



“Protecting the Integrity of our Community”

W.H.H.O.



Woodland Hills Homeowners Organization

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March 1, 2019

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RE: EVALUATION OF THE WARNER CENTER 2035 SPECIFIC PLAN PROCESS BY WHHO

Dear Mr. Fargo, Ms. Blake, and Ms. Levy:

This document is the formal input from the Woodland Hills Homeowners' Organization (WHHO) concerning evaluations, analysis and recommendations for the 5-Year Status Report of the Warner Center 2035 Plan.

We recognize that recommending any changes to a Los Angeles ordinance as important as the WC 2035 Plan should not be undertaken without considerable deliberations and assessments. The WHHO also understands the importance of not making any changes that would cause the Plan's original EIR to be re-opened or impaired.

However, we also strongly believe that the mandate to have an examination, assessment, and possibly recommendations for changes to the WC 2035 Plan every 5 years was a vital inclusion to assure that the City of Los Angeles resolves issues, situations and practices through "any actions necessary to ensure that the City's implementation of the Plan does comply with its requirements and stated intents." That is why we have compiled this document utilizing the observations and input from individuals directly involved with administering the WC 2035 Specific Plan.

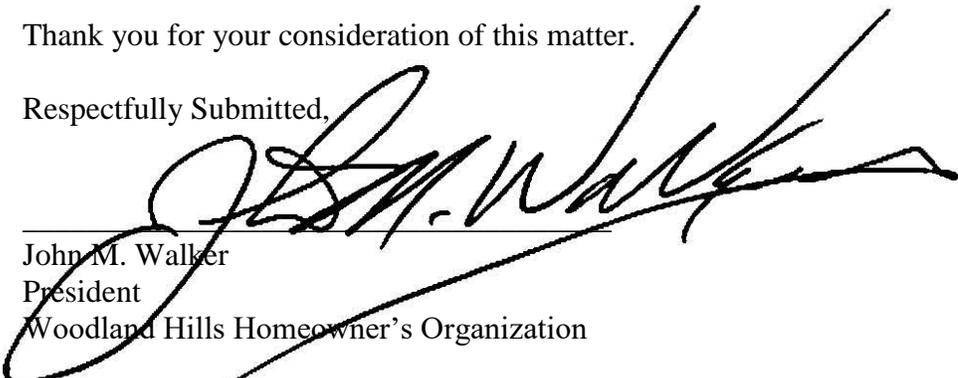
The WHHO hopes that the Planning Commission, City Council and Planning Department will weigh these issues and recommendations carefully, and that the merits of each of our recommended solutions be taken soberly and with the will to fulfill the mission(s) and

goals of the adopted 2035 Plan—to “balance jobs and housing for a sustainable Warner Center.”

We formally request that the WHHO officers be copied on any draft and final submissions of the report prepared by the Department of City Planning and the Department Of Transportation, and any draft and final results/conclusions made or circulated by the City Planning Commission and Los Angeles City Council.

Thank you for your consideration of this matter.

Respectfully Submitted,



John M. Walker
President
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**[NOTE: WHHO Board Member Armen Hovanessian recused himself from these issues due to his prior and present association with the City of Los Angeles.]*

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INTRODUCTION

AN 8-YEAR JOURNEY:

It took over eight years, numerous community Town Hall meetings and open public meetings, and over a hundred professionals from many different City departments, private firms and a broad citizens advisory board to create a final 2035 Plan document of over 300 pages.

Yet, the creators of a Plan that reaches decades into the future, realized that periodic status reviews of its working are required to allow for timely “course corrections” and fixes as necessary.

REALIZING THE PROMISE:

The residents and businesses of Woodland Hills and the West Valley were promised by the framers of the WC 2035 Plan that it would create a balanced live/work/play development mix that would foster an exciting “urban center” in the suburbs and be “mass transit oriented” to help reduce trips and congestion. The overall goal was to enhance the area without negatively impacting the surrounding neighborhoods.

This is why the 5-Year Report is so critical. The WHHO’s review of the Warner Center 2035 Plan casts a critical—but positive-- eye to resolving unexpected issues and helping fulfill the promises envisioned by the Plan.

THE WHHO FIVE YEAR REVIEW:

The WHHO team review of the Warner Center 2035 Plan looks at how the City can move more fairly toward fulfilling that promise up to now and, if falling short, what steps might to be considered to correct it.

Although the merits and goals of the Plan can be recognized and appreciated, our conclusion is that there are areas of the Ordinance and its support documents in which outcomes have caused unintended consequences and clarity or follow through is lacking. The following analysis will be concentrating on the areas in the Plan or in the process of its implementation that require attention and perhaps reconsideration so that the goals of the Plan can be better achieved and negative impacts on the community can be lessened or alleviated.

OUR MAIN FINDINGS:

The WHHO’s findings are quite exhaustive and the issues needing refinement numerous. From the outset, the following issues are the most pressing:

1. Pursuit of the intended housing/jobs balance and the related phasing aspects of the Plan has become the most pressing issue that needs attention.
2. The City’s efforts to attract business (increased employment opportunities) to Warner Center have been largely unsuccessful, and a revised marketing effort needs to be conceived.
3. Affordable/ Workforce housing needs to be provided.

4. Follow-through IS NOT occurring regarding the allocation of collected (and pending) funds for infrastructure improvements and mitigation steps as required at this 5-year point. (Including: police and traffic, schools, parks, libraries, cultural arts.)

WHHO'S RECOMMENDATIONS TO THE CITY COUNCIL:

It must be clear that the WC 2035 Plan requirements included in the 5-Year Status Report section (see Section 10.4.2) are for more than just a status report. It specifies that the City Planning Commission make specific, actionable recommendations to the City Council concerning elements of the plan that are problematic and need adjustment.

Section 10.4.2 (i) states as follows:

“The City Planning Commission, after review of the Department's report, shall recommend to the City Council any actions necessary to ensure that the City's implementation of the Plan does comply with its requirements and stated intents.”

Sections 10.4.2 (j) states as follows:

“The City Council may review the City Planning Commission's action and the Department's report and consider any actions necessary to ensure that the implementation of the Plan does comply with its requirements and stated intents.”

Any action not taken, or those made to minimize this process would be contrary to spirit and the true intent of the Plan.

