



WESTSIDE NEIGHBORHOOD COUNCIL
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October 12, 2020

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RE: West Los Angeles (WLA) Community Plan -
 Draft Concepts for Proposed Land Use Categories
 And Proposed Land Use Changes

Dear Naomi,

The Westside Neighborhood Council (WNC) submits this letter in response to the release of the draft concepts and interactive map information provided to the West Los Angeles community through the City’s July 2020 webinars and materials provided on the City Planning website, specifically on the “Planning the Westside” home page.

In addition to the webinars provided by the City in mid July 2020, the WNC conducted outreach as follows:

- 1) WNC conducted two noticed virtual meetings of the Westside Neighborhood Council Land Use Committee (WNCLUC) with more than 400 total stakeholders who participated. The first meeting which addressed the City’s proposed draft concepts and proposed land use changes for the portion of the WNC’s area north of Pico Boulevard which was held on September 3, 2020. The second meeting which addressed the WNC’s area south of Pico was held on September 23, 2020.
- 2) Announcements encouraging participation in the July 2020 webinars were made via email to stakeholders who subscribe to WNC’s email list and at Board meetings. Announcements were also made at WNC Board meetings in July 2020, August 2020, and September 2020 and October 2020 with reminders regarding the deadline to submit comments to the City Planning Department.
- 3) Additional outreach occurred via individual Board members to homeowner’s associations, businesses, and individual stakeholders.
- 4) The Land Use Committee reviewed all comments received by the WNC and the WNC Land Use Committee with feedback from homeowners and community associations, businesses and individual stakeholders.
- 5) The Land Use Committee prepared a report which was presented to the WNC Governing Board at its October 8, 2020 meeting. The Board provided comments and direction regarding

recommendations relating to the draft concepts for the proposed land use categories and the proposed land use changes and obtained additional input from members of the public.

- 6) This letter is the culmination of this effort and the Board's vote at its Special Meeting held on October 12, 2020.

The WNC's comments include recommendations on the proposed land use categories and each area proposed for land use changes. These recommendations also include some additional areas for study and consideration. Additionally, comments are provided on policy issues that should be considered in the drafting of the West Los Angeles Community Plan. Both of these topics are addressed later in this letter after the following initial comments. Please note that our primary effort to date has been to respond to the draft concepts provided by the City. As the WLA Community Plan process continues, we now move on to the important visioning process that needs to occur for the future of the WLA Community that we had anticipated would be part of the City's work and outreach efforts.

The WNC Land Use Committee has submitted data requests to the Planning Department that are critically important to the understanding of population, housing, jobs, RHNA requirements and other issues that will impact recommendations and decisions for our area. We have never received a response to our requests. We are providing a list of data needs as an attachment to this letter for your reference. We would appreciate receiving the data requested and a response on when we can expect it.

The WNC has some concerns about the Interactive Maps provided on the City's web-site. There appear to be some discrepancies between the different mapping layers. For example, some of the proposed Commercial/Mixed Use Categories do not appear on the first layer that is intended to show all proposed land use changes. Another example is a small area with a historic designation for several parcels on the west side of Overland Avenue just north of Pico Boulevard is not identified on the main layer and is only visible on the residential mapping layer. We believe that verification of the accuracy of the mapping layers needs to occur and that the WNC and the community needs to be notified of any corrections with an opportunity to comment for any mapping errors.

The WNC has some process concerns and procedural issues that we request be addressed. City Planning staff has indicated that the City Planning Department intends to proceed directly from this stage of the process into concept refinement and drafting of the WLA Community Plan with no further outreach to the WNC, the WNCLUC and the community and then begin the environmental review process (an EIR) required under the regulations of the California Environmental Quality Act without any further opportunity to review and provide comments regarding the refined concepts and draft WLA Community Plan. We were notified that the environmental review process on the draft Community Plan which has not been written nor seen by the community is anticipated to begin in early 2021. This is a violation of due process and is unacceptable. The WNC and the community must have an opportunity review and comment regarding the revised concepts and the draft Community Plan and a sufficient amount of time to do so. This should entail more time than was allocated to respond to the draft concepts.

The WNC expects the development of the WLA Community Plan to be a collaborative process and partnership with City staff. It should be noted that the WNC has received complaints regarding the outreach process especially in light of the impacts and complexity of the COVID-19 pandemic to stakeholders' lives (and WNC Board members). Additional time should be provided for each stage of the planning and environmental review process especially as the COVID-10 pandemic continues and we request that City staff discuss adequacy of timeframes throughout the process before deadlines are established. It would also be helpful to notify the WNC Chair and the WNCLUC Co-chairs in advance of completion of the refined concepts and draft Community Plan is coming to a close and nearing release to the community so that we can notify people to anticipate its arrival.

We are also concerned that completing the entire process at the present time without the benefit of knowledge regarding the impacts and changes that will occur from COVID-19 to the land use landscape does a disservice to the community. Many factors that could influence community needs and demands including the appropriate locational and quantitative considerations of land use typology and form are not

known yet. As one example the size and operational characteristics of office uses will likely change. Also, with large scale closure and reduction of many types of uses and businesses, future demand is unknown. It seems that while some work can continue on the Plan that completion of a draft Community Plan should be delayed and not be completed until the outcome of COVID-19 impacts are better understood and analyzed. The WLA Community (both residents and businesses) will have to live with the consequences of the decisions made in the WLA Community Plan for many years to come.

The WNC is also concerned about the relationship of preparing the WLA Community Plan and the ReCode LA process. The WNC does not support the rezoning of any property within the WNC boundaries or the modification of any design guidelines, design standards or other zoning regulations that would affect the WNC area until the WLA Community Plan process is complete. This is critical as policy issues in the WLA Community Plan once adopted should inform the decision-making process for zoning code changes in our area.

