

Communication from Public

Name: South Brentwood Residents Association
Date Submitted: 02/19/2024 06:14 PM
Council File No: 23-0990
Comments for Public Posting: Please see the attached letter from the South Brentwood Residents Association (SBR) on the following project and include our comments in the record. This is scheduled to appear before PLUM on Tuesday, February 20. Thank you. Lauren Cole, President, SBRA ENV-2022-6250-SCEA DIR-2022-6249-DB-CDO-SPR-WDI-HCA 11903, 11905, 11907, 11911, 11913 West Wilshire Blvd.



South Brentwood Residents Association
149 South Barrington Ave. #194
Los Angeles, California 90049
www.southbrentwood.org

February 19, 2024

VIA www.lacouncilfile.com Council File 23-0990

Los Angeles City Clerk
Room 395, City Hall
200 North Spring Street
Los Angeles, CA 90012

Attn: Kevin Golden, City Planning (kevin.golden@lacity.org)
Candy Rosales, City Clerk Staff (clerk.plumcommittee@lacity.org)

**RE: South Brentwood Residents Association Comments on:
ENV-2022-6250-SCEA
DIR-2022-6249-DB-CDO-SPR-WDI-HCA
11903, 11905, 11907, 11911, 11913 West Wilshire Blvd.**

Dear Mr. Golden and Ms. Rosales,

I am writing on behalf of the Board and members of the South Brentwood Residents Association (“SBRA”), which represents approximately 18,000 homeowners and renters who reside in the area south of San Vicente Blvd., north of Wilshire Blvd., east of Centinela Ave. and west of Federal Ave., including all residents living in multi-family dwellings throughout the entire Brentwood community. We are the local residents’ association for this area and our territory includes the north side of Wilshire Blvd. west of the I-405 freeway in the city of Los Angeles.

The SBRA Board has developed the attached guidelines for our position on mixed use projects on Wilshire Blvd. On this project in particular we have met with: a) residents on Goshen in the property immediately behind the project, b) representatives of the project, and c) CD-11 to discuss it. During those meetings we covered several points with respect to this project and SBRA’s position.

We and the Goshen residents have been awaiting updates to those discussions for several months. In particular, we have been waiting to hear whether any of our requests have been taken into consideration and implemented. However, we have received no updates from the developer, Council District 11, or City Planning as to what, if any, changes have been made. SBRA received no notice of this meeting from any of these groups, and only found out over the holiday weekend from the neighbors that this hearing has been scheduled.

For the purposes of this letter, I will assume that the project remains substantially the same as the one we discussed six months ago as we have received no information on any changes. While SBRA is supportive of projects that offer additional affordable housing on the Westside, we have several concerns about this project for the following reasons:

- **Project file ignores the West Wilshire Community Design Overlay which has setbacks and landscaping requirements**– We are distressed that City Planning appears to disregard the existence of the West Wilshire CDO, which developed guidelines for landscaping and setbacks along this corridor many years ago. Earlier projects appear to have followed these guidelines but more recent projects such as this one have not.

Particularly if the City is considering Wilshire Blvd. to be a transit corridor and allowing developers to build larger buildings, all projects need to provide an adequate tree canopy and a satisfactory environment for residents and transit riders. The City cannot claim on the one hand that is it trying to plant more street trees¹ yet on the other hand ignore the existing requirements to plant more of them, as well as the setbacks needed to ensure that all trees can be healthy and grow to their full size. Putting trees on balconies and rooftops for residents is not a replacement for street trees accessible to all, particularly in a time of climate change.

- **Project does not conform to the City's Affordable Housing Target of 20%, nor does it provide enough parking for market rent residents** – This project is located in one of the most expensive housing areas of Los Angeles. As such, we don't understand how the City plans to meet its target 20% affordable housing in mixed income housing² if it continually grants exceptions to this target. If a developer can't support the affordable housing target with 80+% market rate housing in West LA, how does Los Angeles plan to meet its target?

¹ https://dpw.lacity.gov/sites/g/files/wph1766/files/2021-08/LA%20Urban%20Forest%20Equity%20Infographic%20%281%29_0.pdf

² <https://mayor.lacity.gov/news/mayor-bass-acts-make-housing-more-affordable-and-available-all>

We are aware from our discussions with CD-11 that the developer is requesting to provide a lower percentage of very low income housing in lieu of the 20%. However, with a higher number of market rate apartments, the number of parking spaces is absolutely insufficient regardless of the fact that this building is on a transit corridor.

The developer has proposed an impractical number of 160 bike parking spaces for 81 apartments. This seems like more bikes than anyone would ever park in communal bike parking in a large city with crime where residents are likely to prefer to keep their bikes in their own apartments. We question whether this number can even be accommodated on-site, keeping in mind that only stronger and likely younger people can lift bicycles above their heads onto racks on the ceilings.

