



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: November 9, 2017
Time: After 11:00 a.m.
Place: City Hall
Council Chambers, Room 340
200 N. Spring Street
Los Angeles, CA 90012

Public Hearings: Limited Hearing
Required. Public
Hearing held May 23,
2017.

Appeal Status: Not Applicable

Case No.: CPC-2013-621-ZC-GPA-SP
CEQA No.: ENV-2013-622-EIR
Incidental Cases: None
Related Cases: None
Council No.: 5 – Koretz, 10 – Wesson,
11 – Bonin
Plan Area: West Los Angeles, Palms – Mar
Vista – Del Rey, West Adams –
Baldwin Hills – Leimert
Specific Plan: West Los Angeles Transportation
Improvement and Mitigation
Specific Plan
Certified NC: West LA Sawtelle, Mar Vista,
Westside, Palms
GPLU: Various
Zone: Various

Applicant: City of Los Angeles

PROJECT LOCATION:

The project area is located approximately eight miles west of Downtown Los Angeles, contains an area of approximately 1,971 acres, and includes all properties located approximately within a half-mile of the following Exposition Line Light Rail Transit stations: Culver City, Palms, Westwood/Rancho Park, Expo/Sepulveda, and Expo/Bundy.

PROPOSED PROJECT:

The project is comprised of the Exposition Corridor Transit Neighborhood Plan (Specific Plan) and Exposition Corridor Streetscape Plan. The Exposition Corridor Transit Neighborhood Plan is a Specific Plan that rezones, and introduces new development regulations, for select properties within the Plan area. The Specific Plan also establishes urban design standards that would apply to all properties in the Plan Area (excluding those zoned R1 and R2). The Streetscape Plan outlines streetscape improvements to be implemented in the public right-of-way.

The project includes amendments to the West Los Angeles, Palms – Mar Vista – Del Rey, West Adams – Baldwin Hills – Leimert Community Plans, as well as amendments to General Plan land use designations and zone changes.

REQUESTED ACTIONS:

1. Conduct a limited public hearing on the Proposed Plan as described in this Staff Recommendation Report.
2. Approve this Staff Recommendation Report as the Commission Report.
3. Find that the City Planning Commission has reviewed and considered the Draft Environmental Impact Report ENV-2013-622-EIR and State

Clearinghouse No. 2013031038 (Exhibit D), in its determination approving the Proposed Plan, and transmit the EIR to the City Council for certification.

4. Approve and Recommend that the City Council adopt the Findings, and direct staff to prepare additional environmental findings for City Council consideration.
5. Recommend that the City Council adopt the Resolution that does the following:
 - a. City Council certifies, based on its independent judgment, after consideration of the entire administrative record, the Environmental Impact Report ENV-2013-622-EIR (State Clearinghouse No. 2013031038) adopts environmental findings, adopts a Statement of Overriding Considerations, and adopts the Mitigation Monitoring Program (MMP); and,
 - b. Pursuant to procedures set forth in Section 11.5.6 of the Municipal Code and City Charter Sections 555 and 558, amends the West Los Angeles Community Plan, Palms – Mar Vista – Del Rey Community Plan, and West Adams – Baldwin Hills – Leimert Community Plan as part of the General Plan of the City of Los Angeles, as described in the attached Plan Resolution (Exhibit F), the Exposition Corridor Transit Neighborhood Plan (Exhibit A), and corresponding Land Use and Zone Changes (Exhibit C2 and Exhibit C3)
6. Recommend that the Mayor Approve the Resolution that takes the actions set forth in Item 5(b).
7. Approve and Recommend that the City Council adopt an ordinance to establish the Exposition Corridor Transit Neighborhood Plan (Specific Plan).
8. Approve and Recommend that the City Council adopt an ordinance to effect zone changes as identified on the Land Use Designation Map (Exhibit C2) and Zone Change Map (Exhibit C3).
9. Approve and Recommend that the City Council adopt an ordinance to effect zone changes to repeal the West Pico Community Design Overlay (CDO).
10. Approve and Recommend that the City Council adopt an ordinance actions to effect zone changes to amend the boundaries of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay “Commercial Corridors” subarea.
11. Approve and Recommend that the City Council adopt an ordinance to amend LAMC Section 12.04 to add the following to the list of Specific Plan zones: EC Exposition Corridor Transit Neighborhood Plan.
12. Approve in concept the Exposition Corridor Transit Neighborhood Plan Streetscape Plan (Exhibit B).

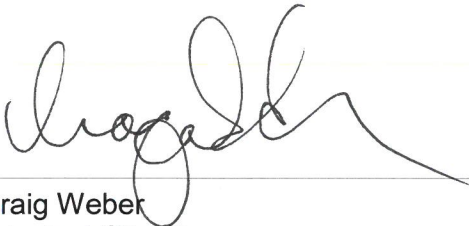
13. Authorize the Director of Planning to present the resolutions and General Plan amendments to the Mayor and City Council, in accordance with Sections 555 and 558 of the City Charter.

RECOMMENDED ACTIONS:

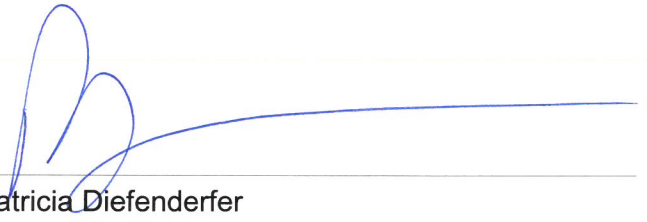
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3. **Find** that the City Planning Commission has **reviewed** and **considered** the Draft Environmental Impact Report ENV-2013-622-EIR and State Clearinghouse No. 2013031038 (Exhibit D), in its determination approving the Proposed Plan, and transmit the EIR to the City Council for **certification**.
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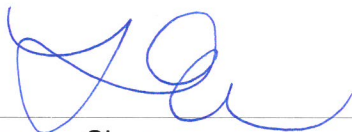
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Exhibits:

A	Proposed Specific Plan
B	Proposed Streetscape Plan
C	MAPS C1 Plan Boundary Map C2 Land Use Change Map C3 Zone Change Map
D	Draft Environmental Impact Report (DEIR) and Technical Appendices
E	Draft Final Environmental Impact Report
F	Draft Resolutions

PROJECT ANALYSIS

Project Summary

The Proposed Project would establish a Specific Plan to regulate future development within the Exposition Line Phase 2 Light Rail Transit (LRT) Corridor, covering approximately one half mile around the following five stations: Exposition/Bundy (Bundy), Exposition/Sepulveda (Sepulveda), Westwood/Rancho Park (Westwood), National/Palms (Palms), and Culver City. The Specific Plan establishes new General Plan land use designations and new zones that encourage infill development and a mix of uses within the identified areas to promote transit ridership, reduce automobile dependence, and create vibrant neighborhoods around the transit stations. Zone changes and General Plan amendments carried forward with the Specific Plan would not affect every parcel within the Proposed Plan Area (Plan Area); these changes would only occur within specific areas of proposed change, referred to as “subareas.” It should be noted that these subareas primarily include land that is currently zoned industrial and commercial, as the intent of the Proposed Plan is to direct growth to the station areas in the form of mixed use development, while generally preserving single family neighborhoods.

The primary objectives of the Proposed Plan are as follows:

Primary Objective 1: Implement the policies of the City of Los Angeles General Plan Framework, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans, which encourage growth to be directed to transit-oriented areas and foster more sustainable, mixed use development patterns that improve mobility options and reduce auto dependence.

Primary Objective 2: 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.

Primary Objective 3: Maintain and expand the City’s jobs base and increase opportunities for economic development in the Exposition Corridor in order to increase the generation of tax revenue in the City that will help pay for the provision of City services.

Primary Objective 4: Implement the General Plan Framework goal to capture a significant share of regional growth in emerging environmentally oriented and clean industries such as technology industry jobs, which are clustered on the Westside and comprise a growing industry sector, and institute zoning that accommodates and creates incentives for the location and continued clustering of these technology industry jobs in the Exposition Corridor where they will benefit from the proximity to transit and mixed use environments.

Primary Objective 5: Create incentives for the provision of affordable housing in new residential development near the Exposition LRT Line to enhance accessibility and housing options for core transit riders and increase transit ridership.

Primary Objective 6: Improve circulation within the station areas; increase mobility choices; promote transit ridership and use of other alternative transit modes; and reduce vehicle miles traveled per capita for those who live and/or work within the Exposition Corridor.

The Proposed Plan also includes secondary objectives that aim to develop a more comprehensive, cohesive, and sustainable planning document.

Secondary Objective 1: Ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through the design of buildings, streets, and the public realm.

Secondary Objective 2: Stimulate vibrancy and activity and create a unique sense of place within each station area through the design of buildings, streets, and the public realm.

Background

The Exposition Corridor Transit Neighborhood Plan (Proposed Plan) is a regulatory land use ordinance as permitted by Section 11.5.7 of the Los Angeles Municipal Code, entitled “Specific Plan Procedures.” The City establishes specific plans to address area-specific land use needs and concerns. The Proposed Plan is the result of several years of planning and community engagement that involved four community workshops; numerous meetings and conversations with residents, employers, property owners, and community business organizations; as well as staff input from numerous City departments.

In 2012, the Los Angeles Department of City Planning (DCP) was awarded a Transit-Oriented Development Planning Grant from the Los Angeles County Metropolitan Transportation Authority (Metro) to do station area planning around five Exposition Line Light Rail Transit (LRT) stations, as well as six Crenshaw/LAX LRT stations. The goal of the grant is to encourage cities to develop regulatory changes that are supportive of transit as means to foster transit ridership, reduce automobile dependence and improve regional air quality. For the Exposition LRT stations, staff prepared a Specific Plan and Streetscape Plan that encourage infill development and a mix of uses at select properties that are proximate to the LRT stations to promote transit ridership, reduce automobile dependence, and create vibrant neighborhoods around the transit stations.

The Metro Exposition Light Rail Transit (LRT) Line is a 15.2-mile-long transit line running between Downtown Los Angeles and the City of Santa Monica. The majority of the line runs along Exposition Blvd., roughly parallel to the Santa Monica Freeway (I-10). Phase 1 of the line was completed in 2012; it extends from Downtown Los Angeles to Culver City, and is complemented by development regulations proposed as part of the South Los Angeles and Southeast Los Angeles Community Plan updates. Phase 2 of the line was completed in May 2016; it extends 6.6 miles from the Phase 1 terminus in Culver City to the Colorado/4th Street Station in Santa Monica. The underlying purpose of the Proposed Plan is to plan for development around the Phase 2 stations in the City of Los Angeles in a manner consistent with state, regional and local policies to encourage infill around transit stations as a means to accommodate growth. Thus, the Proposed Plan includes a variety of land use regulatory changes in the areas along the Exposition Line Phase 2 LRT Corridor (Exposition Corridor), encompassing five station areas within the City of Los Angeles boundaries.

Within the Plan Area, there is currently a variety of zoning. The primary zoning around the Palms and Westwood Stations is residential. The Westwood Station Area and northern portions of the Palms Station is comprised almost entirely of R1 (single family residential) zoned properties, and the southern portion of the Palms Station is comprised mostly of R3 (multifamily residential) zoned properties. Around the Culver City, Sepulveda, and Bundy Stations, there are concentrations of industrially zoned land in the immediate vicinity of the transit stations, with a mix of residential, commercial, and public facilities zoning nearby. Throughout the Plan Area, there are commercial streets that serve a variety of neighborhood and community needs

(Olympic Blvd., Pico Blvd., National Blvd., Venice Blvd., Sawtelle Blvd., Sepulveda Blvd., Westwood Blvd., Overland Ave., Motor Ave., and S Robertson Blvd.).

City land use plans and state legislation were carefully reviewed in the development of the Proposed Plan. The Proposed Plan is consistent with and will complement the plans and policies of the City's General Plan Framework, Industrial Land Use Policy, and applicable Community Plans. The General Plan Framework sets goals to accommodate new housing and jobs in proximity to high quality public transportation, directing it away from single family areas, as appropriate. The General Plan Framework also elevates the importance of urban design and the creation of walkable neighborhoods. The City's Industrial Land Use Policy strives to preserve industrial land for job-generating uses; it includes the recommendation for further study regarding the creation of industrial zones tailored for West Los Angeles. The Plan Area intersects three Community Plan areas; the Proposed Plan aligns with the policies set forth in these community plans to direct growth to corridors and transit-served areas. Additionally, the Proposed Plan furthers the goals of the SCAG Regional Transportation Plan and Sustainable Communities Strategies, the 2008 Complete Streets Act (AB 1358) and SB 743 by helping to reduce vehicle miles traveled, promoting active modes of travel and creating walkable streets that connect a number of surrounding neighborhoods to the Exposition LRT stations.

The Proposed Plan is consistent with Metro First/Last Mile Strategic Plan by encouraging improvements that facilitate easy, safe access to cultural amenities, businesses, neighborhoods, and the Metro system. Additionally, the Mayor's Sustainable City Plan includes benchmarks and metrics to move the City towards a sustainable future. Through strategies called for in the Proposed Streetscape Plan, such as curb extensions and midblock crossings, the Proposed Plan will help to encourage a shift from vehicles to other transportation modes and implement the Vision Zero policy initiative with the goal of reducing traffic-related fatalities.

The proposed General Plan land use designation and zone changes are aimed at accommodating forecasted growth in housing and jobs by 2035 in the area as estimated by SCAG and a market study that was prepared during the development of the Proposed Plan. SCAG's 2016-2040 RTP/SCS includes population, housing, and employment forecasts that provide demographic information to local jurisdictions for use in planning activities. To supplement the SCAG growth forecasts, the market study analyzed the market demand for jobs and housing within the Plan Area. The market study was prepared to provide an additional lens for understanding future demand for housing and jobs at a more fine-grained level than is achieved through the SCAG regional methodology. Together, the two sets of numbers inform anticipated growth in 2035 and guide Proposed Plan recommendations.

