STAFF REPORT: REGULAR CALENDAR

Application No.: 5-17-0429

Applicants: City of Santa Monica

Agent: Christopher Dishlip

Project Location: 1685 Main Street, Santa Monica, Los Angeles County

Project Description: Improvements and addition to Santa Monica City Hall. Proposed project includes the demolition of a rear portion of City Hall, as well as minor interior improvements; the construction of a three-story above basement level, 45 ft. high, approximately 50,200 sq. ft. addition to the rear of the Santa Monica City Hall building to house the City Services Building; and hardscape and landscaping improvements.

Staff Recommendation: Approval with conditions

SUMMARY OF STAFF RECOMMENDATION

The project site is currently developed with the City Hall building, paved areas, and landscaping. The project location is less than ¼ -mile inland of the beach. The project site is located within the Civic Center Core District (“District”). The District is owned and operated by City.

The primary issue raised by the proposed development concerns potential impacts to public access, and the appropriateness of approving the proposed project given the importance of maximizing public coastal access. The proposed City Hall addition will generate a demand of 90 parking spaces. However, based on the current inventory, the Civic Center surface parking lot and parking structure provide an adequate supply of parking to support the proposed increase in the intensity of use.

Staff is recommending APPROVAL of the proposed coastal development permit with special conditions to assure that the proposed project is consistent with the Chapter 3 policies of the Coastal Act. The conditions are: 1) permit compliance and 2) best management practices.
Section 30600(c) of the Coastal Act provides for the issuance of coastal development permits directly by the Commission in regions where the local government having jurisdiction does not have a certified Local Coastal Program. The City of Santa Monica only has a certified Land Use Plan and has not exercised the options provided in 30600(b) or 30600.5 to issue its own permits. Therefore, the Coastal Commission is the permit issuing entity and the standard of review is Chapter 3 of the Coastal Act. The certified Land Use Plan may be used for guidance.
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Exhibit 4 – Letters of Opposition  
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I. MOTION AND RESOLUTION

Staff recommends that the Commission approve the permit application with special conditions.

Motion:

_I move that the Commission approve Coastal Development Permit No. 5-17-0429 pursuant to the staff recommendation._

Staff recommends a YES vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

_The Commission hereby approves a Coastal Development Permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that will substantially lessen any significant adverse impacts of the development on the environment._

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

### III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Permit Compliance.** All development must occur in strict compliance with the proposal as set forth in the application, subject to any special conditions imposed herein. Any deviation from the approved plans must be submitted for review by the Executive Director to determine whether an amendment to this Coastal Development Permit No. 5-17-0429 is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations.

2. **Storage of Construction Materials, Mechanized Equipment and Removal of Construction Debris**

   The permittee shall comply with the following construction-related requirements:

   (a) No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion.

   (b) No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers.

   (c) Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24 hours of completion of the project.

   (d) Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters.

   (e) All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day.

   (f) The applicant(s) shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction.

   (g) Debris shall be disposed of at a legal disposal site or recycled at a recycling facility. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required.
(h) All stock piles and construction materials shall be covered, enclosed on all sides, shall be located as far away as possible from drain inlets and any waterway, and shall not be stored in contact with the soil.

(i) Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems.

(j) The discharge of any hazardous materials into any receiving waters shall be prohibited.

(k) Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible.

(l) Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the onset of such activity.

(m) All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

IV. FINDINGS AND DECLARATIONS:

A. PROJECT DESCRIPTION AND LOCATION

The City of Santa Monica (“City”) is proposing to construct three-story above basement level, 45 ft. high, approximately 50,200 sq. ft. addition to the rear of the approximately 60,000 sq. ft., 55-ft. high Santa Monica City Hall building, a designated City Landmark, to accommodate the City Services Building (“CSB”) (Exhibit 2 & 3). The addition will extend across the east elevation of City Hall.

In designing the proposed project, the City took into consideration the historic sensitivity of the Landmark City Hall building. The CSB has been designed as a structurally separate building wing to the original City Hall building (Exhibit 2 & 3). However, the proposed project includes the demolition of a rear portion of City Hall, as well as minor interior improvements. The scope of demolition is limited to the removal of 37 ft. of the rear portion of the south wing of City Hall (former firetruck bay), removal of exterior stairwell enclosure on the building’s north wing, and removal of seven windows on the south wings and six on the north wing. In addition, the project has received approval from the Landmarks Commission of the City of Santa Monica ensuring the historic preservation of the City Landmark.

The subject site area measures a net 51,380 sq. ft. and is currently developed with the original City Hall building, paved areas, and landscaping. The project location is less than ¼-mile inland of the beach. The project site is located within the Civic Center Core District (“District”) (Exhibit 1). The District is bounded by Civic Center Drive on the south, Fourth Street on the east, Main Street on the
west, and E. Pacific Coast Highway on the north. The District is within the City of Santa Monica’s (“City”) larger Civic Center Specific Plan (“CCSP”) area, which encompasses a number of areas including a total of five special use districts and is bounded by Pico Boulevard on the south, Fourth Street on the east, Ocean Avenue on the west, and Colorado Avenue on the north. The proposed addition will be bounded by the extant City Hall building and the Public Safety Facility and is consistent with the surrounding land uses. The District is owned and operated by City.

**B. PROJECT HISTORY**

This item (CDP Application No. 5-17-0429) and Santa Monica College District’s application for a an Early Childhood Lab School (“ECLS”) (CDP Application No. 5-16-1033) were originally scheduled on the Consent Calendar for the September 2017 Commission meeting, but both items were postponed following the receipt of public correspondence to allow additional review time and to address the issues raised. These items are now scheduled on the Regular Calendar for a full hearing at the October 2017 Commission meeting in San Diego County, which is considered to be “local” to the South Coast District.

Commission staff received three letters/emails (one letter with seven signatures), dated September 8, 2017, from residents of the City of Santa Monica in opposition to the proposed development, requesting that both items be postponed for the next local Commission meeting in December in Orange County (**Exhibit 4**). Issues raised in these letters relate to what they characterize as the City’s piecemeal approach to planning for the Santa Monica Civic Center area, the applicant’s failure to give adequate public noticing, and parking and public access.

The City of Santa Monica submitted a letter dated September 25, 2017 (**Exhibit 5**) in response to the concerns raised by opponents of the project.

With regard to the claim of piecemeal planning for the Civic Center area, opponents of the projects argue all projects planned in the City’s Civic Center Specific Plan (“CCSP”), including the projects presently before the Commission and other future development, should be considered concurrently. The City has indicated that it is currently in the planning stages for additional development included in the CCSP, such as the construction of a multi-purpose sports field and the rehabilitation and expansion of the Civic Auditorium. However, although the CCSP has been adopted by the City, it has not been submitted to or certified by the Coastal Commission. In addition, both the City Hall expansion and the Santa Monica College District’s ECLS project successively received local approval, beyond the planning stage, and have been submitted to the Commission in separate applications. The Commission is required to act on these applications by certain deadlines under the Permit Streamlining Act and may not delay consideration of the applications so as to hear all projects together\(^1\). The future sports field and auditorium expansion projects are not presently before the Commission. The City asserts that extensive due process has been provided for consideration of all relevant issues as the projects currently before the Commission had hearings conducted by the City’s Planning Commission, City Council, and now the Coastal Commission.

Regarding public noticing, opponents argue that the City failed to adequately notice the public of the pending application submitted to the Coastal Commission. Pursuant to Section 13054 of the

\(^1\) However, separate review does not mean that cumulative impacts of the projects may be ignored. Rather, the Commission must analyze the cumulative impacts of past, present, and reasonably foreseeable future projects on public access, as it has done here.
Coastal Commission’s Regulations, the applicant is required to provide the Commission a list of property owners and tenants that are within 100 ft. of the perimeter of the project property, along with a list of known interested parties. The applicant is also required to provide stamped envelopes addressed to those entities so that public hearing notices can be mailed to them. In addition, posting notices are required to be placed in conspicuous locations at the project site, or as close as possible to the site of the proposed development.

Pursuant to the Commission’s Regulations, the City provided the stamped envelopes addressed to the list of property owners and tenants within the 100 ft. radius and a list of known interested parties to which hearing notices were prepared and mailed by Commission staff. Moreover, a notice of the pending application has been properly posted at the project site in accordance with the Commission’s regulations since June 2017. The City has indicated that it opted to post the notice on the front door of City Hall because it is where the notice is most conspicuous to visitors of the building.

Issues related to public access are addressed in Section C (Public Access) below.

**C. PUBLIC ACCESS**

Section 30210 of the Coastal Act states:

> In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act states:

> Development shall not interfere with the public’s right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212(a) of the Coastal Act states:

> Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

Section 30213 of the Coastal Act states:

> Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

As previously stated above, the project site is located in one of the districts of the CCSP area. This District is located less than ¼ -mile inland of the beach in the City of Santa Monica. The District
consists of the Santa Monica City Hall, Public Safety Facility, Civic Center Garage, County Courthouse, and Tongva Park.

In 2008, the Civic Center Garage was constructed and added 770 parking spaces to the Civic Center area, which only had 1,009 parking spaces in the Civic Auditorium surface parking lot at the time. The Civic Center surface lot and parking garage (“Civic Parking Facility”) currently consist of a total of 1,779 spaces. Historically, the surface parking lot of the Civic Parking Facility served events conducted at the Civic Auditorium, which is a multi-purpose convention center that opened in 1958. The Civic Parking Facility presently serves the Civic Center uses (i.e. City Hall, Civic Auditorium, Santa Monica Courthouse, Public Safety Facility), as well as coastal events (e.g. Twilight concert Series), general public parking, and Santa Monica High School staff and students through monthly passes during the non-peak summer season. In addition, approximately 100 of the 230 parking spaces extant at the project site were leased to Macerich SMP LP and served a valet parking program; this lease, however, expired on December 31, 2016 and was not renewed.

The proposed City Hall addition will accommodate the City Services Building, which has been designed to provide office space for up to 239 permanent City employees to facilitate public services in one location. Presently, the 239 City employees are located at various off-site locations near and within the CCSP area (i.e. 1901 Main Street; 1717 4th Street; City Hall; and 1437 4th Street). Out of the 239 City employees, 176 possess monthly passes to the Civic Parking Facility and are accounted for in the present parking demand. Approximately 63 City employees have the option to park either at the Santa Monica Library, at the subterranean parking spaces available to them at their off-site locations, or at the Civic Parking Facility. Therefore, these 63 City employees have the potential to generate new parking demand in the CCSP area. Taking a conservative approach, Commission staff has assumed that the proposed City Hall addition and consolidation of City staff within the CCSP area will generate a demand of 63 parking spaces. The City is also proposing to add six new vehicles to the City’s vehicle pool within the Civic Parking Facility (garage and surface lot), which will displace six parking spaces currently available. Finally, according to the City’s staff report for this project, “it is assumed that 21 regular users of th[e] [North surface parking] lot [that abuts City Hall] will be transferred permanently to the Civic Parking Facility once the construction of CSB commences”. Therefore, based on the new demand, displaced parking, and transferred users, the project will have a total demand of 90 spaces. To determine whether or not the proposed project will be adequately supported by the Civic Parking Facility, a supply of 90 parking spaces must be currently available to mitigate for the increase in demand and displacement of parking anticipated as a result of the proposed development to avoid any adverse impacts to public coastal access.

