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June 26, 2020

VIA E-MAIL

Santa Monica Planning Commission
1685 Main Street, Room 212
Santa Monica, CA 90401

Re: Agenda Item 9A (Expansion of Downtown Hostel)
Applications DRP 19ENT-0341, CUP 20ENT-0158, Maj. Mod. 2-ENT-0118
Owner/Applicant: Hostelling International USA
City Landmark LC03-002 (Rapp Saloon) and Landmark Parcel 17ENT-0272
Addresses: 1436-40 Second Street
Our File No. 22445.001

Dear Commissioners:

This letter is submitted on behalf of Hostelling International USA ("HI USA"), a non-profit organization dedicated to owning and operating hostels through the United States.

I am writing to reinforce the Staff recommendation that the Commission should approve the requested development review permit, conditional use permit amendment, and so-called "major" modification related to the proposed expansion of the existing hostel that has operated in Downtown Santa Monica for more than 30 years.

As to the draft Statement of Official Action ("STOA"), we request and recommend that the Commission address various conditions of approval as discussed in the last section of this letter.

THERE ARE COMPELLING REASONS FOR APPROVAL

While we greatly appreciate the Staff recommendation, it somewhat "buries the lede." First, the City should be thrilled that HI USA is proposing to expand the supply of affordable lodging in Downtown Santa Monica's Coastal Zone. The last time this happened was when HI USA last expanded its facility in 2002. As the Commission is no doubt aware, the California Coastal Act and Santa Monica's Final Draft LUP Update strongly encourage increasing the supply of affordable lodging in the Coastal Zone.

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Second, the City should be quite pleased that as part of this project, HI USA (under the guidance of preservation architect David Kaplan) is proposing not only to update the interior electrical and lighting system currently within the City's first designated City Landmark (the Rapp Saloon), but also expand its occupancy capacity and versatility as a cultural and community resource by removing its nonoriginal elevated flooring, which will mean that there will no longer be any need for the extensive ADA ramp currently found within the historic building. This results in an expansion of the usable floor area without any expansion of the historic building's exterior.

So, this project is a win for affordable lodging, a win for historic preservation, and a win for cultural and community programming space.

INTRODUCTION

What is a hostel?

Hostels are a specialized type of low-cost lodging. Hostels generally offer both shared dormitory-style and private rooms and offer common areas for guests to enjoy and meet others. One of the primary reasons that folks opt for hostels over hotels is a hostel can be significantly cheaper for travelers. Hostels usually have a self-serve kitchen. This means that travelers on a budget have the option to make some of their own meals and store some food and snacks during their stay. A hostel is a type of accommodation that allows folks to travel better, cheaper, and for longer, all while meeting new people.

Hostels are intended to feel much more like a community or a dormitory than a hotel. Hostels usually also offer many different amenities to meet their guests needs, such as free breakfast, self-serve laundry, free Wi-Fi, and more.

Hostels frequently have a social component to them that facilitates travelers meeting new people and trying new things. Often hostels will arrange various social events. These serve as a great way to "break the ice" and get to know other people from around the world. On top of that, hostels have staff that are dedicated to providing travelers with useful information and recommendations as they explore a community.

Hostels generally support local organizations and businesses when recommending activities, restaurants, or shopping to their guests. Rarely would a hostel staff member recommend eating at a chain restaurant or shopping at a big-box chain store. Plus, hostels often team up with local businesses and boutiques to offer special discounts for guests, so travelers can support the local economy and get a taste of the local culture.

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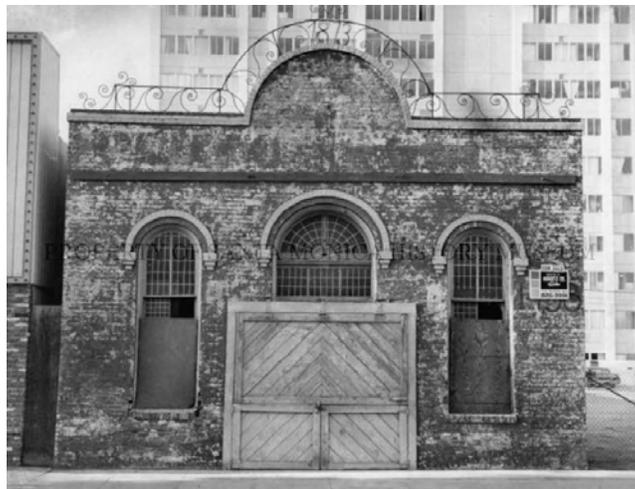
Who is Hostelling International USA?