With one exception relating the WLA and Palms boundary properties around Sepulveda and National Boulevards, the WNC's comments regarding recommendations on land use categories and proposed land use changes addressed in this letter only address properties within the WNC boundaries. However, the WNC believes that as the draft concepts are refined and the updated WLA Community Plan is being drafted additional outreach should occur relating to streets that abut two or more Neighborhood Council boundaries to ensure coordinated planning, design and policymaking. We share boundaries on the north and south with other Community Plan areas that divide two important corridors, namely Santa Monica Boulevard and National Boulevard

LAND USE CATEGORIES AND PROPOSED LAND USE CHANGES PER CITY'S DRAFT CONCEPTS AND INTERACTIVE MAP:

The Westside Neighborhood Council Land Use Committee recommendations regarding the areas proposed for land use changes are as follows:

COMMERCIAL AREAS:

City Proposed Changes:

Land Use Change Category: Neighborhood Commercial

Location: West and east side of Sepulveda Blvd. north of National Boulevard (to the alley on the west side and mid-block on the east side)

Position: Support

Background and Comments: Neighborhood Commercial of 2 to 4 stories with neighborhood serving or community serving commercial/retail pedestrian-oriented uses such as banks, restaurants and newsstands is appropriate for this location. It is already commercial uses similar to the description and is adjacent to the 405 Freeway. It preserves existing uses while allowing possibly a little greater height. The existing C2-1VL Zoning allows 3 stories and 45 feet in height currently. It is adjacent to 4-story residential uses immediately to the north. It is the only commercial zoning in the WLA Community Plan in the triangular shaped area located between the 10 freeway, 405 freeway and National Boulevard that serves that residential neighborhood. The commercial uses on the south side of National Boulevard are located within the Palms-Mar Vista Del Rey Community Plan area. The existing zoning on the south side of National Boulevard at both corners (Vons shopping center, Ross Dress for Less and Big Lots sites) are zoned C2-1VL as well which allows 3 stories and 45 feet currently. These sites are proposed to be changed to Neighborhood Serving Nodes and Transit Oriented Development Land Use Category which will allow 4 to 6 stories in height with additional height

allowed for affordable housing. These properties are anticipated to be converted to high rise multi-family housing at some point and will result in the loss of commercial retail uses. Although these sites proposed for land use changes are outside of our WLA Community Plan area, we are very concerned and would like to ensure that at least one site is maintained for placement of essential community services such as a supermarket. This is further reinforced by the fact that all the commercial zoning on the west side of the 405 at National including the Ralphs Market property are also proposed for this new land use category. Therefore, it could effectively eliminate any market serving these residential neighborhoods.

Land Use Change Category: Neighborhood Commercial
Location: East side of Overland Avenue at Coventry Avenue
Position: Oppose
Background and Comments: Westwood Gardens Civic Association, Inc. opposes this concept because of impacts to single-family residential neighborhood. They want to retain single-family residential character.

Land Use Change Category: Neighborhood Commercial
Location: West side of Overland Avenue on the south side of Clarkson Road
Position: Oppose
Background and Comments: Westwood Gardens Civic Association, Inc. opposes this concept because of impacts to single-family residential neighborhood. They want to retain single-family residential character.

Land Use Change Category: Neighborhood Commercial
Location: East side of Overland Avenue immediately adjacent to the north side of Palms Park
Position: Oppose
Background and Comments: Westwood Gardens Civic Association, Inc. opposes this concept because of impacts to single-family residential neighborhood. They want to retain the single-family residential character. Additionally, this could create an unsafe condition for park users crossing back and forth to Palms Park.

Land Use Change Category: Mixed-Use Corridor
Location: Westwood Blvd. north of Olympic Boulevard to the alley just south of Santa Monica Boulevard and the southeast and southwest corners of Westwood and Olympic Boulevards (the parcels housing the existing corner shopping centers)
Position: Support additional capacity but oppose draft concept as presented; Substitute 45-foot height limit and implement Neighborhood Mixed Use (NMU) Zone
Background and Comments: Westwood Boulevard has more limited vehicular carrying capacity as a minor arterial corridor with smaller lots with less depth adjacent to single-family residential uses with no alley buffer. The NMU has stepdown protections at the rear of buildings for single-family residential neighborhood protection.

Land Use Change Category: Mixed-Use Corridor
Location: North side of Pico Blvd. east of Overland Avenue to Patricia Avenue
Position: Support additional capacity but oppose draft concept as presented; Substitute 45-foot height limit with rear stepdown through implementation of Neighborhood Mixed Use (NMU) Zone
Background and Comments: Pico Boulevard has more limited vehicular carrying capacity as a minor arterial corridor with smaller lots with less depth adjacent to single-family

residential uses. The NMU has stepdown protections at the rear of buildings for single-family residential neighborhood protection.

Land Use Change Category: Mixed-Use Corridor
Location: South side of Pico Blvd. east of corner parcel at Overland Avenue to Patricia Avenue
Position: Support additional capacity but oppose draft concept as presented; Substitute 45-foot height limit with rear stepdown through implementation of Neighborhood Mixed Use (NMU) Zone
Background and Comments: Westwood Boulevard has more limited vehicular carrying capacity as a minor arterial corridor with smaller lots with less depth adjacent to single-family residential uses with no alley buffer. The NMU has stepdown protections at the rear of buildings for single-family residential neighborhood protection.

