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*Making Conservation  
a California Way of Life.*

August 5, 2021

Rachel Kwok, Environmental Planner  
City of Santa Monica, Planning Division  
1685 Main Street, Mail Stop 28  
Santa Monica, California 90401

RE: City of Santa Monica Housing Element  
Update 2021-2029 – Draft Environmental  
Impact Report (DEIR)  
SCH# 2020100575  
GTS# 07-LA-2020-03643  
Vic. LA Multiple

Dear Rachel Kwok,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Housing Element Update would serve as the City's housing plan for 2021-2029, setting clear goals, policies, and programs to meet State requirements by providing for the housing needs of all segments of the population while affirmatively furthering fair housing and preventing the displacement of existing residents. For the proposed 6th Cycle 2021-2029 Housing Element Update, the SCAG has determined that the City's RHNA is 8,895 dwelling units, more than 5 times than the 5th Cycle 2013-2021 RHNA. The significant increase in the City's RHNA is indicative of the severity of the current housing crisis within the State and in Southern California. The proposed Housing Element Update continues to support the City's core values of supporting housing production, particularly affordable housing, but includes departures from the 2013-2021 Housing Element particularly with respect to where housing is incentivized in the City. While the Santa Monica General Plan Land Use and Circulation Element (LUCE) established a strategy to encourage housing production around major transportation systems, it does not account for the new State mandate to affirmatively further fair housing. Key LUCE policies to develop complete neighborhoods in mixed-use areas within easy access to transit opportunities and daily services remain, but the proposed Housing Element Update is driven largely through an equity and inclusion lens. As such, the proposed Housing Element Update includes new goals, policies, and programs to create housing opportunities in areas of the City that have not accommodated or permitted housing.

After reviewing the DEIR, Caltrans has the following comments:

CALTRANS-1 | As stated in the Transportation Study, Appendix G, this project will result in a significant VMT impact. Of the Mitigation Measures explored, there was no mention of significantly reducing or eliminating car parking requirements, despite recommendations made in Caltrans' NOP comment

CALTRANS-1  
(Cont.) letter. Removing car parking is a proven method of both reducing trip demand and improving housing affordability.

CALTRANS-2

- Research looking at the relationship between land-use, parking, and transportation indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation. For any community or city to better support all modes of transportation and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) measures as an alternative to requiring car parking.

CALTRANS-3

- Additionally, rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households than they are for high-income households. Seeing as this project is intended to provide affordable housing, this should be taken into serious consideration. There is sufficient justification to reduce or eliminate car parking city-wide in order to promote affordability and achieve the project's goals.

Despite them being a part of the *Downtown Community Plan*, Caltrans also does not concur with the following vehicle capacity expansions, as they are in direct conflict with State goals and objectives:

- CALTRANS-4
1. Removal of the existing transit mall on Santa Monica Boulevard east of 4th Street to create additional traffic capacity.
  2. Removal of on-street parking to create additional capacity for a westbound through lane on Santa Monica Boulevard from 5th Street to Ocean Avenue.
  3. Removal of on-street parking to create additional capacity for eastbound and westbound through lanes on Olympic Drive between Main Street and 4th Street.

CALTRANS-5

Caltrans recommends that car parking and vehicle capacity expansion both be eliminated and a reanalysis of VMT impacts conducted, with the goal of reducing the Project's VMT impact severity.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2021-03643.

Sincerely,



Miya Edmonson  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

## Meisinger, Nick

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**To:** Rachel Kwok  
**Subject:** RE: Draft Housing Element EIR - QUICK QUESTIONS AND COMMENTS

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**From:** Ann Hoover <[annkbowman@yahoo.com](mailto:annkbowman@yahoo.com)>  
**Sent:** Wednesday, August 11, 2021 12:18 PM  
**To:** Rachel Kwok <[Rachel.Kwok@santamonica.gov](mailto:Rachel.Kwok@santamonica.gov)>  
**Subject:** Draft Housing Element EIR - QUICK QUESTIONS AND COMMENTS

EXTERNAL

Hi Rachel -

Wow, so much work here on the draft HEU EIR. Thank you.

Quick Qs:

- AH-1 | • Will the final version have a Table of Contents or an Appendix so that topics/issues can be located more easily?
- AH-2 | • Would it be possible to call out WATER impacts and ENERGY impacts separately from "UTILITIES" or are you operating within a prescribed format?
- AH-3 | • I think lumping those topics in with UTILITIES downplays the significant strain this coming RHNA will place on water and energy and how that increased demand likely will impact existing businesses and residents in a negative way.
- AH-4 | • It's pretty obvious that the WATER and ENERGY impacts of even meeting the Quantified Objective will be enormous. We are on a long-term water shortage precipice that I don't think any of us fully understand the import of yet: <https://www.latimes.com/california/story/2021-07-21/drone-photos-reveal-the-shocking-truth-of-californias-parched-landscape>; although there have been some sanguine predictions from local observers (see below \*\*)
- AH-4 | • This "stop-development" scenario in Utah is not so far-fetched for California as we might think: <https://www.nytimes.com/2021/07/20/us/utah-water-drought-climate-change.html>

AH-5 | I do know that you're just doing your job here and responding to a state-level mandate. But I hope you're keeping your eyes open and ears to the ground to remain reality-based.

Thanks so much for responding when you can -  
Best, Ann Hoover

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<https://smmirror.com/2021/07/sma-r-t-column-water-woes-not-be-gone/>

<https://smmirror.com/2021/07/sma-r-t-column-warning-water-wars-ahead/>

**From:** [Lois Bostwick](#)  
**To:** [Rachel Kwok](#)  
**Subject:** Trees and green space  
**Date:** Thursday, July 1, 2021 11:46:10 AM

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EXTERNAL

Hi, Rachel!

The latest National Geographic shows LA as lacking in trees needed for health. Do plans for development and higher density include the green growth spaces needed to balance the growth in density? I hope so, as it affects quality of life and requires planning.

Thank you,  
Lois

LB-1

**From:** [William Johnson](#)  
**To:** [Rachel Kwok](#)  
**Subject:** Draft Environmental Report  
**Date:** Thursday, July 1, 2021 11:01:42 AM

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EXTERNAL

WJ-1

It is utter crap. Your constituents, the citizens of Santa Monica, do not want more denser badly designed housing. And more traffic. And more people. You are headed in the wring direction. A freeze on new development is what we need.

Sent from my iPhone