

West Of Westwood
Homeowners Association

June 18, 2018

Planning and Land Use Management Committee
City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012

Attn: Councilmember Jose Huizar, Chair
Councilmember Marqueece Harris-Dawson
Councilmember Mitchell Englander
Councilmember Bob Blumenfield
Councilmember Curren D. Price, Jr.

**RE: Exposition Corridor Transit Neighborhood Plan:
Council File No. 18-0437
City Planning Case: CPC-2013-621-ZC-GPA-SP
Environmental Case: ENV-2013-622-EIR; SCH No. 2013031038**

Dear Chair Huizar and PLUM Committee Members:

I am writing to you on behalf of the Board of Directors of the West of Westwood Homeowners Association (WOWHOA), representing approximately 1,200 households in the Rancho Park area. WOWHOA has several concerns relating to protecting the quality of life of its residents and preserving our existing neighborhood as one of the communities within the Westside Neighborhood Council boundaries that is adjacent to two of the Exposition Corridor Light Rail stations (Westwood and Sepulveda Stations).

Our letter serves to provide the members of PLUM with:

- 1) relevant background and context of the unique neighborhood characteristics in Rancho Park in relation to the proposed Exposition Corridor Transit Neighborhood Plan ("ECTNP"); and
- 2) WOWHOA's position regarding the proposed ECTNP as proposed by Planning Department staff in October 2017 and as subsequently modified by the City Planning Commission ("CPC") at their November 9, 2017 hearing.

This letter addresses WOWHOA's objections to the CPC's modifications to the proposed plan and WOWHOA'S support of the Westside Neighborhood Council recommendation as the proposed ECTNP relates to:

West of Westwood Homeowners Association

1) an approximately ¾ mile section of Pico Boulevard denoted as Sub-Area 26 (which spans from Bentley Avenue to Overland Avenue on the north side and from Military Avenue to Overland Avenue on the south side); and

2) the Exposition Boulevard Corridor denoted as Sub-Area 25 (which generally spans the residentially zoned blocks located between Sepulveda Boulevard and Midvale Avenue just west of Westwood Boulevard).

The CPC recommended significantly increasing the height and density of Pico Boulevard from the already increased height and density in the plan proposed by City Planning staff in which the zoning district would change from C2-1VI to RAS4. The CPC recommended changing the zoning district for the Exposition Corridor from R-2 to R-3.

Background:

WOWHOA has been involved with the ECTNP since its inception in 2013. Our community participated in a multi-year planning process with the City through numerous workshops and public hearings that resulted in the careful and thoughtful crafting of the ECTNP by the City Planning Department based upon input by not only WOWHOA but all stakeholders within the Westside Neighborhood Council area.

This input and staff’s analysis was designed to meet required population growth figures in the Plan Area as well as increase employment in the Plan Area. Specifically, Primary Objective 2 on page 3-1 of the DEIR states: *“Accommodate, employment, housing and population growth projections forecasted through the planning horizon year of 2035 by focusing residential development and new job-generating uses around transit stations.”* In October 2017 after four years of community engagement the City Planning Department transmitted the Proposed Plan to the City Planning Commission that balanced (and achieved) the objectives of the ECTNP with the concerns and priorities of the impacted neighborhoods. The Planning Department’s Proposed Plan not only meets this primary goal but exceeds it by a substantial margin as specified in the City’s data below:

	2035 SCAG Forecast	2035 Proposed Plan (October 2017)	
			% of SCAG Forecast
Population	54,444	59,923	110.1
Jobs	43,097	47,156	109.4

West of Westwood Homeowners Association

WOWHOA, like the WNC, is committed to supporting appropriate residential and commercial densities and affordable housing within the ECTNP planning area. However, we believe that the unique neighborhood characteristics along Pico Boulevard and along Exposition Boulevard (for the sections proposed for up-zoning) have not been considered by the City Planning Commission and, as a result are no longer reflected in the City's proposed ECTNP. Therefore, WOWHOA opposes specific aspects of the City Planning Commission's recommendation regarding the ECTNP as discussed in our position and request discussed below.

One of the unique neighborhood characteristics for WOWHOA and the Rancho Park community is that we are significantly affected by the impacts of this Plan because of our immediate adjacency to two transit stations combined with existing impacts and future impacts that will occur once the construction of the 595-unit Carmel Partners Project (formerly Casden Project) is completed. The Carmel Partners Project was approved at more than 4 times the allowed density of the West Los Angeles Community Plan with extensive traffic and other impacts to the Rancho Park community and WOWHOA.

