



Santa Monica Coalition for a Livable City

STEERING Via Email and U.S. Mail  
COMMITTEE City Council of Santa Monica  
& ADVISORS 1625 Main Street  
Santa Monica, CA 90401

mark armour September 26, 2011

peter davidson RE: Agenda Consent Item 3-R: Planning Services Related to the Bergamot Area Plan

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This report to the City Council from the Planning Director, recommending the hiring of a professional design firm to “develop and complete” the Bergamot Area Plan confirms that no developments currently proposed within the 140 acres under the Plan legally can or should be negotiated or approved until the Plan is completed. To do otherwise, would constitute poor planning policy and piecemeal planning in violation of the California Environmental Quality Act (CEQA) and our local Land-Use and Circulation Element known as LUCE. SMCLC and other community groups within and outside of Santa Monica first raised these objections in December 2010 in connection with the scoping meeting for a draft environmental impact report for the Hines/Bergamot project on the Papermate site. SMCLC reasserts these objections now based on this report.

**This Report Confirms That This Area Plan Design Is a Regional Planning Issue.**

This entire area is one mega development project and the City is treating it as such. Last year, the City was awarded a HUD grant of \$652,500 to develop an Area Plan in order “to transform the 140 acres of industrial land into a transit-oriented, mixed use neighborhood.” According to the City, this entire 140 acres is the “project.” The project includes 35 acres of the Bergamot Transit Village District (and within that, the central 7-acre Hines/Papermate property), 19 acres of the Bergamot Station Arts Center across the street from the Hines project, and 86 acres of the Mixed Use Creative District, which together encompass a huge area from Cloverfield Boulevard on the west to Centinela Boulevard on the east and Colorado Avenue on the north and Exposition Boulevard on the south. (See Map, Exhibit “1”)

Under the HUD grant, residential housing, including affordable, workforce and market-rate housing, is key to creating this transformation in order to promote transit ridership and reduce auto traffic. Indeed, the residential goal to be achieved under the HUD grant is “a 40/60 commercial/residential ratio in one sub-area and a 50/50 ratio in another.” (See City’s Summary of HUD Grant, Exhibit “2”)

This is just another way of saying that under the grant the City has committed itself to plan and approve projects that will not worsen the jobs/housing imbalance in our community. The HUD planning grant summary does not even mention the development of commercial office space. This is not surprising given that a major source of the daily gridlock that residents and visitors alike confront in this very area is the result of the overbuilding of commercial office space in the 1980s.

Now, the City is being asked to commit the bulk of the HUD grant funds to generate this Area Plan to create this new “transit oriented” city within Santa Monica. What this confirms is that fundamental planning for this new city has barely begun. There has been no determination by neutral professional planners as to the cumulative amount and mix of residential and commercial or even where it should be located within the project area.

The report further affirms that LUCE requires detailed planning for this area and coordinating residential and commercial land uses to achieve a “complete neighborhood.”

**Until this Area Plan is completed and it includes the designated residential and other uses, and the infrastructure to support a complete neighborhood, no development agreement for any individual project that is currently in the pipeline should be negotiated. Otherwise, each developer will propose far too much commercial development because its much more profitable than residential. This is, of course, exactly what Hines is proposing. Further, there will be no Area Plan to control it and create a real neighborhood. The notion of a “transit-oriented neighborhood” will be in name only.**

#### **The Hines Project Must Be Put On Hold Until The Area Plan Is Done.**

Postponement is especially critical as to the Hines site because it is by far the largest parcel in the Transit District, it is the closest to the Expo stop, it is proposing a massive commercial project with less than 30% residential housing and several other nearby properties in the District have already been approved with little or no residential mix. That’s not acceptable under the HUD grant, or under LUCE.

In addition, this entire project area abuts existing thoroughfares in all directions which are already at failing capacity much of the day and evening. These roads, both new and existing, would have to be shared by all of the new development that would be built in a compact area that everyone traveling into or out of Santa Monica must traverse to get on or off the highly used 10 Freeway and through much of the City. The Cloverfield/26<sup>th</sup> Street off-ramp on the 10 freeway is at functional collapse now, as commuters back up past the 405 Freeway every weekday morning. Most of Santa Monica’s commuter traffic, as well as resident-generated traffic, would be significantly affected by development in the project area, as would the entire Westside region of Los Angeles.

