
WSAP COMMENTS and WSAP PEIR COMMENTS

From Aletha Metcalf-Evans <ametcalfevans@yahoo.com>
Date Tue 01-Oct-24 11:29 AM
To Westside Area Plan <WestsideAreaPlan@planning.lacounty.gov>
Cc hollyjmittchell@bos.lacounty.gov <hollyjmittchell@bos.lacounty.gov>

CAUTION: External Email. Proceed Responsibly.

PLEASE ADD THIS EMAIL TO PUBLIC RECORD:

I am for fair and equitable housing, and I strongly support the 8/9/24 response from the Ladera Heights Civic Association (%20LHCA%20) to the recently-released draft Westside Area Plan and the 8/14/24 LHCA response to the accompanying PEIR. While some proposed zoning changes may be appropriate, most of those proposed by the County are not. I hereby request that the LA County Planning Department work with LHCA and the United Homeowners Association II to create a zoning plan that is fair to the entire Westside community.

After reviewing both the WSAP/PEIR and the LHCA responses, it is abundantly clear that the proposed would unnecessarily subject our community to unsustainable levels of density, traffic, noise and congestion. Most importantly, the Plan would result in the irreversible devastation of two of the very few truly ethnically and socioeconomically diverse neighborhoods in Los Angeles, while allowing the rest of the Westside to avoid any of the burden of increased density.

As the LHCA responses makes clear, the County must remove all inappropriate upzoning of Ladera and View Park-Windsor Hills-View Heights, and redistribute any upzoning in a more fair and equitable fashion.

Regards,

Aletha Metcalf

[Yahoo Mail: Search, Organize, Conquer](#)

Opposition to Upzoning in Ladera Heights-View Park-Windsor Hills-View Heights

From Brooke McAdams <brookemcadams@gmail.com>
Date Mon 30-Sep-24 12:24 PM
To Westside Area Plan <WestsideAreaPlan@planning.lacounty.gov>
Cc Miriam Thompson <MThompson@planning.lacounty.gov>

CAUTION: External Email. Proceed Responsibly.

PLEASE ADD THIS ENTIRE EMAIL TO PUBLIC RECORD:

I support fair and equitable housing, I strongly oppose the recently released draft Westside Area Plan for Ladera Heights, View Park-Windsor Hills-View Heights, Franklin Canyon, West LA Sawtelle VA, West Fox Hills, Marina del Rey, and Gilmore Island. The current plan proposes that Ladera Heights and View Park-Windsor Hills-View Heights disproportionately bear the entire burden of upzoning. I hearby request that the LA County planning department work with the Ladera Heights Civic Association and the United Homeowners Association to create a zoning plan that is fair to the entire Westside community.

As the Ladera Heights Civic Association and the United Homeowners Association (representing Ladera Heights, Windsor Hills, View Park and View Heights) are preparing detailed objections to the Westside Area Plan, it is clear that the proposed plan would subject these communities to unsustainable levels of traffic, noise and congestion, and would displace parking into these residential neighborhoods. This plan would also devastate two of the few truly ethnically and socioeconomically diverse neighborhoods in Los Angeles.

The current plan must be revised to remove this inequitable and inappropriate community upzoning.

Regards,
Brooke McAdams
Resident in Ladera Heights

WSAP COMMENTS and WSAP PEIR COMMENTS

From Karmen Foster <karmen.patton@gmail.com>

Date Tue 01-Oct-24 5:58 PM

To Westside Area Plan <WestsideAreaPlan@planning.lacounty.gov>

Cc hollyjmitchell@bos.lacounty.gov <hollyjmitchell@bos.lacounty.gov>

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As the LHCA responses makes clear, the County must remove all inappropriate upzoning of Ladera and View Park-Windsor Hills-View Heights, and redistribute any upzoning in a more fair and equitable fashion.

Regards,

Have a great day,

Karmen

WSAP COMMENTS and WSAP PEIR COMMENTS

From Carol Williams <carolw825@att.net>

Date Sun 22-Sep-24 3:36 PM

To Westside Area Plan <WestsideAreaPlan@planning.lacounty.gov>

Cc hollyjmitchell@bos.lacounty.gov <hollyjmitchell@bos.lacounty.gov>

CAUTION: External Email. Proceed Responsibly.

PLEASE ADD THIS EMAIL TO PUBLIC RECORD:

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As the LHCA responses makes clear, the County must remove all inappropriate upzoning of Ladera and View Park-Windsor Hills-View Heights, and redistribute any upzoning in a more fair and equitable fashion.

Regards,

Sent from my iPhone



October 14, 2024

Los Angeles County Department of Regional Planning
Attn: Julie Yom
320 West Temple Street
Los Angeles, CA 90012

**RE: United Homeowners' Association II View Park-Windsor Hills and View Heights
Response to Los Angeles County Regional Planning Westside Area Plan for Ladera
Heights/View Park-Windsor Hills, View Heights and West Fox Hills**

Dear Ms. Yom,

The United Homeowners' Association II (UHA) is pleased to submit comments on the Los Angeles County Westside Area Plan (WSAP). Our comments respond to the sections relative to Historic Resources, Land Use, Economic Development, and Public Service.

