



P.O. BOX 653
SANTA MONICA, CA 90406
310-496-3146
www.smconservancy.org

February 14, 2023

City Council
City of Santa Monica
1685 Main Street
Santa Monica, CA. 90401

Re: City Council Item 7A, February 14, 2023, Study Session on Implementation of 6th Cycle (2021-2029) Housing Element Programs

Dear City Council,

We salute the city's diligent efforts to meet Santa Monica's housing goals, particularly regarding affordable housing. However, we are concerned about some recommendations in the current proposal that upzone neighborhood commercial districts, threatening some of our most valuable community assets.

We are commenting on the section of the Staff Report which refers to Planning Commission discussions as to whether rezoning the Neighborhood Commercial ("NC") district to 55 feet in height with a 2.5 FAR as required by the Housing Element was necessary to meet the goals of the Housing Element. We are very concerned about the impact on the character of the Main Street, Montana Avenue, and the Pico and Ocean Park Boulevard NC districts.

Main Street is one of Santa Monica's most appealing pedestrian streets with unique character and distinctive historical ambience. Importantly, it contains a very high concentration of designated landmarks: the Mendota block, the Elks Club, the Biedler-Heuer Building, the Ocean Park Library, the first Roy Jones house, the Merle Norman Building, the Parkhurst Building, the Horizons West Surf Shop. This is an unusually dense group of identified and protected historic resources compared with other commercial streets. Additionally, it's directly adjacent to the Third Street Historic District.

The proposal to allow 55 ft. high heights on Main Street potentially threatens its existing streetscape scale and viability. The existing height limit of 32 ft. should be maintained, and lot consolidation should not be allowed. This staff-proposed zone change is not needed for our overall housing production goals and will only undermine one of our strongest neighborhood commercial areas.

We look to the LUCE for guidance on goals and policies for our neighborhood commercial areas; here is what it says about Main Street:

- Goal D31: Preserve and enhance the distinctive qualities of Main Street that allow it to be a vibrant local and regional shopping and dining destination.
- Goal D32: Ensure that new and remodeled buildings on Main Street are compatible in scale and character with existing buildings and the surrounding residential neighborhood.

Montana Avenue presents a similar unique pedestrian-oriented street with special character and small-scale businesses. Several historic resources are listed on the Historic Resource Inventory. The eastern part contains older apartment buildings that have been identified in the HRI as the Montana Avenue Multi-Family Residential Historic District. As with the San Vicente Courtyards Historic District, they contain primarily affordable rental housing. For Montana Avenue, the LUCE contains a set of goals targeted to protecting and enhancing its high-quality pedestrian and

retail environment, such as Goal D35: Ensure that new and remodeled buildings on Montana Avenue are compatible in scale and character with existing buildings and the surrounding residential neighborhood.

Pico Boulevard is where a concentration of the city's locally owned legacy businesses serve our most integrated neighborhood. Disruption of the delicate balance of Mexican eateries, small entertainment venues and practical services by displacement and construction of new, large ground-floor-plate retail that attracts corporate tenants will erase decades of living histories of Mexican and African American businesses and families who have been in Santa Monica for generations.

Ocean Park Boulevard has become a thriving hub of small businesses in a setting representative of the historic character of the surrounding residential neighborhood. Large floorplate new retail spaces affordable only to corporate tenants would not be marketable in such a small "inside Santa Monica" neighborhood, likely wiping out the district all together.

The City's major commercial corridors and other parts of the City have underutilized potential for new housing opportunities. Please do not affirm zoning changes to Main Street, Montana Avenue and parts of Ocean Park and Pico Boulevards that threaten their future survival.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Tom Cleys". The signature is fluid and cursive, with a large initial "T" and "C".

Tom Cleys
President of the Board