, subject to completion of the environmental review. All PBV apartments will be set aside for families at 30% of area median income (AMI) or below. The project will provide residential uses in close proximity to commercial and transportation opportunities, serving as an infill, transit-oriented development that would create a more vibrant and sustainable community and reduce greenhouse gas emissions. Project plans are located in **Attachment A**.

Statement of Purpose and Need for the Proposal:

The underlying purpose and need to which the agency is responding in proposing the action and its alternatives. Describe how the proposed action is intended to address housing and/or community development needs.

The project’s purpose and need is to provide housing for low income families. Such housing is in short supply in the local area, the City and the region as a whole. The project would also contribute to meeting the City’s Regional Housing Needs Allocation as required by the State.

Existing Conditions and Trends:

Determine existing conditions and describe the character, features, and resources of the project area and its surroundings; identify the trends that are likely to continue in the absence of the project.

The project site is located within a highly urbanized area of Santa Monica, on the southeast corner of 14th Street and Wilshire Boulevard. The property has been developed for decades and is currently developed with a commercial building and a separate, paved public parking lot.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate. Related Law and Authority Worksheets can be found - <https://www.hudexchange.info/resource/4707/environmental-review-record-related-federal-laws-and-authorities-worksheets/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> *=Standard Compliance Only)	HUD Guidance on compliance with 24 CFR Part 51 Subpart D excludes projects that are further than 15,000 feet from a military airport and further than 2,500 feet from a civilian airport. There are no military airports located within 15,000 feet of the project site (the closest is Los Angeles Air Force Base approximately 51,000 feet, or 9.7 miles away). There are no civilian airports within 2,500 feet of the project site (the closest is Santa Monica Airport approximately 10,500 feet, or 2.0 miles away), as shown in Attachment B . The project is thus not subject to further analysis of Airport Hazards and is found to be in conformance with the statute, and no mitigation is required.
Coastal Barrier Resources	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	HUD Guidance on the Coastal Barrier Resources Act (CBRA) compliance refers to the Coastal Barrier Resource System

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		mapping to determine applicability of this statute. There are no Coastal Barrier Resource System units mapped on the coast of California, as shown in Attachment C . Therefore, the CBRA does not apply to the project, the project is found to be in conformance, and no mitigation is required.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	HUD Guidance on Flood Insurance requires compliance and documentation of Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) classification to establish whether the project site is in a Special Flood Hazard Area (SFHA). The project site is not located within a SFHA identified by the FEMA FIRM, as shown in Attachment D . Therefore, Flood Insurance requirements do not apply to the project, the project is found to be in conformance, and no mitigation is required.
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>HUD Guidance for conforming to the Clean Air Act requires that the project analysis identify if the project is located in an air quality management district that is in nonattainment or maintenance status. If a project is located in a nonattainment status district, the project must not exceed de minimis levels.</p> <p>The project site is located within the South Coast Air Quality Management District (SCAQMD) which is in nonattainment for 1-hour and 8-hour ozone, Particulate Matter (PM)-2.5, and PM-10 levels. The project’s construction and operations emissions were estimated using the California Emissions Model (CalEEMod) version 2022.1.1.30. The CalEEMod output sheets are provided in Attachment E. The project’s emissions would be below SCAQMD thresholds and would not impede attainment of federal air quality standards in accordance with the Clean Air Act, and no mitigation is required.</p>
Coastal Zone Management	Yes No	HUD Guidance on compliance with 24 CFR Part 58.5 Subpart C requires that the

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>project complies with the state’s coastal management plan. The California Coastal Commission manages the coastal zone pursuant to the Coastal Act. Santa Monica’s Coastal Zone is approximately 1.5 square miles and contains two major areas: The publicly owned shoreline and sandy beach, and fully urbanized inland areas near the coast. The project site is not located in the City’s coastal zone, as shown in Attachment F.</p> <p>Based on the above, the proposed project aligns with the California Coastal Act and conforms with the statute. No mitigation is required.</p>
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>HUD Guidance on compliance with 24 CFR Part 50.3(i) and 58.5(i)(2) requires an analysis of health and safety concerns to project’s occupants by checking if there are any on-site or nearby toxic, hazardous, or radioactive substances found. Pacific Environmental Company, prepared two Phase I Environmental Site Assessments (ESAs) for the project site in conformance with the American Society for Testing and Materials (ASTM) International E1527-21 scope of work, included as Attachment G-1¹ and G-2.² The Phase I ESA did not identify the project site on any hazardous waste/materials databases and did not find evidence of recognized environmental conditionals (RECs), controlled RECs, or Historic RECs in connection with the subject property. Therefore, the Phase I ESA determined no additional investigation is recommended. Therefore, the project complies with 24 CFR Part 50.3(i) and 58.5(i)(2), and the project is found to be in conformance. No mitigation is required.</p>
Endangered Species	Yes No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>HUD Guidance on compliance with the federal Endangered Species Act (ESA) is to determine if project activities can potentially affect any rare, threatened or</p>