As shown in Table A, the land use designations and zoning under the current Community Plans in the Plan Area would not accommodate the forecasted demand for housing and jobs by 2035. The existing (2013) number of jobs in the Plan Area is estimated at 33,962 jobs. The current zoning and land use designations would accommodate 37,775 jobs by 2035; SCAG forecasts demand for 43,097 jobs and the market study forecasts demand for 42,078 to 49,922 jobs in the Plan Area. The Proposed Plan would accommodate between 43,419 and 48,296 jobs. The existing (2013) number of dwelling units in the Plan Area is estimated at 25,018 dwelling units. The current plans would accommodate 26,072 dwelling units; but SCAG forecasts demand for 28,497 dwelling units and the market study forecasts demand for 28,733-31,277 dwelling units in the Plan Area. The Proposed Plan would accommodate between 29,441 and 31,060 dwelling units. Therefore, the Proposed Plan would accommodate SCAG projected demand and fall in the range of market study projected demand for both jobs and dwelling units.

TABLE A: POPULATION, HOUSING, AND EMPLOYMENT IN THE PLAN AREA		
	Housing (Dwelling units)	Employment (Jobs)
Existing (2013)	25,018	33,962
Proposed Plan (2035)	29,440 – 31,060	43,419 – 48,296
Current Community Plans (2035)	26,072	37,775
SCAG Projection (2035)	28,497	43,097
Market Study Estimate (2035)	28,733 – 31,277	42,078-49,922

The Proposed Plan has been in development for a number of years. Through this time, staff has engaged in public outreach through a variety of means. Over the course of the planning process, staff hosted or attended approximately 30 public meetings and collected a list of almost 1,200 stakeholders. The Plan began in 2012 with background research, field observations, and two community visioning workshops. Staff conducted meetings with Neighborhood Councils, Council Offices, City agencies and departments, and neighboring cities as well as six focus groups with key stakeholders. Initial concepts were presented to the community at numerous meetings and two workshops in 2013, culminating in an initial Draft Plan (January 2015). A Preliminary Draft Plan and a Draft Environmental Impact Report were released in March 2017. Outreach culminated in an Open House/Public Hearing held on May 23, 2017 with over 160 people in attendance. In total at least 656 stakeholders signed in at one of the outreach events for this Proposed Plan. Staff has prepared a draft Final Environmental Impact Report (Exhibit E) to respond to the broad themes raised by commenters. Additionally, Staff has prepared the Proposed Plan which incorporates changes from the Preliminary Draft (Public Hearing draft) in response to public input and interdepartmental review.

Components of the Proposed Plan

The Proposed Plan is comprised of several interrelated components, which are described in more detail below.

- Specific Plan
- Land Use and Zone Changes
- Streetscape Plan

Specific Plan

The Specific Plan is an ordinance that contains regulations that apply to properties within the Plan Area (with the exception of properties zoned R1 and R2).

The Specific Plan is divided into the following chapters:

1. **Administration.** Describes the purpose of the Plan and defines which projects are subject to the Plan regulations. This chapter also contains the Plan Subarea map, which identifies properties that are subject to new zoning and additional development standards.
2. **Zoning and Development Standards.** Contains regulations that apply to properties within the subareas. This chapter establishes the following new zones: New Industry, Hybrid Industrial: Jobs Emphasis, Hybrid Industrial: Residential Emphasis, and Mixed Use: Commercial/Residential. For these new zones, this chapter defines the allowable uses, permitted floor area ratios, minimum non-residential use requirements, and maximum building heights. This chapter also includes standards for open space and parking. This

3. **Public Benefits.** Describes the type and amount of public benefits required for projects within the subareas that take advantage of bonus development rights. Public benefits include affordable housing, community amenities, and vehicle trip reduction. It includes the points schedule which must be applied to projects to determine the project's point value. The points correspond with the point values of a variety of community amenities found in the Public Benefits Menu (Appendix A of the Plan).
4. **Urban Design Standards.** Includes standards that apply to Mixed Use, Commercial, or Industrial development as well as standards that apply to multifamily development within the Plan Area. The standards include requirements for the following: building form and orientation, architectural treatment, open space design, and vehicle access and parking.
5. **Streets.** Establishes the requirements for development projects to implement streetscape improvements, and describes the process for relief from those requirements.
6. **Process.** Describes how the plan would be implemented for individual projects, including development review processes, application requirements, environmental review procedures, and mechanisms for relief from certain requirements.
7. **Definitions.** Provides definitions for terms used throughout the Specific Plan.

The Specific Plan is contains the following appendices:

- A. **Public Benefits Menu.** Contains a list of community amenities (including public right-of-way improvements) that may be provided by projects taking advantage of bonus development rights per the Specific Plan, along with their corresponding point values. The Public Benefits Menu includes streetscape improvements, mobility amenities, and community facilities.
- B. **Streets Standards.** Indicates the Mobility Plan street designation and establishes the right of way and roadway dimensions for the street segments included in the Streetscape Plan.
- C. **Exposition Corridor Urban Design Guidelines.** Contains guidelines for multifamily, commercial, industrial, and mixed use development that, which may be used to condition discretionary projects within the Plan Area.
- D. **Exposition Corridor Streetscape Plan.** See description of the Streetscape Plan below.
- E. **Environmental Standards.** Contains requirements for construction (including air quality, archaeological and paleontological resources, noise, and traffic) and project operations (including operational noise and water conservation measures), which shall be printed on plans for development projects.
- F. **Mitigation and Monitoring Program.** Describes the procedures for implementing the mitigation measures identified in the Draft EIR by outlining the implementing agency, enforcement agency and monitoring agency, and monitoring phase/monitoring actions for each mitigation measure.

Land Use and Zone Changes

Implementation of the Proposed Plan includes targeted changes to General Plan Land Use designations and zone changes that seek to achieve the Proposed Plan goals. Of the approximately 1,971 acres in the Plan Area, approximately 256 acres are proposed for a land use and/or zone change. The General Plan amendments (changes to General Plan land use changes) and zone changes are shown geographically in the Proposed Land Use and Zone Change Area Maps (Exhibit C). The types of changes proposed are described below. These areas of proposed change, also known as Subareas in the Specific Plan, are located directly around the transit stations and along major corridors within the Project Area. The types of change are generally described below.

Industrial Areas. The majority of the land use and zone changes are centered around the Bundy, Sepulveda, and Culver City stations and involve a change from a Light Manufacturing land use designation to a Hybrid Industrial designation, creating an opportunity for higher-intensity office and light industrial development while also introducing limited capacity for residential development in areas where it is currently not permitted. The following new zones correspond to the Hybrid Industrial land use designation and are applied to these properties: New Industry, Hybrid Industrial: Jobs Emphasis, and Hybrid Industrial: Residential Emphasis.

Commercial Corridors. Another significant portion of the change areas involves changing the zoning for properties along commercial corridors (including Venice Blvd., Motor Ave., National Blvd., Robertson Blvd., and a portion of Pico Blvd.), most of which are currently zoned as C2, to the Mixed Use: Commercial/Residential zone in order to encourage residential uses combined with neighborhood-serving commercial uses, as well as office uses, in areas currently dominated by a variety of low-scale commercial buildings and single-use multifamily residential uses. Within these zone change areas, properties currently designated as either General Commercial or Medium Residential are proposed for change to either the Community Commercial or Neighborhood Commercial General Plan land use designation.

Residential Areas. Several blocks fronting Bundy Dr. south of the Bundy station are proposed for a zone change from R1 to the RAS4 zone to allow neighborhood-scale mixed use development that creates ground floor commercial activity on those streets, linking nearby commercial activity on Pico Blvd. to the station, and introducing capacity for multifamily housing. These properties are also proposed for a land use designation change from Low Residential to Neighborhood Commercial.

Also directly south of Bundy station, the Plan proposes land use and zone changes for select properties to encourage additional housing capacity within close proximity (one quarter mile, or approximately 5 minute walk) of the station. These properties are proposed for change from the existing R1 zone (Low Residential land use designation) to the RD1.5 zone (Low Medium II Residential land use designation) or the R3 zone (Medium Residential land use designation).

Open Space. Several currently vacant City-owned properties adjacent to the Westwood station along the Exposition right-of-way are proposed for a zone change from R1 to the Open Space (OS) zone to make them consistent with pending plans for the creation of the Westwood Greenway, a public open space on these sites.

Inconsistency. One property located within the Bundy station area, adjacent to the I-10 freeway, is currently zoned for single-family residential use (R1) and is proposed for a change to the M1 zone with a Limited Manufacturing land use designation. The existing use on the site, building materials sales, is inconsistent with the current zoning and land use designation. This land use and zone change was a policy decision made as a result of input received during the

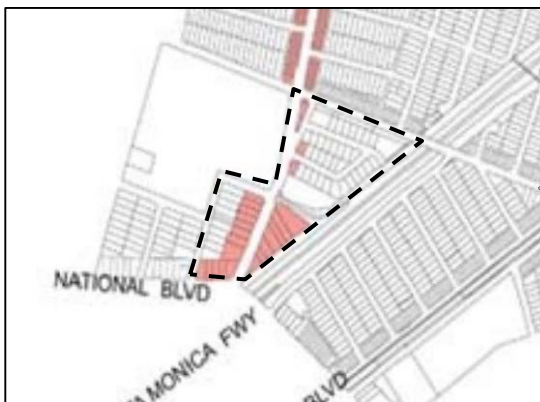
public comment period, and was not included in the original change areas analyzed in the Draft EIR (see Revisions to the Plan for further discussion.)

Changes to West Adams-Baldwin Hills-Leimert CPIO. The Proposed Plan includes land use and zone changes for an area that is currently part of the West Adams Baldwin Hills-Leimert Community Plan CPIO “Commercial Corridors” subarea. As part of the Proposed Project, staff recommends amending the boundary of this CPIO subarea to exclude the areas that overlap with the Proposed Plan subarea (generally along Robertson Blvd. between I-10 and Cattaraugus Ave., shown in the heavy dashed line in Figure 2 below.)

Figure 1: Proposed Zone Change Area



Figure 2: Proposed Area to be Removed from CPIO



Within this area, properties are currently zoned for either C2-1VL, C4-1VL, or RD2-1, and have either a Neighborhood Commercial or Low Medium II Residential land use designation. The Proposed Plan proposes a zone change for this area to the new Mixed Use: Commercial/Residential zone, with a Community Commercial land use designation, which would allow up to 3.6:1 FAR and 68 feet in height. The proposed land use and zoning is more appropriate for this area, as it allows for greater intensity of development and facilitates mixed use development within a short distance of the Culver City station. The change can help revitalize this portion of Robertson Blvd, and link the commercial corridor, and adjacent high school, with the transit station. This is consistent with the recommendations made by the South Robertson Neighborhood Council when providing input on the Proposed Plan, which stated that “this could be an ideal location for high density mixed use that could connect the Robertson corridor with the TOD area surrounding Expo Metro.”

Repeal of West Pico Community Design Overlay (CDO). The Proposed Plan incorporates in full the provisions of the existing West Pico CDO, whether in the Proposed Plan’s urban design standards or urban design guidelines. Therefore staff proposes to repeal the West Pico CDO in order to avoid redundancy in the development review process, and consequently remove the CDO suffix from the zoning of the associated parcels.

Retention of Westwood/Pico Neighborhood Oriented District (NOD). The existing Westwood/Pico NOD also currently overlaps with the Proposed Plan and governs urban design to some extent. However, the Proposed Plan does not propose any change to this NOD. In the overlapping areas all provisions of the Proposed Plan, including the Urban Design Standards and Guidelines, would apply. The design standards and guidelines in the Proposed Plan do not conflict with the provisions of the NOD.

Retention of Sepulveda Corridor Specific Plan. The Proposed Plan does not affect or change any of the regulations contained within the existing Sepulveda Corridor Specific Plan.

Streetscape Plan

The Exposition Corridor Streetscape Plan was developed for five key corridors identified below. The streetscape plan outlines streetscape improvements in the public right-of-way with the goal of creating a pedestrian-friendly environment that encourages walking, bicycling, and transit use while maintaining vehicular circulation. The location of the street segments included in the proposed streetscape plans are:

- Bundy Drive between Missouri Avenue and Pico Boulevard
- Olympic Boulevard between Centinela and Barrington Avenues
- Sepulveda Boulevard between Olympic and National Boulevards
- National Boulevard between Mentone Avenue and Castle Heights Boulevard
- Palms Boulevard between National Boulevard and Motor Avenue

The streetscape plan contains language that clearly identifies when streetscape improvements are required to be implemented, as well as detailed specifications for each streetscape element. It also includes cross sections illustrating the roadway and right-of-way dimensions along each street segment, and plan view drawings illustrating how some of the streetscape elements could be implemented. The Streetscape Plan will be brought back to the City Planning Commission upon certification of the EIR for the Commission's final approval of the Streetscape Plan.

Discussion of Key Issues

The Proposed Plan addresses numerous key issues that have been brought up through public engagement during the development of the Plan.

Concentration of Jobs

A predominant comment received during the early development of the Plan was the concern over the concentration of jobs within the Exposition Corridor, and in particular around the Bundy and Sepulveda stations. There was a perception that there are currently too many jobs located in this area, and that a plan allowing for even more jobs would generate more vehicle trips and result in increased traffic impacts. Some employees in the area called for more housing and amenities to support the existing employment uses. A few comments received on early Plan concepts expressed concern that the proposed Hybrid Industrial zones required too much non-residential use, and that prohibiting housing in the New Industry zone would not be in line with current market demand.

The Exposition Corridor is an important jobs node within the City of Los Angeles. It is adjacent to the cities of Santa Monica and Culver City, and proximate to the area known as Silicon Beach, which contain concentrations of jobs that serve the region, particular jobs in the growing technology, entertainment, and design industries. A majority of the land around the Bundy, Sepulveda, and Culver City stations is currently zoned for industrial use, which allows a range of job-generating uses, including office, retail, and manufacturing, but currently prohibits residential use. One of the primary objectives of the Proposed Plan is to maintain much of this industrial land for jobs uses, in order to expand and strengthen the economic base of the City, remain competitive with other cities by attracting new businesses and industry, and generate tax revenue to fund key City services.

