

# R. Swanson LUCE Comments May 2010

## LUCE Process and Draft LUCE

As someone who has completed many strategic plans for businesses, I find the LUCE process to be one of the most agonizingly long and torturous processes encountered. It is no surprise that some residents are losing interest and becoming skeptical of any potential for change or progress.

The outcome of this process, the Draft LUCE, is an incredibly rich document that will not satisfy everyone, but truly does capture what most residents want. City Staff, the Planning Commission and the City Council are to be commended for enduring this process and producing a document that justifies the wait. It is not a perfect document and my comments will highlight what I see as deficiencies and what I think should not be changed.

The City of Santa Monica really does listen to its residents, as well as its business community that serves us. *Residents elect our primary decision body, the City Council; it is our town, we live here, we vote for our elected officials and our voices need to be heard.*

## Development and Community Benefits

LUCE correctly identifies and balances the five categories of community benefits: Trip reduction and traffic management, affordable and workforce housing, community physical improvements, social and cultural facilities and historic preservation.

It is clear that future development must provide these benefits to satisfy residents. In addition, LUCE addresses the issue of height and building density, which directly result in more vehicle traffic, a serious problem that is not acceptable.

What's more important, LUCE looked at the financial feasibility of development within the various land-use categories and concluded that "the requirement for an increased level of benefits corresponding to increased heights are realistic, even with a reasonable return on investment for the project, due to the land values along the City's respective corridors". As developers are aware, increased height and density increases the value of the building site in excess of the cost of designing and building additional floors with higher density.

LUCE correctly captures some, but not all, of this increased land value with developer provided community benefits. To do otherwise would benefit developers over residents. *Therefore, any attempt to increase the by-right height, the number of stories and increased FAR should be resisted.*

However, a document referenced in the LUCE, The Affordable Housing Production Program, needs to be modified. Specifically, the section titled, "Additional Waivers and Modifications", states that "Developer that seeks a density bonus may also request the waiver or modification of development standards but shall show that: 1) the modification is necessary to make the housing units economically feasible." As we all know, clever land transfers can increase the "cost of land", thereby making economically feasible projects economically unfeasible.

Finally, the scale of development, including step backs and property line setbacks, must fit the desired scale of the community. Santa Monica does not have very wide boulevards and height

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limits in LUCE maintains this scale. We don't want to drive through "canyons" such as the western segments of Wilshire and Olympic Boulevards in the City of Los Angeles.

## Lincoln Boulevard

*The neglect of Lincoln Boulevard continues. What's missing? LUCE is silent on several key pieces of information regarding Lincoln:*

The City is currently negotiating with the State to purchase the roadway from the I-10 to the Venice border. This is clearly in the near-term time horizon and dramatically changes what the City can do.

*While the first Goal for Lincoln focuses on redevelopment, it falls short by not creating a formal redevelopment project area.*

Both owning Lincoln and using redevelopment funding would also help to resolve the visual blight along Lincoln. Without funding, the City is unable to remove non-conforming signs that the Signs 2000 ordinance prohibits since the City must compensate businesses for such enforcement, according to a Senior Planner.

- Finally, the development of the SMMUSD site at Lincoln and Ocean Park is large and relatively underutilized parcel for which there is an inadequate discussion other than to say, "Potentially seek an expansion of the activity center to include Olympic High School, in consultation with the Santa Monica-Malibu Unified School District". After five plus years of working on LUCE, this is the best effort in understanding what SMMUSD is planning to do?

Prior iterations of the LUCE documents clearly suggested a path to redevelop Lincoln with two possible approaches:

- Either use Redevelopment Agency funds to assist in the redevelopment of sites that, based on market forces, would otherwise not redevelop, or
- Make Lincoln Boulevard, between I-10 and the southern City limits, a redevelopment project area. How did the wheels fall off this recommendation?