Land Use Change Category: Mixed-Use Corridor
Location: East side of Overland Avenue south of Pico Boulevard to Esther Avenue
Position: Oppose draft concept as presented for 4 to 6 stories; Substitute 45-foot height limit with rear stepdown through implementation of Neighborhood Mixed Use (NMU) Zone for the blocks between Blythe and Esther; Future development of the corner site (Citibank) on Overland between Pico and Ayres Avenue must be mindful of community concerns related to traffic and circulation at this busy corner.
Background and Comments: Stakeholders voiced opposition to this proposed land use change. The current zoning is C1-1VL-O for the two blocks between Blythe and Esther which allows 3 stories and a 45-foot height limit but with no stepdown in the rear adjacent to the single-family neighborhood. This zone also allows oil drilling through an oil overlay zone. Blythe north to Pico is zoned C2-1VL-O-POD. This zone also has a 3 story and 45-foot height limit but with different uses allowed including hospitals and larger uses. It also has the oil drilling overlay zone. It has pedestrian-oriented design standards as well. WNCLUC recommends opposing the proposed concept but recommending an alternative to replace existing zoning with the NMU Zone that is proposed by the WNCLUC for Pico and for Westwood as it has the same height limit of 45 feet but it has a stepdown in the rear for transition to the single family residential neighborhood and it would eliminate the oil drilling overlay zone. The proposed concept does also include target of southeast corner of Overland Avenue (Citibank site) from Overland to Ayres Avenue for affordable housing/workforce housing.

Additional Areas for Consideration:

Land Use Change Category: Mixed-Use Corridor
Location: Westwood Blvd. from the alley north of Pico Boulevard to the southern end of the proposed Westwood Boulevard Mixed Use Corridor (to the southeast and southwest corners of Westwood and Olympic Boulevards where the parcels housing the existing corner shopping centers are located)
Position: Support additional capacity but only with extension of NMU Zone (45-foot height limit with stepdown of height at rear of buildings adjacent to residential uses). 96% of residents on Glendon and Midvale support this concept.
Background and Comments: Westwood Boulevard has more limited vehicular carrying capacity as a minor arterial corridor with smaller lots with less depth adjacent to single-family residential uses with no alley buffer. The NMU has stepdown

protections (25-foot maximum height) at the rear of buildings for single-family residential neighborhood protection.

Land Use Change Category: Housing Opportunity Zone for Workforce Housing
Location: North Side of Pico Blvd. Carwash site at northeast corner of Beverly Glen
Position: Support
Background and Comments: Existing multi-family residential uses are already located behind this site on Almayo Avenue. This site has convenient access to public transportation and commercial uses on the Pico corridor. Additional community outreach is needed to determine the appropriate use type, number of stories/height, and building form that is suitable for this site however the number of stories should be equivalent or exceed the height/stories of the multi-family uses behind it. .

Land Use Change Category: Mixed-Use Corridor
Location: South Side of Santa Monica Blvd. east of Sepulveda Boulevard to Fox Hills Drive/Century City
Position: Support
Background and Comments: Larger commercial corridor can handle larger development with greater roadway capacity. This corridor has existing alley buffer separating commercial from residential uses. There is existing multi-family housing for a minimum of one block south of the boulevard with heights up to 5 stories.

INDUSTRIAL AREAS:

City Proposed Changes:

Land Use Change Category: Industrial
Location: Sepulveda Blvd. between Olympic Boulevard and Nebraska Avenue
Position: Support
Background and Comments: This allows for industrial uses to come to the sidewalk, parking access to occur off Pontius Avenue and to eliminate dangerous parking situations where parking backs up onto Sepulveda Boulevard.

Additional Areas for Consideration:

No specific locations for opportunities to provide more industrial areas were proposed through community outreach efforts, however preservation of remaining existing industrially zoned areas are crucial because of loss and erosion of industrial zoning that resulted from adoption of EXPOTNP.

OPEN SPACE AREAS:

No new areas are proposed for Open Space or Parks but propose improved park access at Palms Park. Certain improvements and completion of existing projects underway such as the Westwood Neighborhood Greenway Project are supported.

Additional Areas for Consideration:

No specific locations for opportunities to provide more open space and parks were proposed through community outreach efforts or in the draft concept presented. However, consideration should be given to requiring more open space/landscaping incorporated into multi-family residential and mixed-use development (excluding rooftop locations) or option to provide revenue for open space and parkland through developer impact fees to fund additional parks/open space areas in the future.

RESIDENTIAL AREAS:

City Proposed Changes:

Land Use Change Category: Medium Residential
Location: Bentley Avenue between La Grange Avenue and Missouri Avenue
Position: Alternatives for exploration
Background and Comments: Residents on Bentley are almost equally split (56% oppose/44% support). West side of Bentley wants the proposed changes and the east side of Bentley does not want proposed changes; additionally, residents on Camden backing up to the properties on the east side of Bentley do not want the proposed changes. Primary factors for opposition is based upon impacts of increased density, larger buildings, and added traffic. Primary factor for support by residents on west side of Bentley are because of different issues they face largely related impacts from commercial at the rear of their properties, homelessness and crime. These residents want option to up zone and potentially sell their properties. LUC Board has begun exploring ideas regarding alternative compromise but do not have definitive response at this time. If proposed changes were to proceed in some manner for the west side of the street, it would be critical to keep lower height on front of building to have less impact on streetscape and neighbors with the possibility of a taller structure at the rear backing up to the commercial uses. This area warrants additional outreach by City staff to try to resolve these issues.

Land Use Change Category: Low Residential
Location: East side of Camden to the west side of Midvale Avenue from the alley North of Pico Blvd. up to Missouri Avenue
Position: Oppose
Background and Comments: This replaces existing R1-1 zoning on single family streets with new zoning (similar to the R1-V2) that would allow larger homes. This allows larger homes. It should be noted that it does not add housing units or potential for retaining more affordable housing. 93% of stakeholder responses in Westwood South of Santa Monica (WSSM) Homeowners Association opposed this proposed change.

Land Use Change Category: Low Medium Residential Transition
Location: East side of Midvale Avenue from the alley north of Pico Blvd. up to Missouri Avenue
Position: Oppose
Background and Comments: 100% opposition from residents for loss of single-family residential character to their neighborhood; support NMU Zone extension on Westwood down to Pico to offset housing units (see discussion under additional areas for consideration discussion in the Commercial section).

