



Westwood South of Santa Monica Blvd Homeowners' Association  
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October 12, 2023

Los Angeles Board of Transportation Commissioners  
Los Angeles Department of Transportation  
Los Angeles City Hall

RE: Disposition of Parking Lot 707 at 2377 Midvale Avenue, LA 90064  
Meeting of October 12, 2023 / Agenda Item 8

Dear President Eisenberg, Vice President Liban and Honorable Commissioners:

This letter is submitted on behalf of the Westwood South of Santa Monica Blvd. Homeowners Association, the association in whose area City parking Lot No. 707 is located. As you are well aware, our Councilmember has proposed the change of use of that lot, a Special Revenue Funded (SPRF) Lot, from its current use providing much needed parking for our local business community to a site for a homeless interim housing project. While we recognize the need for addressing the challenges the City faces concerning the numbers of unhoused individuals on our streets, we urge you to vote against the approval of the proposed new use. There are many reasons why opposition to this project has grown since it was announced by press release and why we request that your Board exercise its important role in the oversight of off-street parking facilities by adopting a vote of opposition to the requested approvals and recommendations today.

We urge you to oppose the use of Lot No. 707 for the use and operation of an interim housing project, that you do not find that the project is statutorily exempt from CEQA. We ask that you oppose the City entering into a Memorandum of Understanding with the General Services Department authorizing the GSD to procure and acquire the housing units necessary for implementation of the proposed interim housing project at 2377 Midvale Avenue.

Our association has demonstrated its commitment to supporting initiatives to serve the unhoused and do not speak as naysayers or uncaring citizens seeking to send the unhoused from our area to someplace else. We have identified far more suitable locations for homeless interim housing IN OUR COMMUNITY but have been met with a failure on the part of the Council District to consider any of those locations as alternatives to Lot 707. We sincerely fail to understand why Lot 707 was selected for a new use given its vital role in supporting the neighborhood-serving businesses of our Pico -Westwood business corridor and the many businesses only now recovering from the COVID pandemic. Having a healthy neighborhood business corridor meets the very goals of the City's emphasis to create a walkable city – and on fostering local businesses. Living near Pico Blvd. with its local businesses is one of the key reasons that many of our residents chose to live in this area. However, the businesses cannot survive without drawing from those who drive to access their shops and restaurants. We cannot help but feel that this lot is being taken merely because it is low-hanging fruit and an easy grab – particularly so since the Council removed requirements for replacement parking and adopted an earlier motion taking away past Commission authority. However, in the Council District's haste to secure the lot it appears that they have not followed proper procedures for a transfer of City-owned property between City

departments. In fact, they scheduled a full Council vote on this project last Friday without having come before this Board as required. We are both extremely pleased and relieved to find that the project has returned to your Commission and seeks your support. We urge your rejection of the requested approvals. We must point out to you that the site FAILS to meet the City's guidelines for interim housing projects as it will house significantly less than the guideline of 50 individuals. It also fails to provide safe parking, another component of such projects. In fact, it fails to provide adequate parking even for staff who would work at the facility. Should any residents have vehicles, they would have no available parking and would compete with local businesses for the few parking spots available for employees and customers alike. There are many additional legal reasons related to the City's Emergency Declaration that add to the reasons as to why this project should not be approved. It fails to comply with existing government code. (See CA Government Code 8680.9 and 8630, 65662, with rules pertaining to the declaration of an emergency - LAAC 8.27, 8.33, 833(e).) There are also questions related to the taking of the properties in question for use as a parking lot under provisions of eminent domain (CCP 1245.245 related to CF 89-2577 and Ordinance 166,003).

While we support Mayor Bass' dedicated efforts to address the homeless situation which has been a long time growing problem and challenge for our city and many others, our constituents are overwhelmingly opposed to the taking of Lot No. 707 for the proposed new use. The proposed project is in the very heart of our commercial district and in the center of the Westside NC's residential community. It is directly adjacent to homes. Homes are over the fence from the LADOT parking lot that was once a home and whose use was changed specifically to serve the merchants on Pico Blvd. who had little to no on-site parking and where there are lengthy peak hour parking restrictions. We have requested the parking study done by LADOT but to date have been unable to obtain it; we cannot understand how the study could have concluded that the lot is underutilized unless it was based upon daytime usage and failed to understand that the restaurant customers rely upon it for evening and late night parking. LADOT staff told us that the parking lot was not visited after 5 pm because the Department does not pay overtime to staffers doing lot evaluations.