Because of the project site’s proximity to the State beach and its location in a public parking lot, development in the parking lot could adversely impact public access to the beach by reducing the total parking inventory near the coast. If the parking demand generated by development within the CCSP area exceeds the supply of parking that is currently available to the public and for CCSP area uses, visitors of the Civic Center uses will utilize the offsite parking that is needed to support general beachgoers, strollers, bicyclists, and joggers that depend on and use the parking that is available in the general vicinity of the coast. Therefore, in order to find that the proposed project is consistent with the access policies of the Coastal Act, the Commission must find that the parking demand generated by the proposed development is adequately supported by the supply of parking available for new uses in the District or that the project is making other provisions to satisfy this transportation demand.
It should be noted that there is another application concurrently before the Commission for the removal of 230 parking spaces at the Civic Auditorium surface parking lot to accommodate an Early Childhood Lab School (“ECLS”) (CDP Application No. 5-16-1033), which will also be served by the Civic Parking Facility. The required parking supply anticipated for the ECLS project is estimated to be 285 parking spaces.

Current parking utilization data of the Civic Parking Facility (surface parking lot and parking garage) has been provided and indicates that there is an adequate supply of parking to support the proposed development. According to utilization data collected for the Civic Center surface parking lot for the month of March 2017, occupancy did not exceed 60%, with a minimum of 400 parking spaces available on a weekday, and did not exceed 40%, with a minimum of 600 parking spaces available on the weekend. This lower utilization rate may be due, in part, to the Civic Auditorium not being fully operational since 2012 due to earthquake damage; the East Wing of the auditorium is available for limited public events and the Main Hall is available for limited events and film rentals that are not accessible to the general public. Based on July-August 2016 utilization data for the Civic Center Garage, the minimum number of parking spaces available in the parking structure during typical peak weekday period is on average approximately 25%, or 192 parking spaces, and approximately 50%, or 385 parking spaces, on the weekend. In addition, bicycle parking facilities for employees and visitors will be provided as part of the ECLS project to accommodate 27 bicycles onsite. Therefore, it is reasonably foreseeable that the Civic Parking Facility (surface parking lot and garage) will adequately support the City Hall addition.

Downtown Santa Monica is unique in that the City is constantly working on ensuring that the downtown area is transit-oriented. An example of such efforts includes the founding of an Emissions Reduction Program. This program makes use of the Metro Expo Line stations that recently opened, which are less ¼ -mile from the project site, and of the public bike share system recently established downtown, which are within walking distance to the beach and the City’s Municipal Pier. The close proximity and accessibility of the project site to the alternative transportation will help reduce parking demand at the project site.

To ensure adverse impacts to coastal resources and public access are avoided, the Commission imposes **Special Condition 1** to ensure permit compliance.

Opponents of the project argue that the existing parking supply is inadequate and will not allow for future projects within the Civic Center area. However, as described in greater detail above, the existing supply of 1,779 parking spaces has been determined to be adequate to support the proposed uses and reasonably foreseeable future uses associated with the proposed City Hall addition. As for future development within the Civic Center area, the City is currently planning the future rehabilitation and future expansion of the Civic Auditorium and construction of a multi-purpose sports field within the Auditorium Special Use District. For any future development in the Civic Center Area, the City will need to continue to evaluate parking demand and availability to ensure that the parking supply at the Civic Center area is adequate to mitigate for any proposed future increase in demand and/or displacement of parking to avoid any adverse impacts to public coastal access.

The City asserts that tying the fate of the Parking Facility to coastal access is moot due to the project site’s location just within the border of the Coastal Zone. However, as previously stated,
development in close proximity to the coast within the Coastal Zone boundary, such as the project site, has potential to adversely impact public coastal access. This is especially so if the development becomes a popular visitor destination with the potential to generate a high demand such as, but not limited to, a multi-purpose sports field. The City nevertheless recognizes the need to address parking and public coastal access for any new uses in this area. Therefore, the City is presently conducting a comprehensive parking analysis to assess the demand and effects of the future development, and to fully address the adequacy of parking and to provide solutions to avoid any future, cumulative adverse impacts to public coastal access that might result from future approval of other projects in this area.

D. **Visual resources & Community Character**

Section 30251 of the Coastal Act states, in relevant part:

> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas...

Section 30251 of the Coastal Act requires that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. The City is proposing to construct a three-story above basement level, 45 ft. high, approximately 50,200 sq. ft. addition to the rear (or inland) of the approximately 60,000 sq. ft., 55-ft. high Santa Monica City Hall building to accommodate the City Services Building. The proposed development is not anticipated to adversely impact coastal views. Therefore, the Commission finds the proposed development is consistent with Section 30251 of the Coastal Act.

E. **Biological Resources**

Section 30230 of the Coastal Act states:

> Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

> The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges- and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of
natural streams.

Section 30240 of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30230 of the Coastal Act requires that marine resources be maintained, enhanced, and where feasible, restored, and further requires that uses of the marine environment shall sustain the biological productivity of coastal waters. Section 30231 of the Coastal Act requires that the biological productivity and the quality of coastal waters be maintained, and where feasible, restored through measures aimed at reducing water resource impacts from proposed development. Section 30232 of the Coastal Act requires protection against the spillage of crude oil, gas, petroleum products, or hazardous materials in relation to any development.

Storage or placement of construction materials, debris, or waste in a location subject to erosion and dispersion or which may be discharged into coastal water via rain or wind would result in adverse impacts upon the marine environment that would reduce the biological productivity of coastal waters. Because the project site is located in close proximity to the coast and runoff from construction can impact the beach and ocean, the Commission imposes construction-related requirements and best management practices under Special Condition 2 in order to minimize adverse construction-related impacts upon marine resources and for erosion control.

New landscaping is proposed and will consist of both low and moderate water use, non-invasive plants. Typically, the Commission requires that all new landscaping comprise of only low water use, non-invasive plants (Low WUCOLS Ranking) as identified by the California Department of Water Resources. In this case, however, the City Services Building addition will be a “Living Building Challenge” certified building (i.e. Net Zero Energy, Net Zero Waste, Net Zero Water, etc.), and Net Zero Water is proposed to be met through reduction of water use, water reuse, and water recycling. Reused and recycled water will be utilized to water the proposed landscaping. Moreover, stormwater runoff will be diverted to a bio-swale for onsite infiltration.

Therefore, the Commission finds that, as conditioned, the development will be consistent with Sections 30230, 30231 and 30240 of the Coastal Act.

F. LOCAL COASTAL PROGRAM

Coastal Act section 30604(a) states that, prior to certification of a local coastal program (“LCP”), a coastal development permit can only be issued upon a finding that the proposed development is in conformity with Chapter 3 of the Act and that the permitted development will not prejudice the ability of the local government to prepare an LCP that is in conformity with Chapter 3. In August 1992, the Commission certified, with suggested modifications, the land use plan portion of the City
of Santa Monica's Local Coastal Program, except for the areas of deferred certification. On September 15, 1992, the City of Santa Monica accepted the LUP with suggested modifications.

Although the City of Santa Monica has a certified LUP, the project is located within one of the areas of deferred certification. As discussed above, the proposed development, as conditioned, is consistent with Chapter 3 of the Coastal Act. Therefore the Commission finds that approval of this project, as conditioned, will not prejudice the ability of the City of Santa Monica from preparing a total Local Coastal Program for the areas of deferred certification that conforms with and is adequate to carry out the Chapter 3 policies of the Coastal Act.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096 of the Commission's regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. Special conditions imposed will mitigate adverse impacts to coastal resources and public access. The special conditions address the following issues: 1) permit compliance and 2) best management practices. As conditioned, the Commission finds that there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect of the proposed project, and finds that the project is consistent with CEQA and the policies of the Coastal Act.

APPENDIX A - SUBSTANTIVE FILE DOCUMENTS

- City of Santa Monica certified Land Use Plan
- Coastal Development Permit Application No. 5-16-1033
- City of Santa Monica Civic Center Specific Plan
- Preliminary Geotechnical Investigation, Proposed City of Santa Monica – City Services Building, 1685 Main Street, Santa Monica by Geotechnologies, Inc., October 14, 2016.
- City of Santa Monica Planning Commission Report, Agenda Item 9-B, Smgov.net, City of Santa Monica, November 2, 2016.
  Web: https://www.smgov.net/departments/pcd/agendas/Planning-Commission/2016/20161102/s2016110209-B.pdf
- Appeal (16ENT-0200) to City Council of the Planning Commission’s Approval of Development Review Permit 16ENT-0140 for the City Services Building, Santamonicacityca.iqm2.com, Santa Monica Office of the City Clerk, January 2017.
EXHIBITS

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Exhibit 5 – City’s Response to Public Correspondence
Project Location: City of Santa Monica, Los Angeles County

Civic Center Specific Plan Area (CCSP area)
AREA BREAKDOWN FOR EXISTING:

- Portion of Existing Building to be Demolished: 2,200 SQ. FT.
- Paving Area: 36,700 SQ. FT.
- Landscape Area: 14,500 SQ. FT.
- Total Area: 53,400 SQ. FT.
September 8, 2017

Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Attention: Marlene Alvarado

Regarding your meeting on September 14, 2017, we request removal and postponement of the following items on the consent calendar:

Opposition to ITEM NO: Th5a – PERMIT NUMBER: 5-16-1033 – Santa Monica Community College’s Early Childhood Lab School, to be located in the Civic Center

Opposition to ITEM NO: Th5c – PERMIT NUMBER: 5-17-0429 – Addition to the City Santa Monica’s historic City Hall

Reference is made to (i) Coastal Commission Permit Application 5-16-1033 by applicant Santa Monica Community College District relating to “Application of Santa Monica Community College District to replace 230 parking spaces in Civic Center surface parking lot with Early Childhood Education Center consisting of 3, 1- to 2-story buildings totaling 19,152 square feet; outdoor space for childplay areas, and 15 surface parking spaces at 1802 4th St., Santa Monica, Los Angeles County. (MA-LB)” (“ECEC”), and (ii) Coastal Commission Permit Application 5-17-0429 by applicant City of Santa Monica relating to the “Application of City of Santa Monica for 3-story, above basement level, 45-ft. high, 50,200 sq.ft. addition to rear elevation of Santa Monica City Hall to house City Services Building, at 1685 Main St., Santa Monica, Los Angeles County. (MA-LB)” (“CSB”), which are items on the consent calendar for the September 14, 2017 meeting in Cambria.

We request that you remove these applications from the consent calendar and postpone for a hearing based on:
(1) Applicants’ failure to give notice of submission to the Coastal Commission and lack of public access to the Application files;
(2) Inappropriateness of the applications for consent calendar due to their controversial nature. The public overwhelmingly supports the Civic Center Field ("Sports Field"), which has been approved by City Council yet not submitted to the Coastal Commission. The public does not support the ECEC or CSB in general, and would oppose Applications for those projects that prevent the Sports Field from moving forward because its location is being used as mitigation for the parking demands of the ECEC and CSB;
(3) Failure to accurately determine parking usage of the ECEC and CSB and Civic Center parking capacity due to inaccurate and incomplete information provided by applicants; and
(4) Failure to consider the approved Civic Center Field project as a concurrently application along with other uses impacting access because the mitigation measures in the Applications eliminate the location of the Sports Field from the Civic Center Specific Plan ("CCSP").

