

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

Date: August 20, 2018

To: Board of Neighborhood Commissioners

From: Grayce Liu, General Manager  
Department of Neighborhood Empowerment

Subject: Certification of North Westwood Neighborhood Council

The Department of Neighborhood Empowerment (Department) has prepared this report for the certification of the North Westwood Neighborhood Council, which is being subdivided from the existing Westwood Neighborhood Council. Pursuant to [Los Angeles Administrative Code, Section 22.819](#) on Neighborhood Council subdivisions, as one of the final steps to the subdivision process, the Board of Neighborhood Commissioners (Commission) is authorized to review the bylaws for any Neighborhood Council being subdivided and the bylaws in the subdivision petition and to make any amendments to the bylaws to satisfy Article III, Section 2 of the [Plan for a Citywide System of Neighborhood Councils \(Plan\)](#). Once the bylaws are approved, the North Westwood Neighborhood Council shall be deemed a certified Neighborhood Council within the City of Los Angeles.

## **Background**

There are extensive documents referred to in this section of the report. All of these materials are on the Department website at [EmpowerLA.org/nwwnc/](http://EmpowerLA.org/nwwnc/). The specific documents noted in the following sections have been hyperlinked individually from the website.

On December 15, 2017, the North Westwood Neighborhood Council Formation Committee (Formation Committee) submitted a [petition to subdivide](#) from the Westwood Neighborhood Council. Included in this application were the requisite [proposed bylaws](#) and [signatures in support of the petition](#).

After reviewing the application, the Department [sent a letter on February 9, 2018](#) to the Formation Committee noting an issue with the proposed boundaries, which would leave the Westwood Neighborhood Council with an area (Westwood Hills) that was not compact and contiguous as required by the Plan and required an adjustment to the proposed boundaries to include Westwood Hills, an area in the northwest corner of the boundaries between the 405 freeway and Veteran Avenue. Upon further discussion, the Formation Committee agreed to the change, which was finalized by the Department in a [March 2, 2018 letter](#) to the Formation Committee with a [map of the changed proposed boundaries](#).

On March 13, 2018, the Commission held a community information session where stakeholders from the Westwood Hills area requested to stay with the Westwood Neighborhood Council. Representatives from the Formation Committee stated at the session that they would be amendable to Westwood Hills staying with the Westwood

Neighborhood Council. On March 19, 2018, the Department issued an [approval letter](#) to the Formation Committee, which acknowledged that the application met all the requirements of the Plan and would move to the election phase.

After the Commission session, the Department researched the possibility of including the Los Angeles National Cemetery within the Westwood Neighborhood Council in order to meet the compact and contiguous boundaries requirement to reach the Westwood Hills area and determined it was possible because the cemetery receives City services. This information was conveyed to both the Formation Committee and the Westwood Neighborhood Council. The Formation Committee was agreeable to this change. On April 11, 2018, the Westwood Neighborhood Council took action to “keep the boundaries of Westwood Hills within the boundaries of the existing Westwood Neighborhood Council” and “agreed to expand its boundaries to include the Los Angeles National Cemetery.”

Because of the shortened time frame for elections, no official action could be taken to make the changes to the boundaries before the election date. The clarification that Westwood Hills would remain with the Westwood Neighborhood Council, however, was stated at the two additional community information and outreach meetings that were held about the subdivision conducted by the Department. [A proposed map](#) of the boundaries for the two Neighborhood Councils showing Westwood Hills and the Los Angeles Cemetery within the Westwood Neighborhood Council was used at the community meetings. Staff was also available at the Westwood Neighborhood Council meetings to answer questions about the subdivision and clarify any boundary issues.