An overview of both the Phase 1 and Phase II EXPO Light Rail routes shows that there are no other locations along the route where two stations are located in as close proximity as are the Westwood and Sepulveda Blvd. stations. This results in a disproportionate area of impact and change because of the half mile radius from each of these two transit stations for inclusion for up-zoning within the ECTNP.

These unique neighborhood issues are critical to developing appropriate residential and commercial density levels that take into account the existing and future forecasted traffic congestion and circulation constraints in place with predominantly at-grade railroad crossings for the Exposition Corridor Light Rail Line, and the future growth of ridership of the Expo Line. The extensive vehicular (cars, trucks, buses, emergency vehicle and goods movement), bicycle and pedestrian traffic delays caused by the at-grade crossings at Overland, Westwood and Military impact mobility for residents and employees and patrons of commercial businesses and residents alike. These delays will only worsen with increased development that cannot be offset solely by remaining capacity to public transit.

Recently published data shows that the EXPO Line attracts over 60,000 daily riders, with three-car trains arriving every six minutes. While further growth is possible, it is ultimately capped by the physical constraints of the line. Three cars is the maximum train length and the minimum possible interval between

West of Westwood Homeowners Association

trains is five minutes - dictated by space limitations on tracks shared with the Blue Line in downtown Los Angeles.

Some experts calculate that, within these physical constraints, the EXPO Line could support 90,000 daily riders. However, in practice, the EXPO Line would likely lose riders long before this maximum figure is achieved - as trains become uncomfortably crowded and journeys are delayed by the extra time taken for riders to board and exit. In fact, these types of service issues are the reason for the steady decline in ridership on the Blue Line and have already been reported during peak hours on the EXPO Line. Numerous recent studies have indicated that there is a general decline in overall transit ridership. Therefore, transit cannot realistically absorb all transportation needs created by new housing growth. Congestion will continue to grow making it untenable to reach places of employment and education, retail services, and residential neighborhoods.

Significant existing impacts especially in the Rancho Park/WOWHOA neighborhood will be increased as a result of implementation of the ECTNP (and as identified and evaluated in the ECTNP Draft EIR and Final EIR), which are caused by increased neighborhood intrusion and vehicle congestion from the cut through traffic especially along Exposition Boulevard and Military Avenue resulting from the at-grade Expo light rail at-grade (street level) crossings. The EIR analyzed and determined that there will be a cumulatively considerable contribution to significant impacts to traffic in the categories of circulation, neighborhood intrusion and CMP arterial facilities.

Therefore, increased commercial and residential development must be sustainable within the context of the entire transportation network. While we support some reasonable growth around the stations on the Expo Line, we are against excessive up-zoning beyond what is needed to meet housing projections and more than the EXPO Light Rail Line can support, forcing people back into their cars and onto our already congested streets.

There are other opportunities for increased housing density near transit stations that may not have been taken into account. The ECTNP includes a provision in Section 6.1.4 of the proposed plan that allows the Director of Planning to allow an additional cumulative maximum of 1,200 residential units through an Alternative Compliance Review Process for numerous strategic sites throughout the ECTNP planning area above and beyond the proposed zoning for specific districts and streets.

Additionally, recent changes in State and local law permit the addition of accessory dwelling units ("ADU's") that essentially already up-zone all residential districts by allowing smaller accessory dwelling units by right without the requirement of providing additional parking. These ADU's provide an opportunity

West of Westwood Homeowners Association

to provide significant additional housing and in a more affordable manner. The opportunity to construct ADU's is separate from any upzoning and addition of new housing units in the ECTNP.

Increasing density beyond the projected regional and local housing need does not necessarily correlate to solving the much debated affordable housing issue either, since most of the housing being constructed or that will be constructed is targeted to market rate or the luxury market.

Implementation of significant changes along the entire stretch of Pico from Sepulveda to Overland Avenue includes a very large portion of the current business community which is primarily a neighborhood serving retail and services district. These uses have become even more important to the community at-large with anticipated loss of retail at the Westside Pavilion and Macy's which are slated primarily for conversion to office uses.