Based on our review of the Coastal Commission applications, it does not appear that the Applicants gave accurate or complete information to the Coastal Commission and the Applications deserve the scrutiny of a full hearing.

We have combined our request into one document because the Applications are being reviewed concurrently, they are both located within the CCSP area, and Coastal Commission staff relied on the same data and information, and used the same data and analysis regarding parking usage and inventory, for both applications. Therefore, it is both necessary and appropriate that both be postponed. Furthermore, we are aware of no legal deadline for action since these are both projects under the City’s control.

We request that this be postponed to the December meeting, which is the Los Angeles/Orange County meeting, in order to afford the greatest opportunity for public participation. Members of the public who are concerned about these projects, other than those with a financial interest, simply won’t be able to travel to Chula Vista or Bodega Bay to participate in the meeting. Furthermore, this item should be agendized for a full hearing, instead of being placed on the consent calendar due to how controversial and unpopular the ECEC and CSB are in our community.

Our request for removal of the applications from the Consent Calendar and postponement for a hearing is based on the following justifications. We would be happy to provide additional information if needed.

1. Failure to Give Notice

A. Invalid Posting of Notice
The applicants failed to provide notice of their submission of the ECEC and CSB to the Coastal Commission, and as a result the public has not had sufficient access to, or time to review, analyze and respond to, the applications.

The public investigated both sites thoroughly and there was only one notice posted for each project. Public notice for the ECEC was not posted on yellow card stock or in a conspicuous location as required by the Coastal Commission. Instead, the notice is white and is posted in a remote corner of the surface lot that is gated and closed for public use. See Exhibit 1A.

The City did not stamp and date its own notice of submission of the CSB Application for public display until Sept. 5, 2017. See Exhibit 1A. Also, public notice for the CSB is posted on automatic doors, making it impossible for members of the public to read the notice upon entry to the building. See Exhibit 1A.

With respect to delivery of notice prior to the meeting, it appears only residents within 100’ of the projects would get notice, which is zero. In addition, there is a list of Interested Parties who are supposed to get notices for the projects, and we do not know how one gets on that list. Dozens of members of the public spoke out against the ECEC and the CSB at City Council meetings yet the vast majority of these individuals as well as city-sanctioned neighborhood organizations failed to receive notice regarding these projects. Also, the CSB File Log indicates notice was sent on 8/29 but an envelope received by an interested party is postmarked 8/30. See Exhibit 1A. We did not find a Project File Log for the ECEC.

B. Lack of Public Access to Application

Very recently several members of the public happened to hear a comment in passing that the City had submitted the ECEC and CSB to the Coastal Commission for approval without the Civic Center Field or the completion of a parking study supposedly underway. This shocked and infuriated the residents who moved as quickly as possible to confirm the applications by telephone with the Coastal Commission on September 1, 2017.

Because the Coastal Commission does not have electronic files, members of the public went to the Long Beach office on the first day it was open after the three-day weekend on September 5, 2017. Due to the large size of the files, it was impossible to review all of the documents or make copies at that time. A public records request was submitted for both application files, but they are not expected to be available until after the Coastal Commission meeting. As a result, the public has not had an opportunity to review the application and follow-up information submitted by the Applicants to the Coastal Commission.

Although we don't have a copy of the application files yet, we began submitting public records requests to the City on September 2, 2017. We seek specific information we believe is relevant to verify the inaccuracy of information provided by the City to the Coastal Commission, such as
copies of all contracts relating to the Civic Center Parking Structure and Surface Parking Lot. We don't know how long it will take the City to respond, but electronic confirmation from the city says no longer than 10 days, which is past date of hearing. Furthermore, we don’t know how many follow-up requests we will have to make, which depends on the information submitted by the City to Coastal Commission that we won’t receive until after the meeting.

While the Coastal Commission staff has been a pleasure to deal with so far, their availability is limited between now and the meeting. Also, the meeting is in Cambria, 219 miles (a 4-hour drive) from Santa Monica and the meeting is scheduled in the middle of a work/school week, so it will not possible for members of the public who are concerned about the applications to attend at the last minute.

2. Inappropriateness of the Applications for Consent Calendar due to their Controversial Nature

The residents of Santa Monica do not favor the ECEC or the CSB. Yet the City is moving forward and submitting these two projects instead of the project the public does want, the Sports Field. Coastal Commission staff stated that these applications were placed on the consent calendar because the City gave them the false impression that the public supported the ECEC and CSB. This is simply not true.

Furthermore, if the public understood that the manner in which the City had submitted these projects, separately and prior to the Sports Field, they would be livid. This is because City Council approved and promised the field in the surface parking lot and has made public representations that the field will happen. An RFP was issued an $3.45 million was earmarked for construction on the Sports Field in May 2016. As recently as its June 27, 2017 meeting, City Council directed staff to conduct a parking study of the Civic Center that it stated was required by the Coastal Commission, so the public would have no expectation that the ECEC or CSB would move forward prior to completion of such study.

Furthermore, the Sports Field will be rendered impossible to build in accordance with the CCSP by the Coastal Commission’s use of the Sports Field space as mitigation for the increased demands on parking created by these two unwanted projects. The City is violating the CCSP by submitting Applications for the ECEC and CSB that result in removal of the Sports Field from the CCSP.

A. Opposition to ECEC: Challenges to the ECEC have been growing louder as more of the public has learned that our Civic Center land will be leased to Santa Monica College for $1/year and used for private childcare for the employees of Rand, SMC and the City, as well as a satellite campus. Santa Monica voters passed an additional $235 million in bonds for SMC in 2016 and SMC has recently purchased two properties adjacent to its main campus outside the coastal zone that would be more suitable for the ECEC than the Civic Center. There was no meaningful public process for approving the ECEC because there was no development
agreement since the building itself is governed by the Division of the State Architect and the City assured the public that the EEC’s compliance with the CCSP would be enforced through an MOU with SMC. However, the Coastal Commission says it is not bound by the CCSP because the City never certified the CCSP and the mitigation measures required by the Applications would violate the CCSP by rendering the Field component of the CCSP impossible to build.

Statements opposing the project have been made at public meetings and in the press, including by the Chair of the Recreation and Parks Commission. See Exhibit 2A.

- A Letter to the City re: YWCA, John C. Smith, Santa Monica Mirror, June 16, 2016.
- Letter to the Editor: Civic Center Debate from John Cyrus Smith, Santa Monica Mirror, February 8, 2016
- Remove the ECLS from the Civic Center, Santa Monica Daily Press, Nikki Kolhoff, June 29, 2017.

B. **Opposition to CSB:** Many residents believe that the ultimate $141 million price tag for an office addition is just too much. Again, there was no Development Agreement for this project since it is a City project on City land. The Planning Commission approval was appealed and letters of support were submitted to City Council from three of the seven city-recognized neighborhood organizations (North of Montana, Association, Northeast Neighbors, and Friends of Sunset Park), individual board members of two other city-recognized neighborhood organizations (Mid-City Neighbors and the Wilshire-Montana Neighborhood Coalition), Santa Monica Architects for a Responsible Future (SMa.r.t..which publishes a weekly column in the Santa Monica Mirror), and dozens of other residents. Not a single letter opposed the appeal of the City Services Building.

Here are several articles showing public opposition to the CSB. See Exhibit 2B.

- "Appeal of City Hall Addition Approval Goes to Santa Monica Council", 1/19/17 -- Santa Monica Lookout
- "Budget and City Hall Expansion on Tap at City Council", 1/23/17 -- Santa Monica Daily Press
- "Council Rejects Appeal of $75 Million City Hall Annex", 1/26/17 -- Santa Monica Lookout

C. **Support for Field:** Residents have been begging for the Sports Field since it became part of the CCSP in 2005. The Civic Center Surface Lot is across the street from our public high school that has 3000 students and one full-size athletic field. The campus is fully built out and there is no other place for the field. Alternative locations would require busing students and many teams have been spending long hours commuting to fields while they wait for the Sports Field to be built. The Sports Field would take up a portion of the Civic Center Surface Lot, be used by the high school during the day and the community on evenings and weekends.

The Recreation and Parks Commission unanimously supports the Sports Field, and it is also supported by residents, parents, children, teachers and other members of the school district.
partial list of groups that formally support the Sports Field includes: Ben Allen (California State Senator), SAMOHI PTSA and Executive Board, SAMOHI PTSA Civic Center Task Force, SAMOHI Viking Fund, Santa Monica Recreation and Parks Commission, the Santa Monica Field Sports Advisory Council (whose membership includes Santa Monica Little League, Santa Monica AYSO, Santa Monica United Football Club, Santa Monica Girls Fastpitch Softball, Autobahn/PCSC Soccer Club, local private schools, etc.), John Adams Middle School PTSA, Lincoln Middle School PTSA and Executive Board, Grant Elementary School PTA and Executive Board, Will Rogers Elementary School PTA, Franklin Elementary School PTA, Residents Coalition, LAOUT (ultimate frisbee), Friends of Sunset Park, Pico Neighborhood Association, Wilshire Montana Neighborhood Coalition, North of Montana Association, and Northeast Neighbors.

There is a massive outpouring of public support every time the field comes up at City Council and over 1200 people supported the Sports Field in early 2016 alone. Yet the City continues to play games, like neglecting to submit the approved Field to Coastal Commission so the Commission would use the Surface lot to offset parking needs for the CSB and the ECEC projects.

Here is a sampling of support for the Field at meetings and in the press. See Exhibit 2C.

- December 31, 2015 - large volume of letters submitted in support of the Field
- January 25, 2016 - large volume of letters submitted in support of the Field
- June 27, 2017 City Council Meeting - 276 letter submitted in support of the Field
- Civic Lot Stands Empty, and May For Years, Santa Monica Mirror, February 11, 2016
- Santa Monica High Parents 'Astonished' by City's Latest Sports Field Proposal, Santa Monica Lookout, Jorge Casuso, June 22, 2017
- Santa Monica City Council Unanimously Moves Forward on Temporary Sports Field at the Civic Center, City of Santa Monica News, June 27, 2017

3. Failure to Accurately Determine Parking Demand of the ECEC and CSB, Civic Center Parking Capacity and Civic Center Parking Utilization

The scope of the ECEC and CSB projects have changed over time and the descriptions in the Applications do not accurately reflect what is reality or what has been presented to the public by the City. We do not know if the City provided accurate information to the Coastal Commission relating to the parking needs of each project.

A. ECEC: Drawings presented by city to public were not to scale and make the ECEC appear much smaller than it is, and look nothing like the drawings in the Application. See Exhibit 3A. Furthermore, the ECEC has been expanded several times since it was initially approved by City Council from 12,000 sq.ft. to 16,000 sq.ft, with an overall footprint of 24,000 sq.ft. The footprint is now bigger and takes up more parking spots because it was adjusted for sewer and storm drains. City Council also approved removal of a 50-car on-site parking lot at the ECEC. At none of these meetings was there any discussion of a concern for parking.
A restaurant is mentioned in the conditions to the Application. A restaurant on-site was never disclosed to the public.

