



**United Neighborhoods for Los Angeles**

**[www.un4la.com](http://www.un4la.com)**

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November 27, 2018

Honorable Herb Wesson  
Honorable Paul Koretz  
Honorable David Ryu  
Director of Planning Vince Bertoni  
Los Angeles City Hall  
200 N. Spring St.  
Los Angeles, CA 90012

Re: Purple Line Transit Neighborhood Plan  
Case Number: CPC-2018-3731-ZC-GPA-HD-CDO; ENV-2018-3732-EIR  
Alternative Proposal by UN4LA

Dear Councilmembers Wesson, Koretz and Ryu, and Director Bertoni,

United Neighborhood for Los Angeles (UN4LA) is an organization working with community groups throughout Los Angeles to promote better planning and better governance.

We have carefully studied the proposed Purple Line Extension Transit Neighborhood Plan (TNP) and concluded that, as now formulated, it will not work. At best, it will not meet its expressed goals of building affordable housing, increasing transit ridership, and reducing the generation of greenhouse gases.

At worst, the current TNP proposal will upzone the Miracle Mile, San Vicente, Fairfax, and La Brea corridors, further reduce bus and subway ridership, decrease the supply of affordable housing, and expand the generation of GHGs. This is because the proposed Purple Line Extension TNP awards property owners unconditional bonuses to increase the height, size, and density of new residential buildings, without affordable housing requirements. Unless blocked by the courts, this approach might result in more apartment and commercial construction, but these buildings and their rentable units will be limited to the upper end of the rental market. This is exactly the population that owns and drives cars, while seldom riding buses or subways.

Furthermore, the existing problems faced by the Purple Line TNP area have no connection to zoning since these neighborhoods currently have an enormous amount of unused zoning capacity. Additionally, the Miracle Mile corridor has suffered long term decline because of inadequate infrastructure and prior approvals of four new regional centers north of Wilshire Boulevard: Cedars-Sinai Hospital, the Beverly Center, the Beverly Connection, and the Grove shopping center.

Instead, we recommend a transit program that addresses the actual problems faced by the TNP neighborhoods. The revamped Purple Line TNP should be modeled after the recently completed Crenshaw Light Rail TNP, which entirely focused on public improvements. To best make this change, the Purple Line TNP should be folded into the forthcoming update of the Wilshire Community Plan and then fully implement two manuals posted on City Planning's web site: [Mobility Hubs](#) and [Complete Streets Guidelines](#). This approach also has the advantage of relying on the Wilshire Community Plan Update's community analysis and extensive outreach efforts.

We are including attachments that provide further analysis to support our recommendations. If you would like more information on our proposal, UN4LA would be happy to meet with you to discuss these issues further.

Sincerely,  
Casey Maddren, President  
United Neighborhoods for Los Angeles

## ATTACHMENT 1

### UN4LA Alternative to Purple Line Extension Transit Neighborhood Plan

**UN4LA proposes that the Purple Line Extension Transit Neighborhood Plan and its Draft Environmental Impact Report (DEIR) be incorporated into the impending the Wilshire Community Plan Update. We consider this the best way avert litigation and also ensure a high quality planning product. In order to create truly livable, sustainable communities, any planning program must be a holistic effort that engages a range of stakeholder groups in a comprehensive process of assessing the community's current state, and imagining a vision for the future. Instead of pursuing true community engagement, City Planning has insisted on pressing forward with a process that is narrowly focused on upzoning near transit.**

City Planning's efforts to jam through this ambitious up-zoning scheme, using two new Purple Line subway stations as an excuse, have galvanized all local communities, including thousands of area residents. One local organization, the PICO Neighborhood Council, was, like other local groups, excluded from public participation. It nevertheless organized a large public meeting with City Planning in late September 2018. There was a standing room only crowd at this meeting. Local residents made clear that they oppose the Purple Line Transit Neighborhood Plan for the following reasons:

1. Lack of meaningful public outreach.
2. The assumption that high-density development will increase transit ridership. The City has been claiming for at least 15 years that it is promoting Transit-Oriented Development (TOD), yet transit ridership is lower than it was 30 years ago. Metro ridership has declined every year since 2013. *[See Attachment 1A.]*
3. Broad upzoning eliminates incentives to build affordable housing. Currently projects must include affordable units to receive density bonuses. Upzoning the Wilshire Corridor will allow developers to build what they like with no motivation to incorporate affordable housing.
4. Infrastructure is degraded, and it cannot support the level of development City Planning proposes. These areas experience frequent power outages and bursting water mains are a common problem. *[See Attachment 1B.]* Roads and sidewalks are in need of repair. Congested streets are already at gridlock, particularly Fairfax Avenue. Promises that new development will fund necessary upgrades are not based on a realistic assessment of needs.
5. Insufficient police and emergency services. Violent crime has risen dramatically in the area *[See Attachment 1C.]*, and the LAPD is understaffed. Promises that new development will fund increased services are not based on a realistic assessment of needs.
6. Harmful impacts of large new buildings on fragile surrounding neighborhoods and existing businesses.
7. Displacement of teachers, nurses, office workers, and other middle class, working class, and fixed income residents.

