



Santa Monica Coalition for a Livable City

Steering Committee
Victor Fresco
Diana Gordon
Sherrill Kushner
Jeff Segal
Linda Sullivan

Advisors
Abby Arnold
Peter Davidson
Stanley Epstein
Mary Fenstermacher
John Gabree
Susan Giesberg
Nora Hamill
Bea Nemlaha
Laurel Roennau
Ruth Rosen
Jacob Samuel
Carol Sobel
Doris Sosin
Peter Tigler
Ted Winterer
Bill Zimmerman

BY U.S. MAIL and EMAIL (sarah.lejeune@smgov.net)

August 21, 2007

Sarah Lejeune
Senior Planner
City Planning Division, Room 212
1685 Main Street
Santa Monica, CA. 90401

RE: SMCLC's Objections to Initial Study re Santa Monica Place

I. Macerich's Plans to Adaptively Reuse Santa Monica Place Have Widespread Community Support and Should Not Be Delayed by the Inadequacies of this Initial Study.

Since Macerich, the owner of Santa Monica Place, has listened to community concerns and is not expanding the size of its mall, SMCLC is not opposed to its development.

We do, however, believe that this project, as envisioned, illustrates the larger problem with our city's planning, which has allowed a huge amount of high-density building downtown over the past several years without taking into account what would happen should Santa Monica Place ever become successful.

II. The Initial Study Does Not Provide the Key Analysis --- Will a Successful Mall Generate More Traffic Than the Prior, Unsuccessful Mall Did?

SMCLC believes that the new mall will significantly impact the amount of traffic in the surrounding area and exacerbate circulation problems in a wider area as the mall will now become a regional shopping center.

The Initial Study concludes that there will be no significant increase in traffic congestion from a new mall because the mall isn't being expanded (i.e., the square footage remains approximately the same).

But the key question is not the size of the mall, but whether there are new uses that will greatly intensify the levels of activity at the mall, and pose new circulation, congestion and parking issues. For most of its 27-year lifespan, Santa Monica Place has been an underperforming mall. Even so it created traffic problems for the surrounding area,

including the nearby freeway exits. ("Santa Monica Place: Might over Blight and the Bottom Line," Nina Fresco, *Santa Monica Mirror* - 7/13 - 7/19/2005)

Macerich now envisions an entirely new mix of high-end, high price point stores and restaurants for the mall in order to attract a regional customer base. The goal is to make the mall a "destination" similar to shopping destinations like The Grove or Rodeo Drive.

Our Third Street Promenade and the nearby Pier and Ocean are already major destination spots, so this would be another "magnet" potentially creating significant circulation problems throughout the downtown vicinity and adjacent neighborhoods.

III. Since the Initial Study Fails to Consider Greater Intensity and Change in Use It Also Fails to Analyze the Cumulative Traffic Impacts of All the New Downtown Development Plus a Renovated Santa Monica Place, or whether Traffic Mitigations Exist.

In the Initial Study is a chart (Table 4) which shows that 4 of the 8 key intersections in the vicinity of the mall will be failing by 2014. However, the report concludes that the mall's role in this congestion failure is insignificant because the traffic it generates would not be any greater than the previous mall "could have generated."

This is useless speculation with serious consequences for future downtown development. Residents have repeatedly experienced the results of existing city planning based on unrealistic traffic assumptions. Those results include unplanned for congestion and more development than our city's streets, and our residents can handle.

We also believe that the traffic data cited in the Initial Study, from the city's 2004 Traffic database, is stale and unreliable as it was not calibrated, and it relies on a traffic methodology deemed inaccurate by our city, as well as its residents, for determining accurate, citywide congestion and transportation impacts. It is not only key intersections in the project's vicinity that become gridlocked; surrounding neighborhoods bear the brunt of the overflow traffic trying to escape the congestion.

In June 2005, due to similarly flawed and outdated traffic data, SMCLC successfully petitioned the City Council to remove Santa Monica Place from the Civic Center Specific Plan EIR and to require Macerich to conduct new, calibrated traffic and other environmental studies when it returned with its development proposal for Santa Monica Place. The goal was to ensure that our city would understand the true circulation impacts of a revitalized mall in relation to the heavily developed downtown, and that it would then factor the impacts into future development decisions.

IV. What Needs To Be Done

Our city planning department must address getting accurate traffic impact information about this revitalized mall now as part of its obligation to update its traffic database and our circulation element and in order to plan for the future.

We urge the City Council to act now to allocate the additional resources that are needed to allow city staff to expedite study of alternate traffic impact methodologies and to begin collecting the baseline traffic and congestion data for this mall and for the city as a whole.

It has now been over two years since the Council convened experts to explore this issue. Since then there has been widespread community support for a new system, from residents, our Planning Commission, and our highly respected Task Force on the Environment.

Given the current 2009 LUCE completion date, there is sufficient time for the city to choose and implement a new, accurate and citywide traffic impact system. We urge the city to do so.

Sincerely,

Diana Gordon for

The Santa Monica Coalition for a Livable City

Cc: Macerich (R. Young)
Lamont Ewell
Eileen Fogarty
Task Force on the Environment
Planning Commission
City Council