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VIA E-MAIL and U.S.P.S.  
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Westside Community Plans  
Los Angeles City Planning  
200 N. Spring St., Room 750  
Los Angeles, CA 90012

To the Westside Community Planning Group:

Thank you for this opportunity to comment on the Draft Land Use Concepts for the Mar Vista/Palms/Del Rey Westside Community Plan (Draft Concepts).

The Del Rey Residents Association (DRRA) is a 501(c)(4) social welfare organization that represents the interests of the residents of Del Rey. Our comments follow.

#### General Comments

1. Many aspects of these Draft Concepts were developed before the COVID-19 pandemic began. We believe that the pandemic will continue to impact people's willingness to live and work in enclosed spaces. The current Draft Concepts are based upon an underlying belief that increasing density in a community is a good thing that will result in lower housing prices. We disagree, and believe that the update of the Community Plan needs to be prepared with the following points in mind:
  - a. As more people work at home, there will be greater demand for housing that includes a yard or easy access to a park or recreation center that is not being used as a homeless shelter.

- b. If people are less willing to use public transit because it may expose them to infection, the idea of allowing higher densities near transit lines that operate every 15 minutes makes less sense.
  - c. Del Rey is only 2.45 square miles in size, and we do not want tall buildings to be built along all of our major streets (Lincoln Blvd., Washington Blvd., Sepulveda Blvd., Jefferson Blvd., Centinela Avenue, Inglewood Blvd). It will segment the community and make us feel as if we are being boxed-in.
  - d. Any planned density increases need to be planned in conjunction with the City's Infrastructure Plan (which is more than a decade out of date), the Housing Element (which is currently being updated), and the Regional Housing Needs Assessment (which calls for housing construction that could occur with no need for a change in our current zoning).
  - e. Pushing new, multi-family housing into already built-out neighborhoods near transit without (1) providing additional open space and recreational opportunities, (2) addressing climate issues such as heat islands created when buildings replace trees, and (3) ensuring sufficient infrastructure will exacerbate inequities in quality of life issues for new and existing residents. Additional residential densification in Del Rey must be very limited.
2. We agree that the Del Rey community needs to have housing that is accessible for low income residents, but we believe that using "density bonuses" for the construction of affordable units is the wrong way to achieve that goal. It has been our experience that developers take advantage of "density bonuses" to break through height and setback requirements without addressing the infrastructure needs that result from increased density (roads, parking, parks, libraries, utilities, etc.) The addition to a development of "affordable housing" units, through State mandates and incentives, must not result in building heights that would be overly tall for the existing community. This requires a reduction of the proposed height limits so that even with affordable housing, the final height and shape of each project will not be out of character for the neighborhood.
3. We also recognize that slums are created when all of the low income housing is built in one area. Del Rey is fortunate to have a number of 100% affordable complexes - Mar Vista Gardens, two complexes built by Thomas A. Safran and Associates, a PATH building, at least five buildings operated by Venice Community Housing Corporation - dispersed throughout the area. We also have numerous "community care facilities" and "co-living" projects that affect the community's infrastructure needs, but these pockets of residential density are not shown anywhere in the Draft Plan and need to be identified in that draft.

4. In June 2011, the Planning Department participated in a “visioning session” concerning Del Rey’s “Area H” (between Ballona Creek and Jefferson Blvd.). The top responses to the Questionnaire at that time were as follows:
  - a. What is your vision for your neighborhood? Greater sense of community/community identity; More “walkable”/pedestrian friendly.
  - b. What do you consider to be the biggest land use challenge(s) in your neighborhood? Playa Vista and associated density/traffic; traffic and congestion.
  - c. What do you consider the biggest strength(s) of your neighborhood? Neighborhood unity/sense of community; Proximity to LAX/beaches/freeways, etc.
  - d. Do you have any specific suggestions for improving your neighborhood? Increase “walkability.”
  - e. Please provide us with some specific examples of areas, projects, resources that you consider a real strength/asset in your community that you would like to see preserved, maintained or further improved. Ballona corridor/wetlands.
  - f. What city services...would you like to see provided and/or policies and programs promoted in your neighborhood that you think are currently missing? Develop parks/community gardens.

It is clear from these responses that “walkability” is important, and yet most of the new projects in Del Rey, particularly in the Glencoe-Maxella area, have been designed to be inward-facing, providing almost no interface with the neighborhood and failing to foster a sense of community outside of each project.