¹ Pacific Environmental Company, Phase I Environmental Site Assessment Report, July 22, 2024.

² Pacific Environmental Company, Phase I Environmental Site Assessment Report, November 22, 2024.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402		<p>endangered species or habitat. Using accessible California Department of Fish and Wildlife’s tools, a California Natural Diversity Database (CNDDDB) desk-top search was conducted for the project site, as shown as Attachment H. The CNDDDB search conservatively included California listed species in addition to federally-listed species at the Project Site. No reported historical occurrences overlapped with the project site. Based on the records, plus the site’s location within a highly developed, urbanized area, no rare, threatened or endangered species are expected to occur at the site. The present-day project site does not have natural habitats and is not of value for rare, threatened or endangered species. The project’s activities associated with the construction or operation of the affordable senior housing project to replace existing commercial development and would have no substantive adverse effect on endangered species. No mitigation is required.</p> <p>It is noted that all development projects must comply with the Migratory Bird Treaty Act (MBTA), which protects all nesting birds, including those protected by the ESA. Due to the MBTA, projects proposing construction during the Spring nesting bird season are required to conduct surveys prior to construction activities and avoid disturbing nests.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance on compliance with 24 CFR Part 51 Subpart C requires projects to be separated from aboveground storage tanks (ASTs) by distance based on the contents and volume of the AST. The criteria set forth by HUD Guidance requires analysis of ASTs within the following parameters: 1) by proximity (within one mile of the project site), 2) by capacity (with a capacity of greater than 100 gallons), and 3) by contents (containing liquid industrial fuels or contains hazardous liquids or gases that</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>are not common liquid industrial fuels). For ASTs that meet the criteria listed above, they either must be excluded by exceptions established by HUD Guidance or must be located beyond the Acceptable Separation Distance (ASD) listed for the capacity and contents of the AST to avoid project impact.</p> <p>CalEPA's Regulated Site Portal was used to identify all ASTs within one mile.³ ASD for each was then calculated using the HUD exchange ASD electronic assessment tool.⁴ Based on CalEPA's Regulated Site Portal and HUD's ASD electronic assessment tool, all ASTs located within one mile of the project site were found to be located beyond the calculated ASD. Therefore, the project is not subject to further analysis of Explosive and Flammable Hazards and is found to be in conformance with the statute. No mitigation is required.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance states federal projects are subject to the Farmland Protectional Policy Act (FPPA) if they irreversibly convert farmland to a non-agricultural use. Compliance is demonstrated by showing the project site is not located on "Important Farmland". The project site is developed with a commercial building and parking lot, and is located on a developed property that has been urbanized, along with the surrounding area, for decades. California Important Farmland Finder shows the project site is located on Urban and Built-up Land,⁵ as shown in Attachment I. Therefore, the FPPA does not apply to the project, and the project is found to be in conformance with the statute. No mitigation is required.</p>

³ CalEPA, Environmental Mapping Tools and Data, CalEPA Regulated Site Portal, Accessed on October 14, 2025 at: <https://siteportal.calepa.ca.gov/nsite/map/help>.

⁴ U.S. Department of Housing and Urban Development, HUD Exchange, Acceptable Separation Distance (ASD) Electronic Assessment Tool, accessed on October 14, 2025 at: <https://www.hudexchange.info/environmental-review/asd-calculator/>.

