

September 20, 2011

To: Planning Commission
Lily Yegazu, Planner
David Martin, Director, Planning and Community Development

From: Board of Directors, Friends of Sunset Park

RE: Planning Commission 9/21/11 agenda item 9-A -- Walgreens CUP, DR, and Variance

The proposed project lies within the Sunset Park neighborhood. Our Board has had two presentations from the developer over the years, and we've sent comments to the Planner re both the Draft EIR and the re-circulated Draft EIR. In summary:

1. We strongly oppose a CUP to allow Walgreens to sell alcohol at this location.
2. We strongly oppose 24-hour operation at this Walgreens, which is across a narrow alley from condos (and condo bedrooms).
3. We strongly oppose sole access to the parking lot from Lincoln Court, which is adjacent to condos (and condo bedrooms).

During the LUCE update process, we were told over and over again by the previous Planning Director that the new LUCE would preserve residential neighborhoods in 94% of the city.

We don't see where in the LUCE it states that reducing curb cuts should take precedence over preserving the quality of life within residential neighborhoods. Therefore, we don't understand the rationale for the Planning Department's instructions to the developer to remove existing curb cuts and purposely increase alley traffic adjacent to residences by having alley access only to the Walgreens parking lot.

We also don't see how 24-hour operation of a Walgreens store across a narrow alley from residences will "preserve" and maintain/improve the quality of life for residents of our Sunset Park neighborhood.

August 12, 2011

To: Lily Yegazu, Planning & Community Development Department (lily.yegazu@smgov.net)

From: Board of Directors, Friends of Sunset Park

RE: Comment on Recirculated Draft EIR for 1907-1929 Lincoln Blvd. Walgreens Project

The FOSP Board of Directors has the following comments and recommendations regarding the June 2011 Recirculated Draft EIR for the proposed Walgreens project on the SE corner of Pico and Lincoln, within the boundaries of the Sunset Park neighborhood.

2. Inadequate mitigation measures for the project -- The summary of significant environmental impacts and mitigation measure on page ES-12 shows that there are no mitigation measures that would reduce the traffic impacts at Lincoln and Bay. We foresee an increase in traffic accidents at this intersection as customers try to cross heavy traffic on Lincoln Blvd. to drive to and from the store, even with implementation of a suggested T-6 Keep Clear Zone.

1. Incorrect information re access, and inadequate information re existing and projected traffic volumes -- In the Fehr & Peers report attached to the Recirculated Draft EIR, the site plan in Figure 2 shows direct Walgreens parking lot access only from Lincoln Court (and indirectly from Pico Place South, Pico Blvd., and Bay Street).

Yet, page 1 of their report states, "Primary access to the site would be provided from the alley to the east, Lincoln Court." "Primary access" to the store is different from "access only from...."

The report continues, "The alley can be accessed either from Pico Boulevard or from Bay Street," but fails to mention Lincoln Court alley access from Pico Place South.

Then, Figures 3 and 6, which show traffic volumes, include neither Lincoln Court nor Pico Place South. Yet increased traffic in these alleys would have a profound effect on residents living on the north side of Bay Street between Lincoln and 10th.

2. Inadequate mitigation measures for the project -- The summary of significant environmental impacts and mitigation measure on page ES-12 shows that there are no mitigation measures that would reduce the traffic impacts at Lincoln and Bay. We foresee an increase in traffic accidents at this intersection as customers try to cross heavy traffic on Lincoln Blvd. to drive to and from the store, even with implementation of a suggested T-6 Keep Clear Zone.

3. Questionable Planning Department priorities -- Page 1 of the Fehr & Peers report states that, "The existing driveway on Lincoln Boulevard between Pico Boulevard and Bay Street would be removed. This would make more on-street parking space available for metered parking. The driveway on Bay Street between Lincoln Boulevard and Lincoln Court would be removed. These driveways would be replaced with an unbroken curb and sidewalk.

In other words, the Planning Department seems to have recommended to the developer that the access to a 24-hour drugstore parking lot be only from an alley next to condos because additional parking meters and unbroken curbs are more important to the city than residents being able to sleep through the night without being disturbed by (a) the noise of cars passing a few feet from their bedroom walls, and (b) movement-sensor-controlled parking lot lights going on and off all night long.

If this is the case, the FOSP Board strongly disagrees with this Planning Department policy. We think access to the parking lot should be from a street, not solely from an alley next to homes.

5. Weekday Open Hours should be restricted to 7 AM or 8 AM to 10 PM -- Table 4 of the Fehr & Peers report shows "Empirical Drugstore Trip Generation," including "Weekday Open Hours" for three drugstores in Santa Monica. We note that while two of the stores are open 24 hours, the CVS at 1411 Lincoln Blvd. is open 7 AM - 10 PM.

Since the proposed Walgreens is adjacent to a residential parcel on Bay Street, we strongly urge that hours of operation for the new Walgreens be restricted to 7 AM or 8 AM to 10 PM.

Below are the FOSP Board comments and questions regarding the original Draft EIR.