*The final draft LUCE delivers a somewhat toothless Strategic Approach: "Lincoln Boulevard transitions slowly from an auto-dominated boulevard to a pedestrian-oriented boulevard servicing the adjacent neighborhoods."*

In less than five years many of the current auto repair businesses along Lincoln, which are already struggling, will have difficulty serving current/future vehicle designs. These businesses will need investments in training and/or equipment if they are to survive long-term. Many will close and should be replaced by neighborhood serving retail businesses that will need funding to renovate existing buildings and/or perform potential toxic waste remediation.

*A redevelopment district along Lincoln that uses tax increment financing creates a win-win for the City: Developers get low interest loans below market rates from redevelopment funds while the City gets incremental real estate taxes that can more than offset the loan subsidy.*

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While the City Council had the wisdom to proceed with acquiring Lincoln from the State, it might have considered a concurrent redevelopment district, unless there are legal reasons for not doing so.

I question why Lincoln south of the I-10 is designated as “General Commercial” not “Neighborhood Commercial” as is the case with portions of Pico with similar sized lots. This clearly conveys the impression that Lincoln is not intended to serve the local community within walking distance. *I'd suggest “Neighborhood Commercial - Lincoln” with a Tier 2 (height and FAR as in General Commercial - Lincoln) to better characterize what Lincoln needs. I would add “vibrant, highly walkable, with trees, landscaping and local-serving uses” as in the General Commercial Vision (2.1 p36).*

I believe the objective of redevelopment should focus on what reduces traffic, or does not add to it, including consolidation of auto-oriented businesses, limits on office commercial space and more mixed use commercial with housing on floors above ground level. Needless to say, no further addition of businesses with drive through capabilities.

Lincoln will not become pedestrian friendly until the street is safe for bicyclists, who no longer will use the sidewalk instead of the unsafe street. North-south bike routes need to be on streets parallel to Lincoln, without interruption.

Finally, if Lincoln is to become pedestrian friendly, more signalized crosswalks that are synchronized with traffic signals are needed.

*Lincoln remains a gridlocked boulevard throughout the LUCE time horizon, yet no new ideas emerged. Without something dramatic, north-south traffic will continue to use already congested 23<sup>rd</sup> Street, Main Street and Nielson Way. While no magic bullet will solve the problems, how about some fresh ideas?*

A few ideas not fully explored include:

- Removing parking on alternate sides (northbound in AM, southbound in PM) to allow for a bus/bike only lane as proposed several years ago,
- Using a center reverse flow lane with restricted left turn lanes during peak commuting times (northbound in AM, southbound in PM),
- Adding a Big Blue Bus Park and Ride program with parking at or near the LAX transit center. [In an unrelated issue, why doesn't the Rapid 3 Big Blue Buses have a designated luggage stowage area? And, unless you are less than 5 feet tall, the Big Blue Buses do not provide sufficient legroom - not a selling point to lure business commuters on-board.]

The proposed parking lane use by the Big Blue Bus might improve matters, but unless the gridlock south of Santa Monica is addressed concurrently, Santa Monica's efforts will be compromised.

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## Activity Center at Ocean Park and Lincoln

*The Albertson site at Lincoln and Ocean Park is already a community serving facility with a grocery store, pharmacy, restaurant, local serving offices and a variety of other retail businesses. Is it worth redeveloping this property just to add housing given the already gridlocked status of Lincoln, which is projected to remain so during the LUCE horizon?*

Furthermore, the entrances to and from the property are less than optimal and will likely have even more negative impacts on traffic because of the right turn only exit on Ocean Park and no “keep clear” zone on Lincoln to enable southbound traffic to enter safely and easily. While an alternative entrance using 10<sup>th</sup> Court or Hill Street might be feasible, this will negatively impact the adjacent residential areas.

Because of the terrain along Lincoln, pedestrian access to local serving businesses is limited for many residents, unfortunately. *What Lincoln Boulevard needs desperately is redevelopment that adds local serving businesses along its entire length from the I-10 freeway to the Venice border, not a focal point at a congested intersection.* This will also help to reduce traffic form local residents, who now must travel further for needed services.