Land Use Change Category: Low Medium Residential Transition
Location: West side of Glendon Avenue from the alley north of Pico Blvd. up to Missouri Avenue
Position: Oppose
Background and Comments: 100% opposition from residents for loss of single-family residential character to their neighborhood; support NMU Zone extension on Westwood down to Pico to offset housing units (see discussion under Commercial additional areas for consideration discussion)

Land Use Change Category: Low Residential

Location: East side of Glendon Avenue to the west side of Overland Avenue from The alley north of Pico Blvd. up to La Grange Avenue/Mississippi Avenue (block with elementary school is excluded from change)

Position: Oppose

Background and Comments: This replaces the existing R1-1 zoning on single family streets with new zoning (similar to R1-V2) that would allow larger homes. There is an overlay area for several homes on the west side of Overland Avenue that have extra design protections of historic character. It should be noted that it does not add housing units or potential for retaining more affordable housing. 93% of stakeholder responses in WSSM Homeowners Association opposed this proposed change. It is important to note that there are two homeowner groups that include the Overland Avenue corridor from Pico Boulevard to Santa Monica Boulevard. WSSM covers a large area that includes Overland. The second community group, the Overland Avenue Committee, had a mix of responses but did include some support for this proposed change.

Land Use Change Category: Low Medium Residential

Location: Linnington Avenue (north of Olympic Boulevard)

Position: Oppose

Background and Comments: Residents oppose (97%) as follows: single-family residential character of street will be lost: the street is narrow, hilly and curvy with poor visibility (dangerous); insufficient on-street parking availability currently; existing conditions cannot reasonably support additional density. Topography provides a natural buffer between Linnington Avenue and Beverly Glen Boulevard.

Land Use Change Category: Low Residential

Location: Portions of Benecia Avenue south of La Grange Avenue, Portions of Comstock Avenue, and area generally southeast of La Grange Avenue to and including the east side of Fox Hills Drive north of Olympic Blvd. and the westside of Midvale Avenue (excludes existing areas zoned commercial near Olympic and multi-family zoned parcels on the north end of the area up to Santa Monica Boulevard)

Position: Support

Background and Comments: This replaces the existing R1-1-O zoning on single family streets with new zoning (similar to R1-V2) that would allow larger homes. It should be noted that it does not add housing units or potential for retaining more affordable housing. The Century Glen Homeowners Association Board supports this proposed change. It should be noted that a limited number of comments were received regarding this land use change for this area at the Land Use Committee virtual meeting and in written communication received after the Land Use Committee Meeting in proportion to the number of properties affected. However, all of the comments received were in favor of the proposed change except one.

Land Use Change Category: Low Medium Residential

Location: Orton Avenue/Keswick Avenue/Kerwood Avenue (south of Olympic Blvd.)

Position: Oppose

Background and Comments: Residents universally oppose as follows: single-family residential character of street will be lost: the street is narrow and curvy with poor visibility (dangerous); insufficient on-street parking availability currently; existing conditions cannot reasonably support additional density.

Land Use Change Category: Low Residential Historic
Location: Cheviot Hills neighborhood south of Cheviot Hills Park generally east, west and southwest of Motor Avenue (Monte Mar area)
Position: No position
Background and Comments: No position as LUC only received three comments opposing the proposed change at the LUC virtual meeting in September and no letter from the Cheviot Hills Homeowners Association has been received.

Land Use Change Category: Low Medium Residential
Location: West side of Overland Avenue from the Exposition light rail line north to Blythe Avenue
Position: Oppose
Background and Comments: Stakeholders voices opposition to this proposed land use change. Westwood Civic Gardens Association opposed this proposed land use change and the West of Westwood Homeowners Association (WOWHOA) supports their position. These 4 blocks do not have parcels that face Overland Avenue. The parcels face the side streets and are an integrated part of the single-family residential neighborhood. The proposed change would negatively impact the existing single-family residential neighborhood character. Additionally, Ashby is especially narrow and is already has extensive traffic and parking impacts as a residential connector between Westwood and Overland and as the connection to Overland Avenue Elementary School which serves a broad neighborhood area that extends far west of Westwood Boulevard.

Land Use Change Category: Low Medium Residential
Location: West side of Overland Avenue from the Exposition light rail line south to the Notre Dame Academy property
Position: Oppose
Background and Comments: Westwood Gardens Civic Association, Inc. opposes this concept for these two blocks on the west side of Overland Avenue because of impacts to single-family residential neighborhood both along Overland Avenue and for the single-family residents directly behind these properties. They want to retain single-family residential character; concerns regarding traffic and high speed nature of street.

Land Use Change Category: Low Medium Residential
Location: West side of Westwood Boulevard south of the Santa Monica Freeway to the north edge of the corner commercial shopping center at Westwood and National Boulevards (northwest corner)
Position: Oppose
Background and Comments: Westwood Gardens Civic Association, Inc. opposes this concept because of impacts to single-family residential neighborhood. They want to retain single-family residential character; Concerns regarding traffic and parking.

Land Use Change Category: Medium Residential
Location: North side of National Boulevard for the parcels on the northwest and northeast corners of National and Midvale Avenue (midblock on the west to the alley on the east)
Position: Oppose
Background and Comments: Westwood Gardens Civic Association, Inc. and West of Westwood Homeowners Association opposes this concept because of impacts to single-family residential neighborhood. They want to retain single-family residential character; concerns regarding traffic and parking.

Land Use Change Category: Low Medium Residential
Location: East and west side of Bentley Avenue from the alley south of Exposition Blvd. up to Brookhaven Avenue
Position: Oppose
Background and Comments: Residents on this street oppose the proposed change and West of Westwood Homeowners Association is opposing this change. It will change the single-family neighborhood character on a narrow street with existing overcrowded street parking conditions.

