



Dear Planning Commissioners,

The North of Montana Avenue Association has been host to and involved in consideration and open and vigorous discussion of the DCP at our monthly meetings for well over more than a year now. Our members are city residents and volunteers and they have attended countless other civic meetings to define the issues in the DCP of most benefit to our city and to those of greatest concern to us. We have also worked with the other neighborhood associations and community groups in examination of the Plan's EIR in order that the most beneficial DCP be put forward for Santa Monica's citizens. Accordingly, we ask that the following viewpoints and suggestions be incorporated into your consideration of and recommendations for the DCP:

1) A green and public park at 4th/5th and Arizona Avenue. 80% open space at this site on what is publicly-owned land is vastly preferred over a proposed 12-story mixed-used development that lacks real open park space and provides more commercial space that can only increase traffic into the City and our Downtown and exacerbate its office/housing imbalance. No hotel or museum is desired at this site. Preferred instead would be suitably low-rise buildings that would activate the park, such as restaurants, book or bike shop, or other local resident-friendly services. Provision for recreation and entertainment for all ages at this central public park should be considered, as should the need for underground parking.

2) A Downtown Plan that is sustainable, given available water and power use. Sustainability alone, low-rise buildings downtown command priority because of their lesser demand for power and water-use. A four-story building can support about half its daily power needed using solar energy, sufficient to keep the lights on and appliances running during an emergency from earthquake, fire, or large-scale power outage; renewable energy for a higher-rise commercial or office structure with proportionately greater needs is far more difficult to achieve.

The target of Santa Monica's water self-sufficiency by 2020 using only local groundwater sources is in jeopardy if all 3.2 million square feet included in the DCP are built. The City is in the process of determining the actual sustainability maximum for local groundwater, so we really don't know if there is enough or will be enough to support the aggressive build-out of Downtown. Currently, imported water from the Metropolitan Water District is available, but at twice the cost. Water is too essential a resource to get wrong; climate change predictions include extended droughts in our future.

3) The approval process for building in Downtown. We strongly suggest that this process be adjusted to provide for the following as determining the will of the city's residents for Downtown's future growth:

- a. A Council super-majority (5-2) approval for projects over 5-stories or 50,000 square feet.
- b. Projects higher than 6-stories or over 60,000 SF to require both a Council super-majority and a majority public vote for approval.
- c. All developments proposed on publicly-owned land to require approval by a majority public vote. This would also to apply to proposals for removal of existing City Owned parking garages.

4) Reducing buildout. Is 3.2 million SF of new construction too much for Downtown? The overall growth number needs to be reviewed against the LUCE goal of no net new trips, as well as water and power sustainability goals. For example, the Downtown EIR lists 60,100

estimated 2030 peak PM vehicle trips under the proposed DCP, while the LUCE lists 59,500 peak PM vehicle trips for that year. It seems obvious that the DCP already exceeds the "no new PM trips" promised in the LUCE. A serious reduction in development is in order.

5) **Affordable housing** This, not market-rate housing as advocated by the Chamber of Commerce and developers, is still the unfulfilled need. The reliance on developers to include enough affordable housing in their market-rate developments does not allow for units at the level of affordability needed. Santa Monica has missed its target for affordable housing the past two years. The November 2016 voter approval of an increase in sales tax will add about \$10 million annual to the City's Housing Fund. The DCP is silent on this new source of funds and on the State law allowing ADUs, which need to be taken into account along with other sources of affordable housing.

6) **A circulator or jitney service.** If one of the City's goals is to reduce trips by neighborhood residents to our already congested downtown, a circulator or small-van service should be one of the recommendations of the DCP. The Big Blue Bus and the Expo Line have proven incapable of solving the traffic problem; current access to the Expo Line and parking at its stations is virtually non-existent.

We stand united in our suggestions to improve the DCP and the livability of our Downtown and thank you.

Respectfully submitted,

The NOMA Board