

Date: March 1, 2013

To: David Martin

From: The Boards of Directors of Friends of Sunset Park, Santa Monica Mid City Neighbors, North of Montana Association, Pico Neighborhood Association, Ocean Park Association, and Wilshire/Montana Neighborhood Coalition

Re: Steps to Increase Resident Confidence in the Downtown Specific Plan

**The Omission of Community Input on Height and Density in the Downtown Specific Plan (“DSP”) Should Be Rectified Before the Plan Moves Forward For Further Planning Commission Review or City Council Review.**

Community meetings have been and remain an integral part of the LUCE process. “Over the course of the planning process, the community has worked tirelessly to author a LUCE document that reflects the identity, values and vision of this singular beach community” LUCE 2.1-15. Decisions that hugely **change the look, feel and core of our city will affect us all**. Decisions about how high and dense our already built out downtown will be must not be developed in a planning bubble and pushed ahead of ongoing and successful processes built on mutual trust and openness.

Our City ascribes to the American Planning Association "Ethical Principles in Planning". These principles are found on our City's planning department website at:

<http://www.planning.org/ethics/ethicalprinciples.htm>. Planning Process

Participants should:

1. Recognize the rights of citizens to participate in planning decisions;
2. Strive to give citizens (including those who lack formal organization or influence) full, clear and accurate information on planning issues and the opportunity to have a meaningful role in the development of plans and programs;
3. Strive to expand choice and opportunity for all persons, recognizing a special responsibility to plan for the needs of disadvantaged groups and persons;
4. Assist in the clarification of community goals, objectives and policies in plan-making;
5. Ensure that reports, records and any other non-confidential information which is, or will be, available to decision makers is made available to the public in a convenient format and sufficiently in advance of any decision;
6. Strive to protect the integrity of the natural environment and the heritage of the built environment;
7. Pay special attention to the interrelatedness of decisions and the long-range consequences of present actions.

All of these principles are involved in the shaping of the DSP and the failure to

engage residents in any of the **three** workshops held on the DSP as to the heights and densities now being proposed for the Downtown **violate them**.

**This is especially critical because there is considerable confusion as to whether LUCE has actually set height and density limits for downtown. We believe many residents would be shocked to learn that this is not the case.**

Residents Are Stakeholders and their Neighborhood Associations are Core Partners When the City Undertakes Area or Specific Plans And Must Be Treated as Such.

Residents have a vital stake in the pace and character of change in Santa Monica because they must live with the often adverse consequences of new development. There is growing concern that City planners and consultants don't include us in surveys or interviews of stakeholders when proposing changes in zoning or area plans. The omission of any community outreach in the height and density proposals for the Downtown Specific Plan is a glaring example of this disregard. Meaningful community feedback that includes residents is required by the LUCE, standard Planning Principles and federal and county grant programs funding the Bergamot Area Plan and the DSP, as well as long-standing City process. Resident participation in all zoning and area plan proposals is a matter of right.

### **None of the Three Community Workshops Vetted Heights and Density for the DSP**

The three Downtown Specific Plan (DSP) Community Workshops held in January, July, and December 2012 were well attended. Some key land use and planning issues were covered. The January workshop focused on placemaking, street design concepts and the City-owned property at 4<sup>th</sup> and Arizona. The July workshop gathered information on community benefits and the December workshop asked for gateway and opportunity site preferences. However, discussion of downtown height and density, the basis of the LUCE tier system, was not on the consultant or Planning Department agenda. And, when residents tried to bring this topic up, they were told it was not the time.

### **The Role and Management of Consultants to the Planning Department by the Planning Department: We Think Improvement is Needed.**

There is a growing sense of resident dissatisfaction with the interplay of the consultants, the Planning Department and residents over the development of the Downtown Specific Plan (and other plans that are not the specific subject of this letter). We want to have a frank discussion with you about how we view the role of your department both in shaping the Plan and in working with the consultants who are hired to do other specific or area plans that were not fully fleshed out in the LUCE.