8. Lack of municipal accountability relying on tracking and monitoring to determine the impacts of proposed plans, like the TNP.

Neighborhood input is essential to the planning process, and in the case of the Purple Line Extension Transit Neighborhood Plan, it was ignored. Had it been solicited, the Department of City Planning would have learned that its upzoning proposals exceeded the capacity of local infrastructure and displaced existing affordable housing, transit users, and small businesses.

Unlike Beverly Hills' fixed approach to the Wilshire/LaCienega station, Los Angeles is using the Purple Line Extension subway as an excuse to increase the height, size, and density of privately owned properties zoned for apartments and commercial uses in the neighborhoods surrounding the Wilshire/La Brea and Wilshire/Fairfax subway stations.

Community planning processes that address transit must also consider data on local land use and supporting infrastructure. This is why City Planning's Transit Neighborhood Planning approach for the Purple Line Extension is fundamentally flawed. For example, it neglected to consider the constraints of local infrastructure and the adverse impact of taller, larger, denser buildings on surrounding residential communities. The San Vicente/Pico, Fairfax, Wilshire, and La Brea corridors that comprise the greater Miracle Mile area do not have sufficient infrastructure, public services, or community support to become high density, luxury neighborhoods.

Transit Neighborhood Plans must also be based on California's mandatory Complete Streets law, City Planning's Mobility Hubs and Complete Streets Guidelines, and METRO's First-Last Mile Strategic Plan. Nearby neighborhoods urgently need their sidewalks and intersections repaired and upgraded, their missing shade trees planted and maintained, and their street furniture, bicycle infrastructure, bus shelters, kiss 'n ride, and park 'n ride installed.

In local neighborhoods, new developments, even those based on existing zoning, have already displaced rent stabilized apartment units. Once dislodged, these residents cannot afford the rents of new, expensive apartment buildings, a preview of things to come if the City Council adopts the TNP. City Planning's claims that this upzoning ordinance will produce affordable, transit-oriented apartments are not credible. New residential developments in the TNP area and the surrounding DEIR study area are already expensive, up to \$4,500 per month for a one-bedroom unit. New apartments will be priced similarly or even higher. Because the TNP grants developers upfront increases in building height, size, and density, along with reductions in parking requirements, developers will no longer request SB 1818 and TOC density bonuses to obtain these entitlements.

While it may seem counter-intuitive, UN4LA believes that the best way to create affordable housing in this area is to pursue downzoning. This would force real estate investors to include affordable rental units in their buildings in exchange for additional height, building mass, density, and/or reduced parking.

No data exists forecasting a population boom or shortage of developable land in the Wilshire Community Plan or its Transit Neighborhood Plan sub-area. The TNP area's existing zoning has permitted many new, high density, by-right commercial and residential buildings over the past two decades. This is the intended outcome of the 389-page upzoning ordinance that the Department of City Planning prepared to implement the 2002 Wilshire Community Plan.

If the Wilshire Community Plan's current zoning was fully built-out through by-right real estate projects, the plan area's population would reach 573,000 people. If these projects then incorporated SB 1818 and TOC density bonuses, as well as permitted Accessory Dwelling Units, the buildout population would soar to 770,000 people. In comparison, according to City Planning's most recent population estimate, the Wilshire Community Plan housed only 293,000 people in 2015. The plan area's most optimistic population forecast was SCAG's estimate for 2010, 337,000 people, or nearly 500,000 people less than the plan area's maximum build-out population.

These data reveal that all construction and population scenarios can be met by existing zoning. In fact, this zoning is already producing the new commercial and residential buildings that the TNP planners claim could only appear through up-zoning.

UN4LA believes City Planning's current efforts to push through the Purple Line TNP will falter because:

- The TNP will have no relationship to transit because it does not contain any transit-related public improvements.
- The TNP will have no connection to local neighborhoods because stakeholders were excluded from its minimal public participation process.
- The TNP will have no relationship to planning because the ordinances that implement it would be separate from the forthcoming update of the Wilshire Community Plan.