In its submission to the Coastal Commission, SMC stated it would eliminate 230 spaces from the Civic Center Surface Lot and add 15 on-site, for a net of 215. The Coastal Commission questioned this underestimate and assigned 55 spaces to the demand of the ECEC and a total demand of 270. However, the Coastal Commission erred in its total demand calculation by subtracting the 15 on-site spots because those were reserved for drop-off and pick-up, which were not part of the 25 spaces for staff/administration or 30 spaces for college students. Therefore, those spaces shouldn’t offset and the demand assigned to the ECEC should be at least 285.

B. CSB: The CSB was supposed to be a smaller building in a different location and have its own 300-space subterranean parking structure. When the City decided to move the building and eliminate the parking structure in January of 2017, there was no concern expressed by the City for a lack of parking and the City simply concluded everyone could park in the Civic Parking Structure and Civic Center Surface Parking Lot. The Staff report states, “The Plan would require parking for City Hall and the CSB to be provided in the Civic Center parking structure and lot.” This is seven months AFTER the City approved the Sports Field in the same location and issued an RFP and earmarked $3.45 million for construction of the Sports Field.

The Application states the CSB will only need 90 spaces, which is interesting considering the original plan was 300. Why would the demand have decreased by over two-thirds? The Application states that the City staff consolidating at the CSB are located near or within the CCSP. This does not conform with the City’s promise in public meetings to residents that it would be consolidating all City staff from rented locations and locations farther away like Fisher Lumber (14th and Colorado) and Clover Park (2600 Ocean Park Blvd.). We question the accuracy of only 63 staff coming from locations who do not already park at the Civic Center. Plus, the Application fails to take into account any demand whatsoever from the public coming to meet with the staff members.

C. Capacity: We have seen conflicting information on the capacity of the Civic Center Parking Structure and Surface Lot so more time is needed to verify what is correct.

- The Applications erroneously state that the Structure was built to add to the surface lot when, as expressly stated in the CCSP, the Structure was built to replace it and the (much smaller) ECEC and Civic Center Field would be built there. It was never meant to increase the aggregate spots available for future use. See Exhibit 3C.
- Structure: Capacity numbers in public documents range from 744-882. The Application says 770.
- Surface: Capacity numbers in public documents range from 700-1009. The application says 1000.
D. Utilization: There is no clear statement of how many parking spots are available in the Civic Center Parking Structure or Civic Center Surface Lot and what the usage is for those spots from Civic Center and adjacent uses. We question the accuracy of the utilization data presented in the Applications. To begin with, the Coastal Commission requested a parking study and additional information relating to specific uses at the Civic Center Structure and Surface Lot. The Parking Study was not in the file that the public accessed on September 5, 2017 and we question if the study was ever supplied. Instead, utilization is the only data presented in the Application, which is extremely suspect since it is based on capacity numbers already in question, is based on averages from a brief period with high city office closures, and has no bearing on the number of spaces the City is contractually obligated to provide to third parties.

Therefore, it would be irresponsible for the Coastal Commission approve the Applications as consent items instead of holding a hearing after the requested information is provided by the City. It would be irresponsible to base approval of the ECEC and CSB projects on such thin data and then state that the Sports Field requires a full study. The ECEC and CSB should be part of the study, if one is required due to the significant demand for parking that they place on the Civic Center.

4. Failure to Consider the Approved Civic Center Field Project as a Concurrent Application Along with Other Uses Impacting Access

The City has failed to disclose and submit for Coastal Commission approval the Sports Field, to be located in part of the Civic Center Surface Lot, that has been approved by City Council. Instead the City has submitted the two projects favored by City staff so the Coastal Commission will declare parking for those projects in the area in which the Sports Field is to be located. Then the City will make the Coastal Commission the bad guy when it submits for the Sports Field and the Coastal Commission says the Sports Field can’t be built because it assigned that space as parking for the ECEC and CSB.

A. The Field is Approved. The Civic Center Field has been in the CCSP since 2005. See Exhibit 4A for a diagram of the 2005 CCSP of the Field in comparison to how tiny the ECEC was supposed to be. The current version of the CCSP continues to include the Field. See Exhibit 4A from 2005 CCSP (2017). The residents want it, we know what it will look like and how it will be used. In May 2016, the City approved a design budget for a soccer and lacrosse field that is 60 X 110 yards plus sideline space, lighting, fencing and a temporary restroom trailer. At that time, the City acknowledged the Sports Field would result in the removal of 430 spaces from the Surface Lot and issued an RFP and earmarked $3.45 million in funds for construction of the Sports Field. The Sports Field was most recently reaffirmed by City Council at their June 27, 2017 meeting.

The Field itself would not generate any parking needs during the day when used by the high school. The amount of spaces needed on nights and weekends could be easily determined by
speaking with the Field Sports Advisory Committee, which is responsible for assigning field space to all of the groups that use the City’s fields. In any event, the Coastal Commission was not concerned with future night and weekend use by the Civic Center Auditorium, so use by the Field during those times should also be fine.

B. Parking Study Should Include All Projects. The only question now appears to be that of parking. Therefore, the Coastal Commission should consider all three projects concurrently. The City Manager committed to submit the Field for Coastal Commission approval by May 2017. See Exhibit 4B. It makes absolutely no sense to say parking is not an issue for the ECEC or CSB and for the Coastal Commission to approve them only through mitigation by stealing the space promised to the Sports Field for their parking and then suggesting a parking study for the Sports Field. Your review is the parking study. If the City wants to know if the Coastal Commission will approve the Sports Field, submit it! Please tell us if all three projects can go forward or not. If they cannot, then the City must be honest with its residents and tell us if it will build our desperately needed Sports Field for which the Civic Center location is essential to our community, or continue with the overpriced staff building or the SMC project, each of which that have several alternative locations. The City is clearly trying to avoid this because the applications make no mention of the Field whatsoever.

C. Parking Under the Surface Lot is Not in the CCSP and May not be an Option: The Applications state that the “City intends to consolidate the Civic Auditorium surface parking into a below-grade structure.” That is not accurate. First, of the remaining projects, the CCSP only envisioned the CSB and the Auditorium to have their own underground parking, while the Structure was intended to be a replacement of the Surface Lot so the Field and (a much smaller) ECEC could be built. See Exhibit 4C from 2005 CCSP, which states, “The Civic Center Parking Structure provides a means of replacing surface parking lots with public open space and other public oriented uses.” This is still the language of the CCSP as updated in 2017. See Exhibit 4C from 2005 CCSP. It wasn’t until January of 2017 that, while leaving the description of the Structure unchanged, the City amended the section of the CSB to state the Surface Lot could be used for Civic Center parking. See Exhibit 4C. This change was not disclosed to the public and there is no way the public would have expected the Civic Center Surface Lot or the Sports Field to be changed through amendments to the CCSP relating to development standards for the CSB itself.

Furthermore, a review of the plans for the ECEC show a main sewer line running right through the middle of the Civic Center Surface Lot. Also, the City Council rejected a proposal by SMMUSD to build a subterranean lot under the Sports Field in June because it said it wasn’t necessary and wanted to study it more. The City had previously delayed construction of the Sports Field while it waited for grants to build a stormwater catch basin under the Sports Field, so the City appears to be presenting inconsistent information to the public and the Coastal Commission.
D. **Other Projects.** The Sports Field isn’t even listed as a future project for consideration with the park and Civic Center Auditorium, which is a glaring and purposeful omission in disclosure by the Applicants, which shows their information cannot be trusted and must be subject to the scrutiny of a full hearing.

In addition to the Field, the Applicants have not fully disclosed the uses of the Civic Center Structure and Civic Center Surface Lot. We made records requests for the contracts, but we are aware of the following:

- **County Courthouse:** The city rents parking in the Civic Center to the courthouse staff and that isn’t addressed in application. The parking study for CCSP EIR said the Courthouse rents 450 spots from City in surface lot. At the June 2017 City Council meeting, courthouse staff said they need parking for 104 employees plus 1000 juror passes/month plus 600 half-day passes/month.

- **Santa Monica-Malibu Unified School District (SMMUSD):** Carey Upton, SMMUSD Chief Operations Officer, has said that the Santa Monica High School campus, adjacent to the Civic Center, with nearly 3,000 students enrolled, needs 420 parking spots total, and it appears that 200 of those spots are from the Civic Surface Lot. In addition, there will be construction on the high school campus for the next 25 years and all of those construction crews will need a place to park. These numbers are not in the application.

- **ERM Has not Worked:** The Applications state the City’s Emission Reduction Program will result in a decreased parking, but that has not been the case. Even with train in service over a year, a recent City study showed most people going to downtown Santa Monica arrive by car.

- **Removal of Parking Structure #3 at 1320 4th Street:** The City is working with developers to tear down this parking structure with 347 spaces in the coastal zone and ground lease it to a developer and not require the building of any parking to replace it. The most recent proposal was to build a movie theater.

- **New Downtown Community Plan Has No Parking Requirement:** The Coastal Commission must take into consideration that the new Downtown Community Plan approved by City Council (which includes part of our coastal zone, areas adjacent to it, and areas within ¼ mile of the CCSP) does not require that any new parking be built with new construction. That means that more pressure will be placed on existing parking structures and any parking in the Civic Center and the rest of the coastal zone.
Thank you for your consideration. We look forward to a full hearing on these applications and the Sports Field in December in the Los Angeles area.

Sincerely,

Nikki Kolhoff, Santa Monica resident
Ann Maggio-Thanawalla, Santa Monica resident
Jaleh Mirhashemi, Santa Monica resident
Zina Josephs, Santa Monica resident
Nancy Coleman, Santa Monica resident
David Garden, Santa Monica resident
Maryanne LaGuardia, Santa Monica resident

Please include this in the public record and packet delivered to Commissioners.
Exhibit 1A – Posted Notices

The City did not stamp and date its own notice of submission of the CSB Application for public display until Sept. 5, 2017
Exhibit 1A – Posted Notices

The public investigated both sites thoroughly and there was only one notice posted for each project. Public notice for the ECEC was not Posted on yellow card stock or in a conspicuous location as required by the Coastal Commission. Instead, the notice is white and is posted in a remote corner of the surface lot that is gated and closed for public use.
Exhibit 1A – Posted Notices

The public investigated both sites thoroughly and there was only one notice posted for each project. Public notice for the ECEC was not posted on yellow card stock or in a conspicuous location as required by the Coastal Commission. Instead, the notice is white and is posted in a remote corner of the surface lot that is gated and closed for public use. Also, public notice for the CSB is posted on automatic doors, making it impossible for members of the public to read the notice upon entry to the building.
Exhibit 1A – Posted Notices

Also, the CSB File Log indicates notice was sent on 8/29 but an envelope received by an interested party is postmarked 8/30.
Exhibit 1A – Posted Notices

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### PROJECT DESCRIPTION

Additional to the City of Santa Monica's historic City Hall. See application for detailed description.

