



April 19, 2018

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RE: Exposition Corridor Transportation Neighborhood Plan:

- 1) Request Elimination of Proposed RAS4 Subarea and Add New Neighborhood Mixed-Use Zone for Pico Boulevard**
 - A) From Bentley Avenue to Overland Avenue (On the North Side)**
 - B) From Military Avenue to Westwood Boulevard (On the South Side)**
- 2) Request Elimination of Proposed R3 and Retain of Existing R-2 Zoning for Exposition Boulevard Corridor Between Sepulveda Boulevard and Midvale Avenue/Westwood Boulevard**

The Westside Neighborhood Council and our residential and business stakeholders have numerous concerns and object to the City Planning Commission’s recommendation regarding the Exposition Transportation Neighborhood Plan (“EXPO TNP”). Our community participated in a multi-year planning process with the City that resulted in the careful and thoughtful crafting of the EXPO TNP by the City Planning Department based upon input by WNC stakeholders and designed to meet required population growth figures for the WNC planning area. The Westside Neighborhood Council (WNC) is committed to supporting appropriate residential and commercial densities and affordable housing within the EXPO TNP. However, the WNC believes 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 CPC and, as a result are no longer reflected in the City’s proposed EXPO TNP.

The section of Pico Boulevard proposed for up-zoning is a neighborhood serving retail and services district. Furthermore, the neighborhood services retail sales and service uses become even more important to the community with the anticipated loss of retail at the Westside Pavilion. Generally, 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 EXPO TNP is intended to enhance and support that neighborhood serving environment and efforts to make the area more pedestrian oriented and a walkable community.

The Pico corridor in the Rancho Park/West Los Angeles area is the heart of the community’s commercial district. It is the location of numerous retail, service and food serving establishments frequented by residents and those who work in nearby commercial centers (Westwood and Century City) and/or who come to the multi-screen Landmark Theatre complex located in the Westside Pavilion. It is also home to a block long low income senior housing project developed and managed by Menorah Housing constructed in 2011. This commercial district has a long history. Longtime residents will remember the Picwood Theatre and bowling alley originally located where the Landmark Theatres now stand. Many merchants have served the community for decades.

In the mid 1990’s members of the residential and business communities joined together to work with the LA City Planning Department to create City legislation to strengthen and support

the Pico and Westwood Blvd. business community. The result of that effort is the Westwood/Pico Neighborhood Oriented District (commonly referred to as the NOD). That ordinance, Ordinance No. 171,859, was adopted on January 24th, 1998 and took its inspiration (and legal basis) from Sec. 13.07 Pedestrian Oriented District (Added by Ord. No. 168,153, effective 9/13/92) of the Municipal Code.

The Rancho Park/West Los Angeles community was clearly ahead of its time seeking to promote and enhance the local business community by working to improve the pedestrian experience and physical characteristics of the buildings on the street and of the types of businesses that were and are appropriate for a pedestrian friendly business corridor through the NOD.

The community's commitment to the Pico business corridor did not end with the adoption of the Westwood/Pico NOD. During the formation of the Westside Neighborhood Council (WNC), the community placed an equal number of residential seats and business seats on the governing board recognizing the importance of local businesses.

The Westside Neighborhood Council has carried on the tradition of supporting the local business community and Pico business corridor by implementing tree plantings, sponsoring street cleaning initiatives ("push broom patrols"), paying for tree trimming, and by hosting an annual "Pick Pico" shop local business promotion festival and street fair.

In 2007, the WNC retained the professional services of a landscape architecture firm to lead efforts to develop a streetscape master plan for Pico Blvd. which included the establishment of design standards for lighting, sidewalk treatments, landscaping (street trees and planters/containers), crosswalks, street islands, wayfinding signage, etc. In anticipation of the arrival of the EXPO Light Rail Line, the WNC prepared and submitted applications to receive METRO funding for Pico Blvd. pedestrian improvements and, following our third effort, a grant of \$1.8 million was awarded to the WNC. The streetscape design standards developed as a result of the WNC's community planning and outreach process are being adopted in the EXPO Corridor TNP.

