



August 16, 2024

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

RE: Westside Area Plan Draft PEIR Comments

Dear Ms. Yom,

The Los Angeles County Westside Area Plan Draft (WSAP) Program Environmental Impact Report (PEIR) was prepared by the Los Angeles County Department of Regional Planning and PlaceWorks, an urban planning consulting firm that contributed to the proposal to rezone and redevelop the Ladera Heights, Windsor Hills /View Park and View Heights communities. The United Homeowners' Association II (UHA) Land Use Committee has reviewed the Draft PEIR and stands in serious opposition to the PEIR (and by extension, the underlying proposal) for a number of reasons, not least of which, because the primary detriments to these communities have not been addressed in a knowledgeable and thoughtful way, particularly around traffic congestion and roadway safety. The Plan would severely erode the quality of life in these well-established and longstanding quiet hillside communities; and based on other specific and discrete reasons that are discussed below, including expanding residential density along the major roadways and at the proposed Opportunity Sites in Ladera Heights and View Park-Windsor Hills. The competing interests only serve to create dire inconsistencies in the Plan which must be resolved in smart ways.

The current number of households in the Plan area is 15,425 and the population is 32,712. The implementation of WSAP will increase the number of households in the Plan area by 4,773 or 24% and increase the population by 15,704 or 48%. This growth is monumental and imposes a considerable undue burden on these Westside communities. As stated in the PEIR "if a subsequent activity would have effects outside the scope of the PEIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declarations, or an EIR." As such, the UHA hereby requests a new Initial Study and a Negative Declaration, Mitigated Negative Declarations, or an EIR. It is only fair considering the gravity of the WSAP proposal and PEIR with the detrimental impacts that would take place in these targeted communities, including the proposed Opportunity Sites.

The UHA has identified and addressed the negative impacts that Los Angeles Regional Planning has failed to address in the PEIR in the following areas: Aesthetics/Population and Housing, Land Use, Public Services, Wildfire, Agricultural and Forestry, Biological Resources, Cultural Resources and Transportation.

Aesthetics/Population and Housing

The County has stated that one of its guiding principles is “ to preserve the Westside’s character by ensuring future growth is integrated into neighborhoods, commercial districts, and open spaces with designs, densities, and variation that complement community scale and quality and contribute to a more walkable and accessible environment.”

However, the proposed WSAP would result in significant negative changes to the visual character of sites and their surroundings which is what make these targeted communities attractive neighborhoods to live in, and why families have chosen to buy their homes in these safe neighborhoods. This includes increased density, larger scale, and greater height compared to current conditions. When combined with other current and future development in the area, there would be potential adverse impacts on visual character and public views.

The WSAP involves significant changes to land use and zoning for specific Opportunity Sites in Ladera Heights, and View Park-Windsor Hills. These changes aim to guide the visual impact of future development. The destruction in the character of these targeted communities is apparent when one focuses on the following Opportunity Sites proposed by WSAP:

- **Site 9, Leimert Park Adjacent-** an area that is currently zoned C-1, however, these properties are directly across the street from single family dwelling homes that were built in the 1930’s and are part of a historic district that is recognized by the National Register of Historic Places. Under WSAP these properties will be rezoned to mixed use which will allow for the construction of buildings as tall as 45 feet with up to 150 units.
- **Site 10, Angeles Vista/Valley Ridge-**an area that is currently zoned R-1 and is directly across the street from several homes that are part of a district that is on the National Register of Historic Places. Additionally, this property is surrounded by single family dwellings. Under the WSAP, it will be rezoned to mixed use and will allow for the construction of buildings as tall as 35 feet with 50 units.
- **Site 5, Slauson-Heartherdale, Site 6, Slauson-Overhill and Site 7, Slauson East,** are all proposed to be rezoned from C-2 to mixed use allowing for the construction of buildings as high as 65ft (or 45ft if adjacent to a single-family dwelling).
- **Site 11 - Inglewood Oil Field.** The Inglewood Oil Field has played a major role in the history of Los Angeles. Since the discovery of oil and natural gas resources here in 1924, the field has helped fuel our lifestyle and strengthened our local economy. Over the field’s history, 1,600 wells have been drilled within the historical boundaries of the field. Today, the oil field’s boundary covers approximately 1,000 acres making it one of the largest contiguous urban oil fields in the United States.