EVALUATION PROCESS BY WHHO:

The result of the evaluation by WHHO is meant to consider many points of view and be representative of many parties' interests. Thus, the evaluation by WHHO was ascertained through a diligent process of research, over many years, with consideration of the following:

1. Woodland Hills - Warner Center Neighborhood Council Planning, Land Use and Mobility Committee (PLUM) Cases submitted for evaluation from January 2014 to the present.
2. Informal discussions and statements made in public meetings by Stakeholders
3. Discussions with development teams and property owners.
4. Communication with the members of the original Warner Center Community Advisory Committee
5. Input noted by those attending meetings of the Woodland Hills Impacts and Policies (WHIP) Committee of the Woodland Hills Warner Center Neighborhood Council

6. Input received at meetings of the Woodland Hills Homeowner's Organization

7. Close scrutiny of the WC 2035 Plan by an Ad Hoc Committee of the Woodland Hills Homeowner's Organization

A list of the key issues follows with more detailed information after that, reiterating the issue, offering support information as to the reason for the issue, and suggested solutions to be considered.

It is critical to note that this document is inclusive of all projects that have filed applications for development in Warner Center over the first five years, and are not just limited to projects that have completed the entire Planning process.

SUMMARY OF THE KEY ISSUES NEEDING REVIEW AND REVISION

- I. PHASING OF PROJECTS/ BALANCE OF HOUSING AND JOBS.**
- II. INCONSISTENT STAFFING AND INTERPRETATIONS BY L.A. PLANNING.**
- III. CRITERIA FOR ELDERCARE USES AND REQUIREMENTS NEED CLARIFICATION.**
- IV. MULTI-FAMILY OPEN SPACE REQUIREMENTS NEED CLARIFICATION OR REEVALUATION.**
- V. EVALUATION OF THE INTENT OF WORK LIVE UNITS NEEDS TO TAKE PLACE.**
- VI. SETBACK REQUIREMENTS NEED TO BE BETTER DEFINED AND CORNER LOT CRITERIA INCLUDED.**
- VII. NEED TO MITIGATE THE “CANYON EFFECT” OF UNLIMITED BUILDING HEIGHT IN COMBINATION WITH REDUCED FRONT SETBACKS.**
- VIII. THE INTERSECTION OF OXNARD STREET AND CANOGA AVENUE HAS NOT BEEN DEEMED AN ACTIVITY NODE.**
- IX. PAOS LIMITS AT SETBACKS AND SIDEWALKS NEEDS TO BE CLARIFIED AND REEVALUATED.**
- X. NEIGHBORHOOD PROTECTION PLAN NEEDS TO BE IMPLEMENTED.**
- XI. WARNER CENTER CULTURAL AMENITIES COMMITTEE NEEDS TO BE IMPLEMENTED.**
- XII. FINAL PLAN IMPLEMENTATION BOARD (P.I.B.) RESPONSIBILITIES HAVE BEEN DETERMINED. Some of the responsibilities originally intended in the Plan to be under the guise of the P.I.B. are now determined to not be under the Board’s purview. The remaining issues need to be reviewed as to how these will be managed, and which City entities will be responsible for the related needed oversight.**
- XIII. REQUIREMENTS FOR PHASED MASTER PLANNED PROJECTS SHOULD BE RECONSIDERED AND REVISED.**
- XIV. FOOTNOTES IN APPENDIX B NEED TO BE BETTER LOCATED AND HAVE STRONGER EMPHASIS.**
- XV. MOBILITY FEES ARE NOT SUFFICIENT TO PROVIDE THE REQUIRED MITIGATIONS.**
- XVI. MEDIANS SHOWN IN THE PLAN ARE NOT BEING IMPLEMENTED.**
- XVII. NOT ALL STREETS ARE REGULATED OR INCLUDED IN THE ORDINANCE.**

ADDITIONAL ISSUES REQUIRING REVIEW AND REVISION

- 1. OVERSIGHT OF DEVELOPMENT FEES EXPENDITURES (SCHOOLS, PARKS, MOBILITY, LIBRARIES, CULTURAL AMENITIES, ETC.)- FEES COLLECTED MUST BE SPENT WITHIN THE COMMUNITY;**
- 2. AFFORDABLE WORKFORCE HOUSING PER CHAPTER 3 COMMUNITY VISION STATEMENT(PAGE 3-3 AND 3-4) AND GOALS OF THE WC 2035 PLAN;**
- 3. RECENT ISSUES THAT HAVE ARISEN THAT WERE NOT CONTEMPLATED DURING THE DRAFTING OF THE PLAN THAT NEED TO BE ACCOMMODATED (IE: SCOOTERS);**
- 4. COORDINATION/ UPDATING OF REFERENCES TO THE LAMC WITH NEW RECODE LA DESIGNATIONS;**
- 5. COORDINATION OF THE PLAN WITH CURRENT ORDINANCE UPDATES INCLUDING BIKES, PARKS, TRANSIT ORIENTED COMMUNITIES (TOC'S), WORKFORCE HOUSING, ETC.;**
- 6. RECONSIDER THE RAMIFICATIONS OF LOW PARKING REQUIREMENTS WHEN COMBINED WITH THE BIKE ORDINANCE;**
- 7. ADDITIONAL OPEN SPACE GOALS AND PLANS ALLOWANCES;**
- 8. EVA'S AS PAOS (PUBLICALLY ACCESSIBLE OPEN SPACE) - FOLLOW THROUGH FOR PARKING ADJACENCY AND GRASSCRETE AMOUNT OF LANDSCAPE AT THE DAILY NEWS SITE EVA;**
- 9. STRICTER PARKING STRUCTURE AESTHETIC REQUIREMENTS ADJACENT TO PAOS;**
- 10. PAOS ACCESSIBLE UNTIL MIDNIGHT INSTEAD OF 10PM ADJACENT TO NON-RESIDENTIAL USES TO REINFORCE PEDESTRIAN ACTIVITY IN WC.**

DETAILED EXPLANATION OF THE ISSUES REQUIRING REVIEW AND REVISION

The following are the detailed explanation of the issues requiring further review and revision organized in the following format:

- a. Statement of the Issue
- b. Reference to the Relevant Section of the Plan, where Applicable
- c. Expanded explanation of the Issue
- d. Proposed solution(s) to the Issue

I. ISSUE - PHASING OF PROJECTS - BALANCE OF HOUSING AND WORKPLACE SPACE REQUIRES REVIEW.

In the unofficial colored version of the Plan, Chapter 3 Community Vision Statement Page 3-6 Item 1, In the official black and white version of the Plan, Section 1 Intent of the Plan and Appendix B- Graduated FAR Tables for all Projects- Footnote 6

In the unofficial colored version of the plan that is posted on the L.A. Planning website, Item 1 of the key elements of the Plan on Page 3-6 states:

“1. A balance of Jobs and Housing for a Sustainable Warner Center....”