The UHA, representing homeowners and residents of the View Park-Windsor Hills and View Heights communities, is pleased to submit its views in response to the WSAP. This is a unique urban hillside community—within greater Baldwin Hills—along with Ladera Heights, that has distinctive characteristics unlike most other unincorporated urban communities in Los Angeles County.

Furthermore, and especially in View Park-Windsor Hills, there are many important homes that carry federal, state and local historic designations because of their architecture and the architect who designed them, such as Paul Revere Williams; the purpose for which they were built, such as for the leadership of the International Olympic Committee for the 1932 Summer Olympic Games in Los Angeles; and, home to many African American entertainers since the early 1950s, to name a few historic notes. Consequently, these communities should be given different considerations within the conversations and planning of these communities.

We hasten to raise the issue of the County's partner, the City of Los Angeles, and its granting a waiver of the Westchester community from inclusion in the redevelopment plans to increase residential and population density in response to the state's mandate to increase "affordable housing." The question is affordable to whom when the average monthly rent for a one-bedroom apartment in L.A. County is between \$2,456.00 and \$2,753.00. In California, a \$71,000 a year salary boils down to a monthly paycheck of \$5,921.00. There is very little left over to cover other essential living expenses. The issue is not one of the numbers of residential units that are needed, but a question of true dollars-and-cents affordability of current rental units to individuals and families within the very-low, low, moderate and middle-income levels, and of newer units to be developed.

As we analyzed the WSAP, and the state's mandate to increase population and density by approximately 9,000 residents, the UHA strongly objects to what appears to be the State of California attempting to balance its housing affordability needs on the backs of communities that

are ill equipped to shoulder a disproportionate responsibility to resolve the affordability (not capacity) problem.

As the UHA has raised several discreet issues pertaining to the View Park-Windsor Hills, View Heights, and Ladera Heights communities, relative to the WSAP and Preliminary Environmental Impact Report (PEIR), it requests that the County immediately commence a full and in-depth study on:

1. Community disaster preparedness and defined evacuation guidelines based on the proximity to the Inglewood Oil Field that straddles the Newport-Inglewood Fault (oil-spill related disaster, earthquake-related disaster, and wildfire). The lack of defined exit routes was raised in the UHA's comments to the Preliminary Environmental Impact Report;
2. A traffic study that considers the significant proposed increase in building density and population growth;
3. The impacts of proposed increased development and population density near the Inglewood Oil Field; and,
4. Utility infrastructure (water, electricity, gas, etc.) based on proposed increased development and population density.

2. Historic Resources

The UHA has previously voiced its concern regarding the County's lack of protections provided to View Park Historic District, because the district is not on the County's landmark list. The UHA agrees with and applauds the mitigation monitoring measures that are to be taken based on the WSAP's Final Environmental Impact Report (FEIR). However, many areas within the View Park-Windsor Hills, View Heights community have not been designated as historic and, as a result, will not be part of the View Park Historic district. Consequently, the mitigation measures will not be used.

In accordance with the Historic Context Statement vision statement, the UHA has previously requested of the County that all of Windsor Hills and View Park be included in a Los Angeles County-designated historic district, either by Board resolution or action of the Landmarks Commission. If this action is taken it will correct the exclusion of a significant portion of the historic View Park/Windsor Hills community based on a failure to properly research and interpret the tract maps. To illustrate this point, the UHA has attached tract maps completed in 1924 by the Los Angeles Investment Company showing that the area South of Angeles Vista Boulevard is in fact the oldest part of View Park. We continue to ask that the County research and confirm our assertion, and make the necessary changes to ensure that this entire area is designated as a historic district and correctly identified on County maps and street signs.

3. Land Use

Throughout the WSAP, the authors state a number of times that it is not the intention of the WSAP to change the character of the neighborhood. Therefore, the logical extension is that there would not be any new development that would be higher than the tallest building currently located in the View Park-Windsor Hills, View Heights, and Ladera Heights communities of the Baldwin Hills. This seems to be a gratuitous statement in light of the WSAP which would accomplish just the opposite.

A key finding of the WSAP, based on a purported community survey says that *“some residents indicated a desire for more high-quality affordable housing options that are designed to maintain consistency with existing single-family neighborhoods, which they would like to see preserved as is.”* (WSAP Land Use, 3.2.2 Focused Planning Area: Existing Land Use, page 3.3). And a stated purpose of the Land Use Element of the WSAP, *“provides direction for how existing uses in the Westside Planning Area...can be maintained and enhanced and new development seamlessly integrated to complement and benefit the existing community and sustain its environmental resources.”* (WSAP, Land Use, 3.1 Purpose, page 3.1)

3.1 Purpose

The UHA appreciates that the housing crisis in California is one of both housing capacity as well as one of affordability. However, not enough truly affordable units are being developed, notwithstanding new state laws supporting the growing numbers of apartment buildings in single-family home neighborhoods that are seemingly ushering in the “Manhattanizing” of Los Angeles, thanks to the relaxation of building standards, tax incentives, and density waivers available to developers who build to unreasonable heights without appropriate safeguards to single-family homeowners’ rightful expectation to the peaceful use and enjoyment of their properties. It is inconceivable that property values will continue to increase, apace, as a result of these developments adjacent to or in very close proximity to single-family homes.