The UHA questions the WSAP findings that the impact of zoning changes for these sites is “Less Than Significant” and is requesting that the County revisit its findings given that Site 9 is adjacent to, and Site 10 is across the street from homes on the National Register of Historic Places. Additionally, the upzoning of these sites is in direct opposition of the County’s guiding principles “to preserve the Westside’s character...”

With regards to Sites 5, 6, and 7, the UHA is also requesting that the County review its findings that buildings as tall as 65ft housing 50-150 dwelling units will not affect the aesthetic of the community. The development of these areas will add more traffic to an already congested area. Where will the 4,773 new households, that the County is projecting, park their cars?

Furthermore, while it is understood that the County is not *recommending* any development, the County is, through the rezoning process, supportive that a number of units can be built, thereby creating greater population density. Given the County’s projections for the anticipated construction, UHA is requesting an opportunity to review the corresponding traffic, and parking studies that have been completed for the projected development.

Regarding Site 11, the UHA understands that this site was included in the WSAP, because there is future potential for additional housing or commercial development, however because the County has included the IOF in the WSAP it is incumbent on the County to ensure that the oil field is properly shut down. The UHA request that the EIR be revised to include the following actions: 1. Funding be set aside to complete the shutdown of oil and gas operations in the Baldwin Hills Community Standards District (BHCS D) and that it be stipulated that the funds can only be utilized for the purposes of shutting down oil and gas operations, 2. That a mechanism be established to monitor and maintain the systems necessary to shutdown that portion of the oil field operating on unincorporated County land, 3. That a person, entity or organization with sufficient expertise be tasked with creating, implementing and overseeing an IOF shut down plan, 4. The plan must include cost, implementation, monitoring and firm dates and a timeline for the actual shut down of operations and must be placed in the BHCS D.

Additionally, while it is understood that the County is not recommending any development, the County has, through the rezoning process projected that a number of units can be built. Given the County’s projections for the anticipated construction the UHA is requesting an opportunity to review the corresponding traffic, and parking studies that have been completed for the projected development.

Land Use

The UHA opposed the land use goal and policy suggestions as part of the first iteration of the PEIR and reiterates its strong opposition to them:

2.2 That states that development should take place in proximity to the Crenshaw Line (K Line) transit station and along bus corridors as this development is not compatible with the second part of this policy which states that the development

is possible while preserving the existing residential neighborhoods and preserving parklands and open spaces.

LU 2.6 Ensure that plans and entitlements for growth and development in adjoining municipalities are compatible and seamlessly connected with the Ladera Heights/View Park-Windsor Hills and West Fox Hills communities.

LU 2.4 Encourages the development of small and undersized parcels through lot consolidation to support market-supportable land use.

LU 4.2 Accommodate the development of a wide variety of housing options for residents and workers that are affordable for everyone.

LU 5.3 Consider the development of small local-serving (such as coffee shops and restaurants) and community-gathering uses within and are walkable from residential neighborhoods.

LU 18.4 Encourage lot consolidation to support the development of larger floorplate land uses.

LU 21 Commercial uses/services integrated within, scaled to fit, and enabling residents to walk from surrounding residential neighborhoods.

LU 5.5 Utilize incentives to encourage the production of affordable housing, consistent with the Economic Development Element and Countywide Housing.

The UHA strongly disagrees with the County's contention that there is a seamless connection in the development policy between the City of Los Angeles and View Park/Windsor Hills. The development underway on Crenshaw Boulevard has overwhelmed the City of Los Angeles portions of Crenshaw and threatens to overwhelm View Park-Windsor Hills, as well. There are currently 21 housing developments either in pre-development or under construction (also near the K Line on Crenshaw), but adjacent to the View Park-Windsor Hills community. There does not appear to be plans for additional infrastructure (water, street maintenance, parking, law enforcement and power) to service this addition to the population density.