Land Use Change Category: Low Medium Residential
Location: Pearl Street neighborhood generally west of Sepulveda Boulevard, east of the 405 Freeway, north of the Santa Monica Freeway and south of Exposition Boulevard.
Position: Oppose
Background and Comments: Residents in this small neighborhood oppose the proposed change and West of Westwood Homeowners Association is opposing this change. This neighborhood has small narrow streets and is landlocked with limited and difficult access because of the 10 freeway to the south and 405 to the west limiting access to only from Sepulveda Boulevard to the east. It will change the single-family neighborhood character on a narrow street. Additionally, it has been determined that the Los Angeles Department of Transportation (LADOT) will not approve a signal at Richland and Sepulveda which the neighborhood has requested for years because LADOT states that the light at the Sepulveda Boulevard/ Exposition Boulevard intersection is too close.

Additional Areas for Consideration:

Land Use Change Category: Low Residential
Location: Single-family neighborhood generally east of Beverly Glen, south of Olympic Boulevard, and north of the multi-family zoned properties north of Pico Boulevard and west of Fox Hills Drive limited to the single-family zoned properties within the Century Glen Homeowners Association boundaries, with exclusions for the properties on Orton Avenue, and the portions of Kerwood and Keswick Avenues currently proposed for other land use changes by the City. More specifically the properties on the north side of Keswick between Kerwood and Orton and the properties on the east side of Kerwood Avenue between Olympic Boulevard and Keswick Avenue would be excluded.
Position: Support; recommend City conduct additional outreach especially with the residents on Kerwood and Keswick Avenues.
Background and Comments: Late in the planning process after the Land Use Committee was wrapping up its work on the recommendations, comments and requests came in from the Century Glen Homeowners Association and some of its stakeholders about rezoning property within their jurisdictional boundaries to match the City's proposed changes for the single-family residential area north of Olympic Boulevard. Although the Land Use Committee has not had adequate time to review and analyze all the zoning for each parcel in the single-family neighborhoods within the Century Glen Homeowners Association boundaries south of Olympic Boulevard consistent with the LUC's work in all the other neighborhoods proposed for change, we believe that their request for new zoning similar to R1-V2 would generally replace the existing R1-1-O zoning on the single family streets. The exception is that the portions of Orton, Kerwood and Keswick Avenues proposed for other upzoning by the City, where those residents specifically opposed the City's proposed

changes. These areas would be excluded unless verifiable additional outreach confirmed their support for the change to be added to Orton Avenue, or the excluded side of the street on Kerwood and Keswick. Therefore, as a point of clarification the R1-V2 would allow larger homes but it does not add housing units or potential for retaining more affordable housing. The Century Glen Homeowners Association Board supports this proposed change as stated earlier. _ residents who reside in the Century Glen Homeowners Association south of Olympic supports the change and _ residents do not were received as of October __th. Additionally, the Land Use Committee is continuing to receive comments.

Also see additional areas included in commercial (mixed-use) category above.

POLICY ISSUES:

REFINEMENTS OF GUIDING PRINCIPLES AND OPPORTUNITIES

I. Housing: Increase (and preserve) housing opportunities at different affordability levels.

- A. Preserve R1 residential areas in full in the WNC area of the WLA Community Plan. Los Angeles should first investigate all other means to provide ample housing in our communities before considering the possibility of allowing additional density on single-family properties (units/lot).
- B. Preserve existing affordable and missing “middle” housing. Promote and support anti-displacement policies.
- C. Create opportunities for construction of workforce and missing “middle” housing. Explore opportunities to lease (not sell) City-owned properties for this housing. Explore possible development incentives for select identified corner commercially zoned properties on major corridors.
- D. Update TOC Guidelines to be more sensitive to adjacent properties and the community as pertains to parking standards, stepdowns, etc. to better reflect differences between adjacent land uses.
- E. Regulate design of higher density buildings on major corridors with stepbacks (tiering) and sufficient setbacks to adjacent properties of lesser height. Use landscaping setbacks, stepbacks and articulations/breaks in building design to lessen the negative impacts of new construction.
- F. The scale of all construction should be done in consideration to lot size and in proportion to street and sidewalk width, neighborhood character and adjacent properties.
- G. Explore new building form (design) opportunities.
- H. Explore applications of alternative housing forms including but not limited to: Cooperatives, Microunits, Manufactured Housing, Container applications, Shared living arrangements.
- I. New construction on Santa Monica Blvd. shall have stricter, codified development standards that require better design in line with scenic roadway guidelines. As a wide divided boulevard with frontage roads, Santa Monica Blvd. has the character and capacity to “host” larger scale mixed use or wholly residential buildings. Seek oversight by Westwood Design Review Board.
- J. New construction on Westwood Blvd. shall have stricter, codified development standards to promote better design and avoid construction of boxed shaped buildings and must require articulation on all facades (when visible). Same for Pico.
- K. Streets that fall within PODs and NODs should have added design criteria mindful of their pedestrian orientation.
- L. Explore, encourage and promote opportunities for adaptive re-use of office space, hotels/motels, and other commercial and residential properties to provide housing over less environmentally sustainable and more damaging demolition.
- M. Encourage environmentally sustainable practices, including onsite solar installation and the preservation of neighboring property’s solar installation rights.

- N. Property owners who choose to develop under the City's RAS (Residential Accessory Use Zone), a zone implemented to allow for residential uses on former commercial corridors, are not required to maintain ground floor commercial uses even though this zone is viewed as a "mixed use" zone. For the properties that lie within the Pico Westwood Neighborhood Oriented District (NOD) and the NMU zone, all developments include at least a minimum amount/percent of active ground floor (visible to street) pedestrian-oriented uses. In past years, all ground floor uses were sought to be those active uses; however in the current pandemic and with the ever-growing presence of online commerce replacing many brick and mortar businesses, it is time to consider whether a percentage (or sliding scale of square footage depending on the nature of the use) can be established as a part of this Community Plan.
- O. The provision of off-street parking serves many purposes and should not summarily be eliminated under the guise of "proximity to transit." Lack of off-street parking negatively impacts neighborhood beauty, relations with neighbors, and personal safety in exchange for reduced construction costs. Establish minimum parking standards in areas already "parking poor" for new duplex, multi-family and ADU units. (How does one charge an EV vehicle without a dedicated on-site parking area?)

