

December 15, 2014

TO: City Council

RE: Agenda Item 8-A Water Rate Analyses and Proposed Water Rate Options

SMCLC Requests that the City Council Seek Additional Information on the Water Use Impact of New Development before Setting a New Water Policy

The Santa Monica Coalition for a Livable City (SMCLC) requests that the City Council obtain important information not currently available on the impacts of water usage from new development. SMCLC sets out four proposed categories of such information in this letter. Having this information is crucial to an equitable and clearly understood water policy.

As we all know, Santa Monica has declared a Stage 2 water emergency, mandating serious cutbacks in water usage. The city has used the strongest terms in describing the rapidly deteriorating situation:

We are “close to exceeding the most severe drought in California history.”

City Manager Rod Gould added that this is “not a short term” situation, but rather an “on-going crises.” If the drought continues to grow worse, and the reality of global warming suggests that this may well happen, residents could be asked to make even greater cutbacks. Sharply escalating increases in the price of water have also been proposed for capital improvements to engender greater local water self-sufficiency.

There can be no adequate or fair water conservation plan without dealing head-on with the massive amount of new development in our pipeline, which, if approved, would result in many additional water users. To address our water crisis, the city should have a **concrete plan** to significantly control development by either not approving, or limiting certain projects based on their water usage.

Block after block of our downtown is being developed, with taller, denser buildings replacing shorter, less dense structures. NMS and Century West want to build thousands of units including replacing low water users such as Aaron Brothers and Jo-ann Fabric and Craft Store. These, and many other projects being proposed, have real world water impacts that cannot be ignored. For example, no matter how water efficient new projects claim to be, there is simply no way that the proposed projects replacing Aaron Brothers and Jo-Ann, as well as St. John’s Health Center expansion, and the 4th and Arizona project, will not use significantly more water than is currently used at those sites.

If the city ignores development policies that would guarantee more and more water consumers, the result will be obvious: The city will be asking residents to shoulder the

burden of water cutbacks in part to accommodate expansive new development. Residents will rightly resist such a policy.

The City's water plan must address equity and development.

Basic to such a plan must be better information. Residents' attempts to obtain hard information from city staff on the water impacts of new development have been met with resistance or differing responses. Residents have been told that the impact of new development will be minimal, which is so counterintuitive, even with greater water efficiency, that it does not engender confidence. The fact that the city has not been enforcing its own law requiring individual water meters on new multi-family developments only reinforces this mistrust.

SMCLC requests that the Council obtain the following information from staff -- with backup showing the basis for each calculation -- before approving a specific water plan that curtails resident use:

1. **LUCE water increase calculations.** Calculate the water usage associated with the growth figures set out in the LUCE EIR Projected Summary of Land Use Changes. This should be calculated by category—*e.g.*, retail, hotel—and include all projections set out in the summary whether approved, built, or not yet built.
2. **Approved project increase calculations.** Compare the projected water usage of all projects already approved to the current water usage on the same site.
3. **Pipeline project calculations.** Compare the projected water usage of all proposed projects in the pipeline that have been filed but not yet approved to the actual usage on the same sites in 2013.
4. **Increased tourism calculations.** Calculate the increased water usage from projected increased tourism over the next 5 years, compared to usage by tourists in 2013. This should take into account increase in numbers, lengths of stay and overnight stays.

Conclusion

In order for our community to buy in to a new water policy, it is vital that it has confidence in these critical water decisions and regulations that will directly impact residents and businesses. To achieve this, we need to better understand how water for new development will be calculated and factored into development decisions, including what controls and limitations would apply during the current water crisis. These calculations are essential to set a fair and uniform policy.

Sincerely,

Victor, Diana, Sherrill, Jeff

Enclosure (LUCE EIR Table 3-2 Summary of Proposed Land Use Changes)

Table 3-2 Summary of Proposed Land Use Changes

Description	Residential (DU)	Office (sf)	Retail (sf)	Creative/Post-Production (sf)	Industrial	Medical Office (sf)	Hospital (sf)	Institutional	Hotel	Educational	Parks/Open Space (acre)	Airport (based aircraft)
Existing	49,036	10,209,000	7,408,650	3,412,000	1,418,000	2,095,000	921,000	1,543,000	1,108,000	42,539	328	500
Proposed LUCE												
Proposed LUCE Net Change	4,955	448,980	566,803	699,709	-379,137	187,327	763,123	196,029	626,578	—	18.5*	—
Citywide Total	53,991	10,657,980	7,975,453	4,111,709	1,038,863	2,282,327	1,684,123	1,739,029	1,734,578	42,539	346.5*	500
Net Residential v. Nonresidential Change—Proposed LUCE												
Residential	Within Residential Zones		472 units									
	Within Nonresidential Zones		4,483 units									
Nonresidential	3,109,412 sf											
1984 Plan												
1984 Plan Net Change	5,653	1,504,000	686,000	572,000	-393,000	220,000	763,000	205,000	401,000	—	4	—
Citywide Total	54,689	11,713,000	8,095,000	3,984,000	1,025,000	2,315,000	1,684,000	1,748,000	1,509,000	42,539	332	500
Net Residential v. Nonresidential Change—1984 Plan												
Residential	Within Residential Zones		2,244 units									
	Within Nonresidential Zones		3,409 units									
Nonresidential	3,958,000 sf											

SOURCE: City of Santa Monica, 2009.

sf = square feet; DU = dwelling units. Parks/Open Space area includes 104 acres of City parkland and 224 acres of beach.

* Does not account for open space that may be created through open space and community benefit requirements of the proposed LUCE.