An overview of the EXPO Light Rail route, Phases I and II 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. While the Sepulveda station was originally to have been placed west of its current location (and west of the 405) that did not occur. The end result of the placement of these two stations in such close proximity is that the half mile circles drawn for inclusion in a corridor transit plan intersect one another to create an elongated and disproportionate area of impact and change. Implementing significant changes along the entire stretch of Pico from Sepulveda to Overland Avenue includes a very large portion of the current business community and places that business community at significant risk of losing their place of business—the very sources of pedestrian activity on the street.

Other relevant issues to developing appropriate residential and commercial density levels include the existing and future anticipated 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. Therefore, increased commercial and residential development must be sustainable within the context of the entire transportation network.

Recent 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 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 theoretical 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.

So, while WNC supports the concept of reasonable, sustainable growth around the stations on the Expo Line, we are against overly-aggressive up-zoning that would result in a localized population surge that is far more than the EXPO Line can support, forcing people back into their cars and onto our already congested streets.

The Westside Neighborhood Council has two requests that we believe meet the intended goals of the EXPO TNP to address increased housing needs that meet or exceed population projections, include and promote affordable housing, maintain the neighborhood serving commercial district, and protect the adjacent residential neighborhood. Our requests are consistent with the West Los Angeles Community Plan.

First, the WNC requests that no up-zoning occur along Exposition Boulevard from the east side of Sepulveda Boulevard to Westwood Boulevard thus eliminating the R3 subarea and retaining the R2 zoning. The houses and duplexes there are what historically have been referred to as “garden homes” because of the small house and lot size characteristics of that area. There is not enough 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. This would cast a shadow on the homes among many other negative impacts that would detract from the single-family neighborhood. Redevelopment appropriate to lot size is already underway on the street under current zoning with added neighborhood sensitive density construction 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 especially poor choice for significant additions to allow for TOC projects that will be possible when coupled with R3 zoning.

Second, the WNC requests that a new “Neighborhood Mixed Use” Zone be established for Pico Boulevard (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 EXPO TNP. We request the following features for this new zone:

Base Scenario

- Max FAR = 2.0;
- Max Height = 45-feet;
- Mandatory step-down in the back of new buildings (25-foot height limit within 50-feet of R1 property);
- Since Pico Boulevard is designated in the TNP as a Retail Street, the first floor fronting onto Pico must include at least 75% Active Uses and the Pico façade must have at least 75% transparency, consistent with the Urban Design Standards in the TNP for Retail Streets as proposed by the Planning Department in the documents transmitted to the City Planning Commission (CPC). Active Uses located on the ground floor of buildings on Pico Boulevard (as a Retail Street) shall have a minimum floor-to-ceiling height of 15 feet consistent with the Urban Design Standards in the TNP as proposed by the Planning Department in the documents transmitted to the CPC.
- Include EXPO TNP parking standards as proposed by the Planning Department in the documents transmitted to the CPC. Current City Code parking minimums would apply to residential and commercial uses.

Bonus Scenario (for Projects including Low-Income Housing)

- 50% floor area bonus for projects that include low income housing
- Total FAR = 3.0
- 5-foot height bonus (i.e. 50-feet total).
- Reduced parking minimums, consistent with SB 744.

Additionally, the WNC would like to confirm that the guidelines of the Westwood/Pico Neighborhood Oriented District (NOD) will remain in full force where it overlaps the Proposed Plan and governs urban design to some extent to the applicable lots involved in the EXPO TNP as originally envisioned in the Planning Department recommendation to the City Planning Commission. Further, the Urban Design Standards and Guidelines in the EXPO TNP would apply and would not conflict with the Westwood/Pico NOD.

The WNC 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. The WNC believe that these standards strongly support and encourage affordable housing projects as well. The WNC would support the adoption the EXPO TNP with these changes and supports the adoption of the Streetscape Plan.

We look forward to working with the Council office to meet our City's housing needs while addressing the concerns of the WNC stakeholders. While our stakeholders will be directly impacted by any Pico and Expo planning decisions, those impacts will be felt by all Angelenos who pass through our area and/or who work or attend education or religious facilities in the community. The impacts of poor planning and infrastructure insufficiencies and failures are shared and will be immense and affect far more than the WNC stakeholders.

Sincerely,

Terri Tippit

Terri Tippit
WNC Chair