⁵ California Department of Conservation, California Important Farmland Finder, Accessed October 16, 2025 at <https://maps.conservation.ca.gov/DLRP/CIFF/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance on compliance with 24 CFR Part 55 requires the project to address flood risk, including viable approaches to determining the extent of the Federal Flood Risk Management Standard (FFRMS) floodplain designed to account for increased flood risk over time, and determine if the project is required to follow the 8-step or 5-step process for complying with the floodplain management requirements of 24 CFR 55.20. The Project is not located within the 500-year floodplain (or 0.2 percent annual chance floodplains) as depicted on the FEMA FIRM d, as shown in Attachment D.⁶ Projects located outside the 500-year floodplain are exempt from further analysis such as the 5-step or 8-step decision making process and are determined to be in compliance with the floodplain management Executive Order (EO). Based on the mapping, the project is compliant with the EO, and no mitigation is required.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance on Historic Preservation is to evaluate compliance with Section 106 following procedures that the Advisory Council on Historic Preservation outlined in 36 CFR Part 800. A Section 106 analysis report was prepared for the site by Envicom Corporation (Attachment J), which outlines the environmental and geological setting, cultural setting, legal context, and record search results, and provides recommendations and conclusions. While the report findings were negative for cultural resources within the disturbed and previously developed project site, the records search indicated that the site is located within a region sensitive for older historical cultural resources. Archaeological and Paleontological monitoring is recommended, due to the sensitivity of the area for Pleistocene-epoch</p>

⁶ FEMA, National Flood Hazard Layer FIRMette, Map imported on October 28, 2025.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>paleontological resources. The analysis report in Appendix J provides detailed recommendations for monitoring, resources discovery protocol, and for the inadvertent discovery of human remains. Since the recommendation for “discovery protocol” is merely enforcing standard California compliance requirements, it is not considered a mitigation measure for the purposes of environmental analysis.</p> <p>The City initiated consultation with two Indian tribes listed on HUD’s Tribal Directory Assessment Tool on December 5 and 8, 2025, with follow-up efforts made by fax and email on February 20, 2026, and follow-up phone calls made on February 23, 2026. To date no response has been received.</p> <p>The City of Santa Monica initiated consultation with seven Indian tribes listed on the Native American Heritage Commission contact list on February 23, 2026. The Gabrielino Tongva Indians of California Tribal Council responded on the same date asking if any cultural reports were produced as a result of the undertaking and expressing concern as the location of the undertaking is near a recorded village. The City followed up on February 23, 2026, with a copy of the report. No further responses have been received from the tribe or from other tribes included in this consultation.</p> <p>The City of Santa Monica initiated consultation with the Santa Monica Conservancy on January 14, 2026. On January 26, 2026, the Santa Monica Conservancy responded stating that the Conservancy conducted a site visit and does not believe that the Undertaking will have any negative impacts on historic properties.</p> <p>The City of Santa Monica initiated consultation with the State Office of Historic Preservation on December 10,</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		2025. The State Historic Preservation Officer's concurrence letter regarding the City's finding of No Historic Properties Affected is provided as Attachment J1.
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The cited federal noise statutes are used by HUD to protect residential properties from excessive noise exposure. As screening criteria, HUD Guidance for project compliance is that properties within 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles are of particular concern for noise impacts. Should the project not meet these screening criteria, the HUD exterior noise standards (criteria) for new housing construction are applicable. The HUD Noise Study Report for Tierra Affordable Senior Housing Project (Noise Study) (Attachment K) prepared by MD Acoustics identifies applicable HUD regulations and evaluates project compliance. HUD Guidance does not define the term "major roadway," the entire roadway noise environment was considered. The loudest roadway noise generators near the proposed project residences would be Wilshire Boulevard and 14th Street, both of which were studied to determine if they could result in excessive noise exposure to the future project residences.</p> <p>Based on the analysis in the Noise Study, the project's outdoor usable areas with potential noise-sensitive uses would comply with HUD 65 (day night average sound level) DNL standard. Exterior Noise levels at the building façade facing Wilshire Boulevard are projected at up to 71 dBA DNL and facing 14th Street projected at up to 71 dBA DNL. Based on exterior/interior wall assembly and window assemblies, noise attenuation would be below 45 dBA DNL, which meets the required indoor standard. As impacts were found to be less than significant, as described below, analysis of additional roadways with less noise impact on the project site were not evaluated. The</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		project would not be exposed to noise levels exceeding HUD criteria, the project would be in compliance with the cited noise control statutes.
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance on Sole Source Aquifer (SSA) compliance refers to review of the EPA SSA Maps. Based on review of the SSA maps, the project site is not located on a sole source aquifer, as shown in Attachment L.⁷ Therefore, the SSA does not apply to the project, the project is found to be in conformance, and no mitigation is required.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance on Wetlands Protection mapping or other documentation supporting the determination that the project does not impact on- or off-site wetlands. If the project would affect wetland, then an 8-step decision-making process is required. The U.S. Fish and Wildlife Service National Wetlands Inventory website does not map any wetlands within the project site, as shown in Attachment M. The project is developed with an existing commercial building and parking lot - demolition, construction, and operation for the proposed project would not impact wetlands. Therefore, Wetland Protections does not apply to the project, and the project is found to be in conformance. No mitigation is required.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD Guidance on National Wild and Scenic Rivers (NWSRS) calls for a review of the National Park Service National Rivers Inventory (NRI) in order to assess if the project could affect the free-flowing condition of a NWSRS. Based on review of the NRI, the project is not located within a National Wild and Scenic Rivers System, as shown in Attachment N.⁸ Therefore, the NWSRS does not apply to the project, and</p>