The UHA’s response to the WSAP speaks to each section, its goals and policy statements in the Land Use title of the WSAP.

3.2.2 Focused Planning Area: Existing Land Use ~ Ladera Heights and View Park-Windsor Hills.

View Park-Windsor Hills, View Heights, and Ladera Heights are contiguous hillside communities, located in the greater Baldwin Hills, comprised primarily of large and medium-size single-family homes. Contrary to a key finding that “density and distribution of existing development *supports*” automobile use within the community, the UHA takes issue with the apparent paper tiger that sets up an argument designed to rationalize the County’s proposed dense residential and commercial development, under the WSAP. There is some pedestrian activity between the communities, but due to the intended characteristics of the neighborhoods when developed, there are few people walking within the discrete neighborhoods because homes are built on the hillsides. These are hillside communities. This is not a problem and so the County should not create a problem that it will then resolve by increasing density and increasing unnecessary expansion of the current public transportation system. Despite the construction of a sidewalk along Overhill Drive between Stocker Street and Slauson Avenue, there is scant pedestrian activity within and between the communities because the distances require vehicle travel, therefore, the proposed reduction in VMT is unreasonable.

The UHA members have expressed the desire for a full-service, high-quality grocery store (not Food For Less, Albertsons, Super). Importantly too, is the prevention of the loss of existing small businesses along the Slauson Avenue corridor that are favorites and currently serve the residents well. The WSAP seems to contradict itself. On the one hand, the WSAP speaks to retaining existing African American-owned and other minority-owned businesses along Slauson Avenue, there is still the plan to replace them. Clearly, the County is quite aware that developers will not place a priority on retaining these businesses and will only do so if the County imposes such a mandate on the

developers, without waiver or exception. A plan to save these popular and important businesses (coffee shop, eateries, nail salons, barber shop, cultural shops, clothing stores, among other businesses) is absolutely critical.

While the WSAP contemplates single-tenant retail, multi-tenant shopping centers and box stores, along Slauson Avenue, a large box store would be wholly inconsistent with the character of the community. Again, maintaining existing businesses is a high priority for the UHA members and Ladera Heights residents who take advantage of the commercial aspects of View Park-Windsor Hills. While the WSAP speaks to supporting the 54th Street corridor, it would best be served by employing the Larchmont model, as described in the photograph for Opportunity Site #8, at page 3-30, with building height limited to two stories above ground level, respecting the character of that neighborhood.

In terms of the industrial reuses of the Inglewood Oil Field, the County has stated its clear intention to redevelop its 639 acres, once oil production has ceased, for “uses complementing the existing community...” The WSAP immediately goes on to say that a robust collaborative planning process with the community would be employed to determine the scope of any redevelopment plan. However, the WSAP quite notably fails to address the most critical consideration for this task force which is the millions of dollars necessary to complete an in-depth Environmental Impact Study and Environmental Impact Report and Feasibility Study that would recommend redevelopment of the oil field and the appropriate redevelopment, if any at all, and it may not be for housing. Furthermore, to develop the oil field for housing purposes (or even recreation purposes) requires:

1. the decommissioning of the oil wells and
2. unearthing oil reservoirs/drums, and pipelines
3. cleanup of abandoned wells and unplugged wells
4. the full remediation/cleanup of the contaminated soil across all 639 acres of the oil field

The cost of the cleanup and remediation of the egregious soil contamination will be in the billions of dollars and would have to be accomplished before any housing development within any part of the oil field. Consequently, the question becomes whether housing development is worth the cost of full remediation of the Inglewood Oil Field? Would the subsequent cost of the new housing there be worth the expense of the necessary studies and remediation? Preliminary research indicates the remediation cost would be in the neighborhood of $\$2.78348 \times 10^{12}$ (2.78 x 10¹²= XXXXX). This is the industry formula used to calculate remediation costs.

Significantly, the same WSAP key finding also *critically* fails to include consideration of the Newport-Inglewood Fault that runs under the Inglewood Oil Field, immediately west of La Brea Avenue and immediately adjacent to the west of La Cienega Boulevard¹, posing a decided threat to human life and property in the event of a major earthquake along the fault. In addition to the earthquake threat, there is the ongoing threat of a drilling emergency that impacts the surrounding neighborhoods of View Park-Windsor Hills, View Heights, and Ladera Heights.

