

Date: July 9, 2013
To: City Council
From: Board of Directors of Ocean Park Association

Re: Agenda item 4A DSP-CEQA Parameters

The 3D Model of Downtown and the Downtown Specific Plan (DSP) must be completed before any Program Environmental Impact Report (PEIR) can be reasonably prepared. We think a program EIR needs to accurately reflect a plan, not guess at it.

As David Martin is quoted in the Daily Press:” We’ve already adopted the Bicycle Action Plan, we’re very close to the Bergamot Area Plan, [we’re halfway through the Downtown Specific Plan](#) and we are getting ready to start the Memorial Park Plan.¹

If we are halfway through drafting the Plan, let’s finish it before we attempt to analyze the Plan’s environmental impacts. An informed decision on specific heights for all downtown streets and boulevards should be made only after 3D modeling has been done. LUCE process is to make these important decisions with thorough review and public input by residents and the Planning Commission. **We urge you to not to set any downtown heights and densities, particularly as to “opportunity sites” which may have far greater environmental impacts until there is a draft DSP and a 3D Model available for public and Planning Commission review as called for in LUCE.**

Key Issues Need Resolution Before Any PEIR Can Analyze Them;

- 1) Since one of the key LUCE goals is reduction of greenhouse gases through future development, shouldn’t we be developing a Plan that includes analyzing a lower range of heights and densities than those proposed by staff that continue 1984 General Plan limits? Why is the idea of a downtown conservation district incentivizing adaptive reuse barely touched on with little discussion or analysis?
- 2) The LUCE did identify a few sites in the downtown as “opportunities” for investment that are “accessible to transit, accommodate mixed-use development, contribute to the pedestrian oriented environment, and support substantial community benefits.” (LUCE 2.6.10) It did not call for greater heights and density at these sites. Since Opportunity site heights and densities are part of Tier 3 under LUCE, they should not exceed the 84 feet currently proposed for the Downtown as the maximum height.
- 3) The vague and incomplete suggestion for only development review of some Tier 3 projects Downtown, is not authorized in LUCE. All Tier 3 projects require Development Agreements and the full panoply of negotiations and public process.
- 4) There is much in the Staff Report that supports the need for 3D Modeling. The staff assertion that lower heights result in blocky, low buildings and that tall, slender buildings result in greater access to air and light illustrates the importance of building design standards in assuring open space, scale and access to light and ocean breezes. It is not just height and density that determine if a building is blocky or light and open, but the design standards. The unfinished 3D Modeling is an integral, but missing part of any discussion of height and density in our downtown and must be used to determine the future look and feel of our downtown.
- 5) Exclude the study of heights and densities above those recommended by staff in the PEIR, such as the 15-22 story heights and densities currently proposed by developers for hotel/condo projects on Ocean Blvd.

Conclusion:

There are too many incomplete parts of the DSP to proceed with a PEIR at this time and have confidence in the process as yielding the necessary information for good planning and good decision-making.

We urge you to insist on the full public process described in the LUCE before moving forward with an Environmental Review for the downtown. A full public process includes Planning Commission, Architecture Review Board, and City Council review with public participation at each step. Otherwise, the process is one, which seriously curtails the planning process and public participation without a good reason for doing so.

Sincerely,

Ocean Park Association Board of Directors

Cc: Rod Gould
David Martin
Francie Stefan
Planning Commission
Neighborhood Group Leaders

See more at: http://smdp.com/a-peek-behind-the-planning-curtain/124356?utm_source=wysija&utm_medium=email&utm_campaign=newsletter#sthash.oejPxl5U.dpuf