⁷ EPA, Sole Source Aquifer Locations Map, Accessed on July 19, 2024 at: <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

⁸ National Park Service, Nationwide Rivers Inventory, Accessed on October 14, 2025 at <https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		the project is found to be in conformance, with no mitigation measures required.

Environmental Assessment Factors

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>HUD Guidance on compliance with 24 CFR Part 58 Subpart C requires that projects comply with the City of Santa Monica Local Coastal Program, Land Use Plan (LUP). The project site is outside the Coastal Zone and therefore outside the LUP boundaries and is not subject to the Local Coastal Plan.</p> <p>Development on the project site is regulated by the City of Santa Monica’s General Plan and Zoning Ordinance. The project site is a developed property surrounded by existing commercial development to the north, south, and west, with single-family residences to the southeast. The project would be developed on several parcels which are zoned Medium-Density Residential (R3) for the properties zoned R3 at 1211-1217 14th Street and Mixed-Use Boulevard (MUB) for the property at 1402 Wilshire Boulevard.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>The maximum base density for R3 zoning is 1 unit per 1,250 sf and 12 total base units pursuant to Santa Monica Municipal Code (SMMC) Section 9.08.030. The MUB base maximum density is 3.75 FAR for 100 percent affordable housing projects (SMMC 9.11.030). Projects that are 100 percent affordable are eligible for an unlimited density bonus pursuant to Government Code Section 65915. The project would develop 42 units on the R3 parcel, which the City has determined complies with R3 zoning, and the proposed FAR on the MUB parcel would be 3.20 FAR, which the City has determined complies with MUB zoning.</p> <p>The R3 zoning district has a maximum height limit of 40 feet (SMMC 9.08.030). MUB zoning for affordable housing has an 80 feet maximum height (SMMC 9.11.030) limit. State density bonus incentives/concessions allow an additional 33 feet in height (SMMC 9.08.030 and 9.22). The project would be 5-stories and 55 feet eight inches on the R3 parcel and 6-stories and 63 feet and 7 inches on MUB story, which complies with SMMC. As the project would provide 80 affordable housing units, it would help the City achieve Regional Housing Needs Allocation goals in the Housing Element of the General Plan. Additionally, the Santa Monica Housing Authority approved 40 Project-Based Vouchers, subject to the completion of the environment review. Thus, the proposed project is consistent with the City of Santa Monica's General Plan and Zoning Ordinance.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Based on the Phase I ESA, the subject property does not have any possible presence of hazardous substances that would impact soil suitability. Natural Resources Conservation Service (NRCS) Soil Surveys is used to further analyze soil suitability, as recommended by the HUD Exchange.⁹ NRCS Soil Survey maps soil on the project site as Urban land-Pierview complex. The Soil Survey indicates the project site has a 0 to 5 percent slope, which represents an optimal suitability rating for the residential land use type. As the project site and surrounding areas are relatively flat and lack significant slopes, the project is therefore not at risk for high erosion, landslides, or slope failure. The project is required to implement Low Impact Development design elements and best management practices (BMPs) pursuant to SMMC Chapter 7.10, which would incorporate design components to reduce issues related to soil suitability, erosion, drainage, and stormwater run-off during project construction and operation. No mitigation is required.</p>
Hazards and Nuisances including Site Safety and Noise	2	<p>The HUD Exchange website identifies issues analyzed under Hazards and Nuisances including Site Safety and Noise. The range of such issues encompasses natural hazards, air pollution generators, man-made site hazards, and noise and other nuisances. Based on the City Safety Element¹⁰ there are no</p>

⁹ United States Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey, file imported on October 15, 2025.