In particular the Plan focuses on accommodating emerging industrial sectors and encouraging the clustering of creative, clean industry uses, including high tech jobs, within the corridor. To do this the Plan proposes three new zones – New Industry; Hybrid Industrial: Jobs Emphasis; and Hybrid Industrial: Residential Emphasis– and applies those zones to much of the currently industrially zoned land. Like traditional industrial zones, these zones allow light industrial uses, including manufacturing, packaging, distribution, and research and development (R&D), which support the creative, technology, media, and similar industries clustered in the area. Unlike traditional industrial zones, however, the New Industry and Hybrid Industrial: Jobs Emphasis zones limit retail and restaurant uses so they remain ancillary to the employment uses on the site. These new zones also offer more Floor Area Ratio (FAR) than existing conditions, in order to encourage more compact development and efficient use of land near transit stations to accommodate future job growth.

The new zones in the Proposed Plan require varying amounts of non-residential use, but have some flexibility in order to respond to changing market conditions. To respond to concerns about the New Industry zone prohibiting any residential use, the New Industry zone was revised to allow a limited amount of live/work units (up to 50% of total project floor area) to accommodate some housing while still maintaining space for job-generating uses (i.e. small businesses with up to 5 employees). Similarly, the Alternative Compliance process allows projects located on eligible sites, the majority of which are proposed for the New Industry zone, to be developed with more residential uses (and less non-residential uses) than allowed by the zone, in exchange for a greater amount of public benefits.

Another objective of the Plan is to encourage transit ridership and reduce auto-dependence, and consequently greenhouse gas emissions, throughout the region. Locating jobs within close

proximity to transit has been shown to result in increased transit ridership among workers. Within a quarter mile of a station, this mode shift to transit occurs at a greater rate among workers when compared to residents within that same distance¹. Concentrating jobs within the Exposition Corridor is anticipated to result in long-term benefits to the transportation network within the surrounding region, as it provides more mobility options for employees in the area beyond driving a car.

Finally, the Proposed Plan requires larger non-residential projects (those using the Bonus FAR) to incorporate Transportation Demand Management (TDM) measures and demonstrate a reduction in vehicle trips to and from the site over baseline conditions, thus lessening the traffic impact of such projects.

Housing

As housing prices increase and supply remains limited, the need for more housing, and in particular affordable housing, has increasingly become a critical issue citywide. It is especially important for affordable housing to be located near job centers and near transit to allow increased access for lower income households, who tend to be core transit riders.

Through the proposed land use and zone changes on select parcels, the Proposed Plan creates increased capacity for housing within the Plan Area. The Plan would create an additional 4,422 to 6,042 dwelling units over existing conditions, resulting in approximately 29,400 to 31,000 dwelling units within the entire Plan Area by 2035. This is consistent with SCAG projections (28,497 dwelling units) and falls within the market study estimates (28,733 to 31,277 dwelling units) for this area by 2035.

In response to feedback received during the development of the Plan that expressed concern about the limitations on housing within the New Industry, Hybrid Industrial: Jobs Emphasis, and Hybrid Industrial: Residential Emphasis zones, an Alternative Compliance process was developed to allow projects located on eligible sites to be developed with more residential uses (and less non-residential uses) than allowed by the zone, in exchange for a greater amount of public benefits. Thus the Alternative Compliance process would allow for the creation of more housing within the Plan Area, while still maintaining these zones for job-generating use.

Staff received numerous written comments on the Preliminary (public hearing) Draft Plan expressing the opinion that the Plan should further increase land use intensity within Plan Area to create even more capacity for housing. As stated above, the Proposed Plan capacity meets projections for housing estimated by SCAG and the market study. The Plan balances this creation of capacity for housing with the goal of preserving land for job-generating uses, as well as the need to maintain stable single family neighborhoods and areas with rent-stabilized multifamily housing, consistent with General Plan Framework policies.

The Proposed Plan would add to the overall housing supply by increasing the allowable floor area and residential density that can be built within the change areas, and allowing limited residential use to be developed in industrial areas where it is currently prohibited. The Proposed Plan also maintains much of the existing rent-stabilized multifamily housing stock, which is concentrated near the Palms and Culver City stations and is not proposed for land use and zone changes.

¹ Kolko, Jed. "Making the Most of Transit: Density, Employment Growth, and Ridership around New Stations." Public Policy Institute of California. February 2011. http://www.ppic.org/content/pubs/report/R_211JKR.pdf

Furthermore, the Proposed Plan requires projects that exceed the Base FAR to designate a certain percentage of their total floor area as restricted affordable units. The required affordability levels in the Plan are consistent with those required by Measure JJJ for Transit Oriented Communities (TOCs), which are intended to provide development incentives for areas within a half mile of a major transit stop in exchange for the provision of affordable housing. Within the four new zones established by the Proposed Plan, the incentivized (tiered) zoning system serves as the TOC affordable housing incentive program for the area; projects providing the minimum amount of affordable housing are eligible for the Bonus FAR, unlimited density, and other development standards that are part of the Proposed Plan. Additionally, the Proposed Plan does not preclude the use of the existing Citywide Density Bonus Ordinance within the Plan Area, and allows it to be applied to the Base FAR in the new zones.

Public Benefits

Early public engagement reflected an overall desire for communities to receive public benefits as new development comes into their neighborhoods. The Proposed Plan addresses this through tiered zoning, wherein additional development rights (i.e. greater FAR) are available in exchange for the provision of public benefits. For projects that include at least 30% of the project floor area as residential use, the public benefits required include affordable housing (see discussion of Affordable Housing above) and community amenities.

Community amenities in the Proposed Plan aim to address core community needs in the Exposition Corridor, especially as they relate to creating successful transit neighborhoods. The amenities, which are listed in Appendix A of the Proposed Plan, include streetscape improvements, mobility amenities, publicly accessible open space, and community/cultural facilities. These help enhance multi-modal accessibility, including first/last mile connections between stations and surrounding neighborhoods, and provide shared public spaces and community facilities (such as museums and youth centers) that serve and enhance the neighborhood. The amount of community amenities assigned to a project would be determined through a points system based on the project's location, scale, and mix of uses. This reflects the market conditions and ability of different types of projects to support additional benefits (alongside affordable housing). The points system is intended to be updated on a regular basis in order to account for potential economic shifts. The list of public benefits is also intended to be regularly updated as benefits are provided and new benefits are identified.

The public benefit required of projects that are largely non-residential (more than 70% of total project floor area) is the Vehicle Trip Reduction. This requirement that projects reduce their vehicle trip generation by 10% (or demonstrate an Average Vehicle Ridership of 1.75 or more) is intended to address community concern about traffic congestion even as new commercial development is introduced into the subject area.

The Proposed Plan's public benefits system expresses the priority of public benefits for various types of projects, which were vetted with the community throughout the planning process, and establishes predictable requirements. These predictable public benefit requirements, combined with a streamlined project review process, are expected to encourage compliance with the Plan and result in outcomes that are supported by area stakeholders.

Several community groups felt that even projects built at the Base Floor Area Ratio level should be subject to public benefits, as the Base Floor Area Ratio allowed by the Plan (2.0:1 or 2.5:1 depending on the zone) is already higher than the current maximum FAR allowed on commercial and industrial properties in the Plan Area (1.5:1) and thus may be interpreted as "bonus" development rights. Although the Plan does not require projects built up to the Base FAR to provide affordable housing, community amenities, or vehicle trip reduction as described

above, the Plan does require projects in the new zones to provide certain “baseline public benefits,” such as unbundled parking and subsidized transit passes, additional open space beyond current code requirements, and transitional height near low-scale residential areas. In addition to urban design standards and streetscape plans, which apply to all projects within the Plan area, these features help enhance neighborhoods, provide increased mobility options, and contribute to the area’s vibrancy overall.

Building Heights and Intensity

A number of comments on the Proposed Plan relate to proposed increases in building heights and intensity, and the physical impacts this could have on the surrounding community. Many residents in the Plan area expressed concern about proposed building heights in particular areas, including along Pico Blvd. between Sepulveda Blvd. and Overland Ave., along Military Ave. south of Pico Blvd., and within the Bundy Station area (north and south of the station.) By contrast, many comments received during the Draft EIR comment period called for even more building heights and intensity within, and in some cases beyond, the areas of proposed change.

In seeking to accommodate anticipated growth, the Proposed Plan proposes increase in allowable FAR and building height within the subareas. At the same time the Plan ensures new development is compatible with the surrounding context and is built at a pedestrian-scale through tailored building heights, a transitional height requirement, and urban design standards and guidelines.

Building height maximums for properties in the new zones were developed with consideration to the adjacent context. Generally, greater heights are allowed near freeways, the Exposition Line right-of-way, and along major boulevards such as Venice Blvd., while lower heights are applied closer to low scale residential areas and within Neighborhood Commercial districts such as Motor Ave north of Palms Blvd.

In addition, the Proposed Plan institutes a transitional height requirement that applies to properties in the New Industry, Hybrid Industrial: Jobs Emphasis, Hybrid Industrial: Residential Emphasis, and Mixed Use: Commercial/Residential zones and requires buildings to step down in height when adjacent to single-family and two-family residential uses. This requirement is intended to mirror the existing transitional height requirements in the LAMC, which apply to commercial and industrial zones. Within the Plan Area, the proposed transitional height requirement would be triggered in only a few locations, and in all these locations, the higher intensity zone is located across a street (i.e. at least 60 feet) from the lower density residential use. None of the proposed zone change areas directly abut single-family or two-family residential properties.

Finally, urban design standards in the Proposed Plan ensure neighborhood compatibility and human-scale development by regulating building design and site planning. The standards include limits on building lengths along a street frontage, and require passageways through large blocks so as to break down the massing of potentially large projects and allow for pedestrian flow through large sites. The design standards also require parking garages to be screened from view, which helps soften the visual impacts of new uses.

Earlier drafts of the Proposed Plan included a proposed zone change along Pico Blvd. between Sepulveda Blvd. and Overland Ave. from the current C2-1VL zone to RAS4-1VL. This subarea in particular was a source of concern for the single-family neighborhood to the north. Many residents in this area expressed concern about the impact of the potentially taller buildings on the adjacent single-family lots. Although transitional height requirements in the Plan would have helped mitigate such impacts, staff ultimately removed this subarea from the Proposed Plan.

While the proposed rezoning would have allowed only a 5 foot increase in allowable building height compared to current zoning, the shallow commercial lots within this area present challenges for multi-story mixed use development, and housing capacity could be accommodated through other proposed zone changes.

Traffic

A common theme within the West LA area is the concern about traffic congestion. Many comments received noted the current congestion levels, especially on major arterials such as Pico Blvd., Overland Ave., Sepulveda Blvd., Olympic Blvd., and Bundy Dr. There is a significant concern about the potential for new development to result in impacts to the roadway network, worsening congestion and causing increased spillover traffic into neighborhoods.

The Proposed Plan aims to reduce automobile dependence and encourage a shift to other modes of transportation, including transit, biking, and walking. The Proposed Plan does not aim to reduce current congestion levels in the area. By directing growth of housing and jobs to areas within a one half mile of the Exposition LRT Line, the Proposed Plan would contribute to mobility benefits at a regional level by providing residents and workers greater transportation options. By contrast, development that occurs in a sprawling pattern spread throughout the city and at its edges, away from transit corridors, is more likely to continue current levels of automobile dependence and contribute more significantly to traffic congestion within the region. Transportation analysis prepared for the Proposed Plan, and included in the Draft EIR, showed that the implementation of both the Proposed Plan and the City's Mobility Plan network would result in significant shift from automobile use to other transportation modes within the West Los Angeles Area Planning Commission boundary. By 2035 there is anticipated to be a 17% increase in transit mode share, an 11% increase in bicycle mode share, and a 1% increase in walking mode share.

Although, the Plan aims to encourage the use of alternate modes of transportation, it does not assume that people within the corridor will not be driving in the future. A majority of trips within the corridor are still anticipated to be made by car. However, in an effort to reduce car trips (especially single-occupancy vehicle trips) the Plan includes several requirements that utilize Transportation Demand Management (TDM) strategies. TDM strategies have been shown to reduce vehicle trips, especially peak hour trips generated by non-residential uses. The Plan requires all projects within the zone change areas (excluding those in the R3 or more restrictive zones) to provide complimentary transit passes to encourage residents and employees not to drive to the site. The Plan also includes a Vehicle Trip Reduction requirement, which applies to commercial developments that use a floor area bonus and requires owners to demonstrate a reduction in vehicle trip generation using TDM strategies.

Nevertheless, the Draft EIR prepared for the Proposed Plan did find that implementation of the Proposed Plan could result in significant and unavoidable traffic impacts, including the following areas: circulation, neighborhood intrusion, and CMP arterial intersection analysis. These circulation impacts are based on intersection-level Level of Service (LOS) analysis. The Draft EIR also studied Vehicle Miles Traveled (VMT) per capita, which is the new transportation impact threshold soon to be adopted by the City per state Office of Planning and Research guidance. The analysis in the Draft EIR showed that although Vehicle Trips and total VMT are anticipated to increase by 2035 as a result of the Proposed Plan (as well as implementation of the Mobility Plan network), service population (residents and workers) is also anticipated to increase within the area – and at a higher rate – so that the result is a reduction of approximately 3.1% in VMT per capita. This reduction is attributed to shorter trips, less car trips, and internalization of trips made possible by compact, mixed use development encouraged by the Proposed Plan.

Walkability / Pedestrian Linkages

Current walking conditions in the Exposition Corridor are often inadequate. In many areas, the sidewalks are too narrow, shade and seating is lacking, and the blocks are too long. Several commenters noted that certain streets are unsafe for pedestrians. In several locations, freeway overpasses (both the I-10 and I-405 freeways) create challenging conditions for pedestrians, who have to cross underneath them to reach nearby transit stations or other destinations. The Proposed Plan aims to facilitate a more walkable environment throughout the corridor by requiring streetscape elements that improve the condition of the public rights-of-way. The Plan includes streetscape plans for the following street segments within the Plan Area: Bundy Dr., Sepulveda Blvd., Olympic Blvd., Palms Blvd., and National Blvd. (see Plan Components below for exact boundaries of the segments). Additionally the Plan applies urban design standards to multifamily, commercial, industrial, and mixed use projects to ensure they are built at a pedestrian scale, are oriented to the street, and contribute to an active, safe, convenient, and comfortable walking experience.

