



**WESTSIDE NEIGHBORHOOD COUNCIL**  
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October 14, 2020

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City of Los Angeles Planning Department  
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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 the interactive map information provided to the West Los Angeles community through the City’s July 2020 webinars and materials that are 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) The 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 for 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, 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 to 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 Boulevard 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 the 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 the 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 the 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 Boulevard 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 Boulevard 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 a 45-foot height limit with rear stepdown through implementation of the 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 Boulevard 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). Residents on Glendon and Midvale strongly 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: Carwash site at northeast corner of Pico and Beverly Glen Boulevards  
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 Boulevard 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 Boulevard 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 is crucial because of the loss and erosion of industrial zoning that resulted from the adoption of the 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: Oppose  
Background and Comments: Residents on Bentley are almost equally split. Generally, the west side of Bentley wants the proposed changes and the east side of Bentley does not want the proposed changes. Additionally, residents on Camden - especially those backing up to the properties on the east side of Bentley - do not want the proposed changes. Also, a petition with more than 100 signatures opposing the proposed changes was submitted in the closing week of the public comment period. Primary factors for the opposition are based upon impacts of increased density, larger buildings, loss of privacy, increased on-street parking, added traffic and concern for the character of the neighborhood. Primary factors for support by residents on the west side of Bentley are because of different issues they face largely related to impacts from commercial uses at the rear of their properties. These residents want the option to up-zone and potentially sell their properties. The WNC Land Use Committee raised possible alternate scenarios to the affected homeowners beyond just a straight support or oppose option for the proposed up-zoning of Bentley. However, stakeholders on both sides of the debate indicated little or no interest in straying from their positions.

Land Use Change Category: Low Residential  
Location: East side of Camden to the west side of Midvale Avenue from the alley North of Pico Boulevard 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. Responses from residential stakeholders in Westwood South of Santa Monica (WSSM) Homeowners Association strongly 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: There was strong opposition from resident respondents for loss of the single-family residential character to their neighborhood; support for the NMU Zone and its extension on Westwood down to Pico in exchange for not changing the east side of Midvale Avenue to Low Medium Residential Transition (see discussion under additional areas for consideration in the Commercial section).

Land Use Change Category: Low Medium Residential Transition  
Location: West side of Glendon Avenue from the alley north of Pico Boulevard up to Missouri Avenue  
Position: Oppose  
Background and Comments: There was strong opposition from resident respondents for loss of the single-family residential character to their neighborhood; support for the NMU Zone and its extension on Westwood down to Pico in exchange for not changing the west side of Glendon Avenue from Low Medium Residential Transition (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 Boulevard 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 the 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. Stakeholders 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: The residents who commented at the September WNC Land Use Committee meeting strongly opposed the proposed Low Medium Residential for the following reasons: the 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 the area generally southeast of La Grange Avenue to and including the east side of Fox Hills Drive north of Olympic Blvd. (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 the R1-V2) that would allow larger homes. It should be noted that it does not add housing units. The Century Glen Homeowners Association Board supports this proposed change.

Land Use Change Category: Low Medium Residential  
Location: Orton, Keswick, and Kerwood Avenues (south of Olympic Boulevard)  
Position: Oppose  
Background and Comments: Residents strongly oppose the change to low medium residential for the following reasons: the 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.

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 the WNC only received three comments opposing the proposed change at the WNC Land Use Committee virtual meeting on September 23<sup>rd</sup>, 2020 and the WNC did not receive a position letter from the Cheviot Hills Homeowners Association. The Cheviot Hills Homeowners Association did inform its' members about this proposed change to Low Residential Historic, however they did not take a position on the proposed



change. The Cheviot Hills Homeowners Association indicated that they received the same three comments in opposition.

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 voiced 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 the single-family residential character; concerns regarding traffic and high speed nature of the 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 the 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 the single-family residential neighborhood. They want to retain the 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 Boulevard 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 many 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 Studio (includes Orton Avenue and Fox Hills Drive) limited to the single-family zoned properties within the Century Glen Homeowners Association boundaries.

Position: Support

Background and Comments: The Century Glen Homeowners Association and some of its stakeholders requested additional rezoning of property within their jurisdictional boundaries to match the City's proposed land use change to Low Residential for the single-family residential area north of Olympic Boulevard. Although the Land Use Committee has not had to verify the existing zoning for every parcels in the single-family neighborhood within the Century Glen Homeowners Association boundaries south of Olympic Boulevard, we believe that their request for new zoning similar to the R1-V2 would generally replace the existing R1-1-O zoning on the single-family residential properties. It should be noted that the R1-V2 would allow larger homes, but it does not add housing units.