¹⁰ City of Santa Monica, Safety Element, Revised Draft December 2024.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>pressurized pipelines and/or oil gas wells on the site or near the site. Based on the FEMA Earthquake Hazard Maps, the project site is located in Seismic Design Category (SDC) E, which is near major active faults capable of producing the most intense shaking.¹¹ The California Building Code (CBC) uses SDC as design requirements for new buildings to ensure seismic resistance. The FEMA FIRM does not map the project within the 500-year floodplain (or 0.2 percent annual chance floodplains), as shown in Attachment D. (Also refer to Floodplain Management, above, in Statutes, Executive Orders, and Regulations.) Based on the California Geological Survey Tsunami Hazard Area Map and the City Safety Element, the project site is not within the tsunami hazard area.¹² The project is located in an urban area and not located within a fire hazard zone.¹³ Due to the project site and surrounding area being on relatively flat ground, there is no hazard risk of landslides or mudslides, and the site is not located within a liquefaction zone.¹⁴</p> <p>Additionally, the project would meet HUD noise criteria, with no significant adverse project noise impacts anticipated (see Noise Abatement and Control above). Therefore, with implementation of required design features per CBC, the project would have an impact code of “minor adverse impact.” (Also refer to Noise Abatement and Control, above, in Statutes, Executive Orders, and Regulations.) No mitigation would be required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	<p>HUD Guidance requires an evaluation of the project's impact on employment and income patterns. According to the U.S. Census Bureau (all results here are from 2020 Census, reported 2022), the average household income in Santa Monica is \$110,000 per year, with approximately 12% of the population living below the poverty line; of those in poverty, about 15% are over 65 years old.¹⁵</p> <p>According to the U.S. Census Bureau the homeownership rate in Santa Monica is 32%, significantly below the statewide average of 56%. The unemployment rate is 63.4%. About two-thirds of employed residents work for private companies, while 10.1% are employed by local, state, or federal government agencies. The</p>

¹¹ FEMA, Earthquake Hazard Maps, Accessed on October 15, 2025 at: https://www.fema.gov/sites/default/files/2020-07/fema_hazard_maps_western-map_graphic.jpg

¹² California Department of Conservation, California Geographical Survey, California Tsunami Maps, Accessed on October 15, 2025 at: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.

¹³ CalFire, Fire Hazard Severity Zones in Local Responsibility Areas, City of Santa Monica, March 26, 2025. forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008.

¹⁴ California Department of Conservation, Earthquake Zones of Required Investigation, Accessed on October 15, 2025 at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

¹⁵ U.S. Census Bureau (2022), Retrieved from <https://www.census.gov/quickfacts/fact/table/santamonicacitycalifornia/PST045223>.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>remainder are self-employed, work for NGOs, or are caregivers at home.</p> <p>The project is expected to generate temporary jobs during construction. During operations, the project would generate two apartment manager jobs, and a small number of permanent positions related to building operations and on-site supportive services, some of which may be performed by vendors. Overall, it is anticipated that the project will have a beneficial impact on income patterns and local employment by providing housing for low-income seniors, plus a potential slight increase in employment.</p>
Demographic Character Changes, Displacement	1	<p>HUD guidance requires the project to be evaluated for potential impacts to demographic character changes and displacement.</p> <p>According to the U.S. Census Bureau’s American Community Survey 2019–2023 five-year estimates, approximately 19.2% of Santa Monica’s population (about 17,600 individuals) are age 65 or older. This proportion is higher than Los Angeles County overall (approximately 15.2%), indicating that Santa Monica has a relatively older population and an increasing demand for age-appropriate housing and services.¹⁶The City’s Housing Element (2021–2029) also identifies seniors as one of the community’s priority special-needs populations, highlighting the need for affordable senior housing and supportive resources.¹⁷The project will provide affordable housing specifically for senior residents, directly addressing this identified local housing need.</p> <p>The project site is currently occupied by a developed commercial building and does not contain existing residential units or residents. Therefore, the project will not remove or displace existing housing or residents.</p> <p>Instead, the project will increase housing opportunities for low-income seniors, helping prevent displacement pressures on vulnerable older adults in Santa Monica. The project is consistent with the City’s goals in the adopted Housing Element and will not result in significant adverse effects on the demographic makeup of the community. No mitigation is required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The project proposes to develop 80 one-bedroom senior apartments, and 2 two-bedroom manager unit apartments. The