June 10, 2011

To: Lily Yegazu, Planning & Community Development Department (lily.yegazu@smgov.net)

From: Board of Directors, Friends of Sunset Park

RE: **Comment on Draft EIR for 1907-1929 Lincoln Boulevard - Walgreens Project**
(June 13 deadline)

The FOSP Board of Directors has the following comments and recommendations regarding the Draft EIR for the Walgreens Project, which is located on the SE corner of Pico and Lincoln, within the boundaries of the Sunset Park neighborhood:

1) **CUP to sell alcohol** - Page 34 of 467 (online) refers to a CUP that would allow Walgreens to sell alcohol onsite.

Comment: In the February 22, 2011 edition of the Santa Monica Daily Press, SMPD Sgt. Jay Trisler "confirmed...that permits to sell alcoholic beverages at the location would be a cause for concern." In addition, liquor is already for sale at the NE corner of Pico and Lincoln, and at a liquor store one block east on Pico. The CLARE Foundation and Santa Monica High School are also located nearby on Pico Blvd.

Recommendation: The FOSP Board opposes the granting of a CUP that would allow Walgreens to sell alcohol onsite.

2) **Traffic impacts** - The Draft EIR states that the proposed Walgreens project would generate 513 additional daily car trips. It states on page 117 of 467 and on page 148 of 467 that traffic "impacts would be significant and unavoidable" at the intersections of Lincoln & Pico and at Lincoln & Bay.

On page 139 of 467, it describes the Level of Service (LOS) ratings for the intersections of Lincoln and Pico (C and D); Lincoln and Bay (F and F); Lincoln and Ocean Park Blvd. (D and F).

With the 60% Reduced Project Alternative, the Walgreens store would be about 4,000 sq ft rather than 12,000 sq ft. Parking would be reduced from 30 to 12 surface parking spaces, which would in turn reduce traffic impacts.

Also, with the 60% Reduced Project Alternative, "The building would be located approximately 50 feet from the multifamily building to the east of the project site on Bay Street rather than the proposed project, which would be about 20 feet away." More of the parcel would be landscaped.

Comment: The 60% Reduced Project Alternative would reduce traffic impacts in the area and also reduce the general impact of the Walgreens Project on nearby residents.

Recommendation: The FOSP Board supports the 60% Reduced Project Alternative.

3) **Parking lot ingress and egress** - Online page 24 of 467 -- Aerial photo showing the project site, Lincoln Court, and the adjacent residential building

Pages 28 and 29 of 467 -- Lay-out showing vehicle access to the surface parking lot only from Lincoln Court (the alley east of Lincoln Blvd.)

Page 32 of 467 -- The store will eventually be open 24/7, with deliveries to the loading area along the east side of the building.

Comment: None of the businesses currently on the property are open 24/7. This change in hours of operation will impact nearby residents.

Page 33 of 467 -- A 5-foot screen wall will be installed on the east side of the parking lot.

Comment: A 5-foot screen will not protect residents in the multi-family building across the alley from the impact of parking lot lighting.

Page 59 of 467 -- Page 59 -- Aerial view, showing the parking lot, Lincoln Court, and the adjacent residential building

Page 125 of 467 -- "The noise sensitive uses nearest to the project site are multi-family residences located on Bay Street approximately 25 feet to the east and SE across Lincoln Court."

Page 129 of 467 -- Deliveries would be made only once a week for 1.75 hours and not allowed between 11 PM and 6 AM.

Comment: It's not clear from this description whether only one truck will make deliveries once a week, or whether a series of trucks will make deliveries once a week, using the alley adjacent to a multi-family residential building on Bay Street.

Page 145 of 467 -- "Vehicular access to the site's parking would be provided from the north-south alley known as Lincoln Court."

Comment: Nearby residents tell us that Lincoln Court is already heavily traveled by pedestrians, cars, and trucks; that a Sherwin Williams store is due to move in soon, which will bring additional traffic; and that they are concerned that Lincoln Court was not included in the Walgreen Draft EIR traffic studies. An additional 513 daily car trips through that alley will neither increase safety nor reduce the noise impacts on nearby residential neighbors.

Recommendation: The FOSP Board strongly recommends that access to the surface parking lot for Walgreens be moved from an alley (Lincoln Court) that's next to a multi-family residential building, to the arterials (Lincoln and/or Pico).

4) **Mixed-Use Alternative Project** – With this alternative, there would be 33 parking spaces, 40% fewer additional daily car trips, but traffic impacts "would likely remain significant" according to the Draft EIR.

Comment: In addition to significant traffic impacts, locating senior housing in this area does not seem like a good idea. The intersection of Lincoln and Pico is extremely noisy, it's a wide intersection for pedestrians to cross safely (especially if they walk slowly), and the people who hang out near the bus bench on the SW corner of Pico and Lincoln make it seem like a not-very-safe area for seniors to live, walk, or wait for buses.

Recommendation: The FOSP Board opposes the Mixed Use Alternative Project.