In the official black and white version of the plan Section 1 Intent of the Plan, sixth bullet point states:

“The proposed WC2035 Plan is intended to help to concentrate a mix of uses that are within walking distance of one another so people can walk rather than drive”

Footnote 6 states that:

“Multi-phased projects may reserve required non-residential components in a later phase on-site. ...”

(Side note: This is a major characteristic of the plan that should be emphasized in other areas of the ordinance and not buried in a list located in an appendix.)

The Plan is set up as being market driven. Currently the market supports the construction of multi-family housing at the risk of creating an imbalance between employment opportunities to housing in Warner Center that is increasing with every project approval.

Since the Plan was signed into law, space providing employment is being eliminated and the residential portions of projects are being constructed on a huge portion of the site, while the required non-residential portions are being put off indefinitely and are restricted to insignificant footprints. This is a current major pattern of development with few exceptions. The West Valley is primarily single family residential and the employment center serving the overall area is slowly being eliminated. The pattern of development of

each project is at odds with the Vision Statement in the Plan, and the result is sites which are virtually all residential and the required commercial portions are relegated to an almost unbuildable sliver of land.

Proposed Solutions:

The following options should be considered in response to the reduction of employment opportunities in Warner Center in the four districts that require non-residential uses (Uptown, Downtown, College and Commerce Districts):

1. An evaluation of the jobs to housing development balance needs to be conducted every two years by an independent consultant that takes into account the CEQA documents originally prepared by the lead agency. Scrutiny into current traffic analysis and its reliance on a jobs/ housing balance needs to be considered. The abundant housing outside Warner Center borders needs to be considered in the analysis as the employment serves an area much larger than the area within the borders of the WC 2035 Plan.
2. A stringent option that may be needed is to require the employment uses being eliminated or substantially diminished by a project be replaced along with the other uses proposed in the first phase of a phased mixed use project.
3. A less stringent option would be to require a reasonable percentage of the required non-residential uses be built in the first phase of a phased mixed use project.
4. Require a specific minimum percentage of buildable site area (not including Publicly Accessible Open Space) be reserved for future uses. The percentage should vary depending on the district in which the project is proposed (25% in the College District and 35% in the Commerce District for instance.). The practice of reserving a minimal site area for future non-residential uses and unrealistically entitling small footprint high rises of extremely questionable feasibility should be discontinued. Creating reasonably- sized parcels for future sale and/or development is more aligned with the intent of the WC 2035 Plan.
5. Discontinue the practice of using the land designated for future phases for temporary, even required uses, including parking, unless the existing uses are to remain. Mandate that the land designated for future phases be maintained and landscaped as publically accessible open space. This encourages the developer to improve the future phase land as soon as possible. If the land has a relevant ‘temporary’ use, like parking, then the developer has less interest in improving it.
6. Require unused land set aside for future non-residential use to be used as a community benefit, such as a park, design of which shall be reviewed and approved by the Recreation and Parks Department, until such time as the site is improved as entitled.
7. Require, an amount to be determined, to be deposited in a trust fund or perhaps a phased Performance Bond at the time of pulling the first phase building permit requiring follow through of subsequent phases to be built within an agreed-to time period. The trust funds or Performance Bond and the time period shall be a condition of approval and shall be determined on a case-by-case basis. Multi-phased Master Planned projects need special consideration as these projects require extended durations. The justification for a the trust funds or Performance Bond is that promising to meet the Plan requirements for providing employment as a basis for entitlement approval, and inherently allowing residential uses to be built, but not following through with the

non-residential portion of the entitlement, should be considered a breach of the agreement and a breach of the intent of the Plan, justifying and requiring significant restitution payable to a transit or similar mitigation fund.

8. A moratorium may be needed if supported by analysis that shows the balance of housing and jobs does not meet the assumptions-made and conclusions-presented in the original or updated traffic analysis, or if other mitigations are not being implemented to meet the offsets as presented in Environmental or other documents. A moratorium should be set on development of the type of use that is “out of balance” until such balance is back in line. Further, consideration should be given to establishing a percentage of developed area that would be considered out of balance and where the moratorium would be justified to be invoked. (For instance if residential development exceeds non-residential by 15%, then a moratorium on residential development takes place until non-residential development catches up and reduces the overage to below 15%).
9. Any evaluation of the housing/ jobs balance must take into consideration that actual intent and feasibility of the non-residential being proposed for later phases. The possible scenario of the later phases never being built has a dramatic effect on the balance and thus negates the true intent of the WC 2035 Plan.

The quality of life of the area and the marketability of the business community will rely on affordable quality housing and employment opportunities, but also a balance between the two. The goal should be to mitigate traffic issues supporting the ability to **not** spend an unreasonable amount of time commuting.

II. ISSUE- INCONSISTENT STAFFING AND INTERPRETATIONS BY L.A. PLANNING.

In the unofficial colored version of the Plan that is posted on the L.A. Planning website Chapter 1 Executive Summary, Highlights of the Plan, Page 1-5, Item 7

Item 7 states:

“Streamlined Project processing: Expanded Exempted projects, Administrative Clearances, and Streamlined Project Permit Compliance approvals.....”

In the official black and white version of the Plan Section 1, Bullet Point 3 and 9

Bullet Point 3 states:

“The WC 2035 Plan is intended.....to give the developer certainty as to what is permitted”

Bullet Point 9 states:

“The WC 2035 Plan is intended to provide a comprehensive and clear process that will permit development to occur in order to facilitate the creation of an urban center where people can live, work, and play.”

Except for the past year, allocation of consistent, thoroughly trained Planning Staff familiar with the 2035 WC Specific Plan has been insufficient to meet the goals. Staff assigned to Warner Center has been changed 3 times in the five years since the Ordinance’s inception. Thus, knowledge of the intentions and goals of the plan gets lost, and new staff loses time attempting to get up-to-speed while development applications continue to be submitted. Pursuing various interpretations of requirements, where clarity in the plan is lacking, is time-consuming, and often not consistent from project to project or between current and past Planning staff. Furthermore, Staff designated to concentrate on the Plan and related submitted applications in the past have gotten distracted by assignments not related to Warner Center.

These issues are not a reflection on the current staff representatives as to date their ability to focus on Warner Center issues has been supported by upper management and as their tenure continues, they have become familiar and in fact instrumental in beginning to fulfill the intents of the Plan.