¹⁶ U.S. Census Bureau, American Community Survey 2019–2023 5-Year Estimates, City of Santa Monica, CA Accessed on November 4, 2025, at: <https://www.census.gov/programs-surveys/acs.html>

¹⁷ Southern California Association of Governments (SCAG), City of Santa Monica 2021–2029 Housing Element, adopted October 2025, Accessed on November 4, 2025 at: <https://www.santamonica.gov/housing-element-update>.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>senior apartments could house grade-school aged children (e.g., as seniors may be a guardian of a minor) as could the 2 manager units.</p> <p>The project site is located in the Santa Monica-Malibu Unified School District (SMMUSD) and students generated from the development would attend Roosevelt Elementary School, Lincoln Middle School, and Santa Monica High School.¹⁸ The SMMUSD Districtwide Educational Specifications Report states enrollment of Roosevelt Elementary School is 588 students, Lincoln Middle School enrollment is 884 students, and Santa Monica High School enrollment is 2,573 students.¹⁹</p> <p>Based on national data indicating that housing units generate an average of 0.34 public school students per unit (approximately one student per three units)²⁰, conservatively assuming a standard generation rate for all 82 units, the project has the potential to generate an estimated 27 students ($82 \times 0.34 = 27.88$ students, or approximately 28 students). As the project is a senior housing development, and senior communities typically generate few to no school-age children because the vast majority of residents are age 55 or older, often without dependents, the estimated 28 students should be considered to be a conservatively high-end estimate of the potential impact. Actual impacts would be reduced.</p> <p>Even under the conservative assumption, an increase of approximately 28 students districtwide would represent a very small percentage of total enrollment (less than 1% combined across the three affected schools) and would not result in a significant impact on local school capacity.</p> <p>Further, the Santa Monica-Malibu Unified School District (SMMUSD) uses a Development School Fee Justification Study to estimate how new buildings will affect schools. Based on this, the district charges a fee to help cover any potential impacts, as allowed under Section 17620 of the California Education Code.</p> <p>Under HUD Exchange website guidance, cultural facility resources are also considered to be educational facilities. The City has various such public and private resources, including art galleries (e.g., Bergamot Station Arts Center, Santa Monica Art Museum), libraries (e.g., Santa Monica Library), performing arts facilities (e.g., The Miles Memorial Playhouse), community meeting rooms and other facilities or events for cultural purposes (e.g., farmers markets). Many of these opportunities are shown on the City Recreation and</p>

¹⁸ California Department of Education Accessed on October 21, 2025, at: <https://www.cde.ca.gov/sd/profile/details.aspx?cds=19649801938000>

¹⁹ State of California, School Facility Program, Enrollment Certification/Projection, SAB 50-01, Revised May 2009.

²⁰ Zhao, Na. One Public School Child for Every Three Homes. Housing Economics Plus – Special Study, May 1 2020. National Association of Home Builders. Accessed on November 4, 2025, at: <https://www.nahb.org/-/media/NAHB/news-and-economics/docs/housing-economics-plus/special-studies/2020/special-study-one-public-school-child-for-every-three-homes-may-2020.pdf>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Arts webpage. HUD Exchange website guidance states that demand and supply for cultural facilities is a function of factors that include the size of the community, density of development, income, and demographics. Given the variety of cultural opportunities for residents in the City and also in the surrounding greater Los Angeles area and with public transit near the project site, the project residents will have ample cultural resources available to them. Given the relatively small size of the project and the relatively wide range of opportunities, the project residents would not create adverse impact on cultural facility resources.
Commercial Facilities	1	The project is an affordable senior housing development within the R3 and MUB zoning districts. The MUB zone extends along Wilshire Boulevard, providing commercial and mixed-use facilities within close proximity of the project and other residential properties. These commercial uses would be accessed by residents using various modes of transportation such as walking, buses, driving, scooters, e-bikes, and transportation network companies (e.g., Uber, Lyft, Waymo). Ample commercial opportunities would be available to residents.
Health Care and Social Services	2	The project is adjacent to Wilshire Boulevard, where existing properties provide health care clinics, medical offices, and social services facilities in the vicinity of the project site.
Solid Waste Disposal / Recycling	2	Pursuant to SMMC Section 8.108.130, the City will require the project to prepare a Waste Management Plan (WMP) detailing the estimated construction and demolition waste and how that waste will be dealt with. The project must receive approval of the WMP by the WMP compliance official before issuance of a building or demolition permit. The remainder of solid waste would not have a substantial impact on the total capacity of available landfill sites. The City's Resource Recovery and Recycling Division will provide collection services for the project. Expansion of services, when necessary, is accomplished through fee-funded improvement projects; therefore, there is a guarantee of service for new infill projects.
Waste Water / Sanitary Sewers	2	Sewer conveyance services are operated by the City, with sewer water conveyed to the Los Angeles Hyperion Treatment Plant operated by the City of Los Angeles. The plant has a current design capacity of 450 million gallons per day and is currently receiving an average of 275 million gallons per day ²¹ . The project applicant will be required to conduct a sewer study and pay for and construct localized sewer connections, which will assure sufficient infrastructure as well as network and treatment plant capacity.
Water Supply	2	Water supply for the City is currently provided by Santa Monica Public Works Water Resources Division. The City relies on groundwater, imported water, and recycled water for its water supply. The 2020 Urban Water Management Plan states the City has sufficient water supply to meet the projected 2025-2040 water