#### **CEQA Outlaws Piecemeal Projects, Where, as Here, the Project Area Includes Multiple Projects Which Cumulatively Would Have Far Greater Environmental Impacts**

The requirements of CEQA cannot be avoided by piecemeal review. Otherwise, CEQA’s mandate to review the actual effect of the project upon the environment would be defeated if a large project could be divided into many smaller ones – each claiming a minimal impact on the environment – which cumulatively could have disastrous consequences.

Here, piecemeal planning would result from breaking the entire project area into separate projects, and thereby failing to appropriately address the cumulative impacts of all of the reasonably foreseeable future development of the project area that is the subject of the Area Plan for which the city received the federal funding. (See Exhibit “3,” map of the pending projects in this Area)

A review of the City’s website, which lists pending environmental reviews, reveals that there are at least two other projects in this area for which EIRs are being prepared – Roberts Business Center and the Village Trailer Park. We believe that neither will withstand judicial scrutiny under CEQA for the same reason that any EIR prepared for the Hines project would be deficient.

For all of these reasons, SMCLC urges the Council to reconsider its “float up” approval for the Hines project on August 23, 2011, and to publicly affirm that it will not negotiate or approve any development agreement for any project in the Area Plan until the Area Plan is completed for this critical transit city within our city.

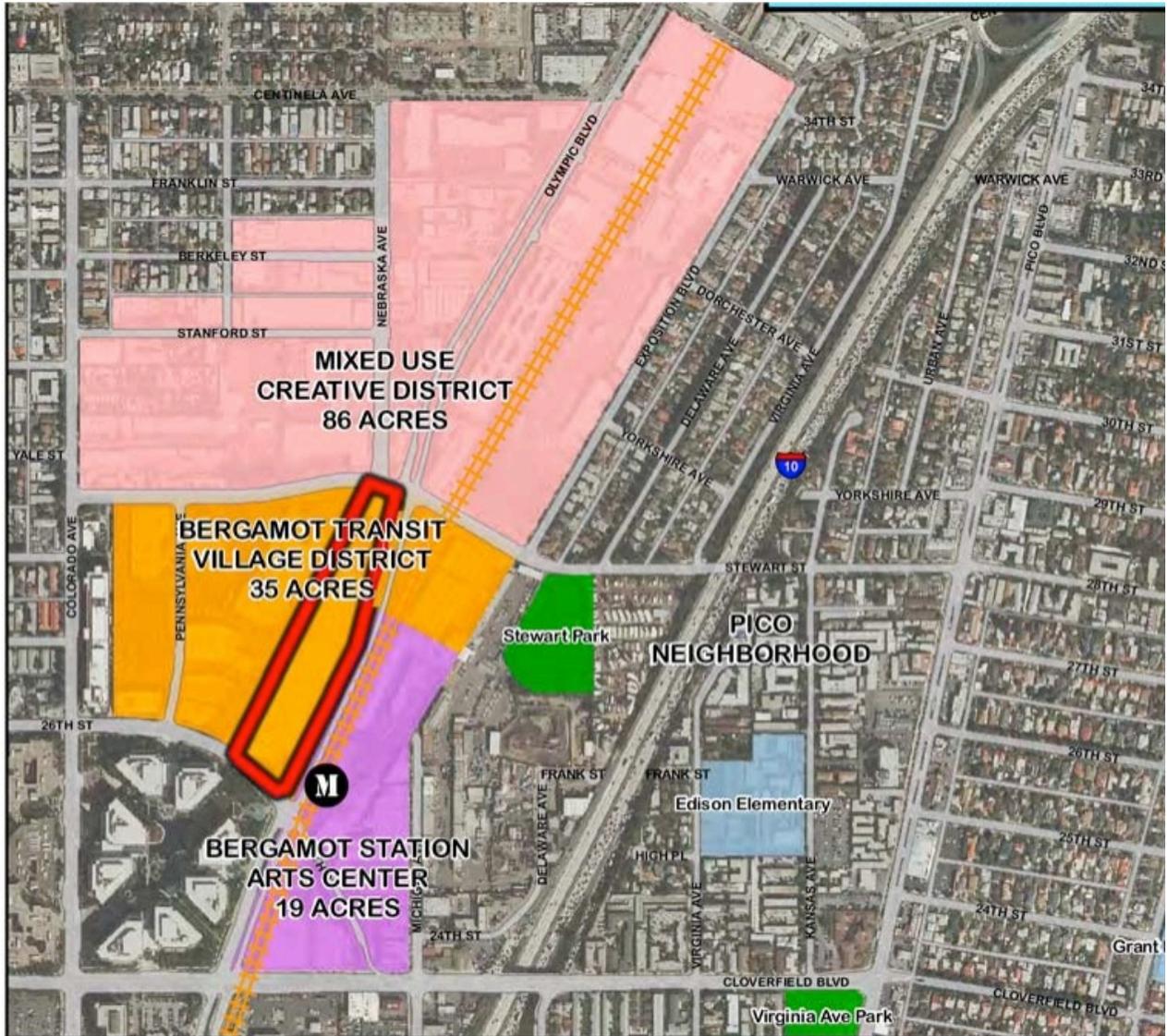
Sincerely,

*Diana Gordon*  
Co-Chair

Enclosures (Exhibits "1" – "3")

Cc:  
Shaun Donovan  
Rod Gould  
David Martin  
Marsha Moutrie  
Planning Commission  
Neighborhood Association Leaders  
Ray Klein  
Norman Kulla  
Paul Backstrom  
Charles Grobe

Exhibits "1" – "3"



Proposed Planning Areas with Project Location Inset

City of Santa Monica Application  
Tiger II/Community Planning Challenge



0 0.025 0.05 0.1 0.15 0.2 0.25 Miles

LEGEND

- Bergamot Station Arts Center
- Bergamot Transit Village District
