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April 6, 2022

**Via email to [Jing.yeo@santamonica.gov](mailto:Jing.yeo@santamonica.gov)**

Jing Yeo  
Planning Manager  
City of Santa Monica  
1685 Main Street, Room 212  
Santa Monica, CA 90401

Re: 2601 Lincoln Boulevard: Incomplete Application

Dear Ms. Yeo:

This firm writes on behalf of the Santa Monica Coalition for a Livable City (“SMCLC”). SMCLC has reviewed Administrative Approval Application filed by SanMon, Inc., for the redevelopment of the property at 2601 Lincoln Boulevard. The application submitted on March 8, 2022 appears to be incomplete. SMCLC expects that the Planning Department will inform SanMon, Inc. prior to the 30<sup>th</sup> day, or by April 7, 2022, that its application is not yet complete because the application does not meet all of the City’s requirements set forth on the Planning Application.

The application contains a requirement for the submission of “Project Plans,” which *must* include: “Dimensioned exterior elevations of the proposed project and adjacent existing buildings.” These plans must include the “[h]eight calculation methodology.” “Fully dimensioned floor plans indicating square feet and interior layout” are required, along with floor area calculations. In addition, “cross-section and longitudinal sections calling out building heights, roof projects, and all building levels in relation to” the various methods of calculating height. The application must also show “size and location of any exterior mechanical equipment on both site plan and elevations.”

The applicant was plainly apprised of these specific requirements because they are all included prominently on the form that the applicant submitted. Nevertheless, the applicant failed to provide all required materials. Indeed, a homeowner remodeling their house in Santa Monica would have to submit more detailed information than has been submitted for one of the largest residential projects in the City’s history.

### **Missing Elevations, Dimensions, and Adjacent Building Elevations**

The applicant's packet of plans includes only two sheets of elevations. These sheets (A30 and A31) show elevations along Ocean Park Boulevard, Lincoln Boulevard, Hill Place North and 10<sup>th</sup> Court. The applicant appears to treat the project as one massive building and only provides elevations for each of the sides of the lot. Yet this is not what is required on the application. The project includes *twelve buildings*. No homeowner would be able to remodel their home without providing an elevation of each and every façade of the building (and any outbuildings as well). This developer should do no less. The application is not complete until the City receives an elevation of each façade of the 12 buildings.

Moreover, the elevations that have been provided also fail to provide several required components. The elevations are not "dimensioned exterior elevations." Critically (and perhaps intentionally) the applicant has also omitted elevations of adjacent existing buildings. The Municipal Code defines "adjacent" as "having a common property line or district line or separated only by an alley, path, private street or easement." (SMMC 9.52.0202.0070.) An alley is "a public way permanently reserved for access to the rear or side of properties otherwise abutting on a street." (SMMC 9.52.020.0140.) Properties along Hill Place North and 10<sup>th</sup> Court are "adjacent" to 2601 Lincoln. Yet none of the elevations depict these adjacent buildings, a clear deficiency.

The applicant should be required to provide complete and compliant elevations prior to the application being deemed complete.

### **Missing Fully Dimensioned Floor Plans**

The applicant submits a number of floor plans for its twelve buildings, but none are truly fully dimensioned. Each of the twelve buildings should have separate floor plan sheets with all dimensions of the floors plans provided as required by the City's application. The fact that the applicant is proposing so many buildings should not relieve the applicant from having to provide comprehensive details about each of the structures it proposes for this site. Again, no homeowner could remodel their home with such scant information provided to the City; the developer should at least be required to provide the fully dimensioned plans that the City requests on its application form.

### **Missing Methodology for Calculating Height**

While the elevations disclose use of the Segmented Average Natural Grade (SANG) methodology, there is little information provided on how SANG is applied, particularly here where the property is an already excavated and graded flat pad. The City should demand further explanation of the propriety of the SANG methodology and calculations here.

### **Inadequate Cross-Sections**

As with its elevations, the cross-sections provided are also inadequate. Sheets A40 and A41 provide cross-sections on only two planes. Sheet A40 provides a single line between 10<sup>th</sup> Court and Lincoln, while A41 provides a single line between Hill Place and Ocean Park. These are patently inadequate. The developer wants to construct 12 buildings of varying heights and

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dimensions. These ALL need to be cross sectioned. Two cross sections on a project of this scope is staggeringly insufficient.

### **Missing Size of Exterior Mechanical Equipment**

The application is also incomplete because, while it depicts exterior mechanical equipment, it does not provide dimensions for it, which is a plain requirement of the application.

### **Community Meeting**

Finally, the application includes pages upon pages of community comment, but no responses from the developer. If the purpose of the community meeting is to engage the developer with the community, it is only logical that responses to these questions should be provided for the benefit of the community members who participated in the meetings, and those who are now reviewing the application.

### **CONCLUSION**

The application for Administrative Approval is incomplete. The Planning Department must request at least the information identified in this letter as missing before it is deemed complete.

Yours truly,



Beverly Grossman Palmer

Cc: City Manager David White (David.White@santamonica.gov)