²¹ Los Angeles Department of Water and Power & Los Angeles Sanitation and Environment. Hyperion 2035 Program Fact Sheet. April 2021. Accessed on November 4, 2025 at: https://www.ladwp.com/sites/default/files/documents/LASAN_Hyperion_2035_Program_Fact_Sheet.pdf

Environmental Assessment Factor	Impact Code	Impact Evaluation
		demands for normal years, single dry year, and multiple dry years. ²² The City implemented a water neutrality requirement on new construction projects, limiting new water demand from projects that use more water than previous ones, avoiding increases in City-wide water usage. Fees paid in-lieu of reducing water demand onsite go into water efficiency projects elsewhere in the community. However, 100% affordable housing projects (such as the proposed project) are exempt from this requirement. No concerns remain regarding water supply.
Public Safety - Police, Fire and Emergency Medical	2	The project is located within the jurisdiction of the Santa Monica Police Department (SMPD). The nearest police station to the project site is approximately 1.0 miles south of the project site. SMPD provide 24 hour patrol services and prioritizes response to request for emergency services. The function of patrol services is to respond to calls for assistance and reports of criminal activity, act as a deterrent to crime, enforce state and local laws, identify community needs, provide support and assistance to the community. The project is located within the jurisdiction of the Santa Monica Fire Department (SMFD), providing fire, ambulance, and emergency medical services (trained Emergency Medical Technicians) to the City. The SMFD has five fire stations located in the City and the closest station is SMFD Station 3 at 1302 19 th Street, 0.5 driving miles northeast of the project site.
Parks, Open Space and Recreation	2	Euclid Park and Reed Park are located within 0.5 mile of the project site, and numerous parks are within a short transit distance. Additionally, Santa Monica State Beach is approximately 1.1 miles southwest from the project site. The proximity of Santa Monica parks and state beaches would provide project residents easy access to parks, open space, and recreation in the vicinity of the project.
Transportation and Accessibility	1	The project would be developed with vehicle and bicycle parking spaces for resident use. The project site is also located within 0.5 mile of transit stops that provide transit access throughout the Santa Monica and Los Angeles area. The project site is located within 0.25 mile of multiple bus stops including Wilshire/14 th , Arizona/14 th , Santa Monica/14 th , and Wilshire/11 th . These bus stops provide access to Bus 2, 20, 41, and 720. The project site is also located approximately 0.5 mile from 17 th /SMC Metro E line station which provides regional transit access from Santa Monica to downtown Los Angeles. The project would be an infill residential project which helps encourage public transportation and project site accessibility.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project site is a previously developed urban property. There are no natural features or water resources located on the property.

²² City of Santa Monica, 2020 Urban Water Management Plan, June 2021.

Vegetation, Wildlife	2	The project site is a previously developed urban property. There are no natural vegetation or wildlife located on the project site.
Other Factors	2	No other environmental factors were deemed applicable.