The UHA is unable to find any reference to how the PEIR considered this when recommending the rezoning of Opportunity Site 9. In the very least, the aesthetics and character of the community—which are already being affected by development in the City of Los Angeles—should have been considered. It is UHA's contention that there should have been discussions between the City and the County, and that the PEIR should be revised to reflect those findings.

Public Services

Higher development densities in Ladera Heights, View Park-Windsor Hills and View Heights (WHVPVH) will increase the population and the demand for infrastructure investment, maintenance, and law enforcement services. The WSAP is projecting an increase of 4,773 households with a corresponding increase in the population.

To maintain a good officer-to-population ratio, more law enforcement resources will be needed as the population grows. The specific impacts of building new sheriff facilities aren't known yet and will be evaluated case-by-case through the CEQA process. The expansion of law enforcement services will be supported by increased tax revenues, helping to fund necessary facilities and personnel. The PEIR states that the WSAP aligns with the County's Housing Element projections, so it will not lead to unexpected growth, keeping the demand for public services within expected limits. Overall, the WSAP's asserts the impact on law enforcement services is considered manageable with current policies and funding.

However, the UHA questions this assumption, as the WSAP has a perceived law enforcement deficit. UHA has been requesting increased patrols for some time to address the uptick in crime that the plan area has experienced in the last few years. UHA understands that comparatively WSAP crime rates area are low. However, given the anticipated increase in households and the uptick in crime, UHA questions the County's finding that public services can be considered "manageable". Additionally, there are currently 21 construction projects underway in the City of Los Angeles adjacent to WHVPVH. While these projects are not in the County, crime does not stop at City or County boundaries. How will the County address crime that will overflow to WHVPVH. The UHA requests that the County provide data on current and projected need for public services resources in the WSAP area given the current deficit.

Wildfire

In reviewing the wildfire section of the PEIR, UHA was unable to find any reference to the Newport-Inglewood Earthquake Fault (NIF). The UHA did find information about NIF under the Soils and Geology section, but what makes the absence of NIF in the wildfire section extremely concerning is that fires caused by earthquakes are a common hazard in the Los Angeles area. This year, insurers are cutting back on homeowners' policies, citing the risk of earthquake-induced fires. The 6.7 magnitude Northridge earthquake that struck Los Angeles on January 17, 1994, caused approximately 110 fires. The fires were likely caused by strong ground shaking, differential motion and soil strains, and inertial forces.

While there are 500 active faults in the state, what makes the NIF different and potentially dangerous to the surrounding community is that it runs through the largest urban oil field in the United States, the Inglewood Oil Field (IOF). Additionally, the oil field is in a designated Very High Fire Hazard Severity Zone (VHFHSZ), its 1,000 acres are filled with oil wells, gas lines and oil pipelines that may break during a quake and start a wildfire. Making matters more precarious is that Ladera Heights and View Park-Windsor Hills are hillside communities with narrow streets and a portion of the plan area is not compliant with the County's General Plan Safety Element that requires two evacuation routes. These constraints make evacuation during a natural disaster, such as wildfire, quite perilous. The WSAP, by increasing density and height to an already congested area is distressing. In fact, the PEIR identifies wildfires as "Less Than Significant Impact." The UHA requests that the County revise the Wildfire section of the PEIR to include the hazards that are uniquely inherent to the location of the NIF and the

Plan area. Additionally, UHA would like the PEIR to include mitigation measures for areas that do not have compliant evacuation routes.

By increasing density and height to an already congested area, the WSAP raises serious concerns due to its inadequate consideration of **Community Evacuation** issues, particularly in relation to the traffic and challenging terrain of View Park, Windsor Hills and Ladera Heights, which border the Inglewood Oil Field and NIF. The potential for a feasible and safe evacuation becomes even more daunting when considering the planned significant increase in residents and vehicles the Westside Area Plan’s project would introduce to our community. It is difficult to envision what an evacuation would look like if the Project were to add 500 or even 1,000 vehicles to the already burdened evacuation routes. Please see the table 1 below outlining the UHA’s evacuations concerns.