Hostelling International USA (<https://www.hiusa.org/>), also known as American Youth Hostels, Inc., is a non-profit organization that operates hostels and offers programs around those hostels. HI USA was founded in 1934 and has nearly 50 locations across the country and is the official U.S. affiliate of Hostelling International. HI USA partners internationally, via Hostelling International, to provide a network of hostels that can be visited across the world.

In addition to providing lodging and interactive opportunities for guests, HI USA also uses a portion of the revenue raised through overnight stays and memberships to support travel scholarships and educational programs as well as for cultural events for overnight guests. HI USA's educational programs include intercultural exchange activities to facilitate the spread of tolerance, on-demand immersive programs designed to help engage with social issues, intensive cultural exchange programs in order to explore cultural differences and similarities, as well as ongoing cultural, travel, and environmental educational seminars.

What is the Rapp Saloon?

The Rapp Saloon building was constructed in 1875 and on August 20, 1975 became Santa Monica's first designated City Landmark (LC03-002). The one-story Rapp Saloon building is reportedly the oldest masonry building remaining in the City, constructed in the first years of the City of Santa Monica's formation. The building has a long colorful history of uses that includes a saloon, Town Hall, and at some point, automotive repairs.



1976 image courtesy of Santa Monica History Museum

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The Rapp Saloon was rescued from demolition¹ and rehabilitated as part of the Hostel project. The Hostel was originally constructed in 1989-90. This is likely Santa Monica's first true adaptive reuse preservation project. The multi-story Hostel building was constructed behind and to the north side of the designated Landmark. The Rapp Saloon building contains approximately 1,000 square feet and has entrances from Second Street and from the Hostel's lobby.

The Hostel has used the Rapp Saloon as a Cultural Facility with programming and nonprofit meeting space for many years, as well as programming and meeting space for the Hostel and its guests.

As part of the proposed expansion, the Rapp Saloon will continue to be shared with non-profit organizations while also providing free and discounted community programming. Following the Hostel's proposed expansion, the Rapp Saloon will continue to be used as a Cultural Facility and will receive improved ADA access, expanded usable floor area (by removing the need for handicapped ramping within the interior), better meeting and performance style lighting, and A/V technology improvements. HI USA intends to submit a Private Developer Cultural Arts Plan reflecting that the use of and improvements to the Rapp Saloon will satisfy the Private Developer Cultural Arts Requirement. (See SMMC § 9.30.120.)

POLICY REASONS FOR SUPPORTING THIS PROJECT

Section 30213 of the California Coastal Act provides in key part:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

This strong preference is also reflected in Santa Monica's Final Draft Land Use Plan (Oct. 2018) of the Local Coastal Program Update. (LUP Update at p. 99.) Policy 47 of the LUP Update states the very same preference: "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided." (LUP Update, p. 108.)

¹ See Certificate of Appropriateness LC-03-002-1. On November 19, 1985, Administrative Approval #AA243 was issued for demolition of the Rapp Saloon. On November 26, 1985, the City Council approved Resolution 7123 extending the time for exercising the right to demolish the building.

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The existing Hostel is located in the Coastal Zone. The proposed expansion of the Hostel furthers the preferences and goals of the California Coastal Act and Santa Monica's LUP Update. Very few opportunities like this come along. The City should welcome this expansion with enthusiasm.

The same is true for the revitalization of the Rapp Saloon. This historic building will not only be preserved, but will remain in community and cultural use, and will receive better interior lighting and updated audio-visual technology capabilities. In addition, the usable floor area will be expanded as described above.

THE PROPOSED PROJECT

The proposed Tier 2 project will expand the existing affordable lodging Hostel facility onsite by adding new and renovated guestrooms on the west/rear of the subject property. The expansion will consist of a five-story addition comprised of 15,622 square feet resulting in a 2.83 FAR-- less than the 3.0 FAR allowed per the DCP. The proposed project's height will be 60', consistent with the 60' height allowed in the DCP.

The Hostel's proposed expansion will achieve a renovated dining room and central courtyard, reconfigured common areas for guest use at the first floor, and will develop 49 new guestrooms (46 new modular unit guestrooms and three guestrooms from conversion of common living space), while removing nine existing guestrooms, and modifying the size of three guest rooms for a net increase of 40 guestrooms. All guestrooms in the expanded portion of the building on the second through fifth floors will consist of prefabricated modular units that will be transported to the site for efficient assembly. Moreover, use of prefabricated modular units will allow the Hostel to remain fully operational throughout most or all of construction (aside from those existing guestrooms that will be replaced). Two of the new guestrooms in the project will be ADA accessible.