### LOCATION

1685 Main Street, Santa Monica (Los Angeles County)

### AGENT

City of Santa Monica
ATTN: Christopher Giddip
1111 - 4th Street, 1500
Santa Monica, CA 90403

### COMMENTS

Date Filed: 5/14/17

- Staff: 5/26
- 30th Day: 6/14/17
- 90th Day: 9/14/17
- 60th Day Extension Requested: No
- 180th Day: 12/14/17
- Document P: Incomplete
- Add'l Info Received: D. Waiver
- Plans Sent Out: R. Waiver

### DDR

Cons 9/2017

Imn. Est. or Amend. Release Date:
NOTICE OF PENDING PERMIT

A PERMIT APPLICATION FOR DEVELOPMENT ON THIS SITE IS PENDING BEFORE THE CALIFORNIA COASTAL COMMISSION.

PROPOSED DEVELOPMENT: Santa Monica Early Childhood Education Center (SM-ECEC): a 20,000 square foot multi-use facility with 2 SMC Classrooms for up to 90 students and 110 children.

LOCATION: 1804 4th Street
Santa Monica, CA 90401

APPLICANT: Santa Monica College

APPLICATION NUMBER:

DATE NOTICE POSTED:

FOR FURTHER INFORMATION, PLEASE PHONE OR WRITE THE OFFICE LISTED BELOW BETWEEN 8 A.M. AND 5 P.M., WEEKDAYS.

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
200 OCEANGATE, 10th FLOOR
LONG BEACH, CA 90802-4402
(562) 590-5071

PRINT ON YELLOW STOCK CARD
September 8, 2017

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802

To whom it may concern:

Regarding the Coastal Commission meeting on September 14, 2017, I oppose the following items on the consent agenda and request postponement so they can be placed on the regular agenda of your December meeting, which is scheduled to be held in the Los Angeles/Orange County area:

ITEM NO: Th5a – PERMIT NUMBER: 5-16-1033 – Santa Monica Community College’s Early Childhood Lab School, to be located in the Civic Center

ITEM NO: Th5c – PERMIT NUMBER: 5-17-0439 – Addition to the City Santa Monica’s historic City Hall

1) Piecemeal submission
There are four major projects in the pipeline in the 2005 Santa Monica Civic Center Specific Plan:
-- the renovation and re-opening of the historic Civic Auditorium
-- the Civic Center Sports Field (for use by adjacent Santa Monica High School)
-- the City Hall addition (City Services Building), and
-- the Santa Monica College Early Childhood Lab School, which will be located in the Civic Center instead of on the SMC Main Campus or on one of its many satellite campuses – a source of ongoing controversy in the community.
Instead of submitting all four projects to the Coastal Commission, the City of Santa Monica and Santa Monica College have submitted only two of the proposed Civic Center projects (i.e., piecemeal submission). The Civic Center Parking Structure and Civic Center Surface Parking Lot will be shared by all four projects, as well as the County Courthouse in the Civic Center, Santa Monica High School, the Doubletree Hotel across the street, etc., so it doesn’t seem to make sense to consider them separately.

2) Notice -- There was apparently no public notice given by the City when the projects were submitted to the Coastal Commission. A written notice from the Commission about item Th5c was mailed to me on August 30 (but not for Th5a). By the time it arrived, the 3-day weekend made it difficult to go to Long Beach to look at the documents, which are not posted online.

Residents submitted a Public Records Act request to the Long Beach office on September 6, 2017, for complete paper files for each application to be pulled and copied, but those may not be available for review before the September 14 meeting.

Residents also filed Public Records requests with the City of Santa Monica on September 5, 2017, but those documents also may not be available in time to analyze before the September 14 meeting.

3) How many parking spaces are there in the Civic Center? -- There seems to be some confusion about the actual number of parking spaces in the Civic Center Parking Structure and in the Civic Center Surface Lot. Does the parking structure have 770 spaces or 882 spaces? Does the surface parking lot have 700 spaces or 975 spaces?

4) Shared data -- Both the City Hall Addition and the SMC Early Childhood Lab School are in the Civic Center Specific Plan and use the same data and analysis regarding parking usage and inventory, so it seems appropriate that both be postponed.

5) Location of Commission meeting -- And finally, the location of the September 14 meeting in Cambria is about 230 miles from my home in Santa Monica, making it impossible for me to attend.

For those reasons, I request that agenda items Th5a and Th5c be postponed to the December 2017 meeting, which is scheduled to take place in the Los Angeles/Orange County area.

Thank you for your consideration of my request.

Zina Josephs
(48-year resident of Santa Monica)
310-450-2258
2454 23rd Street
Santa Monica, CA 90405
Agenda Item

Th5a (PERMIT NUMBER: 5-16-1033)

Oppose

Agenda Item

Th5c (PERMIT NUMBER: 5-17-0429)

Oppose

Maryanne LaGuardia
310-490-6600

California Coastal Commission
To Whom It May Concern

I am writing to request that the two identified permit applications identified above be removed from the Consent Calendar and set for hearing on your December 2017 agenda. I respectfully submit that neither is appropriately before you as a consent item.

Both projects have generated controversy among residents of Santa Monica, and neither can appropriately be decided absent and apart from a third project long approved for that site and overwhelmingly supported by the community — the athletic field —, which project may be adversely affected, if not eliminated, by piecemeal approval of the two submitted projects. As more particularly set forth in the Request for Removal and Postponement submitted today by Nikki Kolhoff et. al., the lack of notice prevents the community from being heard on any of these matters. As someone deeply involved with the field and the extensive community involvement which brought its approval by City Council about, I can represent that the community will want to be heard.

I respectfully submit that lack of notice, inability to acquire necessary access to submission files, incomplete and unclear information, material omission and piecemeal submission in addition to strong community interest support removal of these items from the Consent Calendar and the scheduling of same for hearing in December.

Thank you for your attention to this matter.

Maryanne LaGuardia
Santa Monica Resident (32 years)
310-490-6600
Here are some of the attachments.

On Fri, Sep 8, 2017 at 4:56 PM, Nicole Kolhoff <nikkikolhoff@gmail.com> wrote:

Agenda Item No: **Th5a**
Application number: 5-16-1033
Santa Monica Community College’s Early Childhood Lab School

Agenda Item No: **Th5c**
Application number: 5-17-0429
Addition to Santa Monica’s historic City Hall

Zina Josephs
310-450-2258

OPPOSE

September 8, 2017

California Coastal Commission
South Coast Area Office
200 Ocean gate, Suite 1000
Long Beach, CA 90802

To whom it may concern:

Please see the attached Request for Removal and Postmonement of the two referenced applications. This is the first of several emails due to file size.

Regards,

Nikki Kolhoff
Ann Maggio-Thanawalla
Jaleh Mirhashemi
Zina Josephs
Nancy Coleman
David Garden
Maryanne LaGuardia
RESOLUTION NUMBER __________ (CCS)

(City Council Series)

A RESOLUTION OF THE CITY COUNCIL
OF THE CITY OF SANTA MONICA ADOPTING AN AMENDMENT
TO THE CIVIC CENTER SPECIFIC PLAN THAT WOULD MOVE
THE LOCATION OF THE CITY SERVICES BUILDING FROM MAIN STREET
NORTH OF CITY HALL TO THE REAR OF CITY HALL AND REQUIRE
PARKING FOR CITY HALL AND THE CITY SERVICES BUILDING
IN THE SHARED CIVIC CENTER PARKING FACILITY

WHEREAS, the City Services Building (CSB) is a planned component of the Civic
Core Special Use District in the Civic Center Specific Plan ("CCSP"), adopted on June 28,
2005; and,

WHEREAS, the CCSP envisions the CSB as an important new facility to provide
office space for City operations to consolidate City department staff for improved operation,
service and public convenience; and,

WHEREAS, the City no longer desires to locate the CSB building in the location north
of City Hall on Main Street envisioned in the CCSP for reasons of feasibility, potential conflict
between the 85’ tower of the envisioned building with views of the historic City Hall building
and other considerations important to the siting and development of the building; and,

WHEREAS, the City has identified the rear portion of the parcel behind City Hall as
a preferable location to build an independent structure that is contiguous to City Hall based

Coastal Commission
CDP 5-17-0429
Exhibit 4
Page 22 of 39
on a design concept for a building that will be submitted to the International Living Future Institute for certification under the Living Building Challenge; and,

WHEREAS, the proposed amendments to the CCSP ("Proposed CCSP Amendments") are attached hereto as Exhibit 1 and incorporated herein by this reference; and

WHEREAS, the Planning Commission held a public hearing on November 16, 2016, to consider the Proposed CCSP Amendments and adopted a resolution recommending approval of the Proposed CCSP Amendments because they are consistent with the General Plan; and

WHEREAS, a Sixth Addendum to the Civic Center Specific Plan EIR ("Sixth Addendum") has been prepared to analyze the impacts of the Proposed CCSP Amendments; and

WHEREAS, because the Proposed CCSP Amendments do not significantly alter the program envisioned in the previously adopted CCSP, the Sixth Addendum concludes that the Proposed CCSP Amendments would not generate significant environmental effects or increase the severity of impacts identified in the Final 2005 Civic Center Specific Plan EIR;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SANTA MONICA DOES RESOLVE AS FOLLOWS:

SECTION 1. The City Council has reviewed and considered the Sixth Addendum with the Final 2005 Civic Center Specific Plan EIR, and hereby adopts the Proposed CCSP Amendments.
SECTION 2. The City Clerk shall certify to the adoption of this Resolution, and henceforth and thereafter the same shall be in full force and effect.

APPROVED AS TO FORM:

[Signature]

JOSEPH LAWRENCE
Interim City Attorney
Exhibit 1

Proposed Amendments to the Civic Center Specific Plan

Planning Commission has recommended that Council adopt the following CCSP amendments:

1. Page 4: The following will be added following the fifth (last) paragraph on the page:

   **Update for the 2016 Amendment**
   In 2013, Tongva Park and Ken Genser Square (in front of City Hall) were completed. This milestone was followed by construction of the Village Housing project, with 156 luxury condominium units, and 160 deed-restricted affordable apartments, the last of which was occupied in 2015. The Village project included the final segment of Olympic Boulevard between Main Street and Ocean Avenue. Olympic Boulevard now serves as a connection from the coastal area to the I-10 Freeway on-ramp on 4th Street.

   Over the last few years, the City reconsidered configuration of the City Services Building and proposed to move the project to become a rear extension of City Hall instead of a separate building on Main Street. This 2016 update reflects the revised siting of this important element of the Civic Core Special Use District.

2. Pages 7, 10, 12, 18, 38, 49, 57: All figures on these pages will be revised to remove the City Services Building shown north of City Hall and to show instead the building as a rear extension to the primary City Hall building.

3. Page 9: The first paragraph will be revised as follows:

   In the future, the area will no longer be seen as a number of disparate elements but as a multifaceted urban district with many layers of activity that reflect the maturing form of the city. The new parkland and recreational, community and cultural facilities will augment the shopping, governmental and institutional uses and create additional reasons for residents to visit the area. At the same time, the civic identity of the area will be revealed, not through a single governmental building or set of buildings, but instead through the setting of the historic City Hall, now connected directly with its coastal environment by open space for civic gathering and enhanced through a modern addition based on environmentally-sensitive principles that preserves the predominance of the City’s historic seat of government, focused on a new Town Square which will provide unique opportunities unavailable elsewhere in the city for civic gatherings and special events. To the north of the Town Square, a new City Services Building will create an appealing gateway from the north and counterpoint the cultural role of the Civic Auditorium with the service functions of city government.
4. Page 19: OS-2 will be amended as follows:

OS-2. Public accessibility to and within the Town Square will be reinforced by streets and public ways on three sides – Olympic Drive, Second Main Street and Fujinomiya Douri the existing service lane to the north, which would remain. Parking is provided along the surrounding streets and under the City Services Building. The pivotal location of the Town Square requires that it play an important role in realizing pedestrian connections – linking to the historic Main Street Bridge and its pedestrian interface with the Downtown, providing for pedestrian pathways across the park linking the site to surrounding areas, and accommodating the pedestrian movement along the Olympic Drive Promenade, with special views and access to the Beach.

