

# PURPLE LINE TRANSIT NEIGHBORHOOD PLAN

EIR SCOPING MEETING: SUMMARY OF COMMENTS

July 26, 2018



## Executive Summary

This Purple Line Transit Neighborhood Plan (TNP) project aims to develop land use, zoning, and design regulations for the neighborhoods surrounding three future Metro Purple Line stations in the Wilshire area at: Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega. The study area includes the area in the City of Los Angeles generally within half a mile radius of each station.

On July 26<sup>th</sup>, 2018, Department of City Planning staff hosted an Environmental Impact Report (EIR) Scoping Meeting for the Purple Line TNP project. The plan concepts presented were developed after two primary outreach phases. During the initial phase of the public planning process, in the first half of 2016, the Los Angeles Department of City Planning hosted two community workshops for residents, business owners, and other stakeholders to identify opportunities to enhance neighborhoods surrounding these transit stations, as well as several other small focus groups. Staff collected and summarized this input about their perceived thoughts, ideas, and concerns for the future of their neighborhood as it develops around transit. Please see this [link](#) for the summary of comments received during this 2016 initial outreach phase.

Using the comments received through the first round of outreach, in combination with station area context, current City plans and policies, demographic analysis, and planning best practices, the Department developed initial land use and zoning concepts. The initial concepts included targeted increases in development rights and application of design regulations along commercial corridors; and context specific building design regulations in multi-family areas (identified in SurveyLA). These initial concepts were presented at a public open house on November 16, 2017 at the Pan Pacific Senior Activity Center. A summary of comments received from the 2017 Open House can be found at this [link](#).

The Notice of Preparation (NOP) for the EIR was issued on July 12, 2018. A public Scoping meeting was held on July 26, 2018 which featured planning concepts that had been revised based on input from the November 2017 public outreach meetings. TNP staff promoted the public Scoping meeting through an email to the Purple Line TNP interest list; distribution of meeting information to offices and organizations such as the respective Neighborhood Councils and Council District offices; social media such as Facebook, Twitter, and Nextdoor (in coordination with the Department of Neighborhood Empowerment); and the project's website [www.latnp.org](http://www.latnp.org). Comments to the NOP were accepted in person, both orally and written, as well as via email, mail, and web comment form until August 13, 2018. While the primary purpose of the meeting was to obtain relevant comments to inform the scoping of the environmental analysis for the EIR, staff also received feedback on the revised planning concepts presented at the Scoping meeting.

All comments received inform the Department's planning process and analysis. Below is a summary of comments received from the public during the NOP comment period. The comment summary has been separated into three categories: overall recurring themes, comments that relate to scoping the potential environmental impacts of the presented planning effort, and comments that relate to the planning effort itself.

## Overall recurring themes:

- The TNP should allow for greater amounts of housing around the planned Purple Line extension, in light of the ongoing housing crisis.
- The Historic Preservation Overlay Zone (HPOZ) neighborhoods, and neighborhoods with special provisions such as Q conditions, and areas identified in SurveyLA as eligible historic were frequently mentioned topics, both by those who want to maintain existing conditions and those suggesting changes.

- Displacement is a major concern due to the high number of rent stabilized units in the area, especially in the multi-family zoned areas. Rent-restricted affordable housing and the preservation of rent-stabilized housing are a priority.
- There is a desire for more greenspace and tree planting in both the public right-of-way and private areas within the project area.
- Parking is a concern, both for residents and future transit users. Some say there is not enough parking, while others point out that current levels of parking is unnecessary in residential and commercial development located near transit.
- Existing residential character is important to a number of people.
- Residential neighborhoods can maintain their character through design regulations while allowing for more housing.
- Both real and perceived safety and security of pedestrians, transit users, and bicyclists is of utmost importance at the stations and along corridors, especially along 6<sup>th</sup> Street.
- The City needs to provide adequate public services, including power and water.
- There is a concern over cut-through traffic in the planning area.

**Comments directly related to the Environmental Impact Report are summarized below:**

**Aesthetics**

A number of comments referenced residential neighborhood character, including single and multi-family areas, and want the EIR to analyze the impacts of the proposed project on them. Concerns included height, massing, and scale of new development and their relationship to existing context.

**Air Quality**

Many comments centered on air quality issues rising from construction of projects, particularly regarding the impact on older units without air conditioning and/or filtration systems.

Some concerns were about dispersion patterns of pollutants and their potential entrapment due to tall buildings (approximately 7-13 story) along La Brea and Wilshire.