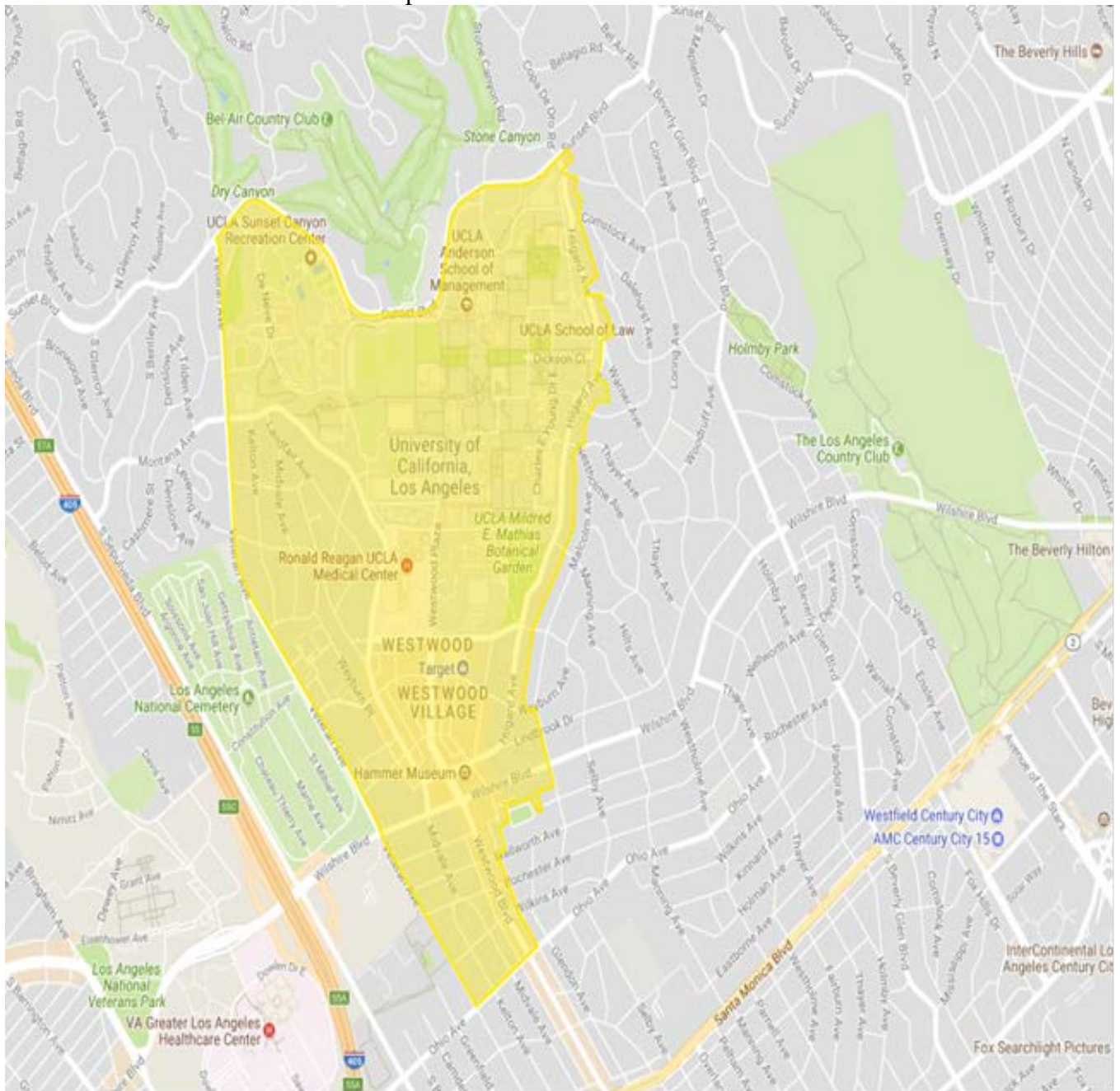
The Department partnered with the Office of the City Clerk to hold the election on May 22, 2018, which included a vote-by-mail component, with the following results:

- Total ballots cast – 3,521
- 2,027 voters voted YES in favor of forming a new North Westwood Neighborhood Council
- 1,494 voters voted NO against the formation of a new North Westwood Neighborhood Council

The North Westwood Neighborhood Council subdivision election was certified by the Office of the City Clerk on May 29, 2018.

### **North Westwood Neighborhood Council Proposed Bylaws**

On August 13, 2018, the Formation Committee [revised their proposed bylaws](#) with a boundary adjustment to exclude the Westwood Hills area per the request of the Westwood Hills representatives. The Formation Committee also disagreed with the Westwood Neighborhood Council’s proposal for shared boundaries. The proposed boundaries for the North Westwood Neighborhood Council, which contain no overlapping areas are depicted in the following map.