- Mixed Use Creative District
- Expo LRT Station (Future)
- Expo Line (Future)
- Santa Monica City Limits

## HUD FY2010 Community Challenge Planning Grant Summary **HUD Region: IX**

The **City of Santa Monica** will be awarded **\$652,500**. Santa Monica will develop a master plan to transform 140 acres of industrial land into a transit-oriented, mixed-use neighborhood that features affordable, workforce, and market-rate housing, creative arts employment and exhibition, performance and incubator space, strong connections to light rail and bus transit, bicycle and pedestrian connections, new parks and public space, and upgraded and expanded infrastructure. The master plan is a critical component of the citywide vision to integrate land use and transportation to achieve reduced greenhouse gas emissions, reduce per capita vehicle miles traveled, and create a sustainable local community. The master plan will connect the Bergamot Station, Transit Village, and Mixed-Use Creative District to the new Exposition Light Rail, which will connect Santa Monica to the densely populated Los Angeles Westside, including Culver City, West Los Angeles, and Downtown Los Angeles.

The grant will cause a significant shift in mode shares away from automobiles, decreasing vehicle miles travelled and increasing transit ridership.

The grant will increase the supply of affordable housing, with a goal of a 40/60 commercial/residential ratio in one sub-area and a 50/50 ratio in another.

Increasing commercial activity in the area will increase tax receipts as well as walkability.

### **Project Highlights:**

**CREATION OF LOCATION-EFFICIENT, INCLUSIVE COMMUNITIES:** The project would create a Transit-Oriented Development that puts affordable housing close to amenities and connects different travel modes.

**EXPAND TRANSPORTATION OPTIONS:** Besides preparing the way for a new transit station, this project would make transportation accessible to the geographically isolated Pico neighborhoods.

**STRENGTHEN LOCAL ECONOMIES:** the development will highlight the area's growing reputation as a dynamic creative arts district, leveraging it to draw more employers and shoppers to the area.