**Biological Resources**

The Los Angeles Audubon Society requested that potential impacts to the stream system and associated urban forest canopy within the project area be mapped and analyzed. It also encouraged any plan for this area to protect the hydrologic function and tree canopy that provide habitat and ecological function for the urban fabric.

Trees were a frequent topic with comments universally calling for more trees, both by addition and by maintaining the current trees in public and private spaces.

**Cultural Resources and Tribal Cultural Resources**

There is a clear recognition of the existing and recently adopted HPOZs, and designated and eligible historic resources in the area. Comments included mapping and accounting for all the resources, and a full discussion on how this planning effort could impact such resources.

**Geology and Soils**

A few comments were received concerning earthquakes and the location of faults in the area. In general, methane zones were discussed, which are noted in the Hazards and Hazardous Materials zones.

**Greenhouse Gas (GHG) Emissions**

Many comments connected GHG emissions at a local, regional, and global level, pointing out that allowing more residents and jobs near transit can reduce trips and GHG emissions. Calls for studying the environmental costs of the status quo versus the benefits of allowing more homes and businesses close to transit.

Other comments focused on the generation of additional Green House Gases in the study area resulting from construction of new buildings, deliveries to these buildings, and access to these buildings by residents, employees, customers, and visitors either driving cars or being car passengers.

There was concern about creating a “heat corridor” along Wilshire Blvd. and how multiple taller buildings would affect the “microclimate.”

### **Hazards and Hazardous Materials**

Comments mentioned the area’s history for oil extraction and potential methane hazards as key issues to study.

There was a request that the Hazards and Hazardous Materials and the Mineral Resources sections the EIR be addressed for the potential significant impacts due to the multitude of petroleum reserves and former oil wells located in the vicinity of the project area.

### **Hydrology and Water Quality**

Comments requested ground water to be analyzed, in terms of ground water pumping for subterranean development, possible contamination, drainage into nearby areas, and the effect on parkway trees.

The stream in the area sometimes referred to as Arroyo del Jardin de las Flores, El Rio del Jardin de las Flores, Brookside Creek, or Flower Garden River was noted as being part of the Ballona Creek Watershed. It was also requested that the impacts on this stream be studied.

### **Land Use and Planning**

Comments questioned the timing of the planning effort in relation to the Wilshire Community Plan update and how the TNP effort comports to the goals in the current Community Plan and the Framework Element of the General Plan.

Some comments suggested that the intensities and densities currently allowed are enough to satisfy the goals of the planning effort.

Some comments questioned if the additional capacity being proposed in the TNP area is already met in the community plan area based on the current community plan capacity.

While some thought that further construction could disrupt the community, others thought that making it accessible to more people would add to the community and the use of the subway for connectivity.

The HPOZ areas were considered by some to be barriers to more inclusive communities.

### **Noise**

Noise was a general concern among comments. Sycamore Avenue residential area was identified as particularly noisy.

### **Population and Housing**

Comments primarily centered on affordability and displacement, with some suggesting that not allowing for additional density and intensity in this area would create displacement somewhere else in the City.

Concern for housing affordability for workforce and family housing was a recurring comment.

Many comments pointed out that the Purple Line extension is an infrastructure improvement that warrants additional housing nearby for access and to provide the ridership necessary for the subway system.

Gentrification and changing demographics are a concern.

### **Public Services and Recreation**

Resources, staffing and capital improvements needs for Fire, Police, Schools, and emergencies services was a common comment with one commenter suggesting an evaluation of the cardiac arrest survival rate impacts of added height above three floors, and the impact on response time (for time-to-patient, as opposed to time-on-scene).

### **Transportation**

Traffic was a concern of a number of commenters, specifically on La Brea, Highland, and Fairfax, as well as the cut through traffic through the neighborhoods.

Comments suggested the evaluation of the TNP project on transit ridership and vehicle miles traveled (VMT).

Parking was a popular comment as many stated there was a need for parking in the area and suggested that the impacts on overnight street parking should be analyzed. Other comments drew a connection between parking and vehicle trips and suggested analyzing how the provision of off-street parking affects VMT by incentivizing driving.

La Brea was mentioned frequently as a high use corridor for personal automobile, taxis, ride share, and commercial vehicles that rely on exclusive access via La Brea, and that impacts and mitigations should be studied for enhanced vehicular circulation.

### **Utilities, Service Systems and Energy**

Power and water systems were a common point of concern by commenters, noting multiple power outages in the area and water main breaks. An assessment of the ability for the area to accommodate new units, businesses, and people as it relates to utilities, service systems and energy was requested.