CHALLENGES TO EVACUATION ROUTES
TABLE 1

Evacuation Routes Challenged by Opportunity Sites 4A, 4B, 5, 6 and 7	Evacuation Routes Challenged by Opportunity Sites 5, 6, 7 and 8	Evacuation Routes Challenged by Opportunity Sites 3, 4A and 4B	Evacuation Routes Challenged by Opportunity Sites 3, 4A, 4B, 5 and 6	Evacuation Routes Challenged by Opportunity Sites 3, 4A and 4B and possibly 6, 7 and 8	Evacuation Routes Challenged by Opportunity Sites 7, 8 and 9
Windsor Hills West. Only 1 exit exists onto La Brea Avenue (Northridge Dr.) for residents who live in the westernmost section of Windsor Hills. At the east side of that Windsor Hills section, 2 exits onto Overhill Drive exist—Northridge and Onacrest Drives. Several streets are cul de sac streets in this area. If there is fire on La Brea, Ave. or in the easternmost section of the oil field, that artery may not be available for evacuation	Windsor Hills South of Northridge. Evacuation from Windsor Hills south of Northridge Drive onto Angeles Vista Blvd would be via winding streets such as Valley Ridge, Parkglen, Inadale, Verdun, and Marburn.	Upper Ladera Heights. Inglewood Oil Field abuts the northernmost and easternmost sections of Upper Ladera Heights. The only exits from this area are 2 streets—Corning and Shenandoah Aves. onto Slauson Avenue	Lower Ladera. The nearest exit for the northern section of Lower Ladera would be 2 streets—Corning and Shenandoah Aves. onto Slauson Avenue. Residents evacuating would be challenged by Sites 3, 4a, 4b, 5 and 6	Western View Park— with its terrain of hills, slopes, narrow streets and cul de sac streets—evacuation would be via 2 exits onto Overhill Drive via Northridge and Springdale Drives. Residents might use Stocker St. via a very steep Valley Ridge Ave. Other residents could use Presidio Drive on to a narrow section of Angeles Vista Blvd	54th Street. Residents in the area surrounding 54 th Street would use that street to access Crenshaw Blvd or Slauson Ave. via West Blvd. Residents’ evacuation
Heatherdale Ave. Only one exit-exists for the entire Heatherdale Avenue. Residential area. Additional units and vehicles at site 4 could possibly create a situation that would bar the residents’ egress in the event of a nearby disaster					

CHALLENGES TO EVACUATION ROUTES
TABLE 1 (Continued)

Evacuation Routes Challenged by Opportunity Sites 4A, 4B, 6, 7, 8 and 9	Evacuation Routes Challenged by Opportunity Sites 1 and 2				
View Park East of Valley Ridge. Evacuation from the eastern section Of View Park would use the narrow, curving Presidio and a narrow Palmero Blvd. and Floresta Ave. And a very narrow Angeles Vista Blvd. to reach Stocker St. There are several streets moving eastward onto Angeles Vista, which turns wider, moving southward. 48 th St. would access Crenshaw Blvd.	The southernmost section of Lower Ladera can exit onto Centinela Ave. via 2 streets-- —Alvern Ave. and S. Sherbourne Dr.				

The PEIR identifies wildfires as “Less Than Significant Impact.” The UHA strongly disagrees and requests that the County revise the Wildfire section of the PEIR to include the hazards inherent with the location of the NIF and the Plan area. Additionally, the UHA would like the PEIR to include mitigation measures for areas that do not have compliant evacuation routes.

Agricultural and Forestry Resources

While the PEIR asserts that there are no Farmland or Forest resources in the planning area, the UHA requests that the County consider the adverse impact that the rezoning would clearly have on a property owner’s ability to plant trees and/or vegetation on their property if high rise developments loom next door and block out sunlight. Adversely affected property owners would be discouraged to plant trees, etc., and be subjected to concrete over their property, thereby, adversely affect animals and birds that rely on the habitat.