II. Industrial: Preserve industrial land and support reimagined 21st century industrial uses

The preservation of the light manufacturing/industrial zone that lies adjacent to the 405 provides the land needed for essential services as well as current and future jobs that do not belong in a more traditional office environment. The West LA area is home to a world-renowned university, major medical center and one of the City's 20 city centers in Century City. All these places provide primarily professional and white collar job opportunities. The light industrial zone provides job opportunities for the provision of trades essential to the functioning of a well-rounded community such as animal care (veterinary, boarding, daycare), car washes, gyms, wine storage facilities, storage facilities, auto repair shops, body shops, building supply stores, lumber yards, welding shops, small manufacturing businesses and a variety of uses typically located in industrial zoning districts. These are essential services and residents and business people should not have to travel great distances to access these types of facilities. By having these needed facilities nearby, the community plan will reduce travel time, greenhouse gas emissions and other impacts of unnecessary vehicular use.

It is not appropriate to locate housing in this zone as housing is often an incompatible use with these facilities which results in friction and endangers the survival of the industrial zone and those operating within it. This zone also provides employment opportunities for blue collar workers at the current time and as the face of business changes, will provide needed land for new forms of industry.

For the health and safety of those working in this zone, it is recommended that building standards include requirements for hi-quality HIPAA filtration in air circulation systems due to its proximity to the 405 freeway.

III. Jobs and Employment: Support a thriving and inclusive economy

As noted in the demographic charts presented by the Planning Dept., the WLA Community Plan area is fortunate to benefit from a broad range of employment opportunities within its boundaries or directly adjacent to it. Major employment areas include Century City with many Class A office buildings (one of LA's 20 city centers), Fox/Disney Studios, as well as the UCLA campus and UCLA Medical Center, Westwood Village, the Veterans Administration and VA Hospital. We will soon have a major Google presence in the former Westside Pavilion location. There is significant office space available on the Olympic corridor to our west and as it continues on into Santa Monica. The City of Beverly Hills with its commercial district, entertainment-related business offices, and tourist destinations is just across the border from Century City.

The presence of these many job opportunities makes our area attractive to future employers as well as being a location where those employees wish to live. Having higher cost residential communities (Santa

Monica and Beverly Hills) to our east and west also creates additional demands on our housing stock as we may appear to be a more “affordable” residential community for those working in those cities.

The employment centers bring a great diversity of residents to our area who wish to live in close proximity to their place of work.

The presence of the Exposition Light Rail line makes access to the employment (and education) opportunities in this community more accessible to those from throughout the region. The completion of the Purple Line to its western terminus will markedly increase access as well with its stops in Century City and Westwood Village – thus reducing travel-related barriers to access for many across the region.

IV. Accommodating Growth: Accommodate growth in a strategic, inclusive, equitable, and sustainable manner

Accurate current population data as well as realistic and well-founded population projection data is required to do good planning. Crafting a community plan without accurate knowledge about current building capacity is not possible.

The ongoing collection of key data is also needed to understand whether the plan’s policies are accomplishing their intended goals.

- A. Design ongoing data capture mechanisms to measure the performance and impacts of new and existing land use forms. Implement ongoing surveys to establish both baseline and periodic experience of residents in transit-adjacent properties to determine if project conditions are accurately reflecting project behavior and to shape future policy decisions. Design reporting protocols and mechanisms to gather relevant data to establish travel and vehicle ownership behavior of residents living in TOD and TOC developments (any projects receiving additional density based upon proximity to transit). Provide transit density bonuses only in areas where behaviors are shown to warrant such densities.
- B. Seek re-establishment of a regular and coordinated biannual (or at most every five years) City infrastructure evaluation that results in guiding development to where there is adequate infrastructure capacity.
- C. Require mandatory reporting on the performance of required TDM programs.
- D. Design ongoing review processes that monitor compliance with project conditions.
- E. Perform periodic and regular assessment of population projections to make adjustments to population assumptions as needed. Reflect significant changes in plan revisions.

V. Design & Compatibility: Strengthen neighborhood character

It is not enough to “encourage” good design standards. There must be qualitative and quantitative language that implements and operationalizes it.

- A. Utilize tools in ReCode to establish design standards for our major corridors that result in buildings with articulation, good proportion, harmony with streetscape.
- B. Because Santa Monica Blvd. is a SCENIC ROADWAY, it is appropriate to establish a process to provide oversight on the design elements of future construction on Santa Monica Blvd. It is recommended that the Westwood Design Review Board’s (DRB) area of attention be expanded south from its current boundary to have jurisdiction over both the north and south sides of Santa Monica Blvd. It is awkward to have the planning process of this important street split between two different community plan areas without a formal mechanism for coordination; by establishing a design review process and by placing that responsibility under the watchful eye of the Westwood DRB consistent design standards, once defined, can be maintained.
- C. Require rear setbacks and tiering where higher density properties abut lower density properties.
- D. Extend and strengthen the language of the Pico/Westwood Neighborhood Oriented District that restricts certain types of signage to address new forms of technology.