For these reasons, the County’s proposal to build housing (including for West Los Angeles College students) along the Newport-Inglewood Fault, in the Inglewood Oil Field, is reckless and imprudent for potential homeowners and commercial interests. The potential liability to the County and State

¹“Geology of the Baldwin Hills,” baldwinhillsnature.bhc.ca.gov; “Living With the Newport-Inglewood Fault,” southbayhistoryblog.wordpress.com

would be massive because this is a known, patent threat and risk. Further, the WSAP fails to put forth any evacuation guidelines and procedures as part of its redevelopment plan, imperative for the safety and life of the residents of the Baldwin Hills communities, regardless of any development within the oil field (as discussed in the UHA comments to the PEIR).

In the alternative, the oil field should be made part of the Kenneth Hahn State Recreational Area, thereby expanding recreation facilities, hiking trails, wildlife habitat, and perhaps the inclusion of a dog park. A key finding in the WSAP denies the need for additional land for public uses such as recreation facilities because there is currently insufficient new population density to warrant it. However, it would seem prudent to expand the existing recreational opportunities (Kenneth Hahn Park, Ladera Park, Yvonne B. Burke Sports Complex, Ruben Ingold Parkway), for the benefit of current residents, and those who may come to the community, as well as park users from other communities and cities. Such park development would respond directly to members of the View Park-Windsor Hills, View Heights, and Ladera Heights communities who indicated they would like more trails and parks with easy access.

Transportation, Communications, and Utilities and Rights-of-Way:

As the County plans for increased residential density in the targeted communities, it will need to expand current utility—water, gas and electricity—and telecommunications/communications infrastructure to accommodate the proposed residential density. Importantly, additional cell phone towers will be required. Currently, cell phone connectivity is poor.

West Fox Hills

Key Findings for West Fox Hills propose rezoning for additional residential development in lieu of or in addition to the current commercial and office land uses in the area. Given the topographical nature of West Fox Hills, i.e., flatlands, and the paucity of multi-family residential land uses, it seems better suited to focus the majority of the proposed increased number of affordable housing units within the WSAP in West Fox Hills.

3.3 Planning Approach

The underlying premise of the WSAP's planning approach foists a one-size-fits-all redevelopment approach on the View Park-Windsor Hills, View Heights, and Ladera Heights communities. The UHA disagrees with this approach for exactly that reason. The UHA is pleased to work with the County and its consultants on devising a more thoughtful plan that truly respects and maintains the unique character and quality of these targeted communities. It fails to consider the unique and noteworthy characteristics of these hillside communities and neighborhoods, topographically and otherwise, and seeks to impose the same redevelopment plan across all communities in the unincorporated jurisdictions of the County. Our communities are semi-suburban while others have a decidedly more urban character and landscape.

The County continues to assert that it has no intention of changing the “character and quality” of the View Park-Windsor Hills, View Heights, and Ladera Heights communities. However, this section of the WSAP states that “While single-family housing has been the predominant housing type in the community,” the plan provides capacity to accommodate a greater diversity of housing units that are *affordable to all*.” (Italics added for emphasis)

One of the over-arching concerns of many is that developers are not required to set aside a meaningful number of affordable units in new buildings that come close to making a meaningful dent in the affordability crisis in Los Angeles County. To achieve meaningful rental affordability, it is imperative that the County (and City) enforce affordability goals that are contemplated in each housing development. A mere set-aside of 20% in a new development of 200 units amounts to only 40 units with 160 units at market rate. How does this set-aside standard help reach governmental goals of addressing rental housing affordability for families who are unable to pay market rate and are living several families to a unit so as to have a place to live? This common, real-life scenario does not meet the Department of Housing and Urban Affairs' standard of living in decent, safe and sanitary housing, paying no more than 50% of income for rent. Indeed, developers want their projects to "pencil out" so they can realize a profit; however, they should not look to "pencil out" such a project when they choose to build projects that include affordable rental housing. Consequently, this massive initiative to create 9,000 units of housing that does not have significant affordability has no legs, especially for the View Park-Windsor Hills, View Heights, and Ladera Heights communities.

In this regard, and in the spirit of collaboration and partnership, the UHA requests to see the various proposed project designs, visuals, and space ratios for residential, mixed-use, and commercial development, and the ratios for affordable units in each development to better understand the direction of the overall WSAP as it is implemented.

In lieu of the same old thinking, the UHA wonders if the County and its consultants, might think more creatively—outside the box, if you will—about how to assist low-income people and families in ways beyond providing "affordable" housing. We are aware of the County's implementation of the pilot program, Breath, and wonder what the data is showing as to its effectiveness thus far, and how it may be more broadly replicated to assist even more financially vulnerable people and families. As you can appreciate, an affordable apartment is not the only assistance low-income and moderate-income people and families need. Rarely is affordable housing the sole element of what is needed: physical and mental health services, job re-training/dislocated workers training, etc. Is the County partnering with agencies that provide these services to broaden the bundling, if you will, of assistance that becomes meaningful to those with affordability challenges? Is the County planning to house the homeless and homeless mentally ill in our community?