The historic Rapp Saloon will remain in use as a community amenity and will have its usable space expanded through the removal of its currently elevated flooring. By leveling the interior floor with the exterior front sidewalk as well as the rear flooring of the Hostel, the interior steps and interior handicapped access ramping can be removed, resulting in a much larger usable space inside, a more grand floor-to-ceiling height inside, and direct access for all through the front and rear entrances without ramps, stairs or lifts. The useable space within the Rapp building will increase from 711 sf to 866 sf. The non-original front door will be replaced in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The non-original concrete steps in front of the Rapp Saloon can be removed, so there would no longer be an encroachment of 10 linear feet into the public sidewalk in front of the

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landmark building. Other proposed improvements will be made to the Rapp's mechanical systems and non-original lighting.

Onsite community and cultural benefits will be provided within the Rapp building pursuant to Chapter 9.23 of the Code.

EDITS TO RECOMMENDED CONDITIONS OF APPROVAL

The draft STOA lists 93 recommended conditions of approval. We ask that the Commission pay particular attention to those conditions of approval. Please note the following, which are listed in the order found in the draft STOA:

Condition 6:

HI USA has some concern about the possible interpretation of the prohibition against "amplified music/noise . . . on the premises." We do not want this condition to be interpreted to prohibit the use of televisions, low volume background music, and the like in common areas of the Hostel. Perhaps a refinement as follows would be helpful:

No dancing, live entertainment or amplified music/noise shall be permitted on the premises, with the exception of within the Rapp Saloon building space. **Notwithstanding the foregoing, the use of electronic devices typically found in hotels or residences (e.g., televisions, speaker phones, emergency alarms, or background elevator/hallway music) shall be permitted at normal volumes within the facility.**

Condition 10:

The second sentence of this condition references the ability to appeal relating to a subdivision map. This project does not propose any subdivision map. That sentence should be deleted:

~~An appeal of the approval, conditions of approval, or denial of a subdivision map must be filed with the City Clerk within ten consecutive days following the date of Planning Commission determination in the manner provided in Section 9.54.070(C).~~

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Conditions 36 and 93.

Condition 36 lists “construction management plan” requirements. Condition 93 lists “construction period mitigation plan” requirements. There is a great deal of overlap between these conditions (e.g., methods of demolition, use of cranes, use of public rights-of-way, construction noise mitigation, construction security, construction parking, etc.). These two conditions should be combined into one single condition that clearly sets forth what is being required.

Condition 40.

Condition 40 requires boarding up a facility “unless the structure is currently in use.” Here, the Hostel will remain in use (once the COVID-19 pandemic is abated). The very intention of utilizing modular construction assembly is to minimize or avoid closure of the facility during construction of the rear addition.

Conditions 42 and 62.

These two conditions (regarding construction fencing and removal of trash) are duplicative of each other. One of them should be deleted. Moreover, only portions of the property will require construction fencing, not the entire “perimeter of the lot.”

Conditions 45 and 63.

Again, these two conditions (regarding construction information signage) are duplicative of each other. One of them should be deleted.

Condition 52.

This condition references “auto parking” (as well as bicycle parking and loading) being subject to review by the Mobility Division. However, as indicated in the Staff Report, there will be no auto parking provided on site. The reference to “auto parking” should be deleted.

Condition 84.

Condition 84 requires the Hostel to install two telecommunications vaults “dedicated solely for City of Santa Monica use.” This is an existing affordable lodging facility proposing to provide additional affordable lodging accommodations. The burdensome requirement to provide the City with two free telecommunications vaults should be removed.

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Condition 85.

This condition requires the Hostel to “provide new street-pedestrian lighting with a multiple circuit system along the new street right-of-way and within the development site” including “new street-pedestrian light poles, fixtures and appurtenances.” This project is not providing a “new street right-of way.” This condition appears to have been drafted for a different project and should be deleted.

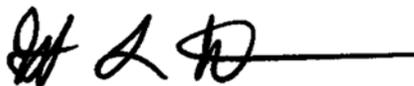
Condition 90.

This condition regarding recycling includes a sentence referencing multi-family housing. The project is an affordable lodging facility; no multi-family housing is proposed. Accordingly, this sentence should be deleted because it is inapplicable: “~~The State of California AB 341 requires any multi-family building housing 5 units or more to have a recycling program in place for its tenants.~~”

CONCLUSION

We urge the Planning Commission to approve the development review permit, conditional use permit amendment, and major modification as recommended by City Staff. We ask that the conditions referenced above be corrected as noted.

Very truly yours,



Kenneth L. Kutcher

KLK:sna

cc: David Martin
Jing Yeo
Grace Page
Heidi von Tongeln
Aaron Chaffee
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David Kaplan