Proposed Solution:

We encourage the current staff to continue in their effort and for management to keep them assigned to their current responsibilities, expanding the team as needed. Establishing a team that can concentrate on the Plan and Warner Center for a long period of time, and that is sized appropriately to handle the workload is critical to the success of Warner Center. The team should be able to:

1. Evaluate projects in a consistent, defensible and fair manner.
2. Provide determinations within a reasonable predetermined consistent duration.
3. Provide determinations that warrant minimal interpretations as to the entitlement requirements during the time when clearances for building permits are being obtained.
4. Keep careful documentation of the approvals.
5. Understand the intent and the department’s ability to mandate connectivity of open space from projects previously approved to projects being proposed and evaluated. Section 6.2.5.3.2(a) must be enforced to the maximum extent possible and reads as follows:

“With respect to any Project that is not a Master Planned Project, a New Street or Pedestrian Adapted Pathway shall be required if an existing or approved New Street or Pedestrian Adapted Pathway or other access way is located on an adjacent property....”

6. Keep a public record of the total housing units and non-residential square footage and lot footprint approved in relation to an acceptable balance of uses and the limits set forth in the Plan.
7. Perform outreach to the Community regarding the Plan and its status at reasonable intervals each year.
8. Keep a straight-forward public record of interpretations of the Plan so that consistency from case-to-case can be achieved and can be communicated succinctly to those who request the information

including other City Departments, elected officials, applicants, the community at large or any other stakeholder(s).

III. **ISSUE- CRITERIA FOR ELDERCARE USES NEEDS CLARIFICATION.**

Chapter 4 Definitions Eldercare as a Community- Serving Use and Chapter 4, Section 6, Item 6.2.3.2.2.e. Parking, Institutions and Appendix B- Graduated FAR Tables for all Projects- Footnotes

Elder-care facilities are listed as a Community Serving use. There is no definition of Eldercare Uses which clarifies that the use includes independent living, memory care, assisted living and skilled nursing, and that the uses are considered a Community Serving Use. There has been some confusion as to whether the intent was to include Senior Day Care Centers only as a Community Serving Use.

Since the Plan was signed into law, Planning has been required to provide interpretations regarding if and which common spaces of Eldercare facilities can be considered non-residential. Currently these interpretations are not included in the Plan and should now be included.

Additional clarification is needed regarding whether certain levels of eldercare should be considered a residential or a non-residential use, in whole, including patient/ resident spaces used for sleeping. (This is directly related to the ratios of residential and non-residential uses allowed in each district on a per project basis in the graduated tables of the Plan.) Clarifying this would prevent developers from attempting “work arounds” for the requirements for non-residential uses on their properties for uses requiring less involvement of project operations staff, especially Independent Living, which in reality are residential apartment units. Conversely, clarifications should support the more healthcare oriented use of Skilled Nursing as a non-residential use.

Also parking requirements for Eldercare is not covered in the Plan and it is therefore implied that it is either considered an Institutional use in the Plan, or because the plan is silent, the LAMC prevails and the Eldercare parking takes precedent. This requires clarification in the Plan, and will impact mobility within Warner Center.

Proposed Solution:

Provide a definition of Eldercare uses or refer to the LAMC, clarify and verify the true intent that it’s a Community Serving use.

Clarify which Common functions are considered “non-residential” and which are “residential” in the definitions or the Appendix B Graduated FAR Tables Footnotes. Include circulation space and support space in the clarifications.

Categorize the levels of Eldercare uses within buildings or portions of buildings as follows:

- Skilled Nursing - Non-residential
- Assisted Living - Non-residential
- Memory Care - Non-residential
- Independent Living - Residential.

Any relaxation of previously interpreted requirements should be communicated through formal notification to the previous applicants. (It must be noted that the Building Code considers Residential Care Facilities for the Elderly to be a residential occupancy which includes Assisted Living and Independent Living.)

Clarify Eldercare parking requirements for all Eldercare uses.

IV. ISSUE – MULTI - FAMILY OPEN SPACE REQUIREMENTS NEED CLARIFICATION.

Chapter 4 Section 3, Item 3--Relationship to the LAMC Item 3.1.6 Residential Projects- Open Space

This Section simply states in its entirety as follows:

“This Plan supersedes LAMC Section 12.21-G.2.a.”

The section being referred to lists the requirements for Common recreation space in multi-family projects. A footnote was added in the unofficial color version released in 2017 in an attempt to clarify that the Plan does not supersede LAMC Section 12.21-G.2b which requires multifamily projects to provide Private Open Space. Also the main part of LAMC Section 12.21- G2 is not superseded which requires 100,125 and 175 sf of open space per living unit depending on the size of the unit. Given that the private space in LAMC 12.21-G.2b is limited to 50 sf per unit, the intent of WC 2035 Plan Item 3.1.6 needs clarification as it is impossible to not create the space in LAMC 12.21-G.2a given all these factors.

Proposed Solution:

Clarify the intent of this item and include or exclude all pertinent Sections of the LAMC to make the intent and the requirements absolutely clear. If the intent is to not require open space within multifamily buildings because PAOS is required, or to credit the PAOS for a portion of the space within a multifamily building, this intent needs to be clearly stated.

V. ISSUES- EVALUATION OF THE INTENT OF WORK-LIVE UNITS NEEDS TO TAKE PLACE.

Chapter 4, Section 4, Definition of Work-live Unit

The definition refers to Section 6 for standards for qualifying Work-live units, but there is no information in Chapter 6 related to this. There are no standards given in the ordinance that give the criteria as to which parts of a Work-live Unit can be considered a non-residential use. What is written allows 750sf of a 1500 sf living unit on any floor of a building to be considered non-residential. This loophole allows full compliance of a 100% residential apartment building to meet the stringent standards of the graduated FAR tables without actually providing the intended employment base in those districts.

Proposed Solutions:

Clear definition of what a real “work space” is should be stated in the Definition. Currently kitchens used by the resident in a work-live unit can be counted toward the work/ non-residential portion of the unit. Bedrooms, full baths and kitchen areas should be mandated as part of the live portion. If a second kitchen is provided then it can be justified as being designated as “work space.” It should be considered that Work- Live units provide a complete Live Unit (living, dining, kitchen, bedrooms, and baths) separate from the work space. Mandate that the resident obtain, provide, and maintain a business license that reflects the address of the business as the Living Unit in question for a resident to qualify for occupancy of a Work-Live unit.