In particular, the South Robertson Neighborhood Council seeks an improved, safe linkage between the Culver City station and Robertson Blvd. (including Hamilton High School). The recently adopted West Adams-Baldwin Hills-Leimert Community Plan, which is applicable to this area of the Proposed Plan, includes several relevant policies and programs that address this concern. Policy M2-1 and the related Program P254 and Program P255 support efforts to implement streetscape improvements in transit-oriented development areas, which include the area around the Culver City station. Policy M3-2 calls for certain streets to be identified as having “pedestrian priority,” where pedestrian needs are considered paramount to vehicular circulation and where investments in pedestrian improvements are encouraged. The related Program P210 supports efforts to implement streetscape plans along these Pedestrian Priority Street Segments, which include the portion of National Boulevard between the Culver City station and Robertson Boulevard. Although the Proposed Plan includes a streetscape plan for several streets within the Exposition Corridor, National Blvd adjacent to the Culver City station was not included primarily due to the likelihood that the street network in this area will be reconfigured as part of the I-10/Robertson/National Area Circulation Improvement Project currently being studied. Still, the Proposed Plan applies design standards to properties fronting this street segment that would require new development to be oriented to the street, have limited front yard setbacks, and have active uses with windows and doors along the ground floor. Even without a streetscape plan, public benefits provided by future development projects could implement improvements that would address community concerns about this linkage, including freeway underpass improvements, new shade trees, and/or new crosswalks and curb extensions (all of which are identified on the Public Benefits Menu in the Proposed Plan). Finally, an additional purpose statement was added to the Proposed Plan to emphasize the goal of creating improved pedestrian connections to transit stations, in particular where there are existing physical barriers such as those around the Culver City station.

Parking

Along with traffic, the issue of automobile parking has been raised frequently throughout the community engagement process. In particular there are concerns about having insufficient parking for new development, and about the potential for spillover parking impacts within residential neighborhoods. An alternate perspective coming out of numerous comments was a call for the elimination of parking minimums throughout the Plan Area. Generally the Plan maintains current LAMC minimum parking requirements, but offers some flexibility by allowing shared parking in mixed use development, exempting small storefronts in identified

neighborhood commercial areas from parking requirements, offering reductions for projects that include restricted affordable units, and reductions in exchange for provision of car share space. Although studies show that there is often reduced demand for parking in TOD areas, the Plan does not propose significant parking reductions, and all exemptions and parking reductions are optional, leaving it up to project developers to respond to current market and site-specific conditions.

Many also brought up the issue of parking at Metro stations, noting that the new Exposition Line Phase 2 stations did not provide enough (or even any) parking for transit riders. The Proposed Plan does not address the issue of parking at stations. This is under the jurisdiction of Metro, as they have their own criteria for determining at which stations to provide parking. The Plan does require unbundled parking and allow owners to make extra parking available to the public, including transit riders. Thus Project sites within close proximity to a station could potentially offer unused parking for Metro riders. However the Plan does not explicitly encourage additional park-n-ride facilities at stations, as this could be in conflict with the goals of encouraging alternate modes of transportation and reducing greenhouse gas emissions. Instead the plan focuses on improvements to the streetscapes around the stations, and locating more housing and jobs near the stations, so that transit riders are encouraged to walk or bike short distances to the stations.

Environmental Impacts

A Draft Environmental Impact Report (EIR) has been prepared to analyze the potential impacts of the Proposed Plan, evaluate project alternatives, develop feasible mitigations, and create a mitigation program. In accordance with the California Environmental Quality Act (CEQA), the Draft EIR analyzed several impact areas and fully disclosed areas where significant and unavoidable impacts would occur. These areas include Aesthetics, Air Quality, Cultural Resources, Noise, Parks and Recreation, and Traffic and Transportation. A copy of the Draft EIR is attached as an exhibit to this report. This report also includes Findings to support the adoption of the Proposed Plan, including draft environmental findings. There is also a draft Statement of Overriding Considerations in this report that is recommended for adoption by the City Council, which states the reasons the benefits of the proposed project outweigh the potential impacts.

Section 15088 of the CEQA Guidelines requires the lead agency (DCP) to evaluate comments on environmental issues from public agencies and interested parties who review the Draft EIR and provide written responses. DCP is preparing responses in writing to all the comments received. As there were several common themes among the comments received, DCP prepared eight Master Responses to comprehensively address these topics. The Master Responses are included in the draft Final EIR, which is provided as an attachment to this report (Exhibit E). The Final EIR will be released prior to City Council action.

During the public review period of the Draft EIR staff received numerous comments expressing concern about whether there is adequate infrastructure and public services to accommodate the growth anticipated to result from the Proposed Plan. The Draft EIR generally found the areas of public services and infrastructure - including utilities, schools, and fire and police services – to be adequate. Refer to the Master Responses in the draft Final EIR (Exhibit E) of this report for more detail.

The Draft EIR is a project-level analysis that assumed a certain amount of new development (housing and jobs) that could occur within the Plan Area by 2035, the horizon year of the Proposed Plan. Projects that comply with the Specific Plan regulations would be eligible for an Administrative Clearance, a ministerial project review process, and will generally not need

additional environmental review. To ensure that future development within the Plan Area remains within thresholds that were analyzed in the EIR, the Plan requires projects to be assessed for consistency in terms of trips and water demand. Projects that exceed the number of trips or water demand that was assumed for the Plan Area are potentially subject to additional project-specific environmental review. For example, projects that exceed the number of trips analyzed are required to prepare a traffic study, which would assess whether the project would result in additional transportation impacts.

Because the details of potential new development within the Plan Area, such as the specific location, scale, or design of specific projects, could not be known at the time of the preparation of the Draft EIR, the development review process in the Proposed Plan includes thresholds, that if triggered would require additional technical studies and possibly project-specific environmental review. For example, in the area of aesthetics, qualifying projects must complete a shade and shadow study to assess the potential of the project to create shade on nearby shadow-sensitive uses. If the study shows a potential impact, the project would have to either be redesigned or perform additional environmental review. The Plan also includes thresholds for historic resources and hazardous materials sites.

Finally, the Proposed Plan also incorporates many typical mitigation measures as project features, whether through urban design standards (Chapter 4 of the Proposed Plan) or through requirements for construction best management practices (Appendix E of the Proposed Plan). This ensures that such mitigations are integrated at the time of project design, and are enforced during the construction process.

Streamlined Development Review Process

For Projects that comply with the Specific Plan regulations, the development review process is an administrative clearance, a ministerial process involving staff-level review. As such, there will be no required public hearing or appeal provisions, and as noted above the majority of projects will require no additional environmental review, as future development has already been analyzed as part of the EIR for the Proposed Plan (see discussion above). This is intended to streamline review for projects within the corridor that will contribute to creating a more compact, sustainable development pattern, help stimulate vibrancy and pedestrian activity around the stations, and accommodate anticipated growth in this area.

Several community groups, as well as one public agency (City of Culver City Planning Division), expressed concern over this, noting the lack of opportunity for the public to weigh in on proposed projects before they are approved. It was also noted that the Proposed Plan exempts projects from having to comply with the City's Site Plan Review process (LAMC Section 16.05). The Proposed Plan was developed over a period of several years, during which staff participated in numerous public engagement activities and accepted input from individuals, groups, and public agencies. The resulting Plan reflects the feedback received and aims to address common concerns about new development. The Proposed Plan regulations, including design and development standards, ensure that future projects are compatible with surrounding properties and in some cases help mitigate potential environmental impacts. Mitigation measures that are typically imposed on infill projects through Site Plan Review and other processes have been included in the Proposed Plan as standards and will be applied to future development projects. This approach, along with other features of the Plan such as tailored design and development standards, have been crafted to minimize the impact of new development to the extent feasible, and to ensure compatibility between future projects and existing development. The Proposed Plan also includes mitigation measures that would be applied to future development projects.

Environmental Analysis

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15082, a Notice of Preparation (NOPs) for the Draft EIR were issued on March 14, 2013 by the City for a 30-day public review period. A total of 27 comment letters were received. Information, data, and observations from these letters are addressed throughout the Draft EIR, where relevant. A public scoping meeting was held on April 10, 2013. The purpose of the scoping meetings was to provide early consultation for the public to express their concerns about the potential environmental impacts of the Proposed Project, and acquire information and make recommendations on issues to be addressed in the Draft EIR. The Draft EIR analyzed the following environmental impact areas:

- Aesthetics
- Hydrology and Water Quality
- Land Use and Planning
- Air Quality
- Noise
- Cultural Resources
- Population, Housing, and Employment
- Geology and Soils
- Public Services
- Greenhouse Gas Emissions
- Transportation and Traffic
- Hazards and Hazardous Materials
- Utilities and Service Systems

A Draft EIR was prepared for the Proposed Plan. The Draft EIR was circulated for a 60-day review period. The review period began on April 6, 2017 with a closing date of June 5, 2017. As the lead agency, the City of Los Angeles received 94 written comments on the Draft EIR from public agencies, groups, and individuals. Responses to all comments received during the comment period will be included in the Final EIR. The Final EIR will be made available prior to City Council consideration and adoption of the Proposed Plan and certification of the EIR pursuant to CEQA Section 15090. Draft portions of the Final EIR are included as an exhibit to this report (Exhibit E); they include Master Responses, which respond to comment themes raised in public comments on the Draft EIR, and responses to comments from public agencies as well as the Mitigation Monitoring Plan, Findings of Fact, and Statement of Overriding Considerations.

Recommended Revisions to the Preliminary Draft Plan

In response to public input and additional staff analysis revisions have been made to the Preliminary (public hearing) Draft of the Plan. Revisions largely involve changes to the Specific Plan text to clarify language, and align procedures with most recent plans under development to ensure successful implementation of the Plan. The revisions also involve a minor change to proposed land use and zone changes.

Revisions to Specific Plan Text

Review of written comments and verbal testimony received through the duration of the Draft Plan, Public Hearings and the Draft EIR comment period identified a number of revisions requested by the community. Additional staff analysis and interdepartmental review also led to a need to make minor revisions and clarifications to the text of the proposed Specific Plan, including revisions that align the Proposed Plan with other City policies and procedures. Revisions incorporated into the Proposed Plan include:

- Incorporation of the an additional Purpose statement to emphasize the need for improved pedestrian connections to transit stations;
- Revisions to allowable use list for new zones, to provide clarification and additional flexibility for retail, schools, and other uses;
- Revision of affordable housing requirement for Extremely Low Income Households to 8% to align with Citywide TOC Guidelines;
- Revisions to language in urban design standards to make more clear and consistent with Department of Building Safety standards;
- Modified locations of where minimum streetwall requirements apply to exclude portions of streets where the zoning would make construction of multi-story development challenging;
- Revisions to design standards governing parking structures to make more clear and align with other similar City standards
- Removal of urban design standards no longer needed due to redundancy with Building and/or Zoning Code, such as standards for lighting;
- Clarification that change of use projects are not subject to new open space and parking regulations or urban design standards;
- New language in Streets chapter to allow relief from streetscape improvement requirements under certain conditions;
- Addition of requirement for on-site construction monitoring to monitor and document compliance with mitigation measures, environmental standards, and other project features;
- Revisions of specific findings required for Alternative Compliance projects;
- Other clarifications and minor text revisions that do not affect the substance of the regulations.

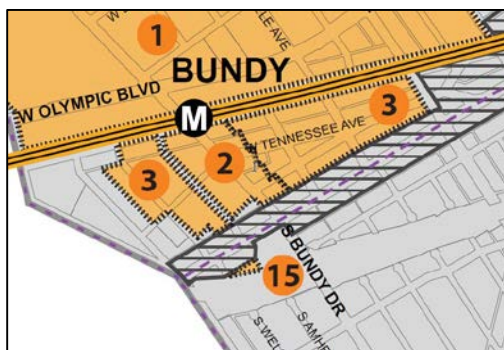
Revisions to Land Use and Zone Changes

The following revisions make minor modifications to the Draft Plans and do not constitute significant new information per CEQA and have not been found to affect the impact analysis or conclusions in the Draft EIR. This will be supported by substantial evidence in the Final EIR to be released prior to City Council's consideration of the Proposed Plans.

It is important to note that other revisions were made to earlier drafts of the Plan in response to public input, namely the removal of change areas on Pico Blvd. (between Sepulveda Blvd. and

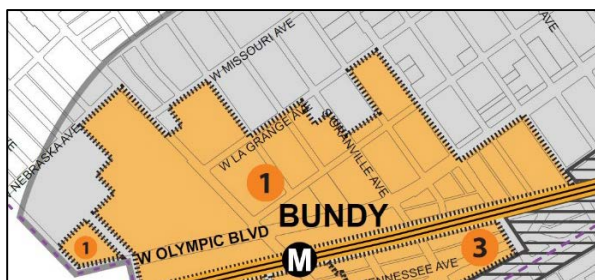
Overland Ave.), removal of change areas along Exposition Blvd. (between Sepulveda Blvd. and Westwood Blvd.) and the addition of a new change area on the south side of Pico Blvd. (between Westwood Blvd. and Overland Ave.). Further detail about these changes, as well as justification for why they do not substantially affect the analysis or conclusions of any of the analyzed impact categories in the Draft EIR, can be found in Appendix N of the Draft EIR.

New Subarea 15



Analysis of this site, located within the Bundy station area, adjacent to the I-10 freeway, supported its incorporation into the Proposed Plan as a new Subarea 15. The property is currently zoned for single-family residential use (R1), and is currently being used for a light industrial use (building material sales). Staff research showed that the site has continuously been used for light industrial uses since at least 1969, when a Certificate of Occupancy was issued for a warehouse building. The current land use (Low Residential) and zoning (R1-1) is inconsistent with the current use of the site, and is not appropriate for a site immediately abutting a freeway and fronting an alley behind a commercial property. The site is proposed for the M1-1 zone, with a Limited Manufacturing land use designation. This zoning and land use designation would allow for the current uses to exist, and not result in any new impacts to the surrounding neighborhood.