Pico Boulevard is also home to a low income senior housing project constructed in 2011 that runs the length of the entire block on the north side of Pico Boulevard to the west of Veteran Avenue. This affordable housing project was supported and successfully advocated for by our local community, homeowner associations and the Westside Neighborhood Council as the land was originally planned to be sold by the County. Similarly, we successfully advocated for the incorporation of low income senior housing in the Casden (now Carmel Partners) Project located on the super block bounded by Pico, Sepulveda, Exposition and Sawtelle Boulevards. Our community has demonstrated support in addressing affordable housing issues as part of the housing need and continues to do so. However, it is critical to maintain a neighborhood serving commercial district that supports small businesses and a healthy jobs/housing balance.

It should also be noted that the section of Pico Boulevard proposed for up-zoning has smaller lots with limited depth affecting development design options. Additionally, Pico Boulevard has a lower street classification with fewer lanes and less vehicular capacity than the wider east-west commercial corridors in the West Los Angeles area such as Olympic, Santa Monica, and Wilshire Boulevards. Further, the proposed Streetscape Plan to accompany the ECTNP is intended to enhance and support that neighborhood serving environment and efforts to make the area more pedestrian oriented and a walkable community.

The Streetscape Plan which is strongly supported and has been promoted by the WOWHOA and the WNC enhances and extends previous longstanding pedestrian-oriented efforts to foster a pedestrian friendly business corridor and community gathering place that began through the establishment of the Westwood/Pico Neighborhood Oriented District (commonly referred to as the NOD) that was adopted on January 24, 1988 through Ordinance No. 171,859.

West of Westwood Homeowners Association

The streetscape design standards proposed for adoption as part of the ECTNP are the culmination of WNC design and planning efforts that began in 2007 with an extensive community planning and outreach process. We support the streetscape plan as reflective of our community values benefiting both residents and businesses which will encourage a more pedestrian oriented environment.

Position and Request:

WOWHOA feels strongly that the added upzoning of Pico Boulevard and Exposition Boulevard by the City Planning Commission is unwarranted and unjustified because the Proposed Plan as drafted in October 2017 meets and exceeds the numbers of housing units needed to meet the projected housing demand and objectives of the ECTNP and to achieve the goals for increased jobs. The further upzoning creates unnecessary impacts to WOWHOA and the Rancho Park community and ignores the culmination of four years of an extensive community engagement process and staff's analysis.

Oppose:

The West of Westwood Homeowners Association opposes the City Planning Commission's decision to up-zone Pico Boulevard (Sub-Area 26) from C2-1VL to RAS4 and to up-zone Exposition Boulevard (Sub-Area 25) from R-2 to R-3.

WOWHOA supports the two requests of the Westside Neighborhood Council (WNC). We believe that the WNC's request will meet the intended goals of the ECTNP to address increased housing needs to meet or exceed population projections, include and promote affordable housing, maintain the neighborhood serving commercial district, and protect the adjacent residential neighborhood.

First, we support the WNC's request that no up-zoning occur along Exposition Boulevard (Sub-Area 25) from the east side of Sepulveda Boulevard to Westwood Boulevard thus eliminating the R3 subarea and retaining the R2 zoning.

The small lot size characteristics of that area (typically 4,500 – 5,000 square foot lot sizes) does not provide sufficient depth to the lots and square footage for a 4-story bldg. to tier. Furthermore, there is only a small alley separating the Exposition homes from the single-family homes behind them. Additionally, ADU's already can be constructed on these lots and redevelopment appropriate to lot size is already underway on the street under current zoning with added neighborhood sensitive density replacing older structures. The physical structure of the street which is bisected by the EXPO tracks, coupled with nearby EXPO at-grade crossings at Westwood and Military Avenues make this street an

West of Westwood Homeowners Association

especially poor choice for significant additions to allow for TOC projects that will be possible when coupled with R3 zoning.

Second, we support the WNC's request that a new "Neighborhood Mixed Use" Zone be established for Pico Boulevard (Sub-Area 26) on the portion of Pico Boulevard from Bentley Avenue to Overland Avenue on the north side of Pico Boulevard and from Military Avenue to Midvale Avenue/Westwood Boulevard on the south side of Pico Boulevard, as an alternative to the RAS4 zoning that is currently proposed as part of the ECTNP.