**For these reasons, UN4LA proposes that the current TNP planning process to be integrated into the forthcoming update of the Wilshire Community Plan.** Beginning in 2021, it should conclude when the subway opens in 2023.

**Conclusion:** To avoid lengthy, costly and divisive litigation, City Council Districts 4, 5, and 10 must make it clear to the Department of City Planning that this plan should be deferred until all transit projects in this area can be properly considered through the forthcoming update of the Wilshire Community Plan. The real barriers to growth in this area have nothing to do with zoning. The Wilshire Community currently suffers from degraded infrastructure, inadequate public services, a lack of truly integrated transit planning, and displacement due to the City's failure to preserve existing RSO apartments and prioritize affordable housing. These problems can only be addressed with the public's participation in creating a comprehensive new Wilshire Community Plan.

## **ATTACHMENT 1A**

**Why Is L.A. Expanding Transit—and Losing Riders? From CityLab, Feb. 1, 2018**  
<https://www.citylab.com/transportation/2018/02/why-la-is-expanding-transit-and-losing-riders/551960/>

[excerpt]

*“The city is losing once-loyal lower-income patrons: They’re driving themselves.*

Happy transit systems are all alike; every unhappy transit system may be unhappy in its own way. Case in point: Southern California.

Los Angeles County, the most populous in the country, has been dramatically expanding rail transit connections for its 10 million residents. Yet across L.A. and five other counties that make up the heavily urbanized Southern California region—Orange, Riverside, San Bernardino, Ventura, and Imperial—ridership on public transportation systems has mostly declined since 2007, and quite steadily since 2013. That’s counting passenger increases on some of the new rail lines.”



**ATTACHMENT 1C**

**LAPD CRIME STATS FOR WILSHIRE DIVISION, YTD 2016 - YTD 2018**

COMPSTAT Wilshire Area Profile 11/10/18 - EXCERPT

	<b>AREA COMMANDING OFFICER:</b> Rank: Anthony Oddo Date of Rank: CAPT-III Date Assigned Area: January 24, 2016 LAPD Appointment Date: December 25, 2016 February 27, 1989		<b>PATROL COMMANDING OFFICER:</b> Rank: Aaron B. McCraney Date of Rank: CAPT-I Date Assigned Area: May 1, 2017 LAPD Appointment Date: March 19, 2017 September 9, 1991											
CRIME STATISTICS for week ending 11/10/18														
VIOLENT CRIMES			10/14/18 TO 11/10/18	09/16/18 TO 10/13/18	% Change	09/16/18 TO 10/13/18	08/19/18 TO 09/15/18	% Change	YTD 2018	YTD 2017	% Change	YTD 2018	YTD 2016	% Change
HOMICIDE			1	1	0.0%	1	0	N.C.*	5	7	-28.6%	5	4	25.0%
RAPE (121,122)			3	2	50.0%	2	7	-71.4%	37	34	8.8%	37	36	2.8%
RAPE (815,820,821)			3	4	-25.0%	4	4	0.0%	35	35	0.0%	35	27	29.6%
TOTAL RAPE			6	6	0.0%	6	11	-45.5%	72	69	4.3%	72	63	14.3%
ROBBERY			39	28	39.3%	28	32	-12.5%	380	354	7.3%	380	293	29.7%
AGGRAVATED ASSAULTS			56	24	133.3%	24	39	-38.5%	480	433	10.9%	480	370	29.7%
TOTAL VIOLENT			102	59	72.9%	59	82	-28.0%	937	863	8.6%	937	730	28.4%
PROPERTY CRIMES			10/14/18 TO 11/10/18	09/16/18 TO 10/13/18	% Change	09/16/18 TO 10/13/18	08/19/18 TO 09/15/18	% Change	YTD 2018	YTD 2017	% Change	YTD 2018	YTD 2016	% Change
BURGLARY			60	83	-27.7%	83	101	-17.8%	931	868	7.3%	931	733	27.0%
MOTOR VEHICLE THEFT			45	37	21.6%	37	43	-14.0%	446	468	-4.7%	446	495	-9.9%
BTFV			115	122	-5.7%	122	108	13.0%	1236	1214	1.8%	1236	1127	9.7%
PERSONAL/OTHER THEFT			157	153	2.6%	153	177	-13.6%	1844	1596	15.5%	1844	1434	28.6%
TOTAL PROPERTY			377	395	-4.6%	395	429	-7.9%	4457	4146	7.5%	4457	3789	17.6%
TOTAL PART I			479	454	5.5%	454	511	-11.2%	5394	5009	7.7%	5394	4519	19.4%