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	2	<p>The project would comply with the 2022 California Green Building Standards Code (CalGreen) (or the most recently adopted CalGreen at the time of plan check) as part of regulatory compliance initiated by Assembly Bill 32. Further, the project must comply with applicable provisions of the SMMC, Chapter 8.106 Green Building Standards Code, which includes the required installation of photovoltaic rooftop for solar-generated power. The project would also be subject to the Santa Monica Energy Performance Approach Reach Code (or Energy Reach Code) adopted by City Council on September 10, 2024 (replacing the City's Zero Emission Building Code that required all new buildings to be fully electric). The Energy Reach Code is a local amendment to the 2022 California Energy Code, and is incorporated in SMMC Chapter 8.36. The project would be an all-electric development and will not connect to natural gas.</p> <p>Under the California Energy Code, new buildings must meet energy requirements including performance targets and permit applicants must demonstrate, using State-approved modeling software, that the proposed design will not use more energy than allowed under the State Code. In Santa Monica, the Energy Reach Code applies increased source energy margin performance requirements to all new buildings, including electric and mixed-fuel designs. For new multifamily residential development projects of four stories or more, the standard Source Energy Compliance Margin requirement must be exceeded by 3 percent, providing additional energy efficiency beyond the California Energy Code.</p> <p>As discussed above, the project is an infill development located in urbanized Santa Monica, which is served by different modes of transportation within the immediate project vicinity such as bus, rail, walking, and bicycling, less energy-intensive uses that reduce climate change impacts compared to automobile travel. The project is also located near services that provide transportation and located near shopping centers, schools, and employment locations which may reduce driving and energy use, reducing climate change impacts.</p>

Alternatives:

Identify below other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Include the benefits and

adverse impacts to the environment of each alternative, and the reasons (e.g., economic, engineering, or others) for rejecting it.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]. As the proposed project would not have significant environmental effects, the analysis of alternatives would not be needed provide information needed to reduce significant environmental effect. The No Action Alternative is discussed below.

No Action Alternative:

Identify below the "no action" alternative, describing the most likely conditions expected to exist in the future in the absence of the implementation of any action.

No Action Alternative [24 CFR 58.40(e)]: If there were no action taken, the project would not occur. Since there are no significant adverse impacts of the project, there would not be an environmental benefit to the No Action Alternative. However, should the project not occur, the positive, beneficial impact of a project that provides housing for lower income senior residents would not occur.

Additional Studies Performed:

Studies and citations relevant to this analysis have been noted as footnotes and appendices.

Field Inspection (Date and completed by):

Envicom performed a field visit to the site in October, 2025.

List of Sources, Agencies and Persons Consulted:

Refer to footnotes and Appendices for sources and persons contacted.

List of Permits Obtained:

Provide a list of permits, reviews, and approvals that are required for project construction.

Relevant to the HUD approval, PBV are requested.

Relevant to project construction, the following permits and approvals are required:

- Building Permit
- Grading Permit
- Mechanical Permit
- Electrical Permit
- Plumbing Permit
- Demolition Permit
- Architectural Review Board approval (received on 2/3/2025)
- Administrative Approval (received on 4/11/2025)

Public Outreach [24 CFR 50.23]:

Provide your FONSI/FOSI notice dissemination list. Also, describe any additional public meetings and hearings that were held as part of or were relevant to the environmental review.

Noticing will occur in the Santa Monica Daily Press (SMDP) newspaper and on the City of Santa Monica’s public website. SMDP’s print edition reaches 12,500 readers daily and receives over 600,000 monthly views.

The development team held five community meetings related to the development of the proposed Tierra Apartments. Two in-person meetings were held on May 22, 2024 and July 8, 2024, and three Zoom meetings were held on May 23, 2024; July 10, 2024; and October 23, 2024. The community meetings were all held in the evenings, outside of typical work and school hours, with the goal of enabling as many community members to attend as possible. The development team noticed all neighbors and property owners within 750 feet of the proposed Tierra Apartments site. The meetings allowed for public input and discussion of the proposed design and its relation to existing neighboring structures; noise and traffic impact during construction and once the building is in operation; and how the project would address the needs of Santa Monica’s growing senior demographic.

Summary of Findings and Conclusions:

Identify below the main points of analysis in the Environmental Assessment. The summary should include any potential impacts of the proposed project, both beneficial and potentially adverse. The summary must also discuss any changes to the proposal necessary to avoid significant impacts.

Based on the analysis above, no adverse impacts would occur in relation to the Statutes, Executive Orders, and Regulations evaluated, and no adverse effects would occur with regard to the Environmental Assessment Factors assessed. No mitigation measures required.

Mitigation Measures and Conditions

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
No mitigation measures are required.	

