

WESTWOOD HILLS PROPERTY OWNERS ASSOCIATION
INCORPORATED 1958

October 5, 2021

Los Angeles City Planning Commission

RE: 2021–2029 Housing Element Update
CPC-2020-1365-GPA
CPC-2021-5499-GPA
CEQA: ENV-2020-6762-EIR, SCH. NO. 2021010130
Hearing Date: October 14, 2021

Dear Sirs:

The Westwood Hills Property Owners Association is submitting the following comments regarding the Draft 2021-2029 Housing Element, which is currently scheduled to be considered at your October 14, 2021 meeting. We may also submit additional comments in the future either at the meeting, hearing or in writing.

1) REMOVE THESE ADDRESSES from Appendix 4.7: Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact and stable neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of this historic master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard Ave., Veteran Ave., Sepulveda Blvd. and immediately south of Wilshire Blvd., the high-rise residential buildings on Wilshire Blvd., along with the high-rise office buildings also on Wilshire Blvd. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

The city’s General Plan Framework lists “preservation of the City’s stable single-family residential neighborhoods” as one of its goals (Goal 3B; Objective 3.5; Policy 7.9.3), while permitting for intensification of selected single-family areas as transitions between high-density and single-family developments. That type of transitional intensification has already taken place in Westwood! By targeting Westwood Hills sites, the result is not “transition,” but *obliteration* of the entire single-family neighborhood that is currently surrounded by multifamily areas.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow, twisting streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already fully developed with housing, surrounded by a densely developed area that includes copious multifamily housing options mentioned above, and

cannot reasonably sustain additional density. We notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

Therefore, please REMOVE from Appendix 4.7 - Candidate Sites for Rezoning, the addresses in the ranges indicated below (inclusive of first and last numbers):

<i>Street Number Range</i>	<i>Street Name</i>	<i>Zip Code</i>
131 to 258	Barlock Ave.	90049
147 to 333	Bronwood Ave.	90049
11006 to 11268	Cashmere St.	90049
510 to 555	Cashmere Terr.	90049
300 to 393	Dalkeith Ave.	90049
134 to 494	Denslow Ave.	90049
101 to 195	Greenfield Ave.	90049
11200 to 11268	Homedale St.	90049
415 to 549	Levering Ave.	90024
11105 to 11278	Montana Ave.	90049
11108 to 11192	Ophir Dr.	90024
121 to 531	Bentley Ave. (aka S. Bentley Ave.)	90049
104 to 363	Glenroy Ave. (aka S. Glenroy Ave.)	90049
113 to 360	Thurston Ave. (aka S. Thurston Ave.)	90049
11000 to 11364	Sunset Blvd.	90049
200 to 288	Tavistock Ave.	90049
201 to 321	Tilden Ave.	90049
123 to 545	Veteran Ave.	90024

2) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last month. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The Staff Report mentions the impact of SB 9 and SB 10 (at p. A-43), but takes the position that any resulting increase in housing units cannot be considered as part of the inventory of sites, although it also says that they are seeking guidance from the state. These bills represent a major policy change, and rather than ignore them the city must redo projections to take into account their impacts.

3) Deadline Extension – the city is rushing to meet an October 15, 2021 deadline, which is not a true deadline. The city has at least 120 days from this date to adopt the updated Housing Element, and if necessary it should also request a further extension from the state, in order to permit analysis of the new state laws SB 9 and SB 10.

4) Data made deliberately difficult to review – in its draft for the September 21 and 22 public hearings, the Planning Dept. provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy were restricted. To make matters worse, the spreadsheet had no discernible organization – there were more than 267,000 addresses in Appendix 4.7, which were listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevented the public from organizing them in a meaningful way. *This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of required public notice.*

5) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses were listed in the draft, the city compounded the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city’s proposal. At a minimum, the city should have provided detailed maps for each Council District showing clearly which addresses are being targeted.

6) Further attempts to circumvent public comment – in addition to making its data as difficult as possible for meaningful public review, in its Draft Review Comments the state Dept. of Housing and Community Development (“HCD”) (at p. 11 of Exhibit O to CPC Staff Report dated October 14, 2021) makes a point of noting that the city “made the housing element available to the public on July 1, 2021 *without sufficient time for the public to comment prior to HCD submittal on July 7, 2021....The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review*” (emphasis added). Nevertheless, despite the city’s failure to make the draft publicly available in sufficient time to permit public comments, HCD notes that it considered comments from Abundant Housing and YIMBY Law (Exhibit O, p. 1) – but apparently made no attempt to consult or consider comments from other groups with different viewpoints.

7) Biased and baseless projections – in preparing its Draft Housing Element, the city is relying on biased and baseless projections from one source, the Turner Center, which is heavily financed by real estate, big tech and financial interests, <https://turnercenter.berkeley.edu/about-us/supporters/>. Further, in response to the HDC’s Draft Review Comments (at p. 6 of Exhibit O to CPC Staff Report dated October 14, 2021), the city also relies upon “pro-bono consulting services from the Turner Center” along with a consultant from MetroSight (p. F-14 of CPC Staff Report dated October 14, 2021) to come up with a statistical model that will support the city’s desired conclusion that *existing uses* on identified non-vacant sites will be *discontinued* during the planning process in order to accommodate lower-income households – a finding that is required by state law in order to include such sites in the inventory.

At a minimum, the city should also take into account projections and statistical modeling from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., <https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/> and <https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/>. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history.

These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space for possible redevelopment and/or repurposing, as businesses no longer require all their employees to be physically present in the office at the same time.

8) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the *maximum* number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a “transit corridor” should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

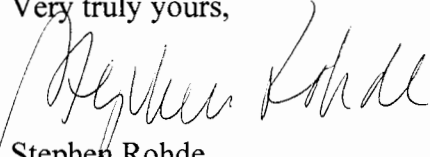
9) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

10) Lack of affordable housing enforcement mechanisms – the city’s most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the

hundreds of thousands of additional units will in fact be affordable when built, or if “affordable” initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Thank you for your attention to these serious issues.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen Rohde". The signature is written in a cursive style with a large initial "S".

Stephen Rohde
President
Westwood Hills Property Owners Association