The planning staff needs to closely supervise the consultants to ensure that the consultants 1) are very familiar with LUCE as it pertains to all issues for which they have been hired or which overlap with their contractual role; 2) recognize that residents must have the opportunity to have a meaningful role in the development of plans and programs, such as the height and density proposals as part of the community process; 3) present a well thought out plan with the specifics of what changes are expected to result from the plan over the life of LUCE when the plan first comes to the Planning Commission; and (4) include and fairly state the views of all stakeholders expressed at the community workshops in the materials that are part of a draft plan.

These are basic planning principles. We don't think it should be the job of the Planning Commission or residents to have to enforce these reasonable process steps where they have not been done, nor do we like to have to pinpoint the failure of consultants and the City to follow LUCE.

### **Additional Key Data is Needed in the Downtown Specific Plan To Enable Meaningful Community Input.**

The recent presentation of the DSP to the Planning Commission was very short on specifics. Here are some of our suggestions for what would be very helpful to the Planning Commission and to us in order to evaluate a draft plan:

**1 - A 3-D rendering as well as a built out scenario to show** how the downtown would look under the DSP if the new heights and densities in the staff report suggested by the consultant were adopted. Will the downtown be 200% bigger than it is now or 400% or what?

**2 - Projections should be generated of how many people would be living downtown** based on the proposed development agreement projects already submitted to the city. The software exists for such an analysis. This analysis is necessary because the new projects will NOT be infill development. We want to understand the percentage of increase anticipated and if it is compatible with the required sustainability of the city. Who are we planning downtown residences for? Families or singles? The type and mix of housing units proposed would determine who lives there and should be a mix to accommodate Santa Monica's diverse population.

**3 - An independent study of who works in the downtown and where they live should be conducted**, similar to the results of the City study of the Bergamot workforce in the Draft Bergamot Area Plan. This may then be compared with the LUCE FEIR and Housing Element projections of housing need and population increases. Recently, a spokesperson for developer NMS submitted a survey of residents living in its buildings at a City Council hearing. Yet, no data was provided as to whether any of its residents in its buildings (a) were actually living IN Santa Monica, rather than other NMS projects in other cities; or (b) if the survey was OF

Santa Monica residents, whether any of them actually worked in Santa Monica. Statements by residential developers that residents of their projects can “live and work in Santa Monica” without needing their cars should not be given any weight without such data, where data clearly exists as to completed projects. We would like to see the City ask for such data when such claims are made.

**4 - Studies of the negative effect building height may have on the benefits offered by sun and sea breezes** are needed. We need to gauge the amount of sunlight reaching the street with the proposed heights. The City should do the necessary calculations to determine this critical factor in relation to any height and density proposed. Input from businesses and residents will help determine the level of acceptable sun/shade associated with building heights. It would be a huge mistake, for example, to allow building heights on 2nd Street to create shadows for the Promenade throughout the winter season. We also need to gauge the possible changes in air quality and temperature that might be expected when a number of buildings exceed certain heights.

**5 - A parking plan for the downtown** must reflect the needs of the business, entertainment, and office uses by employees, patrons, and residents. Needed parking must be identified and integrated with Expo, housing, business, entertainment, and retail needs. Residents are very concerned that there will not be sufficient parking adjacent to Expo to enable residents to use the line to go downtown and return late at night to their cars and that shuttle buses will not operate then or stop in areas that residents deem safe.

**6 - A circulation and traffic mitigation plan** is an essential part of the Downtown Plan. Weekend traffic slows to a halt through most of downtown now and will only get worse if aggressive measures to ensure the LUCE goal of “no net new PM trips” are not identified, pursued, monitored, and enforced with meaningful penalties for non-compliance.

## **Conclusion**

We urge you to consider and implement the recommendations we have made and schedule a **well publicized public community workshop** on proposed downtown height and density relating to the DSP so that all community members have an opportunity to provide substantive input on height and density in downtown Santa Monica. Further, we hope that the Downtown Specific Plan does not move forward again to the Planning Commission or on to the City Council until such a workshop is held and community feedback is fully incorporated into any staff reports.

We look forward to discussing these matters with you shortly.

Sincerely,

Friends of Sunset Park Board

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Santa Monica Mid City Neighbors Board  
Gregg Heacock, President

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Albin Gielicz, Chair

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