The UHA is very concerned that elements of the WSAP does not provide for the maintenance of the "character and quality" of the existing residential neighborhoods—especially ours—which extend to the commercial centers and primary corridors. Unmanaged development along the commercial corridors and centers negatively impacts the adjacent residential neighborhoods, most especially those parts of the neighborhoods where single-family homes directly bound the proposed development, such as at the corner of Slauson Avenue and Heatherdale Drive, among others. Only proactive managed growth will maintain homeowners' peaceful enjoyment of their property and support increased property values. Proper management would focus on reasonable lower building heights, not to exceed a maximum of three stories above ground level with appropriate step backs from the adjacent single-family homes.

Furthermore, the WSAP assumes that redevelopment along Slauson Avenue, at the Ladera Center and in other commercial areas, "will promote a more active pedestrian environment and better access to and from adjoining residential neighborhoods." Once again, it is taken for granted that

residents of the View Park-Windsor Hills, View Heights, and Ladera Heights communities will choose to leave their cars at home and walk to conduct errands and enjoy the new amenities that may be available, despite the fact that these are unwalkable hillside communities. The absolute paucity of pedestrian traffic along the new sidewalk along Overhill Drive, between Stocker Street and Slauson Avenue, is proof that automobile use is an important, necessary, efficient, convenient, and preferred form of mobility in the View Park-Windsor Hills, View Heights, and Ladera Heights communities. Additionally, bus ridership is not a major element of commuter transportation along Slauson Avenue which begs for the rationale of the development of the Home Depot site as a transit hub. Ridership is insignificant even during morning and evening rush hours.

The UHA has consistently asserted its belief that effective and successful planning policy demands the involvement of all key players with transparency, accountability, and predictable *and enforceable* outcomes, with an emphasis on local community participation. To achieve this goal requires new legislation, or other legal action, to rebalance the planning process and put local communities back in charge of their own planning. Rezoning and upzoning commercial corridors to accommodate additional, and more dense housing/affordable housing, must be carefully balanced with the totality of the community's needs, and its character. The UHA must reject the idea embodied in the WSAP, vis-à-vis state housing law, that allows the state to make local land use planning and zoning decisions, thereby minimizing the ability of local government and communities to do their own planning in a more thoughtful way that responds to the needs and desires of local communities. This top-down planning, at its worst, fails at every turn and sours peoples' views of all levels of government.

3.4 Land Use Policy Maps

The Land Use Policy Maps are not helpful.

Opportunity Sites

3.5 Goals and Policies

The stated goals and land use policies are inconsistent with the intent of the WSAP if implemented and as currently drawn without further input from the UHA and Ladera Heights Civic Association.

3.5.2 Ladera Heights, View Park-Windsor Hills, and West Fox Hills

The goal of sustaining and managing growth while complementing and maintaining existing community character are inconsistent with the WSAP's redevelopment plan as the plan will do just the opposite without strict enforcement of development rules that the developers must follow, without opportunity for waivers or exemption. Developers must not be allowed and supported to build without strict limits.

Policy statement LU 2.1 fails to set forth a plan to support existing businesses and "preserving the character of existing residential neighborhoods, parklands, and open spaces."

The UHA supports Policy statement LU 2.2 stating that any plan to focus more dense development close to the Crenshaw K Line and the major bus lines that feed that train station. Affordable housing and market rate housing should be focused more heavily on transit points such as the

UHA II View Park-Windsor Hills Response to Proposed L.A. County Planning WSAP October 2024

Crenshaw K Line and bus transit points to serve those residents who are more transit dependent. However, as stated previously, there is scant ridership on the Slauson corridor bus line.

Policy statement LU 2.3 begs the question of what is “moderate-scale mixed use or housing” development? Too many statements lead to many questions that should be defined and discussed with the context of the WSAP.

A number of the policies under this broad heading have been previously addressed such as the attempt to make this community a walking community which is unreasonable and incongruous inasmuch as this is a hillside community. View Park-Windsor Hills and Ladera Heights already represent “distinct and livable places” which is why they have long been sought-after communities to buy into. The majority of assumptions in the WSAP are easily disproven.

Goal LU 4.2 begs the question of what percent of very-low, low-and moderate-income units are planned to be set aside per 1,000 units of housing? The policy statement refers to development of affordable housing to households of various income levels but doesn’t set forth the income levels and affordability rent rates. This is important data for UHA and refers back to the discussion around affordability, above.

Goal LU 5/5.1, prioritizing large-scale commercial development along our commercial corridors is contrary to maintaining our neighborhood’s “quality and character.” Large-scale residential and commercial development are inconsistent with the character and quality of this community and is better situated in communities in the flatlands with a more urban environment.

The UHA supports Goal 5.3 but is quite wary of Goal 5.4 which do not encourage the actual development of rental housing affordable to low-income and moderate-income people and families, which is the purported primary goal of the Economic Development Element and Countywide Housing Element. Instead, developers are allowed to set aside a small percentage of rental units that are affordable to clerk typists, police officers, firefighters, teachers, mechanics, and service workers. These set asides do nothing to alleviate the problem it is purported to resolve.

The UHA enthusiastically supports Goal 5.5 which speaks to working with the UHA and Ladera Heights Civic Association “to address land use issues, needs and improvements.” This is critical policy point, and we are eager to begin this collaboration with mutual seriousness of purpose and integrity.