It seems improbable that a potential developer that is allowed to develop a residential property into a commercial or mixed-use complex would preserve open space unless mandated to do so by the County which should then enforce the mandate. The developer will use whatever clear-cutting methods necessary to prepare the land for development, including employing heavy equipment, grading and leveling land and removing vegetation and topsoil.

In a review of the Los Angeles County General Plan policy, there is “support for countywide community garden and urban farming programs.” The LA Times published an article recently about an urban micro farm on Angeles Vista, planted in a front yard farm that is supported by an organization called Crop Swap LA. <https://www.theguardian.com/environment/article/2024/may/15/urban-microfarm-farming-environment>. The article describes that the View Park resident’s home “used to have a water-guzzling grass lawn. Today, it is a verdant micro farm that uses solar

power and recycled water to grow carrots, beets, potatoes and more, with the bounty distributed to neighbors.

The WSAP states that the proposed zoning changes will have no impact on the Planning Area, however the opposite is true. There are limited constraints on development entities to mitigate the harm that their activities will cause and to ensure that they “enhance community spaces, promote a stable and livable environment that balances growth and preservation, and improve the quality of life in the Planning Area through the creation of vibrant, thriving, safe, healthy, and pleasant communities.” In fact, the quality of life in our targeted communities would be dealt a significant blow by the proposals in the WSAP and draft PEIR.

Furthermore, the PEIR does not mention that upzoning will result in the loss of mature trees in the targeted communities. According to an article in the publication, LAist, California has lost 30% of its tree cover since the turn of the century—and the only way to solve that problem is to get more trees in the ground. Trees in California’s urban regions play a key role in health and quality of life for all communities. The benefits of an urban tree canopy are well-established—better mental health, more shade, a lower heat island effect, not to mention cleaner air. And even though Los Angeles has the largest urban forest in the nation, many parts of town have been starved for tree cover, especially low-income neighborhoods. The City of Los Angeles’ *Million Trees LA* initiative seeks to plant 20,000 trees per year to support sustainable growth of the urban forest and mitigate the impacts of climate change through the planting of trees and the stewardship of trees.

It will be decades before the young saplings that may be planted by a developer will provide any tree cover benefits that mature trees provide as noted in the article. Also, there is no protection for established trees to become mature trees. It takes decades for established trees to provide a tree canopy and the time invested in the maturing tree is lost to the community. The UHA requests that as part of the PEIR, the County provide an inventory of trees that may be affected in the WSAP area development plan, and mitigation measures to be employed to ensure trees are not lost.

Biological Resources

The proposed PEIR section addressed here is narrowly focused on whether the proposed Project, or WSAP, would result in a significant impact relating to candidate or special status species, sensitive natural communities, protected wetlands, wildlife corridors, or unique native woodlands.

However, the PEIR does not address the fact that people living in the Planning Area are biological resources. Humans need natural habitats for physical and mental health. Research has shown that exposure to natural environments, including the presence of wildlife, has a positive impact on mental health. Spending time in nature, whether observing wildlife or engaging in outdoor activities, reduces stress, anxiety and depression while enhancing cognitive function, creativity and overall well-

being. Increased density by upzoning within the Planning Area creates more traffic congestion and crowded facilities, limiting access to natural environments.

The PEIR proposes to increase the population by 15,704 people, however it does not consider the highly significant impact that the loss of a major supermarket for any period of time would be to the health and wellbeing of the people living in the Planning Area. The Planning Area is already impacted by significant inequity due to historic and current racial discrimination and red-lining that limits access to healthy food choices available through grocery stores. Also missing in the PEIR is access to hospitals and emergency health care for the increase number of people projected for the area. UHA request that the PEIR be revised to include a review of food and health care resources that may be needed for the increased number of households projected in the planning area.

Cultural Resources

View Park Historic District (District) was listed on the National Register of Historic Places in 2016 with this description “The View Park Historic District is located in unincorporated Los Angeles County, approximately nine miles southwest of downtown Los Angeles. The larger View Park neighborhood rests on the southeastern face and the crest of the Baldwin Hills, a low-lying mountain range in west central Los Angeles County. The roughly 450-acre View Park development was initially subdivided in 1923 by the Los Angeles Investment Company. Subdivision continued for two decades and the construction of single- and multiple-family dwellings occurred incrementally from the mid-1920s into the 1960s. View Park is predominately composed of single-family residences, with a small number of multi-family residences, as well as one commercial building (the Los Angeles Investment Company’s office) and small neighborhood park...”