VI. ISSUES- SETBACK REQUIREMENTS NEED TO BE BETTER DEFINED AND CORNER LOT CRITERIA INCLUDED AND REASSESSED.

Chapter 4, Section 6.1 District Requirements- 6.1.2.1.10, 6.1.2.2.9, 6.1.2.3.9, 6.1.2.4.9, 6.1.2.5.8, 6.1.2.6.9, 6.1.2.7.9 Setbacks and Section 4 Definitions

The intent of the setbacks dictated in Section 6 is described in Appendix F Urban Design Guidelines Page 1-19 through 1-22. The area is shown in the illustration on Page I-19 as measured from the back of sidewalk to the building and should be used and landscaped as described in the Plan. Because there is no definition in the ordinance, and only implied in the guidelines of where the measurements should be made from, arguments are being made that the setback is measured from the property line instead of back of the sidewalk as intended. The result is a combination of the newly allowed density, the requirements for the street wall height and the minimum and maximum setbacks are not adequately defined, causing projects that are inadvertently being built closer to the street than intended. Development teams are using the weakness in the wording of the Ordinance to increase buildable area. The intended preservation of the urban forest is also being compromised.

At corner lots the issue is exacerbated. The labeling of the setback as ‘Front Setback’ encourages corner lots along two major boulevards to be able to build uncomfortably close to one of the streets. Again, considering the height and density allowed, the original intent of the Plan as presented to the Community is being compromised.

Proposed Solution:

Provide a detailed definition of where setbacks are measured from in Section 4 Definitions, and refer to it in each area of Section 6. Create a definition that states the setbacks are required to be measured from the “back of sidewalk” as intended.

Include in the definition that the setback is required on all sides of corner lots facing the public way, and not just one frontage.

VII. ISSUES- NEED TO MITIGATE THE CANYON EFFECT OF UNLIMITED BUILDING HEIGHT IN COMBINATION WITH REDUCED FRONT SETBACKS.

Chapter 4, Section 6.1 District Requirements- 6.1.2.1.5, 6.1.2.2.5, 6.1.2.3.5, 6.1.2.4.5, 6.1.2.5.4, 6.1.2.6.4, 6.1.2.7.4, 6.1.2.8.4 Building Height

The requirements of the building code that puts a limit on the height of wood construction, along with the desire for developers to maximize their project densities, plus the street wall requirements of the Plan, the unlimited height allowed in most areas within the Plan borders and a general school of thought that more urban areas inherently have tall building close to the street, is causing great concerns when put into practice. The possible “canyon effect”, as it has been coined, is not a desirable trait for the area and mitigations are desired. Early development and applications being processed reflect there will be a general loss of sunlight at the street and sameness in massing that creates mediocrity in the environment and an undue loss of quality of life to the users of the properties and to the surrounding communities.

Proposed Solutions:

Consider mandating facades that step back away from the public street facades above the currently required 25’ or 35’ street walls. (For instance provide a step back in the building façade a distance of at least sixteen feet (16’) at the top of the street wall up to 50’ in height to allow variety and another step in the facade at the next 20 stories above the mandated street wall after that.)

VIII. ISSUES- THE INTERSECTION OF OXNARD STREET AND CANOGA AVENUE HAS NOT BEEN DEEMED AN ACTIVITY NODE.

Chapter 4, Section 6.1 District Requirements- 6.1.2.3.7, and Map 10- Activity Nodes

Given its key central location, its location in the Downtown District, its potential for important future development at all four corners, and the path of the circulator/ bus route as it has been recently updated, this intersection should be added as an Activity Node.

Proposed Solution:

Add the intersection of Oxnard Street and Canoga Avenue as an Activity Node in Map 10 and Section 6.1.2.3.7.

IX. ISSUES- PAOS LIMITS AT SETBACKS AND SIDEWALKS NEEDS TO BE CLARIFIED.

Chapter 4, Section 6, Item 6.2.2.4.4- Setbacks as Part of Publicly Accessible Open Space

Similar to the lack of clarity with the definition of setback, there is a lack of clarity when using the setback as part of the PAOS on a project. A lack of consistency in interpreting by staff can take place from project to project as to whether the PAOS in the setbacks is measured from the back of sidewalk or to the easement/ property line.

Proposed Solution”

Clarify where the PAOS is measured from and coordinate it to the definition of setback. If the intent is to measure the setback from the back of sidewalk, and the PAOS from the easement, expand the appropriate items in the Plan to clarify this.

X. ISSUE- NEIGHBORHOOD PROTECTION PLAN NEEDS TO BE IMPLEMENTED.

Chapter 4, Section 8- Neighborhood Protection Program

The Program is in the process of being set up and the NPP Committee needs the funds to implement the plan which also needs further clarification. Also, Oxnard Street between Kelvin and De Soto, as well as all streets north of Oxnard to Pierce College are not included in the Program map, Map 11 of the WC 2035 Plan and should be included.

Proposed Solutions:

The program needs to be implemented and properly funded by use of Mobility Fees. The map needs to be corrected to incorporate the area omitted, and the map needs further clarity as there are streets missing on the map--even in areas included in the boundaries.

XI. ISSUE- WARNER CENTER CULTURAL AMENITIES COMMITTEE (W.C.C.A.C.) NEEDS TO BE IMPLEMENTED.

Chapter 4, Section 9- Cultural Amenities Committee

If fees are being collected, they are not being properly managed. The WC Cultural Amenities Committee or Similar Body or Authority has not been set up. Also, The Warner Center Cultural Amenities Master

Plan that would serve as the implementation guideline for the program has not been developed by the Department of City Planning.

Proposed Solutions:

The WCCAC committee needs to be set up by the Council Districts where these neighborhoods are located, and a master plan implemented.