Revised Subarea 1



The 0.7 acre property located at the southwest corner of Granville Ave. and La Grange Ave. is owned by the City of Los Angeles and currently occupied by the Los Angeles Bureau of Sanitation for storage of refuse collection trucks and related operations. The Preliminary (public hearing) Draft Plan included this property as part of Subarea 1, and had proposed a zone change from M2-1 to the New Industry zone and a change in General Plan land use from Light Manufacturing to the Hybrid Industrial designation. Staff analysis supported the revision to remove this property from Subarea 1 of the Proposed Plan and maintain the current zoning and land use designation. The property is not anticipated to be developed with new uses consistent with the New Industry zone; the current use, which would not be allowed under the New Industry zone is considered necessary for continued operation of City services.

FINDINGS

Project Location

1. The Exposition Corridor Transit Neighborhood Plan Area is located approximately eight miles west of Downtown Los Angeles, contains an area of approximately 1,971 acres, and includes all properties located approximately within a half-mile of the following Exposition Line Light Rail Transit stations: Culver City, Palms, Westwood/Rancho Park, Expo/Sepulveda, and Expo/Bundy.

City Charter Determinations

2. **Charter Section 555.** The General Plan Amendments before the City Planning Commission represent Amendments to portions of the West Los Angeles, Palms-Mar Vista-Del Rey, and West Adams-Baldwin Hills-Leimert Community Plans. The portions of these Community Plan Areas that are proposed to be amended have a unique physical identity in that they comprise approximately 250 acres and are within a transit-oriented area that, pursuant to the General Plan, should be planned for a higher density, transit oriented mixed-use development that reduces vehicle trips; provides greater housing and jobs; and brings additional services and amenities to the surrounding residential area. The West Los Angeles Palms-Mar Vista-Del Rey, and West Adams-Baldwin Hills-Leimert Community Plans did not anticipate a light rail station when initially adopted, however, they do contain policies supporting higher density development near light rail stations. Phase 2 of the Metro Exposition Line Light Rail Transit was completed in May of 2016, including four new stations within the Plan Area, linking the Phase 1 terminus in Culver City with the City of Santa Monica. The proposed General Plan Amendments and corresponding Zone Changes will re-designate select sites within the Plan Area to allow for more compact, mixed-use, transit oriented development, allowing these areas to accommodate anticipated growth in housing and jobs within close proximity to the Exposition Line. The portions of the Community Plans that are proposed to be amended also have significant economic identity in that they contains a concentration of industrial land that serves as an important jobs center within the West Los Angeles area of the City of Los Angeles. The proposed General Plan Amendments and corresponding Zone Changes will allow for these areas to accommodate anticipated growth in emerging industrial sectors, and encourage the clustering of creative, clean industry uses, including high tech jobs, within close proximity to transit.

The proposed General Plan Amendments and corresponding Zone Changes reinforce the economic and physical identity of these portions of the Community Plans by: 1) contributing to the available housing stock and the Mayor's initiative to build 100,000 new units by 2020 and thereby helping to alleviate the housing crisis in the City; 2) furthering the General Plan Land Use Element's Goal of making transit stations primary focal points of the City's development; 3) furthering the General Plan Land Use Element's Objective of focusing mixed commercial/residential uses, neighborhood-oriented retail and employment opportunities around urban transit stations; and 4) protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses. In sum, the General Plan Amendments are necessary to reinforce land use development patterns that are supportive of transit, consistent with numerous General Plan goals.

3. **Charter Section 556.** In accordance with Charter Section 556, the proposed Exposition Corridor Transit Neighborhood Plan (Proposed Plan), along with proposed zone and

General Plan land use designation changes, is in substantial conformance with the purposes, intent, and provisions of the General Plan. The Proposed Plan is consistent with and helps to further accomplish the goals, objectives, and policies contained in portions of the General Plan, including the General Plan Framework Element, as outlined below. The General Plan Framework Element establishes the standards, goals, policies, objectives, programs, terms, definitions, and direction to guide the update of citywide elements and the establishment of specific plans.

4. **Charter Section 558.** In accordance with Charter Section 558 (b)(2), the proposed Exposition Corridor Transit Neighborhood Plan, along with proposed zone and General Plan land use designation changes, will have no adverse effect upon the General Plan, specific plans, or any other plans being created by the Department of City Planning in that the Proposed Plan and land use and zone change ordinances are consistent with the City's General Plan and directly implements the policies of the Framework Element. In addition, the Proposed Plan, inclusive of the proposed land use and zone change ordinances, will be in conformity with public necessity, convenience, general welfare and good zoning practice for all of the reasons previously described. The Proposed Plan encourages compact, mixed-use development within the transit corridor in order to accommodate anticipated growth in jobs and housing in a sustainable development pattern; maintains and expands the City's jobs base, and aims to capture a significant share of the region's growth in emerging industries; and increases mobility choices and promotes transit ridership within the corridor. The Proposed Specific Plan and associated land use and zone change ordinances follow good zoning practice in implementing these objectives through increased development rights and tailored allowable uses on select sites near transit stations; public benefit requirements including affordable housing and community amenities; urban design standards applicable to all development within the corridor (excluding R1 and R2 zoned parcels); and streetscape plans for select street segments leading to transit stations.

LAMC Determinations

5. **LAMC Section 11.5.8** – In November 2016 Measure JJJ was passed and it was certified by the County Clerk on December 13, 2016. Measure JJJ requires, in accordance with Charter Section 555, that the Planning Department complete a comprehensive assessment for any amendment to a community plan to ensure that proposed changes do not:
 1. Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or
 2. Undermine California Government Code Section 65915 or any other affordable housing incentive program.

The Proposed Plans do not reduce the capacity for creation and preservation of affordable housing, or reduce access to local jobs.

Capacity to Create Affordable Housing Units

One of the primary goals of the Proposed Plan is to create opportunities for the development of new housing that meets the diverse needs and income levels of City residents. The Proposed Plan encourages an increase in the overall housing supply for all income levels, including new affordable housing units, through land use and zone changes on specific parcels within the Plan Area. Land use designation and zone changes in the Proposed Plan would incentivize greater density, height, and/or floor area ratios, providing additional

housing development potential than would be allowed under existing regulations. This increased development potential for additional housing units would result in a net increase in the supply of housing, and in particular affordable housing, above what exists today. As disclosed in the Draft EIR for the Proposed Plan, the Plan can accommodate approximately 29,400 to 31,000 housing units by 2035, an increase of approximately 4,400 to 6,000 housing units over existing (2013) conditions.

The new zones established by the Proposed Plan include a tiered incentive structure that prioritizes housing for lower income households near transit by providing greater FAR for projects that provide a minimum percentage of affordable housing. The incentives and affordability requirements are consistent with Measure JJJ requirements for Transit Oriented Communities (TOCs); the Proposed Plan will serve as the TOC for the properties within these new zones. These plan features direct housing growth to transit areas and provide opportunities for increased transit ridership consistent with the policies of the General Plan Framework Element and the SCAG RTP/SCS.

Within the Plan Area, areas currently designated and zoned for residential land use would, for the most part, remain designated and zoned for residential land uses. Residential areas that are proposed for change to the Mixed Use: Commercial/Residential zone and a commercial land use designation would have an increase in housing capacity, as this zone allows greater floor area ratio, height, and unlimited residential density.

Capacity to Preserve Affordable Housing Units

The Proposed Plan change areas currently contain approximately 272 single-family units and 785 multifamily units, which comprise a small percentage (5% and 4%, respectively) of all housing units within the Plan Area. Within the change areas there are very few affordable housing units restricted to very low- and low-income households. Those that do exist are located within relatively new developments that are not likely to be redeveloped within the horizon year of the Plan (2035). Although new development within the change areas could affect existing housing stock, this would be offset by a substantial increase in housing units due to the greater capacity in the new zones. In addition, future development projects would be subject to housing replacement requirements of AB2222, which require a one-for-one replacement of any restricted affordable or rent-stabilized (RSO) units located on the project site.

A portion of the existing multifamily housing stock within the Plan Area is built before 1978 and is therefore potentially subject to the Rent Stabilization Ordinance (RSO), which restricts increases in rent levels. The Proposed Plan avoids the majority of such properties, which are concentrated around the Palms and Culver City station areas; those properties are not proposed for change as part of the Proposed Plan. Over 85 percent of the existing multifamily built parcels in the Plan Area constructed prior to 1978 (and therefore potentially subject to the RSO) are not included in the areas of proposed change.

Access to Local Jobs

The Proposed Plan does not reduce access to local jobs because the proposed land use and zone changes do not reduce the amount of land zoned for commercial or industrial uses. Instead, a primary goal of the Plan is to retain existing industrial land around transit stations for job-generating uses, and in particular to accommodate future demand for jobs in emerging industries. The Plan also aims to increase the intensity of development on this land to accommodate a greater number of jobs than would have been accommodated under current zoning.

New zoning applied to industrial areas within the Plan Area include the New Industry: Hybrid Industrial: Jobs Emphasis, and Hybrid Industrial: Residential Emphasis zones. Along with offices, these new zones would also allow supporting uses such as light manufacturing and limited amounts of retail and restaurant use. These new zones only allow a limited amount of residential uses (and in the case of the New Industry zone, only allow live/work units), so that the majority of the land in these areas remains used for productive, job-generating uses that can accommodate the growth of new industries. Along select commercial corridors within the Plan area, the new Mixed Use: Commercial/Residential zone is applied. Although this zone allows a significant amount of residential use, it requires a minimum amount of the total project floor area (10-20%) to be used for non-residential purposes, thus prohibiting entirely residential development and ensuring that at least the ground floor of each new development is occupied by job-generating uses. These use limitations, along with greater allowable floor area ratio and height compared to existing, would result in increased capacity for jobs within the Plan Area.

As a result of the proposed land use and zone changes, the Proposed Plan is anticipated to create capacity for an additional 9,400 to 14,300 jobs by 2035 compared to existing (2013) conditions. By preserving industrial land and increasing the intensity of commercial and industrial development in proposed change areas, the Proposed Plan does not result in a net loss in job capacity, nor reduce access to local jobs. Instead it increases capacity for jobs – particularly high-quality, high-paying jobs, as reflected in the allowable uses in the new zones – and creates more opportunities to locate those jobs within close proximity to transit.

The Proposed Plan does not undermine California Government Code Section 65915 or any other affordable housing incentive.

The Proposed Plan does not undermine California Government Code Section 65915 (State Density Bonus Laws) or any other affordable housing incentives. Under the Proposed Plan, development projects would still be able to qualify for additional density and incentives, including additional height and reduced parking requirements, if they provide the required number of affordable units consistent with State Density Bonus law.

Within select areas, the Proposed Plan applies new zoning that includes a tiered incentive structure, whereby additional development rights may be obtained if public benefits, including affordable housing, are provided. These incentives provided by the Plan (including increased floor area ratio, height, and density) meet or exceed the affordable housing incentives provided in California Government Code Section 65915, the City's Density Bonus Ordinance, and the affordable housing provisions of Measure JJJ for Transit Oriented Communities.

6. LAMC Section 12.32 C.2 (Land Use Legislative Actions)

In accordance with LAMC 12.32 C.2, the proposed zone change ordinances including the Proposed Plan will have no adverse effect upon the General Plan, specific plans, or any other plans being created by the Department of City Planning in that the proposed land use ordinances are consistent with the City's General Plan and directly implement the policies of the Framework Element. In addition, the proposed zone change ordinances will be in conformity with public necessity, convenience, general welfare and good zoning practice. These ordinances promote economic well-being and public convenience through the allocation and distribution of lands in sufficient quantities to satisfy the housing, commercial, retail, service, and industrial needs of the community. The land use ordinances directly implement the policies contained in the General Plan Framework that call for future growth to be concentrated in proximity to transit and along major corridors. The proposed land use

ordinances follow good zoning practice in implementing such policies by including development incentives to encourage new housing near jobs and in locations with multi-modal transportation options, and by including development restrictions such as height limitations in areas that transition between higher and lower densities as well as other development and urban design standards to improve compatibility between development and the existing built environment.

General Plan Findings

The City of Los Angeles has the responsibility to maintain and implement the City's General Plan. Specific Plans are land use ordinances that provide regulatory controls or incentives for the implementation of the General Plan. Since state law requires that the General Plan have internal consistency, the Proposed Specific Plan must be consistent with the various elements of the General Plan. Those elements are Land Use, Circulation (Mobility), Housing, Conservation, Open Space, Noise and Safety. In addition to the seven state mandated elements, the City's General Plan includes a Health Element, Service System Element, Air Quality Element, and the Framework Element. Specific plans apply the policies defined in the General Plan Framework Element and the other elements as they relate to a smaller geographic area.

The General Plan Findings below are listed under categories similar to the categories found in the Framework Element:

Land Use

Distribution of Land Use

With respect to the distribution of land use, the General Plan Framework Element states the following:

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.

Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.

The Proposed Plan provides for a range of land uses, including housing, jobs, and retail and other neighborhood-serving amenities, within compact, walkable neighborhoods concentrated around the Exposition Line transit stations. The concentration of growth, along with mixed use development facilitated by new zoning in the Plan, is intended to provide residents, employees, and visitors more mobility options, including walking and biking as well as facilitate shorter trips. This shift in mobility patterns can lead to a reduction in automobile dependence and

consequently reduced GHG emissions, consistent with policies in the SCAG RTP/SCS as well as state laws.

Population and Employment Growth

With respect to population and employment growth, the General Plan Framework Element states the following:

Objective 3.3: Accommodate projected population and employment growth within the City and each Community Plan Area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.

Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long- Range Land Use Diagram.

Policy 3.4.2. Encourage new industrial development in areas traditionally planned for such purposes generally in accordance with the Framework Long-Range Land Use Diagram and as specifically shown on the community plans.

Policy 3.4.3. Establish incentives for the attraction of growth and development in the districts, centers, and mixed-use boulevards targeted for growth that may include:

- a. Densities greater than surrounding areas,*
- b. Prioritization of capital investment strategies for infrastructure, services, and amenities to support development,*
- c. Economic incentives (e.g., redevelopment, Enterprise Zones, Neighborhood Recovery, and other),*
- d. Streamlined development review processes,*
- e. "By-right" entitlements for development projects consistent with the community plans and zoning,*
- f. Modified parking requirements in areas in proximity to transit or other standards that reduce the cost of development, and*
- g. Pro-active solicitation of development.*

The State of California requires that cities plan for changes in population, housing demand and employment. If growth is anticipated, each city must accommodate a share of the region's projected growth. These projections are developed by the Southern California Association of Governments (SCAG), the Metropolitan Planning Organization for the six-county region. SCAG is mandated by federal and state governments to prepare the Regional Transportation Plan (RTP), a long-range regional transportation plan that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends. The RTP informs SCAG's projection of growth for the region. State and federal regulations require that local plans be consistent with the Regional Air Quality Plan and the Regional Mobility Plan.

