



North of Montana Association

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July 8, 2013

To: Members of the Santa Monica City Council

Copies to: Rod Gould, David Martin, Francie Stefan, Sarah LeJeune,  
Marsha Moutrie, Members of the Planning Commission

Re: Objections re City Council Agenda Item 8-A (DSP CEQA) for Tuesday,  
July 9

We are writing in response to City Council Agenda Item 4-A [AKA 8-A] on  
the agenda for July 9th, 2013, as well as to the corresponding staff report.

**We urge the City Council not to move forward with a Downtown Program EIR (PEIR) at this time.** Commencing a PEIR at this time, before the city has gone through an orderly process of crafting a Downtown Specific Plan, would rush the process for no apparent public benefit and would have the effect of severely limiting meaningful input of resident stakeholders. This proposal appears to be putting the cart before the horse, raising serious questions about the legitimacy and good faith of the city's process.

Further, while we appreciate that planning staff has now proposed specifying height limits for the "opportunity sites" where none had been proposed previously, we are disappointed to note that staff has made no changes in its recommendations for proposed maximum building heights and densities for the rest of the downtown – this after a massive citizen outcry calling for height and density reductions at a DSP workshop on May 6, 2013.

The currently proposed guidelines for downtown in the staff report for agenda item 8-A, including those proposed for the "Opportunity Sites," are too high and too dense. They conflict with the vision for Santa Monica advanced by the community in the 2010 LUCE. [1]

Therefore, we urge City Council to:

1. Observe the established public planning process, holding off discussion and approval of a PEIR for the downtown until after the city has engaged with stakeholders in crafting a Downtown Specific Plan.
2. Preserve the existing (actual) levels of height and density in Santa Monica's downtown because the majority of the Downtown has never been developed to 84 feet and is highly successful at this lower scale. We note that the actual levels of height and density in Santa Monica's downtown are in line with other coastal beach town communities in Southern California. For example,
  - A. The maximum building heights in the Venice Coastal Zone (which extends inland to Lincoln Blvd.) range from 22 to 45 feet (2004 Venice Coastal Zone Specific Plan)
  - B. The maximum building heights in Santa Barbara range from 20 to 60 feet (Santa Barbara Building Height Fact Sheet)
  - C. The maximum building height in the Pacific Palisades Village is 30 feet (Pacific Palisades Commercial Village Specific Plan)
  - D. The maximum building height in Malibu is 24 feet for flat roof buildings and 28 feet for pitched roof buildings (Malibu Local Implementation Plan)
3. Resist basing maximum height and density decisions for downtown on speculation regarding potential future budget shortfalls or potential revenue from future development projects. The projected 2015-2017 budget shortfall is small in comparison to the overall city budget. Attempting to build our way out of a budget shortfall that may never materialize or could be addressed through other less impactful means is inconsistent with good fiscal management.
4. Limit maximum heights and densities for so-called "Opportunity Sites" to be no higher than the limits established for the sub-area within which the proposed project falls. We note that the LUCE makes no mention of additional height and densities being afforded to "opportunity sites".
5. Exclude any PEIR study of heights and densities above 84 feet. LUCE establishes a framework of only three development tiers in the city, and does not say that "opportunity sites" would be eligible for heights and

densities over and above those in Tier 3.

6. Require the completion of resident survey on heights and densities, which was authorized by City Council, before the draft DSP is finalized. Once it is completed, the DSP must then be circulated and reviewed before a PEIR is commissioned

We respectfully request that City Council address these concerns before proceeding with the PEIR for the downtown.

Sincerely,

The Board of the North of Montana Association

[1] During the LUCE process community members were asked “what makes a livable city?” and the response - “For Santa Monicans, it is the preservation of the vibrant, beach town atmosphere, the enhancement of the sense of community, the conservation of unique and diverse neighborhoods, and the ability to enjoy walkable streets, easy access to transit, green streets and open space, and a range of housing choices for all income levels.” SANTA MONICA LUCE, page 3.2-2. High-rise and Mid-rise buildings were not part of the community’s or the LUCE’s vision for the future Santa Monica.