South Brentwood between Federal Avenue and Bundy Avenue is a dense neighborhood consisting primarily of multifamily housing. Our residents experienced severe parking shortages even before the City decided to allow bicycle parking to replace vehicle spaces. While we are supportive of bicycles and for projects to provide bike parking, 160 spaces for this project is excessive, particularly if only a small number of units are affordable with renters who are less likely to own cars. We have seen no evidence that Westside multifamily residents of new market rate housing do not own cars.

As such, we request that the City lower the number of allowable bicycle spaces to the number that can actually be demonstrated to fit onsite, with the number of vehicle spaces increasing proportionally. While we prefer that projects meet a 20% target whenever possible, we also request that if the percentage of affordable housing is allowed to be less than the target that additional vehicle spaces be provided to account for that.

- **Lack of privacy consideration and driveway interference for existing housing** – Developers should not be allowed to build projects as if no other housing exists on adjacent properties. Wilshire Blvd. may be a commercial street but it is adjacent to a residential neighborhood with existing housing and residents.

We asked the developer to provide 3D models to demonstrate that the new housing will not face directly into the windows of adjacent housing. To our knowledge, this has yet to be provided.

The residents on Goshen also raised concerns about conflicts with existing driveways for moving trucks and commercial vehicles for the retail space yet we are unaware of any response to their concerns. This is a busy alley that not only serves several multifamily residences on Goshen but also patrons of the Ralphs market down the street. We also

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raised concerns that the alley is very narrow, making the need for the required setbacks important yet as far as we are aware the developer is being allowed to waive the setback requirement.

We also raised that the developer be required to repave the shared alley behind the property but we have received no indication that this has been addressed.

As you can see on the attached guidelines, the South Brentwood Residents Association supports building more affordable housing on the Westside. However, the benefits given to developers in order to build this housing need to take into account the City's objectives.

We do not believe that this project in its current form achieves this objective. As such, we request that the project is adjusted to reflect the neighbors' and community concerns, as well as the City's goals.

We request follow-up outreach from the developer and the City in order to ensure that these objectives are received. If changes have already been made, the developer and CD-11 should communicate them.

We ask that this project not be allowed to move from PLUM to the City Council at this stage until these issues are reviewed, and hopefully addressed.

Please include the South Brentwood Residents Association (info@southbrentwood.org) on future notices for this project and for other projects along Wilshire in West LA. We created our guidelines in order to monitor and comment on projects in this area.

Thank you for your consideration.

Sincerely,



Lauren Cole
President, South Brentwood Residents Association
info@southbrentwood.org

cc: Marian Ensley, West Area Representative, City of Los Angeles
Carolyn Jordan, Chair, Brentwood Community Council
Jeff Khau, Council District 11

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Councilwoman Traci Park, Council District 11
Sean Silva, Council District 11

**South Brentwood Residents Association Position
on Mixed Use Development Projects Along Wilshire Blvd.**

As of the September 2023 Board meeting, the South Brentwood Residents Association supports the following guidelines for mixed use development along Wilshire Blvd. We will use these guidelines in any discussions or correspondence we have with Council District 11, L.A. City Planning, and other groups as we review projects in this area.

- Affordable housing – In order to achieve the objectives of increasing housing in Los Angeles, and in return for any density bonuses and other benefits received by the developer to build housing, the percentage of affordable units in any project should at a minimum match the average target percentage for the City of Los Angeles, which is currently at 20%.
- Parking – Given the high density of multifamily housing in South Brentwood, parking is already challenging. While SBRA is supportive of bicycling and public transit, especially on a transit corridor such as Wilshire, any project that requests replacing vehicle parking for bicycle parking should be able to provide justification that the number of proposed bicycle parking spaces is realistic given the number of expected residents and commercial customers of the building. Plans for how those spaces will be laid out should be provided in advance of approval in order to demonstrate that the proposed number of bicycles fit within the designated bike parking areas, that the bike parking areas are secure, and that residents can use them, i.e. they don't assume that most residents have to be capable of lifting bicycles over their heads to park them.
- Privacy Studies – In order to protect existing residents and property owners, developers building in a dense area such as the West Wilshire corridor should be required to provide privacy diagrams or 3D models to show the impact of their buildings on adjacent properties. These would demonstrate things like the height and placement of balconies and windows in comparison to neighbors' homes as well as the mass of the building to show its fit with other buildings along Wilshire.
- West Wilshire Community Design Overlay – The West Wilshire CDO was created in order to make Wilshire Blvd. west of the 405 more attractive, pedestrian friendly, and to provide landscaping that can shield pedestrians, transit passengers, and area residents and workers from the impact of harsh weather and climate change. The guidelines of the WWCDO should be incorporated into any projects and should not be waived, particularly with respect to setbacks and landscaping at the street level. Interior decks are not a substitute for community-accessible landscaping.