Importantly, the community is described as being predominately composed of **single-family residences**. The County boasts the existence of the District discussing it as part of Historic Context Statement and mentioning it at least eight times in the PEIR. However, the District is not on the County landmark list and as a result the County does not provide the same protections to the District that it does other landmarks that are on the County Landmark list. The UHA requests that the PEIR state how the County will ensure the protection of the View Park Historic District as it is paramount to the history, culture and character of the community and the County as a whole. The PEIR should be revised to discuss how the County will ensure the protection of this District.

Transportation

The UHA appreciates the overarching goal of the WSAP to reduce the vehicle miles traveled within the targeted communities of Ladera Heights and View Park-Windsor Hills, thereby reducing greenhouse gas emissions. Enacted State legislation, SB743, established “the metric for determining impacts relative to transportation to vehicle miles traveled (VMT),” and a plethora of State, local, and governmental organization policy statements that speak to the reduction of greenhouse gas emissions and the metrics for determining a reduction of VMT. ¹

These comments focus on issues of VMT and roadway safety in the targeted communities Ladera Heights and View Park-Windsor Hills.

5.17.1 Environmental Setting

Ladera Heights and View Park-Windsor Hills are special suburban-like hillside communities that are part of greater Baldwin Hills, which characterizes the existing environmental setting including an abundance of wildlife. Alternate areas that are urban in their environment and character must be strongly considered instead of these targeted hillside communities.

The Los Angeles County baseline of VMTs is more heavily influenced by the urban areas of the County “in contrast” to the suburban environment and character of the targeted communities, therefore, more naturally resulting in higher VMT. The character of the targeted community means that residents are far more likely to use their personal vehicles for commuting to employment, school, entertainment, recreation, and everyday errands. This is a simple fact. Nonetheless, the PEIR speaks to mitigating the VMT by 1.3% to meet what appears to be an arbitrary assignment of a VMT reduction metric in the targeted communities.

The proposed WSAP/PEIR deliberately places an unreasonable burden on the targeted suburban-like communities as compared to the more appropriate densely populated urban areas in the County where VMT reduction is demonstrably needed and rational. Furthermore, the WSAP includes policies focusing on “growth around major transit stops and so called “high-quality corridors.” While “high-quality corridors” is not defined in the PEIR, we will use a reasonable working definition (for this purpose) that speaks to a “major” roadway that has multiple points of transit transfer points as well as connections to Metro trains. This type of roadway does not exist in the targeted communities of Ladera Heights and View Park-Windsor Hills because there is no need for multiple transit transfer points that connect to Metro trains anywhere along the major roadways. The closest such point is at Slauson Avenue and Crenshaw Boulevard in the City of Los Angeles. This proposal is ill-conceived and has no basis in the reality of the Ladera Heights and View Park-Windsor Hills communities. It makes no sense. Any governmental interest is misplaced.

According to Impact, 5.17-2, there is a contradiction to the WSAP and PEIR. The PEIR unambiguously acknowledges that the unique *“predominantly suburban land use context of the Planning Area may limit the effectiveness of many TDM strategies because there are relatively few effective alternatives to driving for most trips, and most destinations...are relatively far from any given home in the Planning Area.”* The section goes on to say that the WSAP increase in housing would, of course, increase population density and create an increase in the VMT—entirely in contradiction to the purpose of the WSAP. An increase in population density in the targeted communities is an ill-conceived plan because, *“[S]trategies encouraging walking, biking, and transit, for example, would only have a marginal effect because the destinations are still too far to effectively reach in a reasonable time by means other than driving.”* Consequently,

employing the WSAP and TDM strategies to reduce the VMT in the targeted communities and will not achieve the desired reduction of greenhouse gas emissions. Ladera Heights and View Park-Windsor Hills are not the appropriate communities in which to impose the WSAP.