5. The Community Plan also needs to acknowledge and accept the importance of “Location, Location, Location.” Del Rey is desirable because it is close to the ocean, and it is criss-crossed by three creeks -- Ballona Creek, Centinela Creek, the Sepulveda Channel. That desirability means that housing in Del Rey is going to be less affordable than in other communities, and Del Rey is never going to be the same as a community in the San Fernando Valley or the Inland Empire. The Community Plan should reflect Del Rey’s uniqueness.
6. The three creeks also create challenges when it comes to emergency preparedness. If Del Rey were to experience a major flood, earthquake, or manmade disaster, it would be difficult for Del Reyans to evacuate. The Community Plan and the Mobility Plan have been developed separately, but they need to be considered together. When the Community Plan allocates additional density to an area, it

needs to consider how those residents are going to enter and leave the area, particularly in an emergency.

7. The key to any Community Plan is that it will be enacted as a City ordinance, and it must be enforceable. The amount of discretion granted to the Planning Department must be tightly circumscribed so there is no perception that developers can obtain variances if they are willing to pay the right price.

### Concept Plan Elements

1. Marina Marketplace:

The Concept Plan sanctions a project (Paseo Marina; Case No. ENV-2016-3343-EIR) that potentially allows development of a project that has been overwhelmingly rejected by the community due to its height, residential density, reduced commercial space, lack of automobile parking, and lack of open space.

It is already difficult for Del Reyans to cross Lincoln Blvd. to access the amenities in Marina del Rey, and the proposed Paseo Marina project would make it even more difficult for residents to move back and forth between Marina del Rey and Del Rey.

The community is adamant about retaining Marina Marketplace primarily as a neighborhood-friendly retail commercial center with added open space that provides pathways for the public throughout and integrates the project with the neighborhood. To retain the local character, the height must be limited to no higher than that of currently existing adjacent properties, not including the Stella apartment building. The Stella development was granted a 'Zone change' to exceed the allowable height by at least 20 feet. It also includes a Q condition that restricts any further development on the remaining portion of that parcel. This exception to the pre-existing height limit must not be used to justify any future height limits. We also request that the Q condition be integrated into the Community Plan. The Concept Plan picture shows a project that would cut off the project from the neighborhood. The DRRA asks that the Marina Marketplace redevelopment be required to provide at least as much ground level local retail commercial space as currently exists and require public pathways and open space.

2. New Low and Medium Residential:

Several neighborhoods in Del Rey are proposed for Low or Medium Residential designation, allowing for duplexes, triplexes, fourplexes, courtyard apartments, bungalow courts, townhomes and even large scale multi-family buildings. The proposed neighborhoods currently are predominantly single family residential. Most of the lot sizes are 5,000 sq.ft. or smaller and simply cannot support

increased density. Moreover, because these lots are small, increasing building footprints will mean that trees will be removed. Studies show that a smaller tree canopy leads to higher temperatures, with known health and environmental risks. Allowing multiple units will encourage developers to acquire multiple lots and drastically change the character of these neighborhoods. New multi-unit buildings will dwarf the existing small, mostly single-story bungalow homes and will deprive them of light, air and open space. Moreover, these streets cannot accommodate more parking. A large number of residents already use garage space for storage or other non-car uses and park their cars on the street, or they drive work trucks or sport utility vehicles that do not fit into existing garage spaces. Further, the retail businesses and restaurants on Washington Blvd. and Centinela Avenue do not have sufficient parking, and the overflow goes to the very blocks that are proposed for Low Residential. Residents have already obtained restricted parking on many of these streets. Though these blocks are close to bus lines, the vast majority of residents have private cars. Increased density will exacerbate the problem.

3. Centinela and Inglewood Neighborhood Villages:

We support the establishment of neighborhood villages on Centinela Avenue and Inglewood Blvd. as depicted in the plan. We agree with the plan's goal of establishing maximum commercial tenant sizes to encourage small independent businesses, and prohibiting uses that do not support walkability. We object to allowing development with heights over 2 stories, however. We are seeking to transform Centinela Ave into the Heart of Del Rey via the Great Streets program. This area should reflect our unique identity and stand as a special place to be protected as a community resource. We would like to create design guidelines to guide development and preservation activities within the Centinela Ave and the Inglewood Blvd areas.

4. Traffic:

The impacts of private car transportation on the environment and housing needs are all very significant, valid concerns, but the burden cannot be placed on a few who happen to live within a block of a bus line. Many of the residents of the Low Residential blocks have lived in their homes for decades. Their small homes have a lower environmental footprint than large homes on large lots that consume more energy, water for lawns and pools and furniture to fill the rooms. The very small benefit of crowding more residences into these areas and hoping that some of the

residents will use a bus for most of their transportation is far outweighed by the harm it will cause to the people living there.

In addition, plans for “transit-oriented development” fail to accommodate the residents who live within one-half mile of a street served by transit, but who cannot use public transit because the routes do not take them where they need to go, or they need to transport goods or people who are mobility-challenged and unable to use public transit.