5. Page 42: The section entitled Fujinomura Douri will be corrected to Fujinomiya and amended to read:

Fujinomiya Douri will be retained as an accessway for public safety vehicles, deliveries, bicycles and others authorized to access the area. If parking is maintained on-site, it shall include ADA-compliant spaces. Some long-term bicycle parking shall be provided with access from this street, is enhanced to provide access to the Town Square, City Hall, and the City Services Building. It will be designed as a narrow street with one vehicular lane in each direction and curbside parking along both sides of the street to provide for drop-off along the Town Square and the City Services Building.

6. Page 58: The City Hall policies will be amended as follows:

CC-2. Major additions and modifications made to the historic portion of the building including the rear addition formerly occupied by the Police Department (approximately 44,000 square feet) shall be removed. City Hall’s historic integrity shall be maintained and the addition of the City Services Building at the rear shall be designed in compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.

CC-3. A central courtyard and garden of approximately at least 806,500 square feet shall be created between the two projecting wings along the east face of the historic City Hall building with low walls or other design features that provide spatial definition and nighttime security along the exposed portions of the space and the facing wall of the City Services Building. The City Hall courtyard shall be landscaped and revitalized with a design that sensitively accommodates accessibility from the lobby of City Hall to the new City Services Building ground floor permit center.

7. Page 50: The building program will be revised to reflect a maximum allowable new size for the City Services Building of up to 55,000 square feet.
8. Page 55: The section entitled "Civic Core Special Use District" will be amended as follows:

Like the Auditorium District, the Civic Core is characterized by a significant open space. The new Town Square is the focal point within the area, and adjacent to it are a grouping of civic and governmental buildings including City Hall, the County Courthouse and the Public Safety Facility. A new parking garage and the Civic Center Parking Structure, immediately east of the Courthouse along Fourth Street is currently under construction. While the historic City Hall structure contributes significantly to the identity of this area, and while the area contains many of the traditional activities of a Civic Center (i.e., city government, public safety, courts), it has lacked a strong sense of place and cohesion. A key objective of the Plan is as it has been implemented over the years has been to reinforce this area as the core of the Civic Center, and as a major public gathering place within the community.

Specifically, the Plan provides for preservation of City Hall and restoration of the original 62,000 square foot envelope through removal of the Police wing and restoration of the original courtyard. This was accomplished in 2005, and facade restorations to return the building to its original appearance were implemented along with the development of Town Square, (now known as Ken Genser Square), and deferral A landscaping plan for the courtyard was deferred. In order to bring city services, currently scattered throughout the Civic Center and Downtown, together into one complex, The Plan also provides for the consolidation of local public services within a new City Services Building of up to 455,000 square feet attached to the rear of the existing building, that provides a strong northern edge to the Town Square and creates a civic gateway to the downtown. In addition to these structures, the Plan incorporates the new Public Safety Facility of 129,000 square feet, and the 1,000 car Civic Center Parking Structure. The District will also include a strong visual focal point at the northern end of Main Street, achieved through measures such as building elements, open space design, public art or circulation features.

9. Pages 58-59: The section entitled "City Services Building" will be amended as follows:

The Plan calls for the construction of a separate City Services Building along the northern edge of the Town Square to be connected to the rear of the historic City Hall building to meet the operational and space needs of city government. The building is envisioned as a distinctive civic structure that reflects the City's philosophy of sustainability and customer service excellence, provides a dynamic northern anchor and terminus to Main Street, and strong spatial definition to the Square. Just as the existing City Hall conveys a strong civic identity befitting of the 1930's, the City Services Building will express the progressive, creative and artistic character of modern-day Santa Monica, while complementing the historic structure in compliance with the Secretary of the Interior's Standards for the
Treatment of Historic Properties and reinforcing the Town Square. The following standards are intended to guide the design of this important structure.

10. Page 59: The following standards are eliminated in their entirety: CC-6, CC-10, CC-12, CC-13, and CC-14. The following standards are amended or added:

CC-76. The massing of the building shall create a strong three dimensional profile befitting its prominent gateway location and that is subservient and responds appropriately to the historic City Hall and creates a transition to the adjacent Public Safety building so that the cluster of civic buildings is perceived as a cohesive grouping. The building's program shall include well-defined entrances that are user-friendly for the public and significant sustainability features to make a clear statement of the City's commitment to environmental health and sustainability, the Main Street axis, and the Town Square.

CC-87. The maximum height of the building shall be 45 feet and three floors as measured from the segmented average natural grade. Fujinomura-Douri sidewalk elevation, with the exception that a portion of the building, not to exceed 5,000 square feet, may be constructed to a maximum height of 85 feet, provided that this portion of the building is designed to create a distinctive vertical silhouette that reinforces the civic identity of the structure on the Town Square.

CC-448. Fenestration shall be carefully composed to reinforce the building massing and volumetric composition. An artful combination of punctured wall treatments—with deeply-set windows, horizontal window bands, and larger expanses of glass is encouraged.

CC-469. Public art shall be incorporated as an integral element of the building design.

CC-10: Parking in the Civic Center parking structure and surface parking lot facility shall be shared with other Civic Center uses and available for general public use. The parking lot on the north side of City Hall, which has been restricted for assigned parking only, may be removed in conjunction with site improvements to meet the needs of City staff and customers. Ancillary structures, including photovoltaic parking shade canopies, may also be constructed in this area. Bicycle parking for Civic Core uses shall be provided in the amount required by the Zoning Code, but with flexibility in regard to location and proximity to building entrances.

In addition to the above, any other references to the City Services Building that would remain in contradiction to the revised location and parameters set forth in this amendment may be revised accordingly in order to ensure consistency within the Civic Center Specific Plan document.
Remove the ECLS from the Civic Center

The Early Childhood Lab School (ECLS) does not belong in the Civic Center Specific Plan. Building it requires accepting a terrible economic deal that uses resident-owned land to benefit private interests instead of addressing the greatest public good.

Santa Monica College (SMC) proposes to lease two acres at $1/year for 65 years and accept $6M from the City’s general fund to build an ECSL satellite campus and private child-care facility for children of city employees, college personnel, and the RAND Corporation (headquartered across Main Street from the Civic Center).

Why would the City contribute land, a below-market lease, and $6M of taxpayer monies for construction costs to an entity that does not serve a significant number of residents (only 4% of students at SMC are from Santa Monica High School) in its daily operations? Dedicating two acres of public land for a private childcare employment perk to serve 110 mostly non-resident preschool children is simply inequitable.

Since 2002, four bond measures have brought $935 million into SMC coffers, obligations that with interest will reach $2 billion, repaid solely by property owners and renters in Santa Monica and Malibu. Hundreds of millions of bond proceeds are available to SMC now. SMC has plenty of other land available— a 38-acre main campus and seven satellite campuses, including the recently acquired YWCA on 14th Street near Pico that already has a child-care facility on site and is conveniently located adjacent to the main campus.
The 1997 City of Santa Monica Open Space Element envisioned the Civic Center as a location for “significant new parks and open spaces”, proposing "a six acre multi-use park at the corner of Pico and 4th." Top priorities haven't changed: resident enjoyment and use of the Civic Center requires renovating the Civic Center Auditorium and building open space for residents and visitors compatible with the cultural uses of a refurbished auditorium, and field space for Santa Monica High School (SAMOHI) students.

As high school enrollment grew, the District cannibalized fields to construct classrooms; now, 3,000 students have less field space than when 1,000 students were enrolled. Parents, teachers, administrators, coaches and students have voiced the need for field space that will allow athletic events and practices to be held close to the SAMOHI campus instead of requiring students to travel elsewhere in the City on a daily basis, adding to traffic congestion and increasing costs of sports participation. In addition, the need for athletic fields has grown, with after-school programs for thousands of residents playing soccer, lacrosse, football, rugby, baseball, softball, ultimate Frisbee, adult soccer and baseball and other sports.

Where else shall our children and we play? Memorial Park is not an alternative because placing a soccer field there would require sacrificing two diamonds from our city's already limited baseball/softball field complex. More fields at the airport would be laudable but they are uncertain, hopeful possibilities at least a dozen years off.

Converting the existing parking lot to fields provides flexibility in programming future events at the Civic Center Auditorium, e.g., film festivals, public gatherings, music concerts, and other artistic programs. The ECLS is dead space on nights and weekends and incompatible with Auditorium uses.

Once this open space is lost, it can never be recovered.

As the late columnist Bill Bauer wrote, "Over the years, there have been many committees and individuals working on a Civic Center Specific Plan. As various interests were catered to, the whole process became muddled, unfocused and sidetracked. The Civic Center is currently home to City Hall, the Public Safety Building, County Courthouse, a multi-story parking garage, and 1100-car surface parking lot next to a 3000-seat multi-use Civic Auditorium, a luxury hotel, Rand headquarters, a 318-unit low-income apartment/market rate condo project and Tongva Park... this is not the right place for an ECLS facility because it adds another disparate element to the Civic Center that isn't compatible with cultural endeavors or an upgraded Civic Auditorium." (Source Santa Monica Daily Press 5/14/15)

Santa Monica residents urge our City Council to immediately halt action on the ECLS, remove it from the Civic Center Specific Plan, and commit instead to building open and field space for our residents and high school students.

These fields belong in the heart of Santa Monica, near SAMOHI.
Civic Center Sports Field – City Manager statement – May 2016

https://newsroom.smgov.net/2016/05/24/statement-from-the-city-manager-civic-center-sports-field

City of Santa Monica NEWS

Posted on 5/24/2016

STATEMENT FROM THE CITY MANAGER:
Temporary Civic Center Sports Field

Recognizing that field space for our community is imperative, as City Manager, I’m recommending immediate funding to design a ‘temporary’ multi-use sports field in the Civic Center with synthetic turf, fencing, lighting and portable restrooms. It is premature to program construction funding for three reasons: (1) the design process will give us a much more accurate estimate of the project’s actual construction cost (currently reflected as $3.25m in FY18-19); (2) we will be working with our partners at the Santa Monica Malibu Unified School District on opportunities for joint use and perhaps some form of joint funding; and (3) we will need to work with the Coastal Commission and the County Courts on strategies for addressing the loss of parking in the Civic Center and coastal area.

I have heard from a number of community members that the time line to start construction of the field is too far out. Constructing a field is many facets. We have put together the following rough and very accelerated planning and construction schedule, recognizing the potential for unanticipated delays:

- Council approval of Capital Improvement Budget - June 2016
- RFP for design, evaluate proposals, Council approval, and contract execution - October 2016
- Design development, community outreach, and Coastal Commission approval (contingent upon parking relocation) - May 2017
- Construction documentation - July 2017
- Plan check - January 2018
- Issue bids for construction, evaluation, Council award, contract execution - June 2018
- Construction start - July 2018

We will work as quickly as possible to effectuate Council’s direction to ensure implementation of this element of the Civic Center Master Plan and the community’s desire for a temporary sports field.

