



March 12, 2012

To: Jing Yeo, Senior Planner
Richard Bloom, Mayor
David Martin, Planning Director
Rod Gould, City Manager

Re: Bergamot Transit Village Center DEIR Comments

The Board of Directors of the Ocean Park Association and Friends of Sunset Park are writing this letter to ensure that our objections to any future certification of the Draft Environmental Report (DEIR) are included in the official record and responded to fully in the preparation of the FEIR.

The DEIR is an incomplete analysis of the proposed project because critical areas of the Santa Monica General Plan were ignored or superficially addressed including regional and area plans, housing ratios and mix of housing types, a shared parking district and regional Transit Demand Management Plan (TDM), defined community benefits, and traffic congestion mitigation.

1) The DEIR is too narrow in scope. Bergamot Transit Village is only one of the 7 projects under construction or in planning stages, along with Agensys, Santa Monica Academy of Entertainment and Technology, Colorado Creative Studios, Roberts Business Center, Village Trailer Park, and Paseo Nebraska, that will total nearly 2.1 million square feet of additional office space with over 24,000 new car trips per day into the area. This area constitutes a new mini-city within Santa Monica and the DEIR doesn't fully take into account current and future development in Los Angeles on its eastern edge.

We think this or any large project in Santa Monica or Los Angeles should only be certified if it fits into a regional plan agreed to by both Los Angeles and Santa Monica. The infrastructure of both cities is already straining under the increased load of traffic congestion, compromised air quality, and overcrowding that is a direct result of piecemeal planning. Santa Monica and our neighbors to the east are already gridlocked during the morning and evening rush hours. ***A full regional***

plan is needed as required in LUCE Goal T9.6 (Continue to advocate for and cooperate with regional partners to create a complete and comprehensive network connecting Santa Monica to other destinations) and LUCE Goal T15.8 (Continue to lead in coordinating with other governmental bodies in the area, including municipalities, SCAG, MTA, and the Westside Council of Governments to address issues of mutual concern related to vehicular movements, traffic congestion and other issues). If all projects cannot be accommodated, they must be downsized to a level that can be supported.

2) There is the no Area Plan as promised in LUCE Goal D20.2 (*Prepare an area plan with a community process to locate a new grid of streets with connections to existing surrounding streets, require a parking district to consolidate parking into a shared facility(ies) and establish a district-wide Transit Demand strategy to capitalize on the new Expo Light Rail.*) An Area Plan would require a coordinated look at all projects and test feasibility against desired locations for housing, office space, schools, etc.; streetscape design; building design standards; traffic circulation; parking and urban form and scale. The plans presented in the DEIR show an uninspired mega-office campus instead of an integrated village of workers and residents with local serving retail/services. The lack of explicit design standards that would be part of an Area Plan can be traced directly to the awkward public spaces, unfriendly pedestrian sidewalks and streets, the streetscape, and the massing that characterize the project. As you may know, Hines has hired the same architectural firm that did the initial project plans for the Pasadena Playhouse area redevelopment. There, dissatisfied residents (Pasadenans for a Livable City) sued the City over deficiencies in the EIR and prevailed. The lawsuit resulted in different architects producing a vastly superior, award winning project. ***These fundamental planning deficiencies can only be corrected by completing a comprehensive Area Plan as promised in Luce Goal D20.2 prior to the certification of the Bergamot Transit Village EIR.***

3) The size of this project will cause even greater traffic congestion on the nearby I-10 Freeway ramps and Los Angeles and Santa Monica Streets. According to the DEIR *eighty-nine Santa Monica and Los Angeles intersections, ten Santa Monica residential streets, and the Centinela and Cloverfield I- 10 freeway ramps have no feasible mitigation by 2030.* This analysis includes anticipated relief from the EXPO light rail coming online in 2015. This directly conflicts with LUCE Goal T15.9 (Discourage use of City streets as an alternative to congested regional facilities) and Goal T15.2 (Limit congestion to portions of the transportation network that have the least impact on the city's neighborhoods, neighborhood retail areas and mixed-use districts, to the greatest extent feasible).

There is significant neighborhood intrusion, enough to require a Neighborhood Traffic Management Plan for residential streets in both Los Angeles and Santa Monica. This means that current residential streets in Santa Monica and Los Angeles will need some or all of the following traffic calming measures: speed bumps, signalized mid-block pedestrian crosswalks, traffic signal timing modifications, additional stop signs, speed limit restrictions, diverters or semi-

diverters, cul-de-sac or street closure, chokers or narrowing of street widths and turn restrictions. These required mitigations conflict with the LUCE goals of Neighborhood Conservation and Enhancement and Proactive Congestion Management – two of the Eight Core Elements of the LUCE.

When only 8 of 97 intersections can be feasibly mitigated by 2030, the lack of a coordinated regional traffic congestion plan is a defect that must be addressed. The current project creates too much traffic congestion and neighborhood intrusion, and must be downsized to a sustainable level.

4) There is no Shared Parking District as required in the LUCE. Goal D20.2, (*Prepare an area plan with a community process to locate a new grid of streets with connections to existing surrounding streets, require a parking district to consolidate parking into a shared facility(ies) and establish a district-wide Transmit Demand strategy to capitalize on the new Expo Light Rail*) and Goal 23, (*Establish Bergamot Transit Village as a model for the creation of new shared parking facilities and TDM strategies*). The Strategic approach section of the LUCE emphasizes this, “At the core of the districts is the creation of a district-wide parking authority to consolidate existing on-grade parking and future parking needs within efficient parking structures”. **Lack of shared parking is a glaring deficiency that must be corrected given the Expo gateway status of the Bergamot Transit Village and the need to reduce vehicle trips within Santa Monica.**

5) Critical LUCE vision, goals and policies were ignored in analyzing this project in drafting this EIR.