And, the Olympic High School site is a particularly underutilized site that has greater potential to better serve the community than just being the site for an alternate high school and monthly flea market. The lack of definition regarding future uses of this property is quite troubling for a document that is supposed to be a “vision” of the future.

Additional parking at the Ocean Park/Lincoln Activity Center, or the Olympic High School site, would definitely be needed to support new mixed-use development, but there does not seem to be a lack of parking in the adjacent neighborhoods. The Big Blue Bus study that recommended creating a “bus only” lane by removing the parking lane on Lincoln during the AM and PM commutes concluded that there was already sufficient parking in residential areas off Lincoln to support business needs.

Shared parking at various points along Lincoln makes more sense than one or two larger lots at Lincoln and Ocean Park. What’s more important is that unless the majority of businesses along Lincoln change from auto-oriented uses to other uses, the great need for parking is not evident. Most vehicles driven to auto repair facilities, for example, do not need off-site parking since they are repaired on-site.

Further, the lack of pedestrian crossings on Lincoln from Pico to Ocean Park Boulevards (only at Pearl, four blocks from either major intersection) limits access to many local serving businesses. Having more pedestrian crossings in this area will likely provide residents with more access to local serving businesses than a single Activity Center.

## Housing

The focus of LUCE regarding housing is new affordable/workforce housing near the Expo transit line, existing boulevards and activity centers and away from existing neighborhoods, as well as the transitioning of completely commercial development to mixed uses, including housing.

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*From my perspective, there seems to be some undefined assumptions needing clarification. Specifically, will affordable/workforce housing along the Expo line and boulevards be rented/sold to those who will use public transit? If so, what percentage was used in the LUCE EIR? Further, it also seems to assume that those who rent/buy new affordable housing will find work in Santa Monica. Otherwise, won't they be adding to the already gridlocked traffic on these same transit routes?*

*Based on the data presented in LUCE, the lowest paid workers in Santa Monica, who represent 30% of the total employment, appear to be frozen out of living and working in Santa Monica. These workers will continue commuting from elsewhere and in auto-centric Los Angeles this does not translate into reduced traffic. Therefore, it seems that LUCE helps those in the middle-income categories, not the lowest income categories.*

Unless parking policy tools restrict parking availability, it is unclear how additional LUCE housing: Will not exacerbate traffic gridlock on many boulevards upon which the majority of new housing will be built, or create street parking issues in areas of new development with decoupled parking/reduced parking requirements.

The City's prior enforcement of Development Agreements regarding affordable housing is not comforting. Will there be more "Dorchester" affordable units lost in the shuffle?

What else is missing in the Housing section? Data! Necessary and sufficient data, such as total employment, number of current housing units, including affordable units, as well as projected growth of jobs and housing under LUCE, to determine if any of this makes sense.

A simple table might outline all of this information thereby making the LUCE document a stand-alone document (without having to consult the 384 page 2008-2014 Housing Element). To not identify the current level of affordable housing can only be classified as an annoying and galling obfuscation, particularly since affordable housing is the centerpiece of LUCE housing!

Finally, LUCE does not state where the money to support affordable/workforce housing comes from. To think that developers are not going to profit, or that they will add affordable/workforce housing as an altruistic goal, is naive at best.

*Community benefits have a cost and LUCE needs to discuss this: The cost of adding affordable/workforce housing has a cost to every other form of housing in Santa Monica by driving up rents and purchase prices of non-affordable housing. Further, this cost includes subsidies from the State and Federal government. Is this sustainability dependent on government subsidies and higher housing costs for non-affordable housing? Are the needs and interests of all residents being served, and discussed?*

## **Bicycles**

*The framers of LUCE listened to the bicycle community in the workshops and it shows. Well done!* Now, we need to proceed with upgrades to the existing infrastructure so that bikes will be the first mode of transportation selected by residents to help meet the traffic and sustainability goals.