This neighborhood is actively doing our part. Those who say that CD 5 does not have any homeless housing facilities are wrong. The very first PATH facility is located on Cotner Avenue just north of Pico Blvd. and for years served as an interim housing facility for a general male homeless population. It is now housing homeless male veterans and is in operation. There is a motel facility on LaCienega Blvd. in CD 5's Westside area as well as an additional shelter (unannounced location) and a safe parking lot facility on National Blvd. Not far from Lot 707 on Santa Monica Blvd. is a relatively new permanent supportive housing project that was built on a former double LADOT surface parking lot. Our community did not oppose that project because there was alternative parking available in nearby midrise office buildings and metered street parking as well without peak hour restrictions. Not so in this case.

Fix the City has submitted a detailed letter to the Commission (dated October 10, 2023) that raises all the evidence and legal basis upon which denial of the approval of the taking of Lot 707 can be based. Not only has the city failed to do a cost-benefit analysis of the project to consider its negative impacts on both the business and residential communities, but it has failed to do a feasibility study as required under the City Asset Evaluation Framework (C.F. 12-1549-S3). Further, it appears that the proposed site is inadequate to meet the needs of the homeless it seeks to serve. It fails to provide adequate indoor space for services it is said to be planning to provide! It is separated by an alley making it impossible for the single planned unarmed security guard to assure that drugs and alcohol prohibitions are enforced. While we understand the need to sacrifice some personal freedom for social and political order, we cannot agree to compromise the safety of our homes, families, and neighbors – commercial and residential—for a project announced by press release, for a project that robs our business community of essential parking and the customers that those parking spaces represent, for a project whose location

was not based upon what is appropriate, but rather based upon a location that was easy to procure. In this case there was no attempt to seek consent nor an attempt to engage us in any conversation about the taking of the Pico parking lots

While the housing and protection of the homeless is of critical importance, and yes, they do need protection whether they know it or not, the protection of the residents and businesses in the community must not be overlooked when considering the placement of such housing. The viability of our Pico commercial corridor is at stake. Those businesses that survived the COVID pandemic are only now beginning to rebuild their momentum. They do not need a punch in the gut from the City. The promise of having a prohibition on encampments within 500 or 1000 feet or any number of feet is illusory for we all know that enforcement is a pipe dream in LA. There is no such thing as enhanced enforcement. There isn't the staffing to do it and our visits to such sites across the City revealed that promises made were promises broken to neighbors of homeless housing projects – from A Bridge Home projects to interim and permanent supportive housing projects.

The process used to secure Lot 707 will, in the long run will do more to harm long-range efforts to house the unhoused than to help them. The constituents that we represent currently feel that the homeless have more rights than they do. I personally fear that this effort will do great damage to future efforts by the city to raise additional funds to support related social service efforts. Voters are frustrated and believe that despite massive amounts of money being used to address the challenges faced, that the programs are without direction and operating without a structure and expectations to make a difference. I have often heard references made to the “homeless industrial complex” that has grown along with the growing numbers of unhoused.

Creating a 33-bed facility may seem like a start, but it results in a very expensive size project to operate. In fact, the Councilmember has told us that many providers declined to participate specifically because the project was “too small.” The size will also affect and limit the availability of on-site services where the shortage of service providers is but one more challenge the City faces. Furthermore, neither your Commission nor the Council have been presented with actual budgets that show the operating costs for this facility. The Council's Housing and Homelessness Committee was given a \$4.5 million request for funding but that had nothing to do with any operating costs and did not even detail all costs needed to construct the facility proposed. (The project also has been pursued in such haste that contracts are being let with no bids which is an additional concern to taxpayers.)

We are doing our homework. We have proposed two excellent alternatives that could be pursued with minimal negative impacts, if any, and continue to look for options. We have asked the Council District to take a “time out” to evaluate those options but have failed to gain their participation in considering alternative sites. A vote to oppose the project by the Commission could serve to help establish a needed pause in the rush to approve this project such that the alternatives could be properly vetted by the City. I note that the alternatives identified by the community would house SIGNIFICANTLY more homeless than Lot 707 can house and would likely result in a significant operating cost saving per resident. Funds to address the great needs are not unlimited and the city owes it to all Angelenos to spend available dollars wisely.

Thank you for your consideration.

Sincerely,



Barbara Broide, President

Westwood South of Santa Monica Blvd. Homeowners Association