- XII. ISSUE- FINAL PLAN IMPLEMENTATION BOARD (P.I.B.) RESPONSIBILITIES HAVE BEEN DETERMINED. Some of the responsibilities originally intended in the Plan to be under the guise of the P.I.B. are now NOT under the Board’s purview. The remaining issues need to be reviewed as to how these will be managed and which City entities if not the P.I.B. will be responsible for the related needed oversight.**

Chapter 4, Section 10, Item 10.1- Plan Implementation Board / Entity

The Plan contemplates an entity be established which would take the lead in implementing the Vision for Warner Center. The Entity (**the Plan Implementation Board**) was to take the lead regarding the following per Section 10.1 of the Plan which listed the areas as follows:

- **Streetscape Improvements**
- **Roadway Improvements**
- **Transit Improvements**
- **Coordinating Internal Circulating Systems**
- **TDM**
- **Parking Coordination**
- **Coordinate Open Space and Recreation Space**
- **Wayfinding Signage Coordination**
- **New Street And Walkway Coordination**
- **Public Benefit Development**
- **Maintenance, Landscaping and tree trimming**
- **Resource Management including Water, Gas and Electricity**
- **Economic Development including Possible Fee Reductions, Tax Incentives, Parking Meter Recommendations, Federal and State Grants/ Matching Funding.**
- **Insure that Projects are developed consistent with the Plan’s Urban Design Guidelines**

The final definition of the entity’s responsibilities was determined as an advisory role to the Council District 3, the Department of Transportation and the Department of City Planning. The lack of consistent Planning and Department of Transportation Staffing, and the present limitations in authority of the Plan Implementation Board compared to what was initially envisioned in the Plan, creates a critical

need for additional oversight by either the P.I.B. or others having jurisdiction over the issues that are listed. Many of the issues listed in Section 10.1 have been expressed by stakeholders as items of extreme importance, with them not knowing the issues were actually included in the Plan but are not being implemented.

Proposed Solution:

The Plan Implementation Board membership needs to be trained and have a working knowledge of the Plan and additional responsibilities must be assigned to the Board. The leadership of the entity must be forthright in communicating the entity’s concerns to appropriate City Departments and must provide proper outreach to the community so that others can assist in the effort when needed.

The City needs to determine succinctly the final mission of the Plan Implementation Board and especially the limits or expansion of its authority. Any item listed in the Plan that was not included in the enabling Ordinance for the P.I.B. must be reviewed and either assigned specifically to the P.I.B. or to other City agencies or Departments or a relevant Warner Center Board. The responsibilities must be incorporated into the Plan and a system of assessments of the follow through by each of the agencies or departments must also be included.

XIII. ISSUE- REQUIREMENTS FOR PHASED MASTER PLANNED PROJECTS NEEDS TO BE RECONSIDERED.

Appendix B- Graduated FAR Tables for All Projects- Footnote 6

The second part of the note states the following:

“.....Such future phases shall be fully entitled and designed at the time as the initial phase to the satisfaction of the Director of Planning....”

Although a manageable requirement for smaller projects with few phases and/or short timetables, this requirement becomes an unnecessary level of detail for larger projects with many phases that can span multiple decades. Design of the later phases in detail could easily become an exercise in futility as the nature of such detailed design is bound to need revision when extended out by over a decade. Building material availabilities, construction technologies, and aesthetic styles will change during that time as well as the potential impact on the community. Thus, the process of detailed design of larger projects or at least the later phases of the project slows down the initial process and creates unnecessary costs to the developer and the burden of additional review time to the City and Community groups.

Additionally, given the effect of this requirement on submittals, this issue should be located more appropriately in other sections of the Plan.

Proposed Solutions:

Reconsider at least Phased Master Planned Project requirements. Deprioritize aesthetic and /or architectural issues during the Master Planning approval with conditions for individual building applications to come back for more detailed review limited to items not already approved during the Master Plan process.

Additionally, any requirement related to submittals and applications should be included in Chapter 4, Section 5 of the Plan, “Development Review Process, Procedures and Fees”.

Further, any changes or revisions proposed to the approved project by the developer must be subjected to additional public comments and review.

XIV. ISSUES- FOOTNOTES IN APPENDIX B NEED TO BE BETTER LOCATED AND HAVE STRONGER EMPHASIS.

Appendix B- Graduated FAR Tables for All Projects

The items in the footnotes are so important that their placement **only within the Appendix B portion of the Ordinance is inappropriate**. Also, in the latest unofficial color version of the plan the notes are not legible.

Proposed Solutions-

Many of these items also belong in parts of Chapter 4. A note under each graduated Table in Section 4 Chapter 6 should refer the reader to the Footnotes of Appendix B. Locate the Footnotes on a separate page in Appendix B and increase the font size to be clear and legible.

Item 3 belongs in Chapter 4, Section 7 “Mobility” and/or Appendix D “Mobility Fee table” and should be removed from the Appendix B footnotes all together as it has nothing to do with the FAR tables.

Item 4 should be added to Chapter 4, Section 6.

Item 5 should also be added to the definition of Work-Live Units in Chapter 4, Section 4. Also item 5 refers to Section 6 for more information, but no related information occurs in Section 6. This should be clarified.

Item 6- See XIII above.

Item 7 should be added to Chapter 4, Section 6.

XV. ISSUES- MOBILITY FEES AREN'T SUFFICIENT TO PROVIDE FOR MITIGATIONS.

Appendix D- Mobility Fee Table

Mobility Fees need to be reassessed to make sure the funds necessary to accommodate the effects of development on the increased trips and vehicle miles traveled are mitigated. Mobility fees are not being generated for residential land uses that are replacing many non- residential uses.

To illustrate this, a review of the Mobility Table in Appendix D was undertaken by the WHHO. Residential land use mobility fees vary but when an FAR of 3 is achieved, the assessment is \$1.31 per square foot. For many other uses the fees are much greater. In the case of office uses, as an example, the mobility fee at an FAR of 3 is \$6.34 per square foot. Based on the trips generated by these uses this makes sense, but the issue that causes concern is when credits are provided for the demolition of existing uses.

Considering the example land uses given, if a developer proposes to demolish a 100,000sf office building the developer will get a credit of \$634,000.00. This allows the Developer to build a 537,288 sf residential building and the mobility fee is zero. Thus such a large new project would not create the ability to implement the impact mitigations necessary because of the new development. Besides the lack of being able to deal with the traffic, this is an example of encouragement of residential construction and the discouragement of non-residential construction which can easily tip the balance ratio between commercial and residential. Since these fees are paid at the time of pulling of the building permit, this can contribute to the non- residential later phases to be permanently tabled. (Note that the example given is actually in reality much worse as the 100,000sf office building would have a much lower FAR which means the credit would be much higher.)

It must be noted that eliminating employment uses and replacing such uses with residential uses at an unmanaged rate burdens the transportation system by forcing commuting. The intent of the Plan was to create a Regional Core where residents could live, work and play within the Plan area. The mobility fee structure does not account for the current pattern of development that forces residents to leave Warner Center to go to work.