Most egregious is the failure to meet the LUCE requirement of 40% housing in the Bergamot Transit Village District itself. Bergamot Transit Village Vision, Land Use Parameters (At the ground floor, uses that can maximize transit ridership such as creative office, retail, cultural, entertainment and public serving uses are allowed. Above the ground floor, residential and creative office uses are allowed. However, the ratio of residential to nonresidential uses should be 40/60). The Hines site is one of the few development opportunities that exist within this District. At 7 acres, it is the largest parcel and is the logical site for the most affordable and workforce housing because it is nearest to the Expo station. The City chose to call this District a “village” and thus committed to having the District include 40% residential, including workforce and affordable housing when it applied for a HUD Grant. In fact, due to the lack of other opportunities to develop housing within the Bergamot Transit Village District, Hines would have to include more than 40% housing on its site to meet the LUCE and the HUD Grant terms. To date, the Hines project proposes to build only 29% housing and over 70% commercial/retail. As one resident put it, “This is a “village” in name only”. And a predominantly commercial project that adds over 550,000 square feet will worsen the jobs/housing imbalance that is the direct result of too much commercial office space having been concentrated in the same area that contributes to greater traffic congestion. We know from previous city traffic studies that commercial projects generate at least three times more traffic than residential units.

Clearly, this project's office and retail spaces must be downsized and the amount of housing increased to reach a level of reasonable acceptability required by the LUCE and Los Angeles and Santa Monica residents. ***The final EIR must evaluate a project that has a minimum 40/60% housing to commercial ratio with specific affordable and workforce housing identified to meet the LUCE vision for Bergamot Transit village.***

6) The DEIR superficially addresses expanding housing opportunities by noting that 325 housing units will be provided. LUCE Goal LU11.2 (*Expand Housing Opportunities by identifying and designating specific infill areas along transit rich boulevards and in the districts, including near EXPO Light Rail stations and at transit hubs*). In these areas, new residential is desired to create complete neighborhoods and support sustainability goals. The DEIR doesn't attempt to define how many units are workforce, affordable or market rate. However, when 325 units divide the square footage allotted to housing, a different picture emerges. An average of 688 square feet of space results (not including elevator shafts and hallways), enough for a studio or one-bedroom apartment. This would provide little or no affordable or workforce housing for families. Using 1.9 persons per household times 325 units, as discussed in Impact 4.13.1, only studio and one-bedroom units seem under consideration for the 618 projected residents. ***The final EIR must address expanding housing opportunity by showing the mix of workforce, affordable and market rate housing.***

7) Two of the alternatives to the project discussed in chapter six of the DEIR ignore the LUCE vision and policy on providing housing at transit centers by providing 0% housing in alternative 2 (zoning compliant), and only 27% housing in alternative 4 (reduced project). If alternative 2, which has no housing, were configured as a mixed use building (a common option in Santa Monica) the additional 104,000 square feet would provide 34% housing along with reduced traffic – 5% more housing than is provided in the proposed project! Alternative 4 provides only 27% housing because most of the square footage reduction comes from housing. There is a 26% reduction in housing, a 13% reduction in office space, but only a 19% reduction in total size. These are biased alternatives that make the proposed project emphasis on office space seem favorable and ignore LUCE vision, goals and policies for the Bergamot Transit Village. ***The final EIR must show how Bergamot Transit Village will meet the LUCE vision of 40/60% housing/commercial ratio and the policy of encouraging a range of housing at transit centers. Policy LU 5.1 (Encourage Desired Uses at Stations. Encourage a range of housing options, including affordable and workforce housing around the Expo Light Rail stations with a balanced mix of local serving retail, services, and employment) and the.***

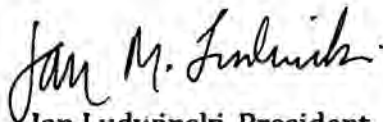
8) Community Benefits need to be determined by a community process as described in LUCE Goal LU10.2 (*Benefits tied to Community Values. Require new development that requests height above the base to provide measurable benefits to foster complete neighborhoods and support the goals of the LUCE, including reducing vehicle trips and*

GHG emissions, maintaining diversity, and promoting affordable and workforce housing). Community benefits are addressed in the EIR as if there was community consensus when in fact, the first meeting to discuss community benefits was held on February 7, 2012, approximately one month after the DEIR was released for public comment. Residents at the February 7 meeting noted that determining community benefits in the vacuum created by lack of an Area Plan was frustrating and circular. As one resident stated, "Without an Area Plan, how do we know if wider sidewalks, shared parking, workforce and affordable housing and other desirable features are required by the updates in process to the Zoning Ordinance and Area Plan or a community benefit?" There is, in fact, no consensus on this or the other projects in the 140 acres designated for development in the former industrial area of the city. ***The final EIR must include analysis of a project with measurable community benefits determined by residents in public community meetings.***

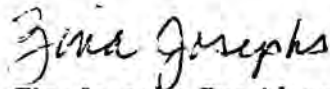
In summary, the DEIR is incomplete in critical areas and must not be certified until sufficient information and detail on:

- Regional and area plans are completed;
- Housing ratios and mix of types are included;
- A Shared Parking district and regional TDM plans are completed;
- Community Benefits are defined and approved by residents;
- And all relevant missing LUCE vision, goals and policies are addressed.

Sincerely,



Jan Ludwinski, President,
On behalf of the Board of Directors,
Ocean Park Association



Zina Josephs, President,
On behalf of the Board of Directors,
Friends of Sunset Park

CC: City Council