

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



March 8, 2024

Lisa Webber, AICP, Deputy Director of Project Planning  
City of Los Angeles  
200 North Spring Street, Suite 525  
Los Angeles, CA 90012

Dear Lisa Webber:

**RE: Los Angeles AB 2097 Implementation –  
San Monica Blvd. and Sepulveda Blvd. – Letter of Technical Assistance**

This letter provides technical assistance regarding the application of Assembly Bill (AB) 2097 (Chapter 459, Statutes of 2022) and is provided for the benefit of both the City of Los Angeles (City) and Irvine Associates (Requestor)<sup>1</sup>. The California Department of Housing and Community Development (HCD) previously issued this letter as an email to the City, sent on January 12, 2024. HCD's Housing Accountability Unit (HAU) received a technical assistance request from the Requestor regarding whether the intersection of Santa Monica Blvd. and Sepulveda Blvd. qualified as a "major transit stop" as defined in the Public Resource Code section 21064.3.

**Question 1. Can the Culver City (CC) 6 and 6R colinear local/bus rapid transit (BRT) lines (line family) be combined to meet the 15-minute service interval frequency to qualify as a major transit stop under Public Resources Code section 21064.3, subdivision (c)?**

**Response. For the purposes of AB 2097, colinear line families are combined and considered as one service route for service interval frequency.** Only the locations where the buses stop with a frequency interval of 15 minutes or less during morning and afternoon peak periods may qualify as major transit stops. Line families are intended to function as one bus route, where transit riders typically board the first bus available whether it is a local, express, or BRT line. This determination is consistent with Southern California Association of Governments' (SCAG) Connect SoCal Technical Report, adopted September 3, 2020.<sup>2</sup> HCD understands, per the City's email response dated January 9, 2024, that the City of Los Angeles is currently considering aligning with SCAG's methodology.

---

<sup>1</sup> AB 2097 is codified in Government Code § 65863.2 and became effective January 1, 2023. HCD has authority to enforce AB 2097 pursuant to Government Code § 65585, subdivision (j)(12).

<sup>2</sup> September 3, 2020. Connect SoCal. Southern California Association of Governments (SCAG). [Technical Appendix \[scaq.ca.gov\]](http://TechnicalAppendix.scaq.ca.gov)

**Question 2. Does the intersection of Santa Monica Blvd. and Sepulveda Blvd. qualify as a “major transit stop” as defined in the Public Resources Code section 21064.3?**

**Response. The Santa Monica Blvd. and Sepulveda Blvd. intersection qualifies as a “major transit stop” because it meets the qualifications of subdivision (c) of Public Resources Code section 21064.3.**

A “major transit stop”, as defined in the Public Resource Code section 21064.3, means “a site that contains any of the following:

- (a) An existing rail or bus rapid transit station.
- (b) A ferry terminal served by either a bus or rail transit service.
- (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

The Los Angeles (LA) Metro Local Route 4, the Santa Monica Big Blue Bus Route 1, and the CC Lines 6 and 6R each have a bus stop located at the intersection of Santa Monica Blvd. and Sepulveda Blvd. Both the LA Metro Route 4 and CC Line 6 and 6R (“two or more major bus routes”) have a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Table 1 details the average service interval frequency in both directions during the peak periods for LA Metro Route 4 and CC Line 6 and 6R.

**Table 1 Peak Period Service Intervals - LA Metro 4 and CC 6 + 6R**

| Peak Period <sup>3</sup>         | LA Metro Route 4 |      | Culver City Line 6 + 6R |       |
|----------------------------------|------------------|------|-------------------------|-------|
|                                  | East             | West | North                   | South |
| Average AM Frequency (min.)      | 7                | 9    | 8                       | 12    |
| Average PM Frequency (min.)      | 8                | 7    | 10                      | 9     |
| Average AM + PM Frequency (min.) | 8                | 8    | 9                       | 10    |

HCD may review local government actions and inactions to determine consistency with these laws and may notify the California Office of the Attorney General if a local government is in violation of state law. (Gov. Code, § 65585, subd. (j).) If you have any questions or need additional information, please contact Grace Wu, of our staff, at [grace.wu@hcd.ca.gov](mailto:grace.wu@hcd.ca.gov).

Sincerely,



Shannan West  
Housing Accountability Unit Chief

<sup>3</sup> Per Connect SoCal 2020, the morning peak period is defined as 6am to 9am and the afternoon peak period is defined as 3pm to 7pm.