One of the primary objectives of the Proposed Plan is to accommodate the 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. According to the 2012-2035 SCAG RTP/SCS, the projection for the Plan Area by 2035 is 28,500 dwelling units and 43,000 jobs. With the Proposed Plan, reasonably expected development by

2035 is approximately 29,400 – 31,000 dwelling units and 43,400 to 48,300 jobs. (The range of housing and jobs reflects the future conditions under both scenarios analyzed in the EIR – the Proposed Project and the Proposed Project with Alternative Compliance, which would result in more housing and less jobs.) Thus the growth anticipated by the Proposed Plan meets the SCAG projections for both housing and jobs.

The Plan focuses this additional growth on corridors and existing industrial areas, and has limited impact on single family zoned neighborhoods. One single family neighborhood (immediately south of the Bundy station) is proposed for change. This neighborhood comprises approximately 24 acres and contains approximately 200 dwelling units, which represents 3% of the total acreage of R1 parcels within the Plan Area, and 3.4% of the total number of dwelling units on R1 zoned parcels within the Plan Area. It is located along an important corridor and within close proximity (approximately one quarter mile) to the transit station. This neighborhood was identified as benefiting from increased overall housing capacity through new multifamily zoning, and the introduction of neighborhood-serving uses through medium-density mixed use zoning (RAS4) along Bundy Dr.

Within the areas proposed for the Hybrid Industrial land use designation, new zoning encourages these areas to be developed with light industrial uses, as well as commercial and institutional uses, with limited amounts of housing, retail, entertainment, and similar uses. This reflects the Proposed Plan's objective to maintain and expand the City's jobs base and increase opportunities for economic development within the Exposition Corridor, as well as the objective to capture a significant share of regional growth in emerging industries and encouraging the clustering of such jobs within the Corridor.

The Proposed Plan creates incentives for development within the transit station areas through several means. New zoning within the industrial areas allows for the introduction of limited amounts of housing within areas where such use is currently prohibited. New zoning also allows for greater Base FAR than existing (which, in industrial and commercial areas within the Plan Area, is generally 1.5:1 today). Bonus FAR (up to 3.6:1 or 4.0:1, depending on the zone) is offered in exchange for public benefits, including affordable housing, community amenities, and/or vehicle trip reduction. The new zoning also offers some flexibility in meeting minimum parking requirements, such as exemptions for neighborhood-serving uses within mixed use developments in identified neighborhood commercial districts. Finally, the Proposed Plan creates a more streamlined development review process, essentially making most projects "by-right" when they are in compliance with the Specific Plan regulations and do not exceed identified environmental thresholds.

Residential Neighborhoods

With respect to residential neighborhoods, the General Plan Framework Element states the following:

Objective 3.5: Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.

Goal 3C: Multifamily neighborhoods that enhance the quality of life for the City's existing and future residents.

Objective 3.7: Provide for the stability and enhancement of multifamily residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and

services and the residents' quality of life can be maintained or improved.

The Proposed Plan Area is located in an urbanized part of the City and thus contains sufficient public infrastructure and services to support existing and future residents. The Draft EIR analyzed the Plan's potential impact on public services, including fire, police, schools, parks, and libraries, and utilities (including water supply, wastewater and solid waste infrastructure, and energy) and found that with the exception of parks, the Proposed Plan would result in a less than significant impact.

The Proposed Plan focuses new infill development on industrial, commercial, and multifamily areas near transit, and generally maintains the character of existing single family zoned areas. One single family zoned neighborhood (south of Bundy station) is proposed for new multifamily zoning. As stated above, this area represents approximately 3% of the total acreage of R1 parcels within the Plan Area, and was identified as benefiting from increased overall housing capacity through new multifamily and mixed use zoning that responds to the recent introduction of substantial transit infrastructure (the Exposition LRT) to the area. Changes to the character and scale of this neighborhood is anticipated to occur incrementally over time, as individual single-family lots would have to be consolidated, and not all lots are anticipated to be redeveloped.

The proposed mixed use and multifamily zoning applied to the subareas creates opportunities for the development of housing near transit, providing future residents with increased access to a variety of mobility options. The proposed zoning also stimulates more pedestrian activity in the transit station areas.

Commercial Areas

With respect to Neighborhood Districts, the Framework Element states the following:

Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.

Objective 3.8: Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.

With respect to Mixed-Use Boulevards, the Framework Element states the following:

Goal 3I: A network of boulevards that balance community needs and economic objectives with transportation functions and complement adjacent residential neighborhoods.

Objective 3.13: Provide opportunities for the development of mixed-use boulevards where existing or planned major transit facilities are located and which are characterized by low-intensity or marginally viable commercial uses with commercial development and structures that integrate commercial, housing, and/or public service uses.

Within the Proposed Plan area, the intersection of Motor Ave. and National Blvd. is considered a Neighborhood District. This area is proposed for the Neighborhood Commercial land use designation Mixed Use: Commercial/Residential zone, which accommodates a broad range of uses, including commercial, residential, and institutional. Within this area the proposed zoning allows for multi-story development up to 58 feet. This mix of uses, building type and height would be compatible with, and complementary to, the adjacent multifamily neighborhood, while

promoting increased commercial activity on Motor Ave. and National Blvd. Within this portion of Motor Ave. (between Palms Blvd. and I-10) the Proposed Plan exempts neighborhood-serving uses from minimum parking requirements, making it easier to locate restaurants, cafes, retail, and personal services within mixed use projects and thus contribute to a more active street frontage. This segment of Motor Ave. (between Palms Blvd. and I-10) and the portion of National Blvd (between Motor Ave. and Mentone Ave.) is also designated as a Retail Street in the Urban Design Standards, which requires shallower front yard setbacks and greater amounts of ground floor active uses and transparency.

Within the Proposed Plan area, Venice Blvd. and Motor Ave. are considered Mixed Use Boulevards. Along these corridors the Plan proposes the Mixed Use: Commercial/Residential zone, which facilitates development that combines commercial, residential, and other neighborhood-serving uses. Because it requires a minimum level of non-residential use, this zone prevents new development that is entirely residential with no public-serving uses on the ground floor. The proposed zoning would help stimulate economic development on these streets, which are currently mostly characterized by low-intensity, often automobile-oriented, commercial development or single-use residential buildings. New mixed use development along Venice Blvd. and Motor Ave. would complement the adjacent multifamily neighborhoods around the Palms and Culver City stations, providing for greater opportunities for residential development that includes retail and services that will serve the needs of adjacent residents.

Industrial Lands

With respect to Industrial Lands, the General Plan Framework Element states the following:

Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.

Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.

Policy 3.14.2: Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).

The Proposed Plan maintains much of the currently industrially zoned land in the Exposition Corridor for job-generating uses. A Hybrid Industrial land use designation and new corresponding zones are applied to select areas around the Bundy, Sepulveda, Palms, and Culver City stations to allow for increased development in these areas with a focus on space for high-quality jobs in the creative, design, media and technology industries. Along with offices, these new zones would also allow supporting uses such as light manufacturing and limited amounts of retail and restaurant use. The new zones in the Hybrid Industrial land use designation only allow a limited amount of residential uses (and in the case of the New Industry zone, only allow live/work units), so that the majority of the land in these areas remains used for more productive, non-residential purposes.

Several blocks that are currently zoned for M2-1 between the Bundy and Sepulveda stations (south of Olympic Blvd) are not proposed for any change. This area is maintained in order to continue to allow a variety of industrial uses that support nearby residential and commercial uses to continue to exist. Auto-oriented or low intensity uses that are limited or prohibited in the new zones, can be located in this area, which is located further from the stations.

Transit Stations

With respect to transit stations, the General Plan Framework Element states the following:

Goal 3K: Transit stations to function as a primary focal point of the City's development.

Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

Policy 3.15.1 Prepare detailed plans for land use and development of transit-oriented districts consistent with the provisions of the General Plan Framework Element and the Land Use/Transportation Policy.

Policy 3.15.2 Work with developers and the Metropolitan Transportation Authority to incorporate public- and neighborhood-serving uses and services in structures located in proximity to transit stations, as appropriate.

Policy 3.15.3: Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy 3.1.6.

Policy 3.15.4: Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.

Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.

The Proposed Plan is a land use plan that has a primary goal of directing growth in jobs and housing to areas around the Exposition LRT Line, thus preserving surrounding low density residential areas from encroachment. The Plan increases the allowable density and floor area ratios for select properties within approximately half mile of the corridor, and applies a variety of new zones that allows for residential, office, light industrial, institutional, retail, and other neighborhood-serving uses. This approach helps preserve the existing low density residential areas within and beyond the Exposition Corridor.

The proposed New Industry, Hybrid Industrial: Jobs Emphasis, Hybrid Industrial: Residential Emphasis, and Mixed Use: Commercial/Residential zones have a tiered FAR structure that requires projects to provide public benefits in order to be eligible for the Bonus FAR. These public benefits are intended to enhance multi-modal accessibility, including first/last mile connections between stations and the surrounding neighborhoods, and provide shared public spaces that serve and enhance the neighborhood and complement more intense development around the stations. They include benefits such as mobility hubs and other bicycle facilities, community and cultural spaces such as youth centers or museums, and publicly accessible open space such as parks, plazas, paseos, or parklets.

The Proposed Plan includes urban design standards, which would ensure that new development promotes pedestrian activity by requiring buildings to be oriented to the street, with ground floor activity and transparency; limiting building length and requiring large blocks to be

permeated with paseos; and limiting the visual impact of vehicular circulation and parking on building design. The Proposed Plan also addresses transitions between lower density residential neighborhoods through height limitations, including a transitional height requirement for development adjacent to R1 or R2 properties. The Proposed Plan also includes a Streetscape Plan, which outlines streetscape improvements in the public right-of-way with the goal of creating a pedestrian-friendly environment that encourages walking, bicycling, and transit use while maintaining vehicular circulation.

Together, the new zoning and associated public benefit amenities, urban design standards, and Streetscape Plan, would create more mixed-use centers at the stations, to efficiently use the land closets to the stations, foster transit ridership, and make the areas more walkable and compatible with surrounding residential neighborhoods.

Pedestrian-Oriented Districts

With respect to pedestrian-oriented districts, the General Plan Framework states the following:

Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.

Goal 3E: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide for Los Angeles' communities.

Policy 3.15.4: Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.

Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.

Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents.

Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

The new zoning proposed around transit stations and along commercial corridors would stimulate increased levels of pedestrian activity by facilitating a greater mix of uses and more building intensity than allowed by current zoning. The resulting compact, mixed-use development would provide jobs, housing, and a range of commercial uses that serve employees and residents of the surrounding areas. As a result more people will be able to walk to work or to access the goods and services they need on a daily basis.

The new Hybrid Industrial: Jobs Emphasis, Hybrid Industrial: Residential Emphasis, and New Industry zones proposed by the Plan limit or prohibit auto-oriented and low intensity uses (i.e. car sales, drive-through establishments, public storage and warehouses), thus encouraging non-residential uses that are more likely to be accessed by pedestrians, such as offices, hotels, retail, and personal services. The proposed Mixed Use: Commercial/Residential zone, which is applied to much of the major commercial corridors within the Plan Area, facilitates multi-story mixed use development, i.e. housing or office over retail. This type of development would result in more people living and/or working in the area, and thus a livelier, more active pedestrian environment, when compared to typical low-rise commercial development that is permitted today. The proposed RAS4 zone, which is applied to properties fronting Bundy Dr. south of the

Bundy station, would similarly stimulate more pedestrian activity as new multifamily development introduces ground floor retail fronting the street, helping to link commercial activity along Pico Blvd. to Bundy station.

The proposed Urban Design Standards would ensure that future development within the Plan Area is pedestrian-oriented. The standards require buildings to be oriented to the street, with convenient pedestrian entries, reduced front yard setbacks, and requirements for active uses and transparency (windows and doors) along the ground floor. The standards also require large sites to be permeated with paseos, streets, or other mid-block passageways that allow for more convenient pedestrian movement within the neighborhood. Finally, the standards contain numerous regulations that limit the impact of driveways and parking on the pedestrian environment, thus making it safer and more pleasant to walk.

The Proposed Plan includes a Streetscape Plan, which specifies streetscape features that aim to improve the pedestrian experience along street segments leading to the transit stations. These features include wider sidewalks, shade trees, street furniture and lighting, and pedestrian safety features such as crosswalks and curb extensions.

Cultural and Historic Resources

With respect to historic districts, the General Plan Framework Element states the following:

Goal 3M: A City where significant historic and architectural districts are valued.

With respect to cultural and historic resources, the Conservation Element states the following:

Conservation Element - Objective: protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

Conservation Element Policy: continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.

The Proposed Plan does not intend to affect historical resources (e.g., HCMs) or reasonably expect to incentivize development of properties with historical resources. The Proposed Plan includes standards that further protect historical and potentially historical resources by requiring additional review by the Office of Historic Resources for any project located on sites identified in the City of Los Angeles' SurveyLA report. This review would lead to further historic assessment being prepared, and/or modifications to development project to ensure they adhere to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. These requirements in the Proposed Plan help capture any potential impacts to historic resources that are not currently captured for a typical "by-right" project.

Housing

With respect to housing, the Framework Element states the following:

Objective 4.3: Conserve scale and character of residential neighborhoods.

Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.

Objective 4.2: Encourage the location of new multifamily housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

Objective 4.4: Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.

With respect to housing, the Housing Element states the following:

Objective 1.1 Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.

Policy 1.1.2 Expand affordable rental housing for all income groups that need assistance.

Policy 1.1.3 Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.

Policy 1.1.4 Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.

Policy 1.2.8 Preserve the existing stock of affordable housing near transit stations and transit corridors. Encourage one-to-one replacement of demolished units.

Objective 1.2 Preserve quality rental and ownership housing for households of all income levels and special needs.

