



Los Angeles City Planning Commission  
200 North Spring Street, Room 532  
Los Angeles, CA 90012

*Re: November 9, 2017 City Planning Commission Meeting, Agenda Item 13 (CPC-2013-621-ZC-GPA-SP)*

Dear City Planning Commissioners,

We encourage you to amend the draft Expo Line Transit Neighborhood Plan (TNP) to make it a bolder plan worthy of leveraging our major investments in new transit, addressing the severity of the housing crisis gripping Los Angeles, and taking advantage of the opportunity to evolve transit-adjacent neighborhoods to become more sustainable, walkable and diverse places.

The Expo Line TNP is the first of several transit plans being adopted by the city and will influence several other transit and community plans being considered near Los Angeles's expanding transit lines. As you know, Los Angeles is suffering from a severe housing crisis contributing to rising homelessness, rent burdens, displacement, overcrowding, lower-income and younger residents being forced to leave the city for less expensive regions, and a denial of opportunity for people who wish to move to Los Angeles to pursue their dreams.

During the comment period for the draft EIR, over one-hundred of our members and supporters, including thirty-two who live on the Westside, wrote letters encouraging more upzoning to allow more new homes in the plan area. We are disappointed that these letters were not acknowledged in the responses to comments included in the draft FEIR. We understand that this may be related to the fact that some of these letters did not comment directly on the adequacy or completeness of the DEIR. However, we feel it is important for the City Planning Commission to know that there is a new, pro-housing awareness in Los Angeles, and we want to make sure you are aware that many people in the community supported more housing than proposed in the plan before you today.

We hope that you will listen to the voices of those residents who want more homes to benefit both their own families and the large number of Angelenos struggling to afford life here. The era when LA was planned to benefit existing homeowners who try to block new housing is waning, and we hope that the Expo Line TNP will help accelerate the transition to a more diverse and welcoming city.

We also hope that you will give equal consideration to pro-housing voices from across Los Angeles. Angelenos want access to opportunities in the most privileged neighborhoods, where disadvantaged communities have historically been excluded, both explicitly<sup>1</sup> and implicitly<sup>2</sup>. The housing crisis is a regional problem, and every new housing unit in wealthier areas like the Westside helps reduce gentrification and displacement in lower-income neighborhoods.

While the draft plan has some good provisions, we believe that it can do much more to help meet the city's challenges and unlock the benefits of transit expansion. At a minimum, we recommend approving the TNP with the following changes<sup>3</sup>:

- Restore the R3 subarea along Exposition Blvd. between Sepulveda Blvd. and Westwood Blvd.
- Restore the RAS4 subarea on Pico Blvd. between Sepulveda Blvd. and Overland Ave.
- Remove parking minimums in new zones, or start with a baseline of 1/4<sup>th</sup> of the parking currently required under LAMC Section 12.21 A.4. This would be consistent



with the draft re:code LA recommendations for ‘linked-compact’ communities. We believe that Expo Line-adjacent areas should be among the most linked and compact places in the city and that parking rules should encourage this evolution.

- Increase zoned residential density on Motor Ave., Venice Blvd., and Westwood Blvd.

We also encourage the City Planning Commission to consider bigger changes to the TNP, even at the risk of the need to perform supplemental environmental analysis. There are two main ways the plan could be improved: increase the number of homes that can be constructed, and provide people with more flexibility in project design.

First, to increase the number of homes that can be constructed under the TNP, the commission should consider the following:

- Where commercial boulevards like Exposition Blvd., Sepulveda Blvd., Westwood Blvd., Motor Ave., Pico Blvd., and Venice Blvd. are not already designated industrial or hybrid industrial, rezone them to mixed-use
- Rezone one-unit properties to allow a minimum of one unit per 1250 SF of lot area, subject to existing FAR limits. This will allow low density residential areas to retain their form but allow four-plexes on most properties.
- Increase the bonus FAR to 6:1 in all new zones. This will encourage more projects to use the bonus system.

Second, to provide additional flexibility in project design, thereby encouraging development to take place, the commission should consider the following:

- Consolidate the two hybrid industrial zones into a single zone and set the minimum commercial share at 20%. The proposed zones are too prescriptive and run the risk of repeating the apparent error of the Cornfield Arroyo Specific Plan (CASP), where no new housing has been proposed in the five years after adoption of the plan.
- Require commercial-supportive ground floor space rather than mandatory commercial uses in the mixed-use zone. Mixed-use buildings are great, but many projects in Los Angeles have required ground floor commercial spaces that sit empty or underutilized. Instead, we recommend buildings in this zone be required to have 15’ ground floors suitable for future conversion to commercial uses when warranted by demand.
- Eliminate the height bias against residential buildings for plan areas with height districts 7 through 10, and allow the taller commercial height limits for all structures.

We hope you consider these recommendations, and we look forward to continuing to work with you to improve this and future plans to ensure all Angelenos have access to a home, without fear of displacement.

Sincerely,

Abundant Housing LA

<sup>1</sup> <http://joshbegley.com/redlining/losangeles>

<sup>2</sup> <http://beta.latimes.com/opinion/op-ed/la-oe-rothstein-segregated-housing-20170820-story.html>

<sup>3</sup> These recommendations should be interpreted within the scope of the completed EIR.