Doing so would impose a **significant negative impact** on these targeted communities. And even if the WSAP were to be imposed, the study goes on to acknowledge that while, “VMT per capita would be reduced as a result of the proposed Project, with Mitigation Measures T-1 and T-2, the **impact related to VMT per service population will remain significant and unavoidable.**” This conclusion begs the question of why Los Angeles County would waste time and resources in an attempt to impose implementation of the WSAP on the Ladera Heights, View Park-Windsor Hills community. We strongly recommend the alternative of looking to a true urban environment to implement the WSAP where it would have greater impact in the reduction of VMT.

A transportation network already exists in the Ladera Heights, View Park Windsor-Hills communities as there is bus transportation, and usage of bicycles/bike lanes; however, vehicle trips remain the preferred mode of transportation because of the character of the targeted communities. To reiterate, these are hillside communities and walking and cycling pose obstacles to the reduction of VMT.

Characterized as a “Less Than Significant Impact,” Impact 5.17-3, is the idea that because there is no current development plan for new roadways. At Section 5.17.3.2 Proposed Project Characteristics and Relevant WSAP Goals and Policies, “*The WSAP is intended to the guide long-term growth of the Planning Area, promote active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to foster economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to support sustainable mobility options in an enhanced built environment.*”

The Ladera Heights and View Park-Windsor Hills communities are already intergenerational communities due to the income levels of many of the households. Given the price of condominiums in Los Angeles and in California as a whole, intergenerational neighborhoods are more and more difficult to achieve, as the County acknowledged in a recent public meeting. The WSAP does nothing to encourage and support intergenerational communities. The issue is not housing capacity, but housing affordability, and is not contemplated in the WSAP. Furthermore, and in terms of fostering economic vitality that serves local needs, the trend in such redevelopment is the constructive eviction of current small businesses that cannot afford the new and higher rents for the same, or similar space, following the redevelopment. This trend destroys the economic vitality of the neighborhoods and rarely do the same services continue to be available. That is the reality of redevelopment; it does not serve the neighborhood/community.

According to Los Angeles County, because the WSAP is planning for future growth within the Planning Area, no actual development is being proposed at this time.”

Our targeted communities must, nonetheless, address the impacts of the probability of future population growth that would be inconsistent with the environment and character of this part of the Planning Area.

The potential safety hazards, and real and identifiable safety hazards, due to “roadway design features” are quite significant. Specifically, and currently, the intersection of Slauson Avenue and La Brea Avenue for eastbound traffic is especially dangerous between Fairfax Avenue and La Brea Avenue relative to the left-turn lane on La Brea Avenue. Many drivers illegally use the eastbound left-turn lane as a driving lane, along Slauson Avenue, to bypass the line of cars waiting for the traffic signal to turn green to either proceed along Slauson Avenue or to reach the left-turn lane to turn left onto southbound La Brea Avenue. Drivers have driven through the tall orange plastic pillars that have been erected as an effort to stop this hazardous practice, but to no avail. Law enforcement ignore and drive past as these drivers drive illegally, without conducting a traffic stop to cite them. Many collisions and near collisions occur many times each day. This hazard must be taken seriously by the County and remediated immediately to ensure the safety of the residents of the targeted communities and those who drive through these communities every day. Much more must be done to prioritize remediation of these safety hazards rather than focus on creating population density and unnecessary transit transfer points.

The UHA believes that the use of VMT would have a ***significant negative impact*** on these targeted communities. We request that the County review its use of VMT for this area as we do not believe it is appropriate.

We furthermore note the mischaracterizations of street locations and directions at pages 5.17-17 and 5.17-18 of the PEIR. Both Overhill Drive and Angeles Vista Boulevard are not located in Ladera Heights; Overhill Drive runs northwest to southeast; Angeles Vista Boulevard runs northeast to the south. Further, Fairfax Avenue only runs north and south through Ladera Heights; Centinela Avenue primarily runs east and west through Ladera Heights and into the City of Inglewood to the east but is not located in View Park-Windsor Hills. It is concerning that the County does not know what roadways are in which neighborhoods/communities within the proposed Planning Area.

