



STEERING
COMMITTEE
& ADVISORS

February 2, 2016

RE: PC Agenda Item 5-A Downtown Specific Plan

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Dear Planning Commission:

The new draft of Santa Monica’s Downtown Community Plan (DCP) is out: Unfortunately it is a formula for intense, fast-tracked development of our downtown. It ignores community input and the City’s own scientific poll in which residents overwhelmingly rejected taller buildings and greater density, and said they wanted more open space, slower growth and a lower scale feel in our downtown.

The draft DCP combines the worst of city planning. It is a plan for a developers’ paradise. On the one hand it fast tracks development, reducing community input and eliminating City Council review altogether for very large projects up to 84 feet and 100,000 sq. ft. It then specifically carves out a series of downtown super sites that can be developed well over even these outsized projects.

In a bit of Orwellian speak, the Downtown *Specific* Plan was recently changed to the Downtown *Community* Plan. While acknowledging an engaged community’s input, the DCP then proceeds to ignore it. Unfortunately, the DCP reads like a Chamber of Commerce—Tourist Bureau brochure.

The DCP is important: It will control downtown development for the next 20 years. SMCLC urges the Planning Commission and the City Council to reject this draft—it needs to be re-written. Here are some of its many problems:

1: Overall, the DCP is a plan for a much denser, congested downtown, clogging already overcrowded streets. Expect high-rise hotels and an increasingly tourist-driven area. Lincoln to the 10 Fwy will be heavily developed. Canyons with up to 100,000 sq. ft. buildings will replace 2-3 story ones.

The DCP never adequately answers “why” this is good for residents. Instead, the DCP should be for a more resident-friendly, lower scale downtown than envisioned in this draft.

2: In an amazing gift to developers, the DCP sets out procedures to sharply expedite large development projects (up to 100,000 sq. ft.), hastening them through the system, shortcutting community input and eliminating City Council consideration.

This procedure ignores the fact that the problem with the process to date has been poorly conceived projects, not the time taken for community input or proper review. Fast track development is exactly the wrong way to go.

To have some understanding of what 100,000 sq. ft. is, that is about **twice** the size of the Clock Tower building at 225 Santa Monica Blvd. (photo left) and the approximate size of our main public library (photo right.) Projects these sizes would be rushed through the process, with limited review, and in a too carefully crafted by half legal process that would eliminate the right of residents to challenge them by referendum, as residents did with the Hines project. 100,000 sq. ft. is so outsized for fast track, that merely cutting it wouldn't help.



3: In a key zoning-busting section, the DCP carves out a number of mega downtown sites (well over 100,000 sq. ft.) that can be developed well above zoning. These “exceptions” swallow even the already flawed rules. They are on Ocean Avenue and in central downtown. This flies in the face of keeping ocean views and a downtown in scale.

In the City’s downtown survey, residents by more than 2-1 firmly rejected this. Yet these “opportunity” sites remain central to City Hall’s downtown plan. In fact, the DCP specifically states that as time goes on even **more** such zoning-busting mega sites are possible with a simple amendment to the plan. Opportunity sites must be eliminated.

4: Many of the bigger projects in the DCP are to be built under Development Agreements, a process that has resulted in some of the worst projects and one which City Hall has recently said it wanted to stop using altogether. Development by DA, which allows special deals outside the rules, needs to end.

5: Basic to the DCP is the flawed premise that a list of “community benefits” will offset the burdens of overdevelopment and bad projects. This has been rejected by residents time and again, including in the City’s downtown survey. These so-called benefits are essentially the payment of *fees* that are a cost of doing business for developers. **Want a bad project? Ok. Pay a fee.**

When SMCLC recently asked the City for a central accounting of past community benefits it didn’t exist. Money sits in numerous separate accounts, unspent, and the records had to be pulled together from a variety of sources. Monitoring and accountability fall far short.

Residents are stuck with bad planning and out-of-scale projects forever, with lasting negative environmental impacts, in exchange for a collection of “benefits” often in the form of fees. As to affordable housing, which is very important and a vital obligation of the City, the City has to find ways to fund it beyond using it to justify overdevelopment and bad planning. With a one billion dollar bi-annual budget, with existing laws requiring affordable housing from developers and with other available options, the City can have affordable housing without selling itself out to developers.

6: The DCP looks to its “mobility plan” to somehow provide a *deus ex machina* to save us from even more gridlock caused by intensified new development. The mobility plan, with its built-in costs and inconveniences, seems aimed more at trying to mitigate what it admits will be significant traffic impacts from newly planned overdevelopment in the DCP, than to overall improve our daily lives and ability to get around. The plan ignores reality.

Residents need fast, reliable, convenient, interconnected transportation alternatives, that allow for multi-stop shopping, school, work and play. Buses are one core of any alternative to driving, yet Big Blue Bus ridership has decreased year after year, buses now cost more to operate,

routes and times haven't improved and fares have gone up. As SMCLC recently reported, all City employees (over 2,000) are provided free parking and most drive in single occupancy cars to and park in the downtown area. Year after year fewer use alternatives to driving solo. And it's going to get worse, as the accelerated development called for in the DCP will decrease, not increase, mobility. None of these serious problems is adequately dealt with in the mobility plan. Traffic and congestion will get much worse.

Conclusion

While there is much in downtown that we love, it has become increasingly difficult for residents to navigate and use and ever more oriented to charmless development and tourism. We can have and want an exciting, active, accessible downtown without overdevelopment. In fact, overdevelopment will choke and destroy what we most love about our city.

Residents feel that we are losing control over what makes our City livable. This draft DCP takes us in the wrong direction. It should be rejected and rewritten as a true community-oriented plan.

Sincerely,

Diana Gordon

Cc: City Council, Rick Cole, David Martin, Community Leaders