- E. Consider review of prohibited uses within the NOD.
- F. Adopt an on-site sign program for buildings on all commercial corridors.
- G. Adopt policies that severely limit (or ban) the installation/placement of digital billboards.
- H. Take advantage of opportunities to underground utility wires and poles whenever feasible.
- I. In instances where there might be a change from single family R1 zoning to duplex or other low density residential form within an R1 community or on one side of a street, it is imperative that the new housing adhere to those design elements that characterize a single family R1 neighborhood. Those properties must include onsite parking, front and back yards, a maximum 30 foot height (which allows a two story structure with a pitched roof).
- J. Extend the northern boundary of the Pico Westwood NOD to the alley just south of Santa Monica Blvd. There appears to be no rationale for its exclusion. This would serve to connect the NOD with the Westwood Blvd. POD north of Santa Monica Blvd.
- K. Eliminating on-site parking in multi-family developments (and others) has not increased transit use and reduced fossil-fuel vehicle use. It is imperative to provide needed parking in order to keep vehicles off the street and reduce overcrowding of our street parking. Removal or unbundling of parking is not stopping those who wish to have a vehicle or drive from doing so. Filling streets with parked cars makes streets more difficult to navigate for all and compromises public safety. This is especially true for the narrow substandard street widths.
- L. Small Lot Subdivision projects shall maintain the rear and front setbacks of existing homes/adjacent properties. Currently these projects do not relate to the surrounding context. Standards that require breaking down the massing, height and façade of these projects will make them more compatible in their setting.
- M. Explore historic preservation designation of any potential candidates within the Plan area.

VI. Open Space: Expand access and connections to open space

This community is currently documented as being a “park poor” community relative to our population / parkland ratio and in comparison to many other areas of the City.

- A. The Community Plan must have strategies for preserving and creating open space.
- B. The Community Plan must not offer or allow projects to apply for a reduction of open space on the menu of available building incentives.
- C. Develop mechanisms to raise fees/funds to finance the purchase of new open space.
- D. Acknowledge the fact that open space within 1,000 feet of a freeway is not to be considered *usable* open space due to exposure to fine particulate matter (a public health hazard). Thus, for residential housing within 1000 feet of a freeway, develop mechanisms to capture the value of the required open space and create an escrow fund (or other financial tool) in which to place those funds (and those from other nearby similar developments) to purchase open space, insure, improve or provide security in order to gain access to existing open space (such as to establish a shared use agreement with a local LAUSD campus).
- E. Larger scale projects that exceed a defined number of square feet shall have therequirement to provide open space that is accessible to the public during daylight hours.
- F. For corner properties, establish landscape and setback requirements that result in the creation of ground floor open space.
- G. Seek opportunities to obtain open space-related community benefits from development projects that seek variances from established planning rules.
- H. Leverage and combine funds for open space from all available funding sources to result in added community open space. Remove impediments to the creation of new open space.

VII. Mobility: Promote a safe, effective walkable, and multi-modal transportation network

- A. Just as developers have often been required to widen streets as part of their project conditions during the entitlement process, so too, should the City have tools to require developers to widen the sidewalks adjacent to their properties in the event that such widening would benefit and serve

a community streetscape plan. Sidewalks are more inviting when they are at least 6 feet wide. Our current 5-foot sidewalks are often narrowed or obstructed.

- B. No waivers should be allowed for reduced standards below minimum roadside width.
- C. Sidewalks should be designed in proportion to the street width and building heights adjacent.
- D. Sidewalks should not be obstructed with utility poles. Do not permit large poles to be placed in the middle of sidewalks (see Sepulveda/Pico adjacent to Anawalt).
- E. Bus shelters placed on our narrow sidewalks should not make passage difficult. Seek shelter redesign to reduce depth of shelter on sidewalk.
- F. Prohibit placement of sidewalk “public amenity kiosks.”
- G. Work with policy makers and transit providers to explore need for and potential location for a Westside Mobility Hub/Center. (The so-called Westside Transit Center is located in the Mid-City area at Pico/Rimpau.)
- H. Analyze need for a local micro transit offering to connect potential riders to transit and major local destinations (UCLA Medical Center, EXPO station, Purple Line subway station, major employment hubs (UCLA, VA, Century City).
- I. Acknowledge that some streets should have priority for vehicles and discourage bicycle and scooter use on those streets to facilitate the flow of traffic and for public safety.
- J. Identify secondary streets for safe passage of/for bicycle riders.
- K. As/if streets are re-zoned to allow for significantly taller buildings and increased density, the dedication of wider sidewalks should be considered to promote pedestrian walkability. (Are there citywide standards on this?)

VIII. Complete Neighborhoods: Encourage vibrant, healthy, complete neighborhoods

As the City adds density, it is critical that it remain a City that provides the infrastructure and amenities that welcomes the young and old and all those in between. As density increases (often with housing unit sizes reduced), with little attention paid to the need for parks and open space, Will Los Angeles come to be seen as an unfriendly city for those who are looking for a place to raise their family?

- A. Ensure the availability of all types of housing to serve people at all different ages and stages of their lives.
- B. Seek opportunities to create shared public spaces: One characteristic of a vibrant community is reflected in the presence of a public space where people can gather to share experiences; in Southern California such spaces are often outdoor spaces (different from green open space). One goal of our Community Plan should be to establish such a publicly accessible space whether in conjunction with (on site of) a development project or free standing.
- C. Demands and development on corridors should be reflective of both their physical attributes and the role that they play in mobility. Major arterials such as Santa Monica and Wilshire Blvds. have a different carrying capacity and character than secondary arterials. Pico Blvd. in the WNC portion of the WLA Community Plan is very different than from the Pico corridor just west of the 405 freeway and from Wilshire and Olympic Blvds. While a wide street, Olympic is very different from Pico and Santa Monica Blvds. in that it is for the most part (until just west of Century City), a residential R1 street and shall be preserved as such.
- D. Continue to build upon the Pico Streetscape Plan to partner with businesses and residents to further the improvement of our commercial heartland streets: Pico and Westwood Blvds. Encourage physical improvements in the streetscape and the retention and recruitment of a balance of neighborhood-serving businesses and services in walking distance from the residential communities.
- E. What is needed to fully implement Santa Monica Blvd. Scenic Roadway designation?