Mobility Element

Goal M1: A safe, efficient and accessible transportation network for all Westside communities

Policy M 1.2. UHA Supports the general concept

Policy M 1.6 UHA Supports the general concept

Goal M 2: A safe transportation network for users of all ages and abilities

Policy M 2.1. UHA Supports the general concept

Policy M 2.3 Annually review the Capital Project Program list and the CEO's Capital Programs for opportunities to incorporate roadway safety improvements proposed by CTSP into upcoming projects. **The County must involve the Ladera Heights, View Park-Windsor Hills and View Heights communities at the outset of such review and discussion.**

Goal M 3: Improved access to reliable, safe, and high-quality transit service

Policy M 3.1. Promote the use of transit by strategically orienting new developments around major transit stops and high-quality transit corridors. Apply the Los Angeles County Transit Oriented District Design Guideline to new projects and emphasize design elements that facilitate transit use, including pedestrian walkways, bus plazas, and similar features. **Ladera Heights and View Park-Windsor Hills oppose this proposal because it is inconsistent with, and inappropriate for the character and environment of these targeted communities, as it would create unnecessary population density and greater traffic without meaningfully reducing current VMT levels. See above.**

Goal M 4: Pedestrian and bicycle infrastructure is safe, connected, and comfortable for users of all ages and abilities

Policy M 4.1. Provide continuous pedestrian access along major streets with existing sidewalk gaps, such as La Brea Avenue between Slauson Avenue and Obama Boulevard, and Overhill Drive between Slauson Avenue and Stocker Street/La Brea Avenue.

The UHA questions the PEIR's use of this proposed plan as given the danger it presents to pedestrian life and safety. The traffic flow is simply too fast to safely add sidewalks along La Brea Avenue more specifically between Don Lorenzo Drive and Sanchez Drive in Baldwin Hills. There are already pedestrian sidewalks along La Brea Avenue, northbound, between Sanchez Drive and Obama Boulevard. Also, there are already sidewalks on La Brea Avenue between Stocker Street and Don Lorenzo Drive for access to Norman O. Houston Park. In addition, there are pedestrian sidewalks along the east side of La Brea Avenue, between Slauson Avenue and Overhill Drive, that provides access to the homes going into View Park-Windsor Hills. There is already a pedestrian sidewalk on the north/east side of Overhill Drive between Slauson Avenue and La Brea Avenue, and this sidewalk is strictly controlled by light signals on each end of the roadway. These critical errors in the Plan demonstrate the pressing need for the County planners to become knowledgeable about their subject matter and to involve the residents who know their neighborhoods and communities.

Conclusion

Comments from both the View Park-Windsor Hills United Homeowners' Association and the Ladera Heights Civic Association have been extensive and clear-throated in their critique of the WSAP/Draft PEIR and the extremely significant negative impacts that the proposals would have on these communities. These communities are historically and largely African American, yet also ethnically diverse representing residents of many

cultures and backgrounds that make Ladera Height and View Park-Windsor Hills desirable places to live and raise families.

While these comments are critical of the Plan, the UHA and the Ladera Heights Civic Association would be pleased to fully discuss the reasonable alternatives with you in more detail. Alternatives include mandates on prospective developers and enforcement of those mandates to ensure that any new projects are done with respect to the established communities. Population, housing, transportation, land use, public services, wildfire, biological resources, and aesthetics are all important issues negatively impacting these targeted communities in meaningful and significant ways, and the Plan fails to adequately address these issues in a cohesive and consistent manner and the significant negative impacts they would have on our communities. The Westside Area Plan cannot move forward in its current iteration without greater community input to ensure that the Plan protects these targeted communities of Ladera Heights and View Park-Windsor Hills.

Thank you for your attention to these comments. We look forward to your response and to working with you going forward. If you have questions regarding this letter, please contact Angela Sherick-Bright by email at ahserick@pacbell.net.

Sincerely,



Toni McDonald Tabor
Board President
United Homeowners' Association