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 21<sup>st</sup> 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, and 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 Boulevard. 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 Boulevard. 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 Boulevard. There appears to be no rationale for its exclusion. This would serve to connect the NOD with the Westwood Boulevard POD north of Santa Monica Boulevard.
- 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 must 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 1,000 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 the requirement 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 adjacent building heights.
- D. Sidewalks should not be obstructed with utility poles. Do not permit large poles to be placed in the middle of sidewalks (see intersection of Sepulveda/Pico Boulevards adjacent to the Anawalt Lumber as an example).
- 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 Boulevards 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 Boulevards. While a wide street, Olympic is very different from Pico and Santa Monica Boulevards 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 Boulevards. 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 Boulevard 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 follow 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 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 Boulevard/Veteran Avenue 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 a minimum 5-foot landscaped parkway as a 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*

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Terri Tippit, WNC Chair

Attachments:

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

Cc: Councilman Paul Koretz, CD5

## ATTACHMENT A

### **DATA NEEDS REQUESTS**

In order to do our task which has been framed in large part as being responsible for making recommendations to provide land zoned to meet the current and future housing needs of Angelenos, we must have access to the data that describe our current state and the projected goals. This is particularly important due to the fact that many believe that there is now amply zoned land to accommodate future population growth figures across Los Angeles for many years to come.

Population projections with zoning capacity that accounts for density bonuses and ADUs shall be established prior to upzoning areas to determine if upzoning is actually needed to meet goals.

What level of population growth should be used to establish 2016 (or later) population from the base of 2010 census figures? Growth rate per year? Historical ACTUAL growth rate? Projected growth rate and numbers?

**For each of the following land use categories, we must have accurate data upon which to make future land use planning / zoning decisions:**

R1 Low Residential (Single family)  
R2/R3 combined (Low Medium/Medium  
R4 High Medium  
Commercial up to C4/R4  
TOC Available (Low/Low Medium)  
TOC Available (Commercial)

### **DATA NEEDED per category:**

Dwelling units per net acre  
Net acres of zoning  
Number of dwelling units  
Persons per dwelling unit  
Capacity before bonuses  
Capacity after ADU bonus (applied to only 25% of R1 parcels and that percent may change over time as experience is gained)  
Capacity after SB 1818 Bonus (Assume at 35%/maximum bonus)  
Capacity after TOC bonus

How many more of each needed by 2030? 2040? How many of each, allowed by 1997 Community Plan Zoning, remain un-built? How many Accessory Dwelling Units allowed by State 2017 law remain un-built? Up-zoning is normally used to rejuvenate undervalued, dying neighborhoods. Why is City even thinking about Up-zoning Westside R1 neighborhoods?

Current and historical vacancy factors in the area?  
Vacancy rates of rental units?  
Percent of unoccupied homes?

Percent of overcrowded residences?

Current RSO units

Data to describe the percent of different tiers of affordable housing (extremely low income, low income, etc.)

Profile of housing built in last RHNA cycle

Job data: Current employment

Future jobs targets

Jobs to housing ratio ( 1 residence for every \_\_\_\_ jobs)

Housing goals (total and per income category)

## **CHANGING ENVIRONMENT**

How to identify local climate risks and resilience opportunities?

How will autonomous vehicles and new mobility services affect land use and mobility? How will this be addressed in the Community Plan update?

How to assess post-pandemic travel demand (and its effect on land use and entitlement programs tied to transit?). How to forecast travel demand?

How does the Coronavirus impact current Complete Streets design including planning for walking, biking, etc. to ensure safety? How to make streets safer for walking and biking (particularly if people are staying away from shared modes of transit)?

What kinds of impacts will be felt as a result of the fiscal impacts of the Coronavirus (vis a vis service delivery, city and transit staffing, etc.? How will this impact development?

What will be the impact, if any, from the shift from LOS traffic evaluation mechanism to VMT in evaluating future roadway improvements?

How will recent cutbacks in METRO budget affect local transit services and the relationship of transit services to the awarding of development rights and reduced parking standards linked to transit?

## **HOUSING**

How can we incentivize the creation and use of ADUs that would be offered at an affordable rent to provide low income or workforce housing?

- A. Is it possible to create regulations that provide disincentives for using ADUs for short term rentals?
- B. Will we need to demonstrate affordability of ADU units in order to count them toward the City's housing goals? How will this be calculated: Will we use the SCAG study average, will there be an LA average, or....?

## ATTACHMENT B

### QUESTIONS FOR FURTHER COMMUNITY OUTREACH EFFORTS

#### QUESTION/FOR POSSIBLE CONSIDERATION & COMMUNITY DISCUSSION re: ADU

The State provides those who build a ground-level ADU with a bonus of up to 850 square feet of additional FAR for a separate ADU unit. Los Angeles grants up to 800 square feet. However, the additional bonus square footage comes with the requirement that the ADU be at ground level which perhaps inadvertently creates an incentive to consume valuable yard/open space when an ADU could just as well be built over (or partially over) a garage if one is available.

QUESTION: Should the WLA Community Plan contain a provision that provides the (up to) 800 square foot bonus for an ADU on the second floor of a garage if that ADU is built with required additional rear and side setbacks to preserve privacy for the adjoining property?

#### QUESTION FOR COMMUNITY DISCUSSION REGARDING ACQUISITION AND EXPANSION OF ADDITIONAL PARK/OPEN SPACE AREAS:

Shall this plan suggest that IF private property adjacent to an existing park should become available for sale, that the City (or other individuals or organizations) shall seek to purchase said land in order to increase the footprint of an existing park?