5. Lincoln Boulevard:

Lincoln Boulevard north of the Ballona Wetlands should **not** be designated a Regional Center, and there should **not** be a Regional Center located in or adjacent to the protected wetlands. As a main north-south vehicle route through the westside and Santa Monica to LAX, Lincoln Boulevard is already beyond its vehicle capacity. Traffic congestion is a nightmare, particularly during the summer tourist season (before COVID-19). Soon, the redeveloped Cedars Sinai Hospital will begin to draw more patients and visitors. Redevelopment of large-scale residential projects in the Glencoe-Maxella Specific Plan area and Marina del Rey without traffic mitigation continue to exacerbate the dire traffic conditions. A Regional Center would make traveling along Lincoln Boulevard intolerable and should not be part of the Community Plan until a breakthrough traffic reduction system, such as a center lane light rail route, is in place.

6. Ballona Wetlands Ecological Buffer:

The DRRA agrees with the proposal to apply specific design standards and buffer zones for properties adjacent to the Ballona Creek Bike Path and the Ecological Reserve. We recognize the need for cyclists and pedestrians to connect from Sepulveda Blvd. along Centinela Avenue and Inglewood Blvd. to the Ballona Bike Path, and from the Ballona Bike Path north to UCLA and Santa Monica, perhaps along McLaughlin Avenue and Beethoven Avenue. However, we do not support expanded access to the ecological reserve itself. The reserve should be maintained as open space for non-human species with as little human activity as possible.

7. Mar Vista Gardens:

The DRRA supports preserving Mar Vista Gardens as legacy garden style apartments for low income housing. However, this property is not considered architecturally or historically significant nor a prime example of Planning for its period. Therefore, the preservation of the buildings as they are designed should

not be required or even encouraged.

8. Open Space / Public Space:

Del Rey lacks a public meeting space. There are very few government/public or civic buildings, and those that exist (schools and LAPD Pacific Division) do not provide easy access for indoor community meetings or nighttime gatherings. Ideally, the City would acquire property (or use a portion of the LAPD lot) to develop a large public meeting space that is accessible directly from a public way, has adequate parking for meeting attendees and which enhances the neighborhood character and usability. Additionally, Marina Marketplace must incorporate such a space.

The entire length of the Culver Boulevard Bike Path should be called out in the Community Plan as important open space for the community.

Area C of the Ballona Wetlands and the Tule Wetlands should be zoned Open Space, not agricultural.

9. Hybrid Industrial Live/Work - Area H:

Area H was one of few light industrial areas on the Westside. Like the others, it has been slowly changing character, and now includes schools, residences, several medical facilities, office and storage buildings. Each non-industrial development begets more. It will not be long until there are no industrial businesses left if the area is designated Hybrid Industrial Live/Work. In addition, the multiple cul-de-sacs and Ballona Creek are barriers that must be considered when planning for this area. Further, building heights should be determined by the Floor-to-Area Ratios and not the heights of nearby buildings.

10. Del Rey Beethoven Island:

Del Rey Beethoven Island, known in the community as Bird Island, is a vital stopover for creek birds and supports the open vista corridor of the Ballona Creek environment. Because it is so small, any development is problematic, even with additional ecological design standards. This property should revert to its previous zoning as open space.

11. Hybrid Industrial (Jobs Emphasis) - Mesmer Triangle:

The DRRA supports retaining the Mesmer Triangle as an industrial hub but opposes heights ranging from 6-8 stories. The area of mostly one or two-story local businesses is unique on the westside of Los Angeles. The small-size, older

buildings provide space for small, local businesses. Allowing mid-high rises will completely change the character of the area and likely push out these businesses. Densification in this area should be prohibited. Restoration and reuse of existing buildings should be required.

12. Neighborhood Villages:

The DRRA supports neighborhood villages and suggests that more be added to the plan in existing commercial and mixed-use locations; these must be subject to height limits as stated above.

Missing Information

1. The available draft does **not** include sufficient information on:
  - a. The expected impact of additional development on traffic and related parking.
  - b. Additional open space in the form of parks available to all residents (that is, not including 'open space' available only to residents of a particular development).
  - c. Projections for student population and school requirements.
  - d. Expected housing requirements for specific areas. The only information available was for the City of Los Angeles in its entirety.
  - e. For Development guidelines, the Concepts contain height information but not density/other limits.
  - f. Future changes in demand for particular types of housing and working locations as a result of COVID.
  - g. Projected needs for electricity and internet connectivity as we transition away from fossil fuels.
  
2. The draft does not provide a tactical plan to eliminate homelessness while maintaining the quality of life for the non-homeless residents.

Sincerely,

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Del Rey Residents Association

Westside Community Planning Group  
DRRA Comments re Draft Concepts  
September 14, 2020

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