Policy 1.2.2 Encourage and incentivize the preservation of affordable housing, including non-subsidized affordable units, to ensure that demolitions and conversions do not result in the net loss of the City's stock of decent, safe, healthy or affordable housing.

Objective 1.3 Forecast and plan for changing housing needs over time in relation to production and preservation needs.

Policy 1.3.5 Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within the City to meet the projections of housing needs, according to the policies and objectives of the City's Framework Element of the General Plan.

Objective 1.4 Reduce regulatory and procedural barriers to the production and preservation of housing at all income levels and needs.

Policy 1.4.1 Streamline the land use entitlement, environmental review, and building permit processes, while maintaining incentives to create and preserve affordable housing.

Objective 2.2 Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.

Policy 2.2.3 Promote and facilitate a jobs/housing balance at a citywide level.

Objective 2.4 Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.

Policy 2.4.1 Promote preservation of neighborhood character in balance with facilitating new development.

Policy 2.4.2 Develop and implement design standards that promote quality residential development.

Objective 2.5 Promote a more equitable distribution of affordable housing opportunities throughout the City.

Policy 2.5.1 Target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed use development, Transit Oriented Districts and designated Centers.

Housing Supply and Affordability. The Proposed Plan seeks to accommodate population growth projected for the area by SCAG for the year 2035 by increasing capacity for housing through a variety of means, including allowing limited amounts of residential uses in industrial areas where it is currently not allowed, facilitating mixed use development along commercial boulevards, and allowing increased density in select residential areas. Consistent with the Plan's primary objective to direct growth to transit-oriented areas, the Plan encourages this housing growth to occur within a half mile of the Exposition Line LRT corridor. The Proposed Plan also aims to create incentives for the provision of new affordable housing units within residential development in order to enhance accessibility for low income transit riders and increase transit ridership. Therefore the Plan requires that new mixed use development seeking additional development rights set aside a percentage of the total units for low, very low, or extremely low income households. This would generally increase the housing supply, and in particular address the need to create a supply of housing that is affordable to a variety of income levels. Finally, the various zones applied within the Plan area would result in a range of multifamily housing types, including small lot subdivisions, mid-rise apartments, live/work units, and housing within mixed-use buildings. The lack of residential density limitations within the four new zones also allow for greater flexibility in unit size to accommodate a wide range of household types.

Sustainability and Design. The Proposed Plan is consistent with Housing Element Objectives 2.2 and 2.4, which aim to create sustainable, livable neighborhoods with a mix of uses and housing types, and quality design. The Proposed Plan allows a variety of land uses, including residential, as well as retail, office, and industrial, to be located within each station area, creating neighborhoods that are vibrant, accessible to transit, and which encourage walking and bicycling, and contain amenities for residents, workers, and visitors. The Plan includes a unique land use and zoning strategy for each station area, resulting in a concentration of jobs near the Bundy, Sepulveda, and Culver City stations, and more residential focus in the Westwood and Palms station areas, thus creating a mix of uses across the entire corridor.

The Proposed Plan's Urban Design Standards, which apply to all properties within the Plan Area (with the exception of single-family and two-family zones), would ensure new development is pedestrian- and transit-oriented and displays a high level of design quality. The building height regulations, including transitional height, which apply to projects within the four new zones, also serve to create appropriate physical transitions between new, larger development and the existing surrounding neighborhood.

Regulatory Barriers. The Proposed Plan is consistent with General Plan Framework Objective 4.4 and Housing Element Objective 1.4, which aim to reduce regulatory and procedural barriers

to increase housing production and capacity. The Proposed Plan includes a more streamlined development review procedure in which projects that comply with the Specific Plan regulations would be eligible for Administrative Clearance. Many projects would also be able to utilize the EIR prepared for the Proposed Plan as the project's environmental clearance. This would facilitate the development of new housing and potentially reduce development costs, allowing more housing to be built and in a more timely manner.

Conserving Residential Neighborhoods. The Proposed Plan supports General Plan and Housing Element policies to conserve residential neighborhoods by encouraging development in focused areas around transit stations and along commercial boulevards, which would generally keep development away from stable single-family that abut the Exposition LRT Line. The Proposed Plan also avoids changes to land use and zoning in areas with substantial concentrations of rent-stabilized multifamily residential units, such as the Palms neighborhood, so as to minimize the potential for displacement of these relatively affordable housing units. The Proposed Plan respects existing neighborhood scale and character through building height regulations and Urban Design Standards that address the potential adjacency of new development to existing residential areas.

Urban Form and Neighborhood Design

With respect to urban form and neighborhood design, the General Plan Framework includes the following goals, objectives, and policies:

Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.

Objective 5.1: Translate the Framework Element's intent with respect to citywide urban form and neighborhood design to the community and neighborhood levels through locally prepared plans that build on each neighborhood's attributes, emphasize quality of development, and provide or advocate "proactive" implementation programs.

Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.

Policy 5.2.1: Designate centers and districts in locations where activity is already concentrated and/or where good transit service is, or will be, provided.

Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

Objective 5.6: Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.

Objective 5.7: Provide a transition between conservation neighborhoods and their centers.

Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus of investment in the community.

The Proposed Plan encourages future development to occur within the area served by the Exposition Line and other transit, along key commercial corridors and around intersections of arterial streets and the Exposition Line stations. As part of the Proposed Plan, Urban Design Standards were developed for multifamily residential, mixed-use, commercial, and industrial development to ensure neighborhood compatibility and pedestrian-oriented development by regulating building design and site planning. These design standards include maximum front yard setbacks, minimum streetwalls, required direct entrances from the street, and limitations on parking and driveways in the front of a property, as well as requirements for ground floor activity and transparency on identified "Retail and Active Streets." Compliance with these standards would contribute to the creation of a vibrant urban environment. The design standards also regulate building materials and architectural details to ensure that there is a high standard of design quality in new development. Finally, the design standards address the design of publicly accessible open space, ensuring that such space is of sufficient size, easily accessible, and incorporates sustainable practices.

Economic Development

Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

Policy 7.2.3 Encourage new commercial development in proximity to rail and bus transit corridors and stations.

Policy 7.2.8 Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors

Policy 7.2.9 Limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use.

One of the primary objectives of the Proposed Plan is to maintain and expand the City's jobs base and increase opportunities for economic development within the Exposition Corridor. One way the Proposed Plan achieves this is by directing commercial and industrial development to areas within proximity to rail stations through targeted land use and zone changes. These changes increase the allowable FAR and height on properties that are currently zoned for commercial and industrial uses, but are primarily in Height District 1, which limits FAR to 1.5:1 and thus does not easily accommodate multi-story and/or mixed-use development.

Industrial land use designations are either maintained or proposed for change to Hybrid Industrial, a designation which accommodates a limited amount of housing but is still focused on employment uses and can accommodate emerging environmentally-oriented and clean industries, such as the technology jobs clustered in the Exposition Corridor. Thus the new land use designations and corresponding new zones allow for the capture of a significant regional share of these growing industries within the Plan Area, helping the City to remain competitive with other cities in the region. Applying this new land use designation, which limits residential use, also helps preserve the City's tax base to pay for essential City services, which is a key objective of the Plan

One area, along Venice Blvd adjacent to the Culver City station, is proposed for a redesignation from Light Manufacturing to Community Commercial, making it consistent with adjacent properties along the Venice Blvd. commercial corridor. This area proposed for redesignation

currently contains retail uses, and the shallow depth of the lots is insufficient to accommodate viable industrial development. This change would not result in any adverse impact to adjacent residential neighborhoods, as it is surrounded entirely by commercial and industrial uses, or cause significant impacts to the industrial land in the area.

Objective 7.4 improve the provision of governmental services, expedite the administrative processing of development applications, and minimize public and private development application costs.

Policy 7.4.1 Develop and maintain a streamlined development review process to assure the City's competitiveness within the Southern California region.

Policy 7.4.2. Maximize opportunities for "by-right" development.

The Proposed Plan includes a more streamlined development review procedure in which projects that comply with the Specific Plan regulations would be eligible for Administrative Clearance. Most projects would also be able to rely on the EIR prepared for the Proposed Plan as the project's environmental clearance. This would facilitate the development process for new non-residential development and potentially reduce development costs, assuring that the City, and the Exposition Corridor in particular, remains competitive with surrounding areas.

Objective 7.5 Capture a significant share of regional growth in the "targeted" or emerging industries in the City of Los Angeles.

Capturing a significant share of regional growth in emerging industries is a primary objective of the Proposed Plan. The Proposed Plan includes three new zones focused on accommodating emerging environmentally-oriented and clean industries, such as technology industry jobs. The New Industry, Hybrid Industrial: Jobs Emphasis, Hybrid Industrial: Residential Emphasis zones allow for a range of types of office and light industrial development, but limit residential, retail, restaurant, and entertainment uses, and disallow automobile-related uses. This mix of uses is consistent with the needs of these emerging industries, accommodating business and industrial activities and an appropriate level of supportive uses. These new zones also include increased allowable floor area ratios (FAR) and other development standards that incentivize new development, which can facilitate the continued clustering of jobs within the Exposition Corridor where they will benefit from proximity to transit and mixed use environments.

Objective 7.8 Maintain and improve municipal service levels throughout the City to support current residents' quality of life and enable Los Angeles to be competitive when attracting desirable new development.

Policy 7.8.3 Encourage mixed-use development projects, which include revenue generating retail, to offset the fiscal costs associated with residential development.

Through new zoning applied to select parcels, the Proposed Plan requires projects to incorporate a minimum level of non-residential use, whether that be office, industrial, retail, hotel, etc. This ensures that mixed-use developments that include residential also contain revenue-generating uses that can offset the fiscal costs associated with residential development. Overall the Plan proposes to maintain a jobs focus within the Exposition Corridor; the majority of new zoning applied to currently industrial areas would allow a very limited amount of residential use. This would help preserve the City's tax base to pay for essential City services, which is a key objective of the Plan.

Objective 7.9 Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.

Policy 7.9. 2 Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements

The Proposed Plan concentrates future residential development within the Exposition Corridor, within close proximity to transit stations and along mixed-use corridors, where there is currently extensive transportation, utilities, and other infrastructure to support new development. The Plan allows for a limited amount of residential development to be built on currently industrial land surrounding the transit stations, thus providing increased opportunities for people to live near transit while still preserving land for jobs. Further housing opportunities are also created by the Plan through the rezoning of the currently single-family neighborhood to the south of Bundy station to allow for multifamily residential development. Within the variety of new zoning applied within the Plan Area, new residential uses can include a range of typologies, including dwelling units within mixed-use development, live/work units, traditional low-rise apartments or condominiums, small lot subdivisions, townhomes, fourplexes and duplexes. These housing opportunities would allow more people to live near transit, thus providing them increased access to jobs and services within the Exposition Corridor and beyond.

Mobility Plan 2035

The City's Mobility Plan 2035 (Circulation Element) contains a number of important policies related to the Proposed Plan, including:

Policy 1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.

Policy 2.3 Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment

Policy 3.3 Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Policy 3.5 Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.

Policy 3.8 Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities

Policy 4.8 Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.

Policy 4.13 Balance on-street and off-street parking supply with other transportation and land use objectives.

Policy 5.2 Support ways to reduce vehicle miles traveled (VMT) per capita.

Policy 5.3 Support a range of transportation metrics to evaluate the multiple purposes that streets serve.

The Proposed Plan is consistent with the Mobility Plan of the General Plan in that it concentrates future employment and housing growth in accessible locations near the Exposition Line transit stations, thereby helping to minimize increases in vehicle trip generation and improve air quality while providing residents and employees with greater proximity and access to jobs and neighborhood services. The Proposed Plan includes new land use and zoning that encourages development of a mix of uses, whether within a single site or across a whole station area or the entire Exposition Corridor, which can reduce automobile mode share and increase transit, walking, and bicycle trips over time.

Although most development within the Plan area would be subject to current code-required parking minimums, the Proposed Plan includes some flexibility to facilitate certain types of uses and development with the Plan area. The Plan exempts neighborhood-serving uses within mixed-use development within select areas from minimum parking requirements. The Plan also allows for reduced parking ratios for restricted affordable units, and allows for mixed-use development to take advantage of shared parking to provide less parking than would otherwise be required if each use was parked separately.

The Urban Design Standards in the Proposed Plan are written so as to ensure new development within the Plan Area is pedestrian-oriented and results in a more walkable built environment. Similarly, the Proposed Streetscape Plan includes features – i.e. wider sidewalks, street trees, street furniture, curb extensions, and crosswalks - that make for an improved pedestrian experience along street segments leading up to the Exposition Line stations, while maintaining roadway capacity for vehicle circulation and future on-street bicycle facilities. The Proposed Plan does not modify any street designations; the right-of-way width of each street segment in the Streetscape Plan remains consistent with Mobility Plan street designations.

Another way the Proposed Plan supports multimodal transportation and reduced dependence on single-occupancy vehicles is through the public benefit requirements. In exchange for additional development rights (Bonus FAR) the Proposed Plan requires projects to provide public benefits. These can include the implementation of streetscape improvements (per the Streetscape Plan) beyond simply the area in front of the project site. Public benefits provided by a project can also include mobility amenities, such as additional bicycle parking facilities, multi-modal mobility hubs, and enhanced bus shelters. All of these can serve as first/last mile strategies to help connect the Exposition Line transit stations to destinations within the corridor. For projects that are comprised primarily of non-residential use, the required public benefit is the Vehicle Trip Reduction. This requires projects to demonstrate a 10% reduction in peak hour vehicle trips to/from the project site over baseline conditions (or an Average Vehicle Ridership (AVR) ratio of 1.75 or more), documented in an annual report submitted to the City. These trip reductions (or increases in AVR) are achieved through the implementation of Transportation Demand Management (TDM) measures, such as additional bicycle facilities, transit subsidies, parking pricing, employer-sponsored shuttles and ridesharing services.

