



October 21, 2020

Mr. Shawn Landres, Chair
and Santa Monica Planning Commissioners
City of Santa Monica
1685 Main Street
Santa Monica, CA 90401

Re: Proposed Amendments to Section 9.10.040 of the Santa Monica Municipal Code to Prohibit Certain Fast Food Restaurants in Establishments with Frontage on Third Street Promenade, October 21, 2020 Agenda, Item 9-B

Dear Chair Landres and Honorable Planning Commissioners:

Downtown Santa Monica, Inc. (DTSM) recommends the Planning Commission adopt the proposed resolution and advise City Council to amend the Zoning Code, making permanent the ban on large chain fast food establishments on Third Street Promenade currently enacted by an Interim Zoning Ordinance (IZO).

We have collaborated closely with City staff over many years to fine tune our understanding of the restaurant market as the lines between traditional fast food and modern fast casual restaurants have blurred.

We recommend the definitions and typical fast food conditions written into the code be consistent with the IZO currently in effect. After careful review of many other jurisdictions, we believe these criteria to be the most straightforward and easily enforceable. However, in order to provide limited additional flexibility in light of current economic conditions, we ask that the threshold used to define chain fast food be increased slightly from 100 to 150 domestic locations.

The IZO's prohibition of fast food uses on Third Street Promenade is intended to promote land uses and tenancies that contribute to the long-term character of the street, which is a policy prioritized in the Downtown Community Plan. While we understand and share the sense of urgency around filling our increasing number of vacancies and stabilizing our local economy, we caution that permitting even a few fast food outlets now will significantly alter the tone and character of the Promenade for decades to come.

Additionally, we are sensitive to the need for the district to be welcoming and inclusive, both to lower income guests who may seek food options at lower price points as well as to minority entrepreneurs, who may access business opportunities through franchises.

However, we urge you to keep in mind that such uses are expressly permitted, and well represented, throughout downtown while the code change we propose applies only to three discrete blocks worthy of additional scrutiny and careful planning.

We look forward to our continued partnership to keep Downtown a unique and vibrant community and destination.

Sincerely,



Kathleen Rawson, CEO
Downtown Santa Monica, Inc.

cc: DTSM, Inc. Board of Directors
DTSM, Inc. Staff
David Martin, Director of Community Development
Jing Yeo, Planning Division Manager
Tony Kim, Principal Planner