IX. Climate Change Resilience: Promote resource protection, resiliency planning and climate change adaptation

- A. Repurpose existing buildings as they become available whenever feasible.

- B. New construction shall be required to meet Cal Green Standards, meet or exceed LEED Platinum tier and be required to install solar panels.
- C. Trees are recognized as a valuable resource in fighting climate change, reducing heat island effect and in contributing to a more attractive urban environment while providing habitat for numerous species. The WLA Community Plan should elevate the importance of our urban forest with the following policies:
 1. Tree planting requirements shall be increased for all parcels, including those in commercial areas. In-ground planting (as opposed to container planting) shall be required with sufficient surrounding unpaved area to allow for survival and growth.
 2. Tree preservation strategies shall be strengthened to retain mature trees when healthy and whenever possible.
 3. Street widening orders that would result in the removal of mature trees shall only be carried out when contiguous widening can/will be done within a defined period of time. An escrow mechanism shall be established to capture the cost of widening the adjacent street for use in a location within the area (to provide nexus) where a demonstrated need for widening has been shown. Where contiguous street widening is not currently possible, seek a recorded irrevocable offer to dedicate land which runs with the land and can be implemented when acquisition of a full block or contiguous stretch of street is possible.
 4. Tree replacements shall be required to be a minimum of 36-inch box trees. Replaced trees must be watered and cared for until established, a minimum of three years.
 5. Street trees should be preserved whenever possible during sidewalk repair or replacement. City to consider installation of meandering sidewalks, alternative pavement surfaces, etc. within ADA compliance.
 6. Tree wells shall be of sufficient size for healthy growth of trees and maintained so as not to constrict their growth.
 7. Expand planted areas around tree wells in city streets where feasible. Parkways are intended to contain plant material, not concrete or other permanent man-made material.
 8. Establish a local urban forestry program designed to protect existing trees, improve local streetscapes and promote the good care of and planting of an expanding urban forest. Seek implementation of an Urban Forest inventory with plan to incentivize replacement of dead or missing trees.
 9. Replacements of removed trees must be planted on site whenever possible (and if not, in close proximity to the development project). Tree replacement ratios to be based on size of tree(s) removed to replace lost canopy as quickly as possible.
- D. Front double driveways shall not extend past the sidewalk to the curb which, when they do, threaten parkways, the trees on them, and unpaved landscape opportunities (that promote replenishment of the water table and reduced sewer runoff).
- E. Parkways shall be unpaved wherever possible. When possible, remove pavement from city parkways and install permeable surfaces. (See parkway at Menorah Housing project on Pico Blvd./Veteran Ave. where a pilot project removed pavement from the parkway and established a parkway with existing mature Ficus trees. With adequate unpaved area surrounding them, the former sidewalk/root conflicts that existed were resolved.)
- F. Establish landscape minimum standards for each land use category in the community plan. Enforce existing landscape standards (including prohibition of paved front yards).
- G. Wherever feasible (and where ADA requirements can be maintained), maintain 10-foot parkway green buffer between pedestrians and roadway uses.
- H. For those properties within 1,000 feet of a freeway location, install HIPAA filter and assure that maintenance protocols are followed with inspections. (HCID to incorporate filter purchase and installation/change records when doing regularly scheduled housing inspections.) Develop language to be given to new tenants of such buildings that informs residents of the importance of proper filter maintenance (along with a contact number to report if they are not), schedule for filter maintenance and related pertinent information related to requirements for maintaining safe indoor air quality.
- I. Establish uniform awning standards for locations over the public right-of-way in the NOD to encourage placement of awnings to shade pedestrians from harmful UV rays.

Lastly, we have some unanswered questions that we would appreciate feedback about as follows.

UNADDRESSED / UNANSWERED QUESTIONS:

INFRASTRUCTURE

With the addition of what may be significant density and new incoming population, the ability of infrastructure to meet the related demands that result from that density is seriously being questioned. The City of Los Angeles ceased doing its coordinated annual infrastructure reports that evaluated capacity and the condition of the City's infrastructure some years ago (and a return to some form of coordinated reported is needed). Residents across the Westside and City are well aware of the negative impacts of the deterioration of the infrastructure and of the challenges faced by the City in its attempts to meet current demands.

We would be remiss if we did not share our concerns about adding significant density without significant infrastructure upgrades. The strain on infrastructure must be fully understood and failures prevented. The added traffic will make many parts of our area impassible. The capacities of water, sewer, electric and gas delivery networks, landfills, etc. must not be taken for granted. Shifts to reliance on renewable energy sources must be done in a manner that allows for needed transitions from current to future sources.

The safety and security of our residents is a critical factor and adequate emergency services –police, paramedic and fire resources must be added. Current response times are not adequate and yet when new projects are reviewed, there is seldom mention of current shortfalls – much less discussions of the impacts of added demands.

How will new population densities be accommodated in local schools? (Can they be accommodated?) Schools play a critical role in establishing community/community identity- as they educate our children. Westwood Charter Elementary School has been over-enrolled for a number of years and cannot absorb new students from new density being planned. The existing boundary lines for the school were the basis of home buying decisions on the part of many families in the area. Those who moved into a specific school area expect to be able to enroll their children in that school. What will be done to accommodate new students? Are school district impact fees adequate to account for new student influx? How will any influx of new students be addressed by LAUSD and coordinated with the City? These issues should also be addressed where applicable to Overland Avenue Elementary School and all schools within the Community Plan boundary.

We appreciate the opportunity to comment on the WLA Community Plan and look forward to continued discussion with the City as the draft concepts are refined and the draft WLA Community Plan is being written. Please do not hesitate to contact us with any questions regarding the recommendations that we have made and issues that we have raised.

Sincerely,

Terri Tippit, WNC Chair

Attachments:

- A. Data Needs Requests
- B. Additional Follow Up Questions for Community Outreach

Cc: Councilman Paul Koretz, CD5