Proposed Solution:

The Department of Transportation needs to evaluate the true cause and effects of removing the existing use, and adding the new ones. There should be an avenue to contribute to the mitigations for increased traffic in Warner Center through Mobility Fees paid for every project, understanding that the nexus for such fees needs to be defensible. It should be recognized that the employment uses provided to the entire West Valley within Warner Center creates an opportunity to not burden the freeways. The trip counts/vehicle miles traveled should be reviewed and open discussions should be undertaken.

XVI. ISSUES- MEDIANS SHOWN IN THE PLAN ARE NOT BEING IMPLEMENTED.

In the official black and white version of the Plan, Street Sections-Figures 1 through 11

The street sections were included in the original, official black and white version of the WC 2035 that was executed by the Mayor on November 21, 2013, but were not included in the updated unofficial color/graphic version released in 2017. Added in the recent unofficial updates currently available on the LA Planning website, these street sections are still not coordinated with the WC Street Standards Tables 1 and 2, but are the only places where the required street trees are shown. Also these sections reflect landscaped medians in many of the streets and to date there is no evidence of these medians being required of developers or provided by the City. The medians are an important part of the concepts within the plan as stated in the unofficial colored version of the Plan that is posted on the L.A. Planning website, Chapter 3, Key Elements of the Plan, Item 4:

“Establishment of an Urban Forest which will flourish in large parkways, medians and publically accessible open space in order to provide aesthetics, shading, and the absorption of greenhouse gas.” (Emphasis added.)

Proposed Solution:

Option 1- Coordinate the street sections with Tables 1 and 2.

Option 2- Delete the street sections but provide the street tree information in the appropriate District Section of Chapter 6 and make selection required and not arbitrary.

Similarly, provide requirements for the streets where medians should be added and would be feasible in the appropriate District Sections as well. Provide the process in which funding and maintenance of the medians will occur whether by the developer or the City. Add the information to the Ordinance text to remove any doubt about it being a **standard (requirement) versus a guideline.**

XVII. ISSUE- NOT ALL STREETS ARE REGULATED/ INCLUDED IN THE ORDINANCE.

Street Sections and Tables 1 and 2- WC 2035 Plan Street Standards

Erwin Street, Califa St., Marilee St., Eton Ave, Independence Ave. and Kittridge St. were not included in these standards in the Ordinance as signed by the Mayor in November 2013. Thus, there were no mandates for street widenings, right-of -way widths, parkways, sidewalks, street trees, or medians on these streets. In a version that incorporated upgraded graphics released in 2017, the Tables were not included at all. The recent version available on the LA Planning website includes Tables that include these streets. As these additions were not properly vetted and perhaps the requirements for these locations need further scrutiny, it would seem that the new additions aren't enforceable until approved by City Council. If enforcement is intended, then that should be incorporated in the Ordinance.

Proposed Solution:

Given the strong possibility that development will occur at some of these locations, adding these streets to the Tables is important. However, any alterations to the Plan should be vetted through a Public process and formally approved by the authority having jurisdiction.

ADDITIONAL CONCERNS –

The above items are specific to the current Warner Center 2035 Plan and in most cases have a direct nexus to the stated intents and requirements of the Ordinance and its various Appendices. It must be recognized and made a matter of administrative record that other matters of concern have been communicated to the Woodland Hills Homeowner’s Organization during the investigation phase of producing this report. The following are the items of most concern:

1. **Oversight of Development Fees (Schools, Parks, Mobility, Libraries, Cultural Amenities, etc.)- The Funds Collected and Where the Funds are Spent-** The mitigations in the Environmental Impact Report that are justified simply by developers paying fees to the City needs to be scrutinized. Also, the nexus to justify the Development fees being paid at all needs to be made public with facts. The fees are not the issue, but how the money is allocated to the immediate vicinity that’s affected by the development is what’s being questioned by numerous stakeholders. If school fees, parks fees, library fees, mobility fees, cultural art fees and others are paid by a developer, and justified by the development’s effect on the area, the funds need to be allocated in the area, and not sent downtown for use in other areas.

For instance, a 400-unit multifamily housing project pays about \$1.8 million to the Los Angeles Unified School District. If the over 7,000 living units currently approved or filed under the plan all pull building permits, about **Thirty One Million Dollars (\$31,000,000.00) is collected by LAUSD**. As an example, this can contribute to the need generated by the development to build a new elementary school on the empty Oso School Lot that is located within a mile of Warner Center.

Similar examples of development fees can be provided in all categories and the conclusion is the same. The claim for mitigations in the EIR or simply the nexus to burden developers with fees is not justified without proper **local** improvements **paid by the funds collected**. Furthermore, the ability of the public to fairly review and comment on the EIR can be questioned if the impression was given that the fees were truly solving a problem (mitigating an issue), and after the public is no longer paying attention the money is spent in such a way as to not mitigate the effects of the development directly.

Related to this issue are other areas of importance; the increase in population and its effect on police and fire services and aging utilities. The Five Year Report needs to review these issues and provide the means used to determine why or why not these services are affected.

2. **Affordable / Workforce Housing per Chapter 3 Community Vision Statement, Page 3-3 and 3-4 Goals of the WC 2035 Plan**- There is a growing concern amongst stakeholders about the Plan’s missing mandates for affordable and/or workforce housing. The following goals in fact are stated in the Plan:

“....it becomes crucial that the new plan’s true public benefits in facilitating new development is to ensure community gathering spaces, good urban design, pedestrian activity, and housing that is affordable to a broad range of households.”

“1. Additional housing can offer new workers in Warner Center a place to live, and create healthy jobs-housing balance.”

The issue arises related to providing a broad range of income households. For a truly sustainable Warner Center to be achieved, commutes need to be reduced and provisions for housing where people work needs to be provided to the best level possible.

Some focus needs to take place looking at the work force and perhaps other household categories such as Family-oriented housing that may not be getting accommodated currently by development within the Plan area. Greater development incentives, housing type percentage mandates, provision of government subsidies, and other approaches need to be reviewed.

Areas with potential for review should be:

1. Current MTA Property- Current parking areas along the Orange Line have development opportunities for more affordable housing development. Replacement parking for orange line users should be mandated as part of the developments if this is pursued. Public private partnerships should be considered in these endeavors.
2. Older, well established smaller rental buildings on the periphery of Warner Center- These buildings should be reviewed for possible renovations and up-zoning, and use for more affordable housing. Linkage fee allocations to these properties should be considered as a source to incentivize the property owners to accomplish this goal.
3. Linkage Fee reductions to balance possible mandates for inclusions of more affordable units in new construction may be an answer that balances interests and financial pressures of the development community with the City and Community’s goals for more affordable housing.