### **Agriculture and Forestry Resources, Mineral Resources, Wildfire**

No specific comments were received for these categories of environmental impacts.

## **Comments directly related to the planning effort are summarized below:**

### **Housing**

- Maintain rent stabilized units and encourage more affordable housing.
- Facilitate permanent supportive and bridge housing.
- Residents of RSO/NOAH units are prolific users of public transportation. These units must be protected. All RSO units in the TNP shall be required to be replaced with RSO units with the same rent at the time of their removal from the market.
- While those who occupy luxury housing are the ones who use public transportation the least, those who occupy affordable units of all levels use it the most. Require 50% of the proposed increase in housing density to be moderate, low and very low income housing – without off-site contributions to city funds. Any increase in density without inclusionary housing will result in increased congestion and decreased air quality.
- Higher inclusionary housing ratios would be appropriate in this area to ensure those who use transit have access to transit.
- Short-term rental regulations must be in place on all housing built under the TNP program. All housing created under the TNP project should be banned from leases less than 6 months.

## Density

- Some commenters specifically voiced their disapproval of adding more density in the project area as presented, while others expressed their approval of re:code LA tools, the presented planning concepts, and the proposed increase in intensity and density near transit.
- Those in support of the project believe that the proposed changes are going to improve their community.
- Accommodate more types of housing, not just 30+ high-rise condominium towers, but also 4-6 story mixed-use buildings where single-family homes currently exist.
- Permit townhomes and small apartments in single-family zones close to the new stations. This is a small change that would permit more dwelling units without materially impacting the neighborhood feel.
- Allow fourplexes in single-family residential areas; this can be accomplished without materially changing the massing, bulk, and lot coverage of the existing homes or affecting the character of the area.
- Remove density limits from multi-family buildings while using form standards to encourage high-quality building design.
- The multi-family zoned properties in the Miracle Mile HPOZ north of 8th Street were specifically mentioned as places where the HPOZ could be removed in order to accommodate additional density closest to the Wilshire corridor.
- Consider plan options that accommodate more housing in the area.
- The proposed plan does little to actually address the large swath of single-family zoning that will continue to limit the supply of housing, despite ADUs or Granny Flats being permitted.
- Comments pointed to the concept that more housing near transit means less car trips, which means greater environmental benefits and reductions to greenhouse gases.
- Some comments mentioned measures M and R that were evoked for the need to build homes where our tax dollars are investing in public transit.
- Some comments connected the tradeoffs of increased density on the corridors with the protection of the existing multi-family stock in the residential neighborhoods.
- Some commenters feel that the increased property values should result from proximity to amenities as opposed through artificial scarcity, and that more residential units should be allowed in the project area.

## Commercial

- There were concerns with the ability of the area to support more commercial uses, perhaps creating empty spaces with dead frontages and hurting the pedestrian experience, while others thought more commercial and intense uses would create more vehicular traffic along the north/south corridors.
- There is a strong desire to protect local merchants and the neighborhood serving businesses from displacement and high rents.

## Design

- Preserve the variety of building typologies by discouraging further mansionization and using graduated increases in building size and density from low rise residential R1s to high rise on the commercial corridors. For instance, step from FAR 4 on 8th St., to FAR 9/14 on Wilshire.
- Designs of poor quality “faux historicism” have proliferated under the Miracle Mile Community Design Overlay. Discourage them through amendments to the Miracle Mile Community Design Overlay.

## Mobility

- Shared parking, unbundling parking costs from rents, as well as reducing or eliminating parking requirements, are strategies that should be considered to encourage transit use and improve housing affordability.
- Some comments noted the lack of parking in the area in general, and suggested park and ride, and kiss and ride lots for the Metro stations specifically.
- Drop off areas for ride share users should be incorporated in new developments.

## **Public Realm**

- Many comments referred to the need to maintain existing trees and add new trees.
- Encourage larger sidewalks and parkways, as well as permeable surfaces.
- One comment requested that the alleys behind La Brea's commercial & retail spaces be maintained, and that public green space or pocket-parks be added for all Q Lots facing R1-V3-RG single-family homes in Hancock/La Brea neighborhood. Project for Public Spaces (PPS) program in NYC was mentioned to be explored.

## **Public Services**

- More homes would lead to increased demand for amenities that serve the area, reducing the need for vehicular trips.
- Ensure that the Los Angeles Department of Water and Power anticipates and plans for existing and future demand.
- Provide adequate support for police and fire services.