West of Westwood Homeowners Association agrees with the WNC which believes that the features of the new Neighborhood Mixed Use Zone that WNC proposes is sensitive to the community scale for these two areas and the adjacent R-1 single-family residential uses while maintaining and encouraging a vibrant neighborhood serving commercial district with the ability to add needed housing consistent with SCAG's projected population and employment demands for the area. WOWHOA believe that these standards strongly support and encourage affordable housing projects as well. WOWHOA would support adoption of the ECTNP with these changes and the additional changes discussed below. WOWHOA supports the adoption of the Streetscape Plan.

West of Westwood Homeowners Association opposes the following additional proposed regulations within the Exposition Corridor Transit Neighborhood Plan in addition to the CPC's further upzoning of Pico Boulevard and Exposition Boulevard as discussed above.

- 1. Director's Determination for Alternative Compliance:** WOWHOA objects to the sole authority of the Director of Planning to be able to allow up to a maximum of 1,200 additional residential dwelling units within the Plan area in excess of what is allowed by the zoning as specified in Section 6.1.4(E). If any excess residential dwelling units are proposed outside of what is allowed by the Neighborhood Plan, it should require a) noticed public hearings; b) decision by the Planning Commission and the City Council; c) and require public benefits that include significant tangible trip reduction measures of at least 25%, substantial community benefits and public right-of-way improvements and street widening as necessary.
- 2. Maximum Building Heights:** WOWHOA continues to oppose the maximum building heights for the property located in the superblock of Sepulveda Boulevard to Military Avenue from Pico Boulevard to the Exposition Light Rail Line right-of-way. The West of Westwood HOA requests that the Sepulveda Boulevard to Military Avenue superblock be reduced to a maximum height of 70 feet regardless of the combination of

West of Westwood Homeowners Association

- uses on the site in conjunction with the proposed transitional height limits (for the area currently shown in Height Areas 7 and 9) which is more compatible with the adjacent residential uses and less impactful than the proposed height limits. The height limits proposed will create light, shade and shadow, privacy, noise and traffic impacts on the West of Westwood residential neighborhood.
3. **Setbacks and Yards:** WOWHOA requests that a minimum setback requirement of 25 feet be added and proposed for any street setback adjacent to or across the street from residential uses in Section 4.2.1.
 4. **Vehicular Access:** Projects in the proposed **Hybrid Industrial: Residential Emphasis** and **Hybrid Industrial: Jobs Emphasis Zoning Districts** located on the superblock between Sepulveda and Military from Pico to the Expo Light Rail should be prohibited from taking any vehicular access to or from Military Avenue. WOWHOA opposes vehicular access to or from Military Avenue.
 5. **Truck Hauling:** WOWHOA opposes truck hauling on residential streets except for residential projects. WOWHOA requests that the Neighborhood Plan and Mitigation Measures should prohibit truck hauling from residential streets including but not limited to residential corridors of Military Avenue and Exposition Boulevard (for Sepulveda Development projects) and Ashby for the proposed Mixed-Use Commercial Residential Zoning District proposed to be located on the property currently occupied by the Westside Pavilion shopping center.
 6. **Design Standards:** WOWHOA requests that the design standards and Neighborhood Plan prohibit balconies, patios or other outside active open space areas above the ground floor that face Military Avenue and the R1 and R2 neighborhoods to the east.

Support

- 1) WOWHOA supports the increased housing and jobs that the ECTNP will provide subject to the above-requested changes.
- 2) WOWHOA generally supports the ECTNP except for the items that we explicitly oppose as discussed in this letter.
- 3) WOWHOA supports the transitional height requirements in Section 2.4.2(B) for projects or portions of project adjacent to properties in the R1 and R2 zoning districts.

West of Westwood Homeowners Association

- 4) WOWHOA supports the requirements for shade and shadow studies as specified in the Exposition Corridor Transit Neighborhood Plan in Section 6.2.2 Aesthetics.
- 5) WOWHOA supports the two Sepulveda Boulevard streetscape plan alternatives.

These concerns affect the health, welfare, safety, and overall quality of life of the households we represent. The Board of Directors of the West of Westwood Homeowners Association respectfully requests that the issues raised in this letter be addressed in the Exposition Corridor Transit Neighborhood Plan and associated EIR for the Exposition Corridor Transit Neighborhood Plan where applicable.

Sincerely,

Terri Tippit

Terri Tippit, President
West of Westwood Homeowners Association

Kimberly Christensen

Kimberly Christensen, Land Use Chair and Board Member
West of Westwood Homeowners Association

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