However, the consideration of attracting business, the effects on existing real estate values, the effects on the costs/ rents of the other housing types being offered needs to be considered while these issues are being reviewed. The avenues to provide a broader housing base shouldn’t burden the rents of residents of market rate and higher levels of housing. Construction quality and reductions of amenities should also be carefully

considered as possible outcomes of faulty decision making. Reduction in housing construction because of affordable mandates as an unintended consequence should be reviewed and avoided.

The cost of construction, once a project exceeds seven stories, should be considered in the decision making related to this issue. Overzealous affordable housing mandates may discourage this type of development. The construction of taller buildings that is more costly to build and provide for the higher end market should not be negated as all levels of housing need to be provided.

Also, the different levels of affordable housing that are needed should be recognized and considered. It may be feasible that particular levels of affordable housing could be included within the Warner Center borders, and still provide other levels connected by transit or within reasonable distance of the Warner Center area. Affordable housing is not a “one size fits all” issue.

If evaluations of particular affordable housing types being located directly in Warner Center are deemed problematic due to the possible negative outcomes and/ or support cannot be generated, looking to other options should be pursued outside the WC 2035 Ordinance such as incentivizing or zoning through the reCode LA effort or the updating of the Canoga Park- West Hills- Winnetka- Woodland Hills Community Plan areas that provide transit access to Warner Center. This will also provide an opportunity for increased transit ridership and hence justification for increased transit funding. Land adjacent to Warner Center or along the Orange Line and most importantly around its transit stations could be considered for affordable housing, so that the goals of sustainability can be obtained through these alternate means. Lands currently of industrial uses or that could be considered underused because of adjacencies to transit may prove to be more viable for development of some levels of affordable housing and thus require less development incentive.

Conversely, although WHHO supports and is available to participate in efforts to provide affordable housing of different levels in and around Warner Center, it does **not** support the following:

1. Reduction of Publically Accessible Open Space requirements as a trade for providing affordable living units in residential projects. This is **not** supported.
2. Relinquishing the 100-foot minimum height limit requirement for residential projects in the Downtown District as a trade for providing affordable living units in residential projects in that District is **not** supported. Continuing the pattern of development of seven story projects allowed in the rest of the Warner Center Districts into the Downtown District will be detrimental to the quality of the area and the intent of the Plan. The repetitive nature of the current pattern of development in the rest of the Plan area should not be allowed in the most important and central area of Warner Center and Woodland Hills.
3. Reduction of Cultural Amenity Fees as a trade for providing affordable living units in residential projects is **not** supported.
4. Any proposed trade for mobility improvements to provide affordable housing units is **not** supported.

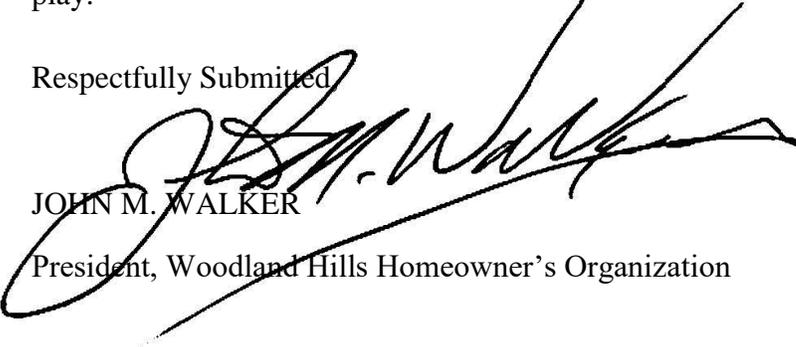
5. Any compromises to any public improvements or environmental mitigations (under the premise of overriding considerations for instance) as a trade for providing affordable living units in residential projects is **not** supported.

The conclusion of WHHO's research regarding affordable housing is that different levels of affordability may be provided in Warner Center and also connected to Warner Center via transit, but unintended consequences need to be investigated. That affordable housing should be provided without burdening the rents of other housing types, threatening development feasibility or trading/compromising the public benefits or the positive characteristics of the WC 2035 Plan.

3. **Recent Issues that have arisen that were not contemplated during the drafting of the Plan that need to be Accommodated-** An issue that needs review is the possible adjustment to the Plan to allow limited elimination of parkways where parallel parking isn't allowed for pick up and drop off of car poolers, users of Transportation Network Companies (Uber, Lyft, etc.), Electric Scooters (Bird, Spin, LimeBike, etc.), taxis, etc., and the appropriate placement of electric scooter parking currently obstructing the right of way.
4. **Coordination of references to the LAMC with ReCode LA -** The WC 2035 Plan includes many references to the current LAMC. The most concentrated area in the Plan where this occurs is Chapter 4, Item 3 "Relationship to the Los Angeles Municipal Code", but there are numerous other locations. All the references will need to be coordinated with the new zoning code. In addition if elements of the LAMC get revised or deleted in the new code, the WC 2035 Plan needs to be expanded to cover the original intent of the issue to become stand alone on those subjects. If the Plan references a part of the New Code that has changed the intent from the original code, this should be considered a revision to the WC Plan given that it was specifically referenced, thus requiring a public process where the changes are made clear to the public. In other words, there should be careful analysis so that the WC 2035 Plan isn't inadvertently being revised indirectly by revisions of other Ordinances or at least that a conscious recognition takes place that it is being revised.
5. **Coordination of the Plan with current ordinance updates including bikes, parks, Transit Oriented Communities (TOC's), workforce housing, etc.-** New Ordinances are being approved that make the Specific Plan less able to be an all-encompassing document. Updated references to the new Ordinances should be added to avoid misunderstandings between the City and the various stakeholders. An example would be any updates to park/open space ordinances that would be in addition to or supersede the WC 2035 Plan Publicly Accessible Open Space requirements.
6. **Reconsider the low parking requirements when combined with the bike ordinance -** There has been concern raised by stakeholders that given the low parking requirements allowed by the Plan that further reductions allowed by the bike ordinance may be inappropriate, falsely creating the idea that there will be a tremendous increase in bicycle usage in the foreseeable future.

These issues are important to our community and we at the WHHO hope that the City Officials who will review this ground breaking Specific Plan will do so with an eye towards fairness to all that come to this great part of the Valley. We are here to help and support all efforts to create a better community in which to live, work and play.

Respectfully Submitted



JOHN M. WALKER

President, Woodland Hills Homeowner's Organization