Rick Cole
City Manager
Santa Monica High Parents 'Astonished' by City's Latest Sports Field Proposal

By Jorge Casuso

June 22, 2017 -- A City report that outlines six options for a sports field at Santa Monica's Civic Center was met with "astonished" opposition from Samohi parents who have lobbied for a permanent field for more than 12 years.

The plan explores not only the permanent and temporary fields at the center of the City Council's previous discussions, but a plan to install a temporary field at Memorial Park and another to resurrect the Civic Auditorium ("City Proposes Six Options for Santa Monica Civic Center Sports Field," June 22, 2017).

City officials -- who acknowledge a field at Memorial Park some ten blocks from the high school "would not meet the desires of the Samohi community" -- may have underestimated the Samohi parents' vehement opposition to their latest proposal.

"We continue to be astonished at the contortions City staff and Council will go to to avoid fulfilling the promise of a field at the Civic Center," Ann Hoover, co-Chair of the SAMOHI PTSA Civic Center Task Force, wrote in an email to the Lookout.

"The 'economic analysis,' which the City paid for (not the District), is irrelevant -- this is not a commercial project, it's public land, a field and much-needed replacement parking for the heart of our City," Hoover wrote. "It is not something that needs to 'pencil out.'"

Hoover rejected the idea of installing a field at Memorial Park that can be used for sports, such as soccer and lacrosse.

"(T)hat is zero benefit to SAMOHI students and Downtown field/park users, and would really upset the baseball/softball communities, which have been expecting only diamonds at Memorial Park."

For Samohi parents, the City's report seems a far cry from their original call for a
permanent field on the Civic Center lot.

The City's analysis, Hoover said, "fails, among many other things, to quantify and factor in future benefits such as the priceless, incalculable value that fields and open space offer to everyone.

"SAMOHI kids, Downtown residents, and field users City-wide have asked for this field in overwhelming numbers for over 12 years. It's time for the Council to keep its promise, to install the permanent field at the Civic Center and not a temporary one.

"Ultimately, it's a matter of political will and prioritization, not economics," Hoover said.

Hoover noted that the Council has chosen to spend large sums on other projects, including the proposed $76 million City Services building and $45 million for Tongva Park.

"The school district is standing by to contribute over half the cost of this project -- $50 million! -- and believes the field and parking will be of great value to SAMOHI now and over the long run," she wrote in her email.

"Surely Council will not reject this incredible opportunity to have assistance fulfilling its long-standing promise."
LETTER TO THE EDITOR: CIVIC CENTER DEBATE FROM JOHN CYRUS SMITH:

By mirrormg - February 6, 2016

Dear Editor,

As a dedicated Santa Monica Recreation and Parks Commissioner, I believe there are three things the City Council can and must do as it debates the Civic Working Group's Report on the future of our Civic Center:

1) Ensure the site includes a full-sized, multi-purpose athletic field for use by Santa Monica High School and every resident and visitor to our city...

2) Reconsider the construction of the Early Childhood Education Center, if it is to be primarily used as a glorified day care center for the children of already well-compensated City, SMC and Rand employees, many which do not even live here...

3) Make sure the Civic Auditorium is run by a private entity and can become a new and worthwhile cultural entity, and if it cannot, consider ways to preserve the wonderful, land-marked facade and create something more utilitarian and culturally positive on the site...

Here's why...

Santa Monica High is home to thousands of students. The 2005 Civic Center Plan committed to a much-needed field on the Civic site. That promise should not be broken. Kicking the can down the road by dangling possible future fields at the airport is unacceptable, and would only add unnecessary traffic to our city from its most congested area. (4th and the I-10) to its most contested one (SMO). The Council, by
making a full-sized, multi-purpose field a priority, would be delivering on a promise to those thousands of SaMoHi students, while also serving our residents and visitors with a wonderful green space the site surely needs. The field would also serve as the “glue” which connects and unites the Civic Center with the many fine facilities such as Barram Hall and the Greek Amphitheatre, which can and should be used to compliment any venue the Civic Auditorium might eventually become.

The Early Childhood Education Center is a noble pursuit... Who would not want to support the creation of a place that serves our neediest and most-vulnerable young residents? But the ECEC as conceived now is no such a place: It would serve primarily the children of three entities: City, SMC and Rand employees, many who do not even live here. The parents of those children, to be sure, are well-compensated. Surely, Rand can and should fund its own daycare on its own site, like other progressive companies. Surely, the City can and should utilize present space such as the Ken Edwards Center or the Fallsades Park site for its daycare. How nice it would be for our seniors and children to mingle in the same place, benefitting and enriching the lives of each other. I have taught at SMC. My son attends school there. Please do not tell me there is not existing space at the college for a daycare paid for by the SMC employees whose children would benefit from it. One final point: An expensive and new building on city-owned land will not produce better children, but one or two dedicated teachers in any loving environment will. There are less-expensive alternatives to the ECEC and the Council can and must consider and encourage their Implementation.

Finally, the Civic Auditorium itself. I was part of the “Save the Civic” group which advocated for the creation of the Civic Working Group and advocated for many of its members. I commend their efforts and dedication. Clearly, history has shown us the city has proved to be a less-than-ideal Civic steward. I say this not as criticism but as fact. The City Council can and must allow a private entity to give the Civic a second life as a new cultural venue, where a small King Tut exhibit, or a Tom Petty concert, or the Santa Monica Symphony, or a marquee movie screening during the AFI Convention could be screened. The new Civic must be all these things and must earn its place in the Civic Center’s future. If it cannot, then the best option might be to preserve its landmarked façade and create something on the site that will serve the above uses and much more. A white elephant serves no one and takes up a lot of space. The Civic must be reborn, or it must be allowed to fade gently into history.

These decisions are complex and difficult. Positive change will take time. There will be winners and losers. But the right decisions outlined above can and must be made and the right actions taken. Anything less is to squander the opportunity to be truly “civic” to the Civic Center’s future.

In closing, I commend and stand with the many students and parents in support of a full-purpose field. When deciding the Civic Center’s future, the field is a good place for the Council to start.

Sincerely,

John C. Smith,
Santa Monica Recreation and Parks Commissioner
CIVIC LOT STANDS EMPTY, AND MAY DO FOR YEARS:

By mirronmag - February 11, 2016

Empty lot.

The presence of more than 100 speakers at City Council advocating the fulfillment of a 10-year-old promise to build a sports field at the corner of 4th and Pico in Santa Monica did little to progress the issue despite its inclusion in the 2005 Civic Center Specific Plan. However, a Request for Qualifications (RFQ) on the Civic Auditorium will go-ahead immediately.

Santa Monica City Council, voting at a regular scheduled meeting Tuesday February 9 at City Hall, moved to take next steps on the Civic Working Group (CWG) and City staff's recommendations to proceed with changes to the Civic Auditorium only, leaving other elements of the 2005 Civic Center Specific Plan without resolve.

The nine-member CWG spend two years developing recommendations for City Council. City Staff then worked with consultants HR&A to develop a "robust set of alternatives"
Following two hours of public comment, City Council Members spent more than an hour deliberating the issue before moving the motion to focus on the auditorium only.

Councilmember Gleam Davis suggested a direction to City staff to look at the possibility of erecting a temporary sports field on the allocated site, acknowledging that it could take "years and years" before an actual sports field is realized.

Councilmember Davis' direction received a friendly amendment from Councilmember Ted Winterer for staff to generate a rough cost estimate for the temporary field for the City's budget study in the spring.

Amongst much umming and ahming, and fears of safety, costs and practicalities, Davis' direction was moved. So residents may, indeed, get feedback from City staff "soon."

"We were disappointed that Council, despite the 100+ individuals who spoke to the urgent need for this field, possibly gave no firm deadline to City Staff for reporting back to Council, and at times seemed at pains to make the staff process as time-consuming and cumbersome as possible," said Ann Hoover, Co-Chair Samohi PTSA Civic Center Task Force.

"We were blown away by the turn out for the pre-meeting rally," Hoover added. "People are so motivated to build this field because the need is so great and so immediate."

Kids from across the city played sports outside City Hall and took to the council-meeting dais, pleading with City Council to come good on their 2005 promise.

Alternatives presented by City staff to councilmembers could have seen the inclusion of plans for a playing field and open space made part of the RFQ process.

The speakers' words seemed to fall on relatively-deaf ears however, as Councilmembers referred to rules, regulations, and funding limitations before deciding to move on the auditorium only.

"Since the 2005 Plan we've had the Great Recession, and then, after we'd agreed to a joint plan with Samohi, the state pulled out the redevelopment funding on which we'd relied," Councilmember Kevin McKeown explained re: the time delay. "We managed to get some wonderful public amenities completed in the Civic Center, like Tongva Park, but the sports field is only one of the elements that was delayed."

Funding for the temporary field will be considered as part of this spring's annual budget work, Councilmember McKeown added. "The design will come in consultation with Samohi, the School District, the College, non-school sports leagues, and the community."

At no point did Council address the elephant in the room, observed Northeast Neighbor Tricia Crane, "Why it had been possible for them last summer to fast track the construction of an Early Childhood Education Center (ECEC) on public land at the Civic Center but not a sports field."

"What irks me is that the daycare center/preschool (ECEC) at the Civic Center has been green lighted and ground will be broken this year. Why was the daycare center/preschool given the green light by the current City Council and NOT the park?" commented Suzanne Brewer on The Mirror's website.

"Why do the people of Santa Monica have to wait for a playing field at the Civic Center while ground is being broken on a daycare center/preschool which is primarily for the children of people who are not Santa Monica residents?" she asked.
Indeed, during the council meeting, City Manager Rick Cole mentioned several times that councilmembers have the power to do whatever they wish, by means of City staff direction.

Several councilmembers indicated that looking at adding more playing fields in the future across Santa Monica was the best solution to his suggestion, although nothing was put in motion regarding this.
September 25, 2017

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802 – 4302

RE: Application No. 5-16-1033; Agenda Item Th5a (Santa Monica Community College District Early Childhood Lab School)
Application No. 5.17-0429; Agenda Item Th5c (City of Santa Monica City Services Building)

Dear Chair Bochco and Commissioners:

This letter responds to correspondence received by the California Coastal Commission regarding the above referenced applications. The correspondence seeks to have the Coastal Commission postpone the consideration of two pending applications in an attempt to block approval of these projects out of a misplaced concern for future approval of a third, unrelated project, the Civic Center Multi-Purpose Sports Field. In support of this intended goal, the correspondence asserts that the project applicants gave flawed notice, the project applications were improperly scheduled on the Commission’s September 2017 regular meeting consent calendar, the applicants gave incomplete or inaccurate information regarding parking, and the mitigations proposed for these pending applications eliminate the location of the Civic Center Multi-Purpose Sports Field (“Sports Field”).