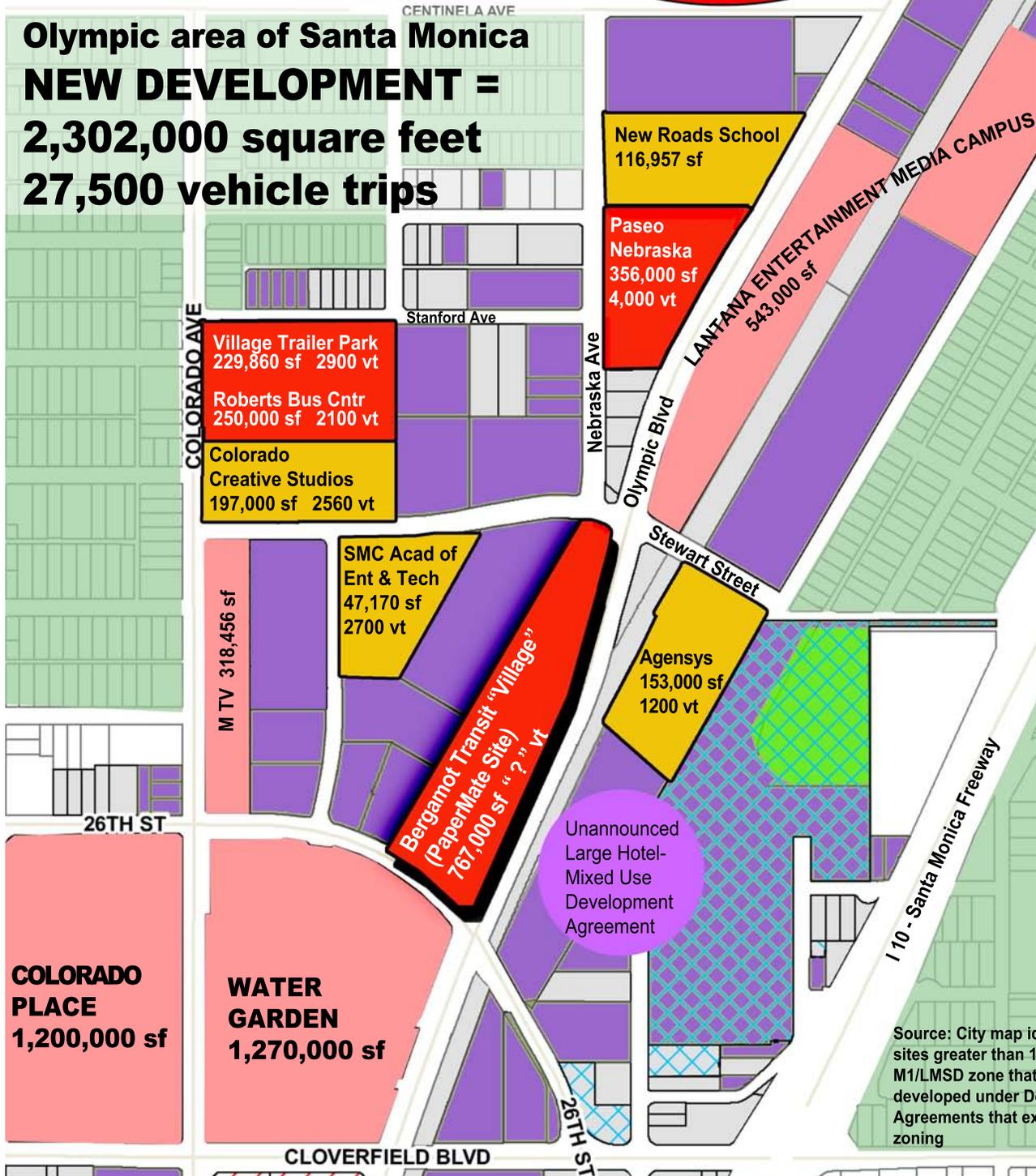
**Funding Amount:** \$652,500

**Core Partners:** Pico Neighborhood Association, Pico Improvement Organization, Santa Monica City Arts Commission

- PENDING DEVELOPMENT AGREEMENTS
- APPROVED DEVELOPER AGREEMENTS
- BUILT WITH DEVELOPMENT AGREEMENTS
- CITY IDENTIFIED AS FUTURE DEV. AGREEMENTS
- RESIDENTIAL AREAS

**LA: Olympic and Centinela/Bundy Project**  
 1,300,000 sf 20,000 vt (on hold)

**Olympic area of Santa Monica**  
**NEW DEVELOPMENT =**  
**2,302,000 square feet**  
**27,500 vehicle trips**



Source: City map of sites greater than 1 M1/LMSD zone that developed under Development Agreements that exceed zoning

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