Likewise, Goal 6.1 is a non-starter for the UHA which opposes such incentives that do nothing to create meaningful numbers of affordable rental housing (see comments in re Goals 4.2, 5.4 and other previous comments).

Goal 6.4 runs at the heart of this rezoning/upzoning initiative. The mandate to increase affordable housing across the state presumes that a one-size fits all approach is reasonable and equitable; it is not. Some commercial corridors, such as through View Park-Windsor Hills along Slauson Avenue, immediately adjoin single-family residences and the UHA seeks to protect the sanctity of American homeownership, the American Dream. State legislation/statutes must be amended retroactively.

The UHA is roundly supportive of Goal LU 6.7 that supports improved beautification of businesses and facades reflecting historic designs.

In relation to Goal LU 10, The UHA has continuously encouraged an open and collaborative exchange with L.A. County throughout this planning process with the expectation that there would be mutual cooperation without gamesmanship.

3.5.3 Community-Specific Opportunity Sites

Site 2: Ladera Center

The UHA would support Goal LU 11, as consistent with the perspective of the Ladera Heights Civic Association. Critically, the building heights and set-backs to transition with the adjoining residential neighborhoods is an absolute requirement that the County planning department must enforce. In the opinion of the UHA, building heights must be limited to not more than three stories above a ground-floor commercial level which respects the adjoining homes and apartments.

Site 3: Wateridge Business Center

Overall, the UHA supports the future development of Wateridge within the current building heights.

With regards to Goal LU 12.5, the UHA has to question the purpose of a multi-modal transportation hub imagined for the Home Depot site where there is no existing bus transfer point at such a volume as to require a transportation “hub”? What is the goal of a multi-modal transportation hub when there is no multi-modal transportation along Slauson Avenue except perhaps the few pedestrians walking along Slauson Avenue? What does “multi-modal” mean in this context? If you build it, they likely will not come. This plan needs further thought and discussion.

Site 4a: Slauson-Fairfax/Home Depot Center

As indicated in the previous comment regarding future development of Wateridge, the UHA would support future development within current building heights at Wateridge but is very concerned about the proposed multi-modal transportation hub.

The UHA strenuously opposes Goal LU 13.2, to build “big box” commercial buildings on this site. Again, the purpose is not readily understood. This land use is wholly inconsistent with the quality and character of the View Park-Windsor Hills and Ladera Heights communities.

Goal LU 13.3 begs the question of what incentives would attract small non-chain local businesses?

The UHA opposes Goal LU 13.8 UHA which has been discussed previously.

Site 4b: Slauson-Fairfax Intersection

Goals LU 14 through LU 14.2 is questionable. There are already commercial enterprises on this site. If housing is to be developed it should be not more than two stories above ground level. There is existing multi-family rental housing to the rear of these businesses. Is the plan to evict these tenants and build new on the site? If so, will these current tenants be able to afford to move into the new building into the same size apartment? This is a critical question. If the answer is no, then the WSAP is counterintuitive and destructive to the community.

Site 5: Slauson-Heatherdale

The UHA is strenuously opposed to **“concentration/intensification of commercial and housing development abutting the Slauson-Heatherdale intersection.”** Commercial and housing should be no higher than two stories in respect of the adjoining single-family homes on Heatherdale and on Orchid Drive, above the Jet Inn Motel. Homeowners bought homes in this community because of the quiet, peaceful neighborhoods. Intensive development, as described in this WSAP would compromise, if not destroy, homeowners’ right to the peaceful enjoyment of their homes and properties. Such development is wholly inconsistent with the quality and character of the View Park-Windsor Hills community, and it is contrary to the many promises in the WSAP to support the “quality and character” of this community while fully appreciating that the WSAP would do just that if not held to strict development standards that respect the quality and character of this community.

Site 6: Slauson-Overhill

The UHA is strenuously opposed to **“concentration/intensification of commercial and housing development abutting the Slauson-Overhill intersection.”** Commercial and housing should be no higher than two stories in respect of the neighboring single-family homes. Homeowners bought homes in this community because of the quiet, peaceful neighborhoods. Intensive development, as described in this WSAP would compromise, if not destroy, homeowners’ right to the peaceful enjoyment of their homes and properties. Such development is wholly inconsistent with the quality and character of the View Park-Windsor Hills community, and it is contrary to the many promises in the WSAP to support the “quality and character” of this community while fully appreciating that the WSAP would do just that if not held to strict development standards that respect the quality and character of this community.

Site 7: Slauson Corridor East

The UHA supports the redevelopment of this section of the Slauson corridor. However, we continue to stress the critical importance of the commercial businesses along Slauson Avenue be built at no higher than one story above ground level, including the density bonus, in respect of the adjoining single-family homes.