As more fully detailed, below, as applicants we seek to correct the erroneous assertions in the correspondence. Additionally, the Commission has stated that it will consider these pending applications as non-consent items on its October 2017 regular meeting, thus giving these correspondents full opportunity to voice their concerns about these projects. More importantly, these correspondents have given no legal basis to postpone the consideration of these projects any further, given that the substance of their complaint has nothing to do with asserted impacts of these projects on coastal access. Therefore, we respectfully urge the Commission to consider and approve the two pending applications at its upcoming October meeting.
BACKGROUND
The two Santa Monica projects that were postponed from the September 14, 2017 meeting are important public projects that are part of a comprehensive, community-driven plan, the Civic Center Specific Plan (CCSP), which the City first adopted more than 20 years ago [https://www.smgov.net/uploadedFiles/Departments/PCD/Plans/CCSP%20Updated%20January%202017%20FINAL.pdf]. The City Services Building, a City project, and Early Childhood Education Center (now renamed the Early Childhood Lab School, or ECLS), a partnership between the City and the applicant, Santa Monica College, achieve CCSP objectives that build on previously completed projects and are successfully creating a hub of public activities benefitting the entire community. As the Commission is aware through its approval of Coastal Development Permits (“CDP”) over this period, the City has steadily and methodically implemented the CCSP, beginning with the construction of the Civic Center Parking Structure and creation of Olympic Drive. Since that time, the Public Safety Facility, City Hall restoration, Tongva Park, the new RAND building, the extension of Olympic Drive and the mixed use Village project with significant affordable and market-rate housing units, have each been accomplished, as envisioned in the CCSP. To assert that the development of any single element of the overall plan is “piecemeal” development is to turn the concept of long-term comprehensive planning on its head. Simply put, the cohesive, responsible, long-term development of the Civic Center has proceeded one project at a time, consistent with the overall vision and comprehensive plans adopted in a public and transparent way. To assert otherwise is to discredit the very idea of long-term planning.

A. THE CITY HAS CONSISTENTLY IMPLEMENTED THE CIVIC CENTER SPECIFIC PLAN OVER THE PAST 20 YEARS WITH POSITIVE IMPACTS ON COASTAL ACCESS FOR THE PUBLIC
The original CCSP and subsequent amendments envision a child development center and play area, a City Services Building (CSB), the construction of the Civic Center Parking Structure, a Civic Auditorium Park (now the Civic Center Multi-Purpose Sports Field), and a Civic Auditorium Expansion with subterranean parking. All parking in the Civic Center is shared and serves all users within the area. The City plans with sensitivity to peak demand consideration, which varies by use, optimizing the resource for utilization by complementary uses.

The Civic Center Parking Facility, as modified by the ECLS, can serve current parking needs as well as future projected parking demand from the ECLS and the CSB. The Sports Field project, the next implementation of the CCSP, is currently in planning and the City anticipates completion of the project’s 100% design development (without additional parking) by March-April 2018. The City is conducting an extensive parking study to assess the demand and effects of the proposed project, addressing the adequacy of parking now and in the future in order to provide full information to decision-makers when that project comes forward. The parking study will also specifically analyze the provision and utilization of beach parking facilities and any potential impacts that the project may have on that resource. The City will also need to pursue a minor amendment to the CCSP with associated CEQA analysis, modifying the configuration and placement of the field. The City will proceed with the CCSP amendment concurrently with the parking study to minimize delays in obtaining the City Council’s approval for the project, to be followed by submittal to the Coastal Commission for a CDP. Without such an application before the Commission at this time, early consideration of the Sports Field, as suggested by the correspondents, would be premature.
The future construction of the Sports Field, which the City is committed to complete, is separate and independent from the construction of the ECLS and CSB. The design and construction of the ECLS has already been approved by the California Division of the State Architect, and is ready to proceed with building permits and construction once Coastal Commission approval is obtained. The CSB is a design-build project that is currently in plan check, and will proceed with construction in January 2018 assuming Coastal Commission approval is obtained. The delay of either of these projects will do nothing to facilitate Coastal Commission approval of the Sports Field, and will only serve to unnecessarily delay these projects and substantially increase their costs due to well-documented construction cost escalation in the Los Angeles area, all of which must be paid with public funds.

Again, the claims of “piecemeal” planning do not accurately describe the history of Civic Center development and the facts as described above. If the approach advocated in the letters were applied logically, the Coastal Commission should not have approved any of the CDPs for prior projects in the CCSP area and all the progress in the Civic Center area thus far could not have occurred. The request for postponement in order to wait for all projects in the CCSP to be considered at the same time is neither required nor economically feasible.

Moreover, of primary interest to the Commission, this project has no impacts on coastal access and environmental protection. The City’s public beach and Pier parking lots provide 5,870 parking spaces, which are just part of the 14,930 public parking spaces available in the Coastal zone today. In fact, CCSP implementation over the years has significantly improved the public’s access to the beach through the roads and pathways between 4th Street and Ocean Avenue and construction of the Civic Center Parking Structure. The reduction of the Civic Center parking lot for the ECLS and additional demand for the CSB do not in any way affect the public’s beach access nor is there plausible adverse impact through displaced parking. The lot is literally on the border of the Coastal Commission’s jurisdiction and distance, topography and historic usage patterns make any attempt to tie the fate of this surface parking lot to coastal access moot. At such time as the City of Santa Monica brings forward the Sports Field project, the associated parking study will fully address changes to the surface parking lot and solutions will be found to assure that the public will always have access to the coastline to the satisfaction of the Coastal Commission.

B. BOTH PROJECTS HAVE COMPLETED A THOROUGH AND TRANSPARENT PUBLIC HEARING PROCESS

Both projects have had extensive due process for consideration of all issues with hearings before Planning Commission and City Council where the community had multiple opportunities to comment on the projects.

As set forth in the Coastal Act, the CDP is intended for the Coastal Commission to consider whether the project affects coastal access or environmental quality. The Coastal Commission should not allow the CDP process to be abused as an opportunity to “appeal” the decisions made by the local municipality’s elected leadership in regard to local land use issues unrelated to coastal protection. The same is true for the ECLS, to which the City consented as property owner and through the CCSP and which has received full approval from the California Division of the State Architect, the agency authorized to approve community college projects.
C. THERE IS ADEQUATE PARKING PROVIDED FOR BOTH PROJECTS CONSISTENT WITH CCSP REQUIREMENTS

The parking standards of the Zoning Ordinance do not apply to the Civic Center, which specifies that uses should all be served by shared, public parking. Consideration to ensure that adequate vehicle parking and access has been included in both projects, supplemented by enriching the City's Transportation Demand Management strategy to reduce trips and parking need. Parking in the Civic Center consists of the 770-space garage and 1,009 spaces in a surface parking lot. The ECLS will result in the permanent removal of 230 parking spaces, which are located on land that has long been vacant and paved for use as public parking. As a result, the 1,779 total spaces in the Civic Center will be reduced to 1,549 spaces. It should be noted that of the 230 parking spaces being removed, 100 spaces were previously leased to Macerich SMP LP for valet parking. Further, the ECLS will also construct 15 new parking spaces to accommodate short-term visitors and drop-off.

As stated in the Coastal Commission staff report, in order to determine if the proposed project is consistent with the access policies of the Coastal Act, the Commission must find that the parking demand generated by the proposed development is adequately supported by the supply of parking available for new uses in the District. ECLS employees will create an estimated weekday demand of up to 25 spaces. The new City Services Building will result in the relocation of off-site employees and fleet vehicles to this facility with an increased demand conservatively estimated at 57 spaces. In total, the City estimated cumulative increased demand for both projects is 82 spaces. The City studied its utilization data to consider the peak demand time and concluded that the remaining 1,549 parking spaces between the structure and surface lot will more than accommodate the additional demand of 82 spaces.

The Coastal Commission staff reports for the ECLS and CSB indicate a larger project parking demand of 55 spaces and 90 spaces, respectively, in addition to requiring availability of 215 parking spaces to make up for the net removal of 215 spaces. The staff reports' combined total demand of 145 spaces in addition to requiring availability of 215 parking spaces would still be easily accommodated within the available 1,549 parking spaces.

D. BOTH PROJECTS COMPLIED WITH NOTICING REQUIREMENTS ESTABLISHED BY THE COASTAL COMMISSION

The claims of lack of noticing are also incorrect. A CDP notice for the CSB application has been posted on the front door of City Hall, where it is most noticeable to all who visit the building, since June. Similarly, Santa Monica College has had a posted notice of the CDP application at the ECLS site since November 2016. Mailed noticing and application availability are within the Coastal Commission’s purview, and we trust that Coastal Commission staff administers these requirements correctly. An extensive last-minute Public Records request submitted to the City that is being used to justify further delay is irrelevant as Coastal Commission staff has indicated that it has received all necessary information to analyze and make a recommendation on both projects. Since the Coastal Commission meets all over the State, it would be impractical for the Coastal Commission to delay consideration of projects for the convenience of a single project opponent. Similar to concerns raised in the correspondence regarding meeting location, the City and SMC face the same inconvenience caused by the remote location of Coastal Commission meetings.
E. THE COASTAL COMMISSION’S REVIEW SHOULD FOCUS ON IMPACTS TO COASTAL ACCESS AS SET FORTH IN THE COASTAL ACT

The City is concerned the Coastal Commission would allow letters with inaccurate and misleading statements to delay community-supported projects planned by City leaders for more than 20 years. The City’s residents approved the bond money to construct the ECLS and have elected leadership over 20 years to implement the CCSP. These projects improve access to City government service and provide better childcare opportunities for working parents and are nowhere near the sensitive coastal area that the Commission is particularly charged with protecting.

Further, the Commission’s mission of protecting and enhancing California’s coast and ocean for present and future generations is consistent with the project goals set forth by the City Council for the CSB. This is a leadership sustainability project directly aligned with the Commission’s stewardship role executed through careful planning and regulation of environmentally-sustainable development. The sustainability features of the CSB are unprecedented and are celebrated as the model for all development in the State moving forward. By targeting the Living Building Challenge as the building’s sustainability goal, the CSB will be the nation’s greenest municipal building. Living Buildings go beyond traditional “green buildings” that aim to do less harm to the environment and instead focus on ecological restoration to the site they are built on. In addition to being net-zero energy and eliminating the use of any cancer-causing chemicals, the Commission’s interests are directly served by the project’s design to be net-zero in water consumption. 100% of the project’s water demand, including drinking water, will be supplied by captured precipitation and on-site sources treated without the use of chemicals. The site’s landscape, which includes a palette of edible plants, will be irrigated with building generated greywater. Through the use of foam-flush, composting toilets, the building will use 98% less water for toilets than traditional green buildings. This means no water will leave the site, enter the sewage system and end up in the ocean. Any other stormwater that enters the site and cannot be used for drinking water is infiltrated through a bioswale to mimic pre-Colombian hydrology.

We are confident that the CSB will set a new standard for environmental stewardship in future development.

Correspondents’ concerns about the CSB’s project cost have already been fully vetted and discussed by the Santa Monica community as part of the local public hearing process. Regardless, project cost of a local public facility is not a Coastal Commission consideration for issuance of a CDP.

At this time, the ECLS has been approved for construction and the CSB is in its final review for building permits. Both await CDP approval in order to break ground. While the City was disappointed by the postponement from the September hearing, it is critical that both of these important public projects be acted on in October to avoid further delay of critical community services.

Sincerely,

Rick Cole
City Manager