Analysis in the Traffic and Transportation section of the Draft EIR studied the Proposed Plan's impact on VMT per capita and other metrics within the West Los Angeles Area Planning Commission (APC) boundaries. (This was provided for informational purposes only, as Level

of Service (LOS) was the adopted threshold at the time). This analysis found that as a result of the implementation of the Proposed Plan by 2035, in addition to the implementation of the transportation network in the City's Mobility Plan, VMT is anticipated to increase by approximately 8%. However, the analysis also showed that during the same time, service population (residents and workers) in the region would increase by approximately 12%. Thus the VMT per capita is anticipated to decrease by approximately 3%, as service population grows at a greater rate than VMT. This is attributed to shorter trips, less vehicle trips, and internalization of trips, made possible by the compact, mixed-use development pattern encouraged by the Proposed Plan.

Summary of CEQA Findings

A Draft Environmental Impact Report (EIR) has been prepared to analyze the potential impacts of the Proposed Plan. The Draft EIR analyzed several impact areas and fully disclosed that significant and unavoidable impacts would occur in the following areas: Aesthetics, Air Quality, Cultural Resources, Noise, Parks and Recreation, and Traffic and Transportation.

The Plan is the same as the Proposed Project analyzed in the Draft EIR².

Section 15088 of the CEQA Guidelines requires the lead agency (DCP) to evaluate comments on environmental issues received from public agencies and interested parties who review the draft EIR and provide written responses. The lead agency received written comments on the Draft EIR from public agencies, groups and individuals. Responses to all comments received during the comment period are included in the Final EIR.

The Final EIR and associated CEQA Findings and Statement of Overriding Consideration will be considered by the City Council prior to adoption of the Recommended Plans and certification of the EIR. The EIR concluded that, despite the adoption of all feasible mitigation measures, the Recommended Plans would result in potential unavoidable significant adverse impacts that are not mitigated to a less-than-significant level, related to Aesthetics (Visual Character and Shade); Air Quality (Standards during construction and sensitive receptors during construction); Cultural Resources (Historical Resources); Noise (Construction Noise Standards and Vibration; Operational Noise); Public Services (Parks and Recreational Facilities); Transportation and Traffic (Circulation System; Neighborhood Intrusion; Congestion Management Plan Arterial Intersection Analysis)

² Several minor modifications were made to the Proposed Project analyzed in the Draft EIR. These do not substantially affect the analysis or conclusions of any of the analyzed impact categories in the Draft EIR, and are discussed in Appendix N of the Draft EIR.

PUBLIC HEARING AND COMMUNICATIONS

Outreach

The Proposed Plan is the result of a multi-phase public participation process to receive input and feedback. Over a five year period, beginning in October 2012, numerous public meetings and workshops were held with Certified Neighborhood Councils, community groups, area residents and business owners. In total, at least 656 stakeholders signed in at one of the outreach events for the Proposed Plan.

In fall 2012 a series of kick-off workshops were held in tandem with targeted focus groups for members of the public to envision their neighborhood with future Exposition Line, give ideas for a more pedestrian- and bike-friendly neighborhood, and help shape future development. Notice for the kick-off workshops was sent via digital outreach channels and mailed to local residents, property owners, and neighborhood councils.

- Kick-Off Workshop. November 27, 2012. IMAN Foundation.
- Kick-Off Workshop. December 3, 2012. Henry Medina West LA Parking Enforcement Facility,
- Focus Group with Motor Ave Improvement Association. October 16, 2012.
- Focus Group with Pico/Westwood Business and Property Owners. October 17, 2012.
- Focus Group with Culver City Station Neighborhood Property Owners. October 22, 2012.
- Focus Group with Single Family Homeowners in Bundy station area. October 27, 2012.
- Focus Group with the Bundy-Olympic Creative Sector. October 29, 2012.
- Focus group with the development community. October 29, 2012.

Following the kick-off workshops and focus groups, staff compiled a 17-page document summarizing the various feedback and opinions of the stakeholders; this document was made available online.

On April 10, 2013 a Scoping Meeting to inform the scope of the Environmental Review of the Proposed Plan was held; roughly 50 people were in attendance. On May 30, 2013 and June 1, 2013 Community Workshops were held with 73 and 66 people in attendance respectively. These workshops provided an opportunity for the public to give feedback on preliminary concepts for development regulations focused on new zoning, development and urban design standards, public amenities, streetscape elements, and options for right-of-way design to accommodate multi-modal transportation options. Notice for these Community Workshops was sent via digital outreach channels and mailed to local residents, property owners, and neighborhood councils.

From spring 2014 to summer of 2015 staff presented, fielded questions and heard comments at multiple neighborhood council meetings and other organized groups including:

- West Los Angeles-Sawtelle Neighborhood Council
- Mar Vista Community Council
- Westside Neighborhood Council
- Palms Neighborhood Council
- South Robertson Neighborhood Council
- West Los Angeles Regional Forum

- West Area Planning Commission
- American Institute of Architects Urban Design Committee
- Los Angeles Chamber of Commerce
- Westside Regional Alliance of Councils

In an effort to expand the audience and share information about the Proposed Plan with existing and future transit riders, staff set up booths at the Palms and Bundy Stations on the Opening Day of the Exposition Line in May 2016. Staff asked members of the public to map where they live, work or study, and shop or dine. Additionally, staff discussed mobility, walkability, public space, mix of uses, and jobs and housing in the Project Area with members of the public. At this event, staff gathered more than 100 new email addresses to add to the interested parties list.

In March of 2017, staff began the final round of outreach on the Proposed Plan. From March 2017 to October 2017, staff presented, fielded questions and heard comments at multiple neighborhood council meetings. Additionally, staff attended a neighborhood meeting organized with single family homeowners in the Bundy station area and provided that group with information tailored to their geography.

Public Outreach culminated with the Open House and Public Hearing on the Proposed Plan held on May 23, 2017 at the IMAN Foundation. The open house included seven stations with multiple boards covering a range a topics including: project goals, project location, land use, zoning, public benefits, urban design, streetscape, environmental impacts, and transit oriented development strategies. Roughly 160 people signed-in at the meeting, 33 people provided oral testimony to a hearing officer, and numerous written comments were given to staff. A summary of the Public Hearing testimony and communications is provided in this staff report.

Digital Outreach Channels

To support outreach and provide any member of the public with the most up to date information, staff maintained an informative website that provided background information about the Los Angeles Transit Neighborhood Plans program, announcements of upcoming meetings, and other pertinent information about the Proposed Plan (<http://www.latnp.org>). Over the last year, the project website has averaged 700 users a month. From the website, stakeholders may add their email to an interested parties list to receive project specific emails regarding newly published documents and upcoming meetings. To date, the Proposed Plan has an interested parties list of approximately 1,200 people. In addition, staff maintained an active Facebook page and Twitter account. Together, these social media accounts have a combined following of over 400.

Supplemental Materials

In addition to materials developed for specific public meetings such as presentations and presentation boards, staff developed supplemental materials to explain the concepts and components of the Proposed Plan. Staff developed an “About the Project” document summarized the concepts behind the plan, and a “Frequently Asked Questions” document that provided easily accessible responses to commonly asked questions. The “Frequently Asked Questions” also highlighted important maps and plan features. Additionally, staff developed a “Planning for Transit” brochure that summarized the key conceptual underpinnings of the City’s vision to direct growth to transit neighborhoods.

Summary of Public Hearing Testimony and Communications

On May 23, 2107 staff conducted an Open House and Public Hearing at the IMAN Foundation, 3376 Motor Avenue Los Angeles, CA 90034. Approximately 45,000 notices were mailed to all property owners and all building occupants in the project area and within 500 feet of the project area. A public notice was placed on the project's website, www.latnp.org and on the Department's website, www.planning.lacity.org. E-mail notification was also sent to a list of roughly 1,200 on the project's list of interested parties and an official ad was placed in the Daily Journal on April 26, 2017. The Public Hearing was attended by roughly 160 people. Below is a summary of the public testimony received on May 23, 2017 and the total written correspondence received by staff by June 5, 2017 (the end of the public comment period).

Comments were received on a range of topics addressed by the Proposed Plan. The most prevalent concerns raised during the public hearing were related to levels of development, streetscape, affordable housing, and mobility (i.e. the bicycle network, traffic, and parking). The majority of the comments received during the public hearing are consistent with the comments received throughout the outreach phases of the plan development process, with the exception of numerous comments received during the public comment period in support of adding more capacity for housing and reducing parking requirements. For most comment areas there were comments received on both sides of the issue. Many of the plan-related comments received have been addressed in the "Key Issues" section of this report. The approximately 280 written and oral comments on the Proposed Plan received during the public comment period include:

- Advocating for more jobs and housing throughout the Plan Area and supporting the City's efforts to allow more jobs and housing near transit
- Desire to see more housing in the project area
- Opposition to more jobs and housing in the Plan Area and a general opposition to the Proposed Plan
- Support for elimination of parking minimums in the new zones
- Opposition to changes in parking requirements and opposition to unbundling of parking
- Request for retaining zone changes along Exposition Blvd. between Sepulveda Blvd. and Westwood Blvd. to R3 and along Pico Blvd. between Sepulveda Blvd. and Overland Ave. to RAS4
- Support for the elimination of former zone changes along Exposition Blvd. between Sepulveda Blvd. and Westwood Blvd. to R3 and zone changes on Pico Blvd. between Sepulveda Blvd. and Overland Ave. to RAS4*
- Support for the retention of the Pedestrian Oriented District on Pico Blvd near Westwood Blvd*
- Opposition to the zone change of the single family area south of the Bundy Station between Exposition Blvd., Carmelina Ave., Pico Blvd., and Barrington Ave.
- Support for the zone change of the single family area south of the Bundy Station between Exposition Blvd., Carmelina Ave., Pico Blvd., and Barrington Ave.*
- Request for single family zoned area south of Pico Blvd between Bundy Dr and Barrington Ave be changed to a higher density residential zone
- Request for the elimination of zone change on the south side of Pico Blvd. between Westwood Blvd. and Overland Ave. to MU(EC)
- Support for the proposed zone change on the south side of Pico Blvd. between Westwood Blvd. and Overland Ave. to MU(EC)*
- Concern that the proposed zoning near the Sepulveda station, south of Pico Blvd. would permit buildings that are too tall and too dense
- Support for removal of transitional height requirements and removal of shade and shadow study requirements

- Support for increase in allowed heights along Motor Ave., Venice Blvd., and National Blvd.
- Support for more mixed-use zoning along Westwood Blvd.
- Support for retention of existing zoning throughout the corridor and additional provisions for new Affordable Housing
- Concern that the required non-residential uses in the new zones area are not economically viable
- Desire for Public Benefits to include funding for local organizations
- Request that Base FAR projects provide Public Benefits in the same way that Bonus FAR projects are required to
- Desire for incentives that provide bonuses to projects that comply with labor standards similar to those found in Measure JJJ
- Request that schools be an allowed use in the new zones
- Site specific concerns:
 - Request that the M1 property on the corner of Exposition Blvd. and Pico Blvd. be rezoned to commercial
 - Concern about the relationship of the Proposed Plan to recently approved entitlements at the northwest corner of Bundy Dr. and Olympic Blvd.
 - Request that the property on the west side of Sepulveda Blvd. between Olympic Blvd. and Mississippi Ave. currently zoned [Q] P-1 be rezoned to M2-1VL to match the zoning of the adjacent properties.
 - Request for specific changes to zoning along Venice Blvd. between National Blvd. and Cattaraugus Ave.
 - Request that the R3 zoned property at the southeast corner of Sepulveda Blvd. and Exposition Blvd. be changed to a commercial zone to accommodate the existing commercial use
- Desire for additional streetscape plans along Overland Ave., and near the Culver City station to connect Hamilton High School to the station along National Blvd. and Robertson Blvd.
- Opposition to streetscape plans where vehicle lanes would be reduced
- Opposition to addition of a median on Olympic Blvd.
- Opposition to the Alternative Compliance process
- Desire to more broadly apply site eligibility for Alternative Compliance
- Desire for greater requirements for open space and landscaping
- Various comments related to features of the proposed Urban Design Standards

Note: Comments summarized above and followed by an asterisk (*) are changes to the zoning maps that are reflected in the Proposed Plan; this is provided for informational purposes only, for a full discussion on related issues, see the Key Issues section.

Numerous comments were received on a variety of issues that are not directly related to the Proposed Plan and/or are outside of the Department of City Planning's purview including:

- Lack of parking in some residential areas and at Metro stations
- Economic viability of small, local businesses
- Emergency services response times and abilities
- Bicycle connectivity along the Exposition Line Bike Path between Palms and Westwood stations.

Comments relating to the environmental analysis in the EIR are responded to in the EIR.

West Los Angeles Area Planning Commission comments

The Proposed Plan was presented to the West Los Angeles Area Planning Commission (APC) on Thursday, October 4, 2017 for review and comment. Following staff's presentation of the Proposed Plan, the Commission provided the following comments:

Commissioners expressed general support for the Proposed Plan and posed specific questions to staff regarding plan features and expected plan outcomes.

- Commissioners asked about the rationale for the ½ mile radius from the LRT stations that forms the Plan Area; staff explained the common use of the ½ mile radius to represent a comfortable walking distance for pedestrians.
- Commissioners asked about the provision of open space in the Plan Area; staff described the added requirement for open space in non-residential projects required in the Proposed Plan.
- Commissioners expressed concern regarding proposed height limits, particularly along Pico Blvd. near Westwood Blvd.; staff clarified that the height limits for the new zones were selected based on neighborhood context and proximity to the LRT stations; all other heights would remain as they are today. Additionally, to address compatibility between new development and low density residential areas, staff explained that transitional height requirements would apply to new development abutting R1 and R2 zoned parcels.
- Other commissioner concerns related to future mobility options, expressing concern about the infrequency of Metro bus and LRT services in the future and the 1% expected increase in walking trips anticipated as a result of the Plan. Staff clarified that Metro engages in independent planning processes to establish service levels and connections among various transportation service providers. Staff discussed the methodology used to inform the future expected walking trips.
- Commissioners highlighted the streetscape planning effort for Pico Boulevard initiated by the Westside Neighborhood Council, which is currently funded for implementation, and wanted to ensure that there were no conflicts between the community's vision for the street and the forthcoming streetscape plans being prepared by the City; staff confirmed there has been continued coordination between the Department of City Planning and the community on the plans for this street segment.
- Commissioners also discussed the importance of appropriate street tree selection with regard to stormwater retention, shade, flower color, business sign visibility, and other aspects of the street environment.