Site 8: West 54th Street

The UHA supports Goal LU 18 of creating “an active and vital pedestrian-oriented mixed-use corridor maintaining the scale and character of existing development.” Goal Lu 18.4 is, again, a critical point. Along 54th Street, buildings should be “scaled and designed at heights limited to transition with adjoining single-family housing neighborhoods.” Building heights must be limited to a height of one story above ground level in respect of the adjoining single-family homes. This is a quiet neighborhood of single-family homes surrounding 54th Street. The UHA supports using the Larchmont Avenue commercial development model which successfully blends the commercial corridor with the surrounding residential neighborhood. The UHA would strongly oppose building at higher heights for reasons previously established.

Site 9: Leimert Park Adjacent

Again, the UHA opposes the development of new buildings higher than two stories in respect of the historical designation of this single-family neighborhood. That it abuts Crenshaw Boulevard, a major transit and commuter corridor, with a Metro station does not give carte blanche to compromise the peaceful use and enjoyment of the residents. The UHA questions what constitutes “link development.” In addition, the lack of public parking in the new development, as it is within one-half mile of the Crenshaw transit corridor, is an ill-conceived plan as it would drive commuter parking into the neighborhood further compromising homeowners’ peaceful use and enjoyment of their homes and streets.

Site 11: Inglewood Oil Field

In terms of the redevelopment of the Inglewood Oil Field, the County has stated its clear intention to redevelop the 639 acres, once oil production has ceased, for “uses contributing to the quality of life of community residents.” Goal LU 20.3 says that the WSAP would enable the community to be involved in determining future uses of the oil field. However, the WSAP quite notably fails to address the most critical consideration for this “task force” which is the in-depth Environmental Impact Study and Environmental Impact Report and Feasibility Study that would recommend redevelopment of the oil field and the appropriate redevelopment, *if any at all*, and it may not be for housing. Furthermore, to develop the oil field for housing purposes (or even recreation purposes) requires:

1. the decommissioning of the oil wells and
2. unearthing oil reservoirs/drums, and pipelines
3. cleanup of abandoned wells and unplugged wells
4. the full remediation/cleanup of the contaminated soil across all 639 acres of the oil field

The cost of the cleanup and remediation of the egregious soil contamination will be in the billions of dollars and would have to be accomplished before any housing development within any part of the oil field. Consequently, the question becomes whether housing development is worth the cost of full remediation of the Inglewood Oil Field? Would the subsequent cost of the new housing there be worth the expense of the necessary studies and remediation? Preliminary research indicates the remediation cost would be in the neighborhood of $\$2.78348 \times 10^{12}$ ($2.78 \times 10^{12} = \text{XXXXX}$). This is an industry formula used to calculate the costs of remediation.

Significantly, the same WSAP key finding also *critically* fails to include consideration of the Newport-Inglewood Fault that runs under the Inglewood Oil Field, immediately west of La Brea Avenue and immediately adjacent to the west of La Cienega Boulevard (please see previous footnote at page 4), posing a decided threat to human life and property in the event of a major earthquake along the fault. In addition to the earthquake threat, there is the ongoing threat of a drilling emergency that impacts the surrounding neighborhoods of View Park-Windsor Hills, View Heights, and Ladera Heights.

For these reasons, the County’s proposal to build housing (including for West Los Angeles College students) along the Newport-Inglewood Fault, in the Inglewood Oil Field, is reckless and imprudent for potential homeowners and commercial interests. The potential liability to the County and State would be massive because this is a known, patent threat and risk. Further, the WSAP fails to put

forth any evacuation guidelines and procedures as part of its redevelopment plan, imperative for the safety and life of the residents of the Baldwin Hills communities, regardless of any development within the oil field (as discussed in the UHA comments to the PEIR).

In the alternative, the oil field should be made part of the Kenneth Hahn State Recreational Area, thereby expanding recreation facilities, hiking trails, wildlife habitat, and the inclusion of a dog park. A key finding in the WSAP denies the need for additional land for public uses such as recreation facilities because there is currently insufficient new population density to warrant it. However, it would seem prudent to expand the existing recreational opportunities (Kenneth Hahn Park, Ladera Park, Yvonne B. Burke Sports Complex, Ruben Ingold Parkway), for the benefit of current residents, and those who may come to the community, as well as park users from adjoining communities and cities. Such park development would respond directly to members of the View Park-Windsor Hills, View Heights, and Ladera Heights communities who indicated they would like more trails and parks with easy access.

Site 12: West Fox Hills (Del Rey)

The UHA supports the Goals of this section of the WSAP but questions the seemingly gratuitous name change from West Fox Hills to some other moniker. West Fox Hills gives it pride of place. However, this is a decision that must be approved by the collective residents of West Fox Hills/Del Rey.

The UHA's response to the WSAP speaks to each section, its goals and policy statements in the Land Use title of the WSAP. The UHA requests that you give due consideration to the views and ideas expressed in its response to the Westside Area Plan.

5. Economic Development

The UHA has long supported businesses on the Slauson corridor. The View Park-Windsor Hills, View Heights residents frequent the restaurants, coffee house, beauty, and nail shops that make up the corridor and the fabric of our community. We are opposed to the upzoning of Opportunity Sites 5:Slauson-Heatherdale, 6:Slauson-Overhill, 7:Slauson Corridor East. Currently all of these sites are designated as commercial, but upzoning these sites to mixed use could have the unintended consequence of hastening their demise by making the area ripe for developers who have no stake in the community. The implementation of upzoning should be carefully considered, to ensure that those in vulnerable positions are not unfairly impacted. It is crucial that economic strategies are developed that do not disproportionately affect any part of the community. *The UHA questions that the County planners have suggested the zoning changes given the fact that they are anticipating a negative effect on Black businesses along the Slauson Corridor. The UHA opposes the upzoning for the same reasons that the County planners have expressed in the WSAP.*

“The small businesses along the Slauson Corridor face a heightened risk of displacement should there be a sudden shift in neighborhood demographics. An influx of new residents with different consumer preferences could result in changing demands for goods and services, potentially accompanied by rapid rent increases that may place a financial strain on existing small businesses. With nearly 40 percent of businesses operating in the area for over a decade, these long-standing establishments could struggle to navigate evolving market dynamics. Additionally, such businesses can hold significant cultural value in their communities due to their enduring presence. This value can be seen throughout the Slauson Corridor, particularly the intersection of Overhill Drive and Slauson Avenue, where there is a concentration of successful Black businesses.”

...“This transformation could jeopardize local businesses catering to the existing community and the loss of amenities to which residents are accustomed. Tailored interventions should include leveraging future redevelopment opportunities for community benefits and strengthening the ability of residents and businesses to stay in their communities.”

Once the zoning changes are made, they cannot easily be undone, and the loss of Black businesses would be devastating for the community and most likely the loss would be forever. The WSAP goes on to state:

...“These indicators suggest further displacement for this historically significant area if current trajectories persist. It is imperative to acknowledge and harness the rich Black legacy of the community to fuel future economic prosperity and foster neighborhood stability. Potential interventions may entail implementing flexible regulations to support cultural and artistic endeavors, as well as acknowledging and preserving existing historic land uses, architectural styles, and institutions.”

The UHA agrees that flexible regulations should be used to protect the Slauson Corridor. Those regulations should ensure that developers seeking to build large developments are not invited in by zone changes. Rather, the County should shore up and support the Black businesses along the Slauson Corridor.

7. Public Service

The WSAP and FEIR assume that existing infrastructure will be sufficient to handle future demands without significant upgrades, which may not be the case. These reports should include ongoing assessments of infrastructure capacity and identify potential funding sources for any necessary upgrades to ensure that utility systems can accommodate future growth without compromising service quality. The County should provide a more detailed analysis of the cumulative impacts of multiple developments on water supply and wastewater capacity, particularly in areas where infrastructure is aging or near capacity.

Additionally, specific performance metrics to ensure that utility services are provided efficiently and sustainably are not included in the report. For instance, the United Nations Water Conference recommends setting targets for water conservation and waste reduction would help ensure that the WSAP's utility-related goals are achieved.

Neither the WSAP nor the FEIR explicitly discuss the economic impacts of providing utilities and services or identify specific funding sources for potential infrastructure upgrades. Given the potential costs associated with expanding or upgrading utility infrastructure, this is a significant gap in the analysis. These reports should explore funding mechanisms, such as public-private partnerships or grants, to ensure that necessary infrastructure is in place to support future development.

Conclusion

Consultants, Placeworks, Inc., may be very good at their work as urban planners, but they do not appreciate the nature and character of the View Park-Windsor Hills and Ladera Heights neighborhoods and the community at large, which is why Los Angeles County Planning should have included the UHA and Ladera Heights Civic Association as active participants in the development of the Westside Area Plan and Environmental Impact Report from the inception of the initiative. It was not enough to engage our residents only in community meetings where you were unwilling to listen and hear our perspectives and points of views. This has very much been a top-down approach

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to community engagement where government has unnecessarily and unfairly imposed their will and vision on our communities.

The UHA would support new housing and commercial development that will not exceed the height of existing buildings in the targeted communities, or not to exceed 35 feet from ground level, including the density bonus, which would create architectural and building consistency with current building design. A number of sections of the WSAP unequivocally state that it is not the intention of the WSAP to change the quality and character of our communities, yet we understand that the County is mandated to approve developers' applications to build as high as they may propose for the purpose of making the project (with affordable rental units) "pencil out." This is a specious rationale which the State must address for the benefit of its owners of single-family properties who stand to lose their rightful peaceful enjoyment of their homes suddenly made adjacent to multiple-storied apartment buildings creating a decided nuisance.

Going forward, a task force of View Park-Windsor Hills, View Heights, and Ladera Heights residents and County planning (and City of Los Angeles planning where relevant) is proposed for the purpose of guiding the vision, design, planning and future development, along with County and City representatives. We are taxpayers and must be brought into the visioning, design, planning and development processes from the very inception of such sweeping land-use proposals, goals and policies in a true collaborative process.

Sincerely,



Toni McDonald Tabor

Board President

United Homeowners' Association