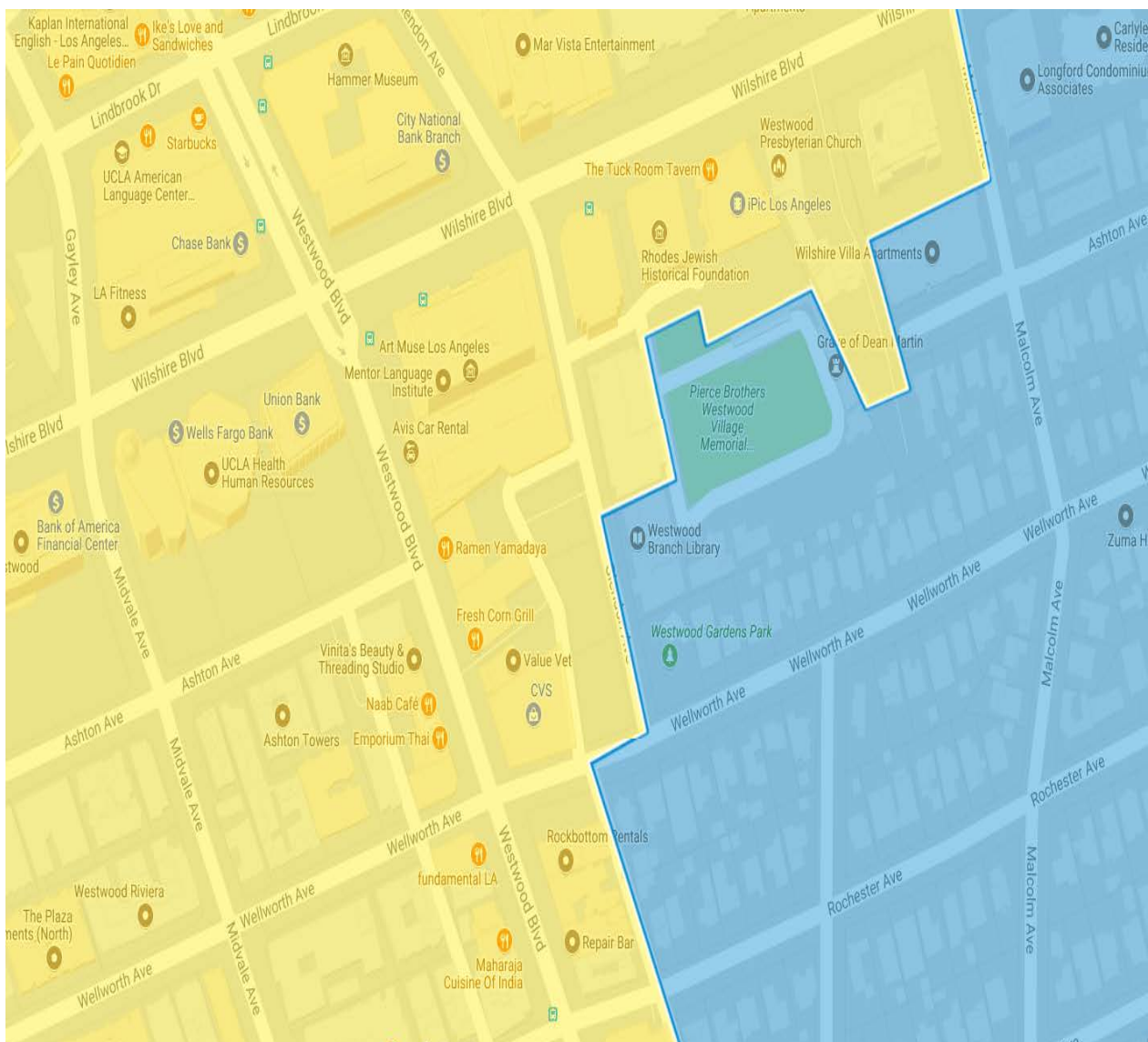
The written description for the boundary is:

1. North – The south side of Sunset Boulevard from Veteran Avenue in the west to Hilgard Avenue in the east; and
2. East – The east side of Hilgard Avenue from Sunset Boulevard in the north to Weyburn Avenue in the south; the south side of Weyburn Ave from Hilgard Avenue in the west to Malcolm Avenue in the east; the west side of Malcolm Avenue from Weyburn Avenue in the north to Wilshire Boulevard in the south; the east side of Westwood Boulevard from Wilshire Boulevard in the north to Ohio Avenue in the south; and

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3. South – The south side of Wilshire Boulevard from Malcolm Avenue in the east to Westwood Boulevard in the west; the north side of Ohio Avenue from Westwood Boulevard in the east to Veteran Avenue in the west; and
4. West –The east side of Veteran Avenue from Sunset Boulevard in the north to Ohio Avenue in the south.

While the map above shows the boundaries going beyond some streets, such as Wilshire and Westwood Boulevards, this was not meant to indicate an overlap in boundaries with Westwood Neighborhood Council. The Office of the City Clerk is redesigning all Neighborhood Council maps based on parcels in order to more accurately show the boundaries. The Department is assisting in redrawing all the Neighborhood Council maps to illustrate which parcels are included when a written description states the “south side” of a street as depicted in this zoomed in map, which shows the east side of Westwood Boulevard and south side of Wilshire Boulevard in the North Westwood Neighborhood Council’s proposed boundary and the affected parcels:



In addition to the boundary adjustment, the Formation Committee changed the number of their board seats and voting structure based on large voter turnout. After review, the Department finds the changes allowable and that the revised bylaws still meet the bylaws requirement of Article III, Section 2 of the Plan in providing the following information:

#### Neighborhood Council Name

In Article I of the bylaws, the name for the new Neighborhood Council is identified as North Westwood Neighborhood Council.

#### Governing Body Board Structure

In Article V of the bylaws, the North Westwood Neighborhood Council's governing body is set forth as 19 board seats for stakeholders 18 years of age or older in the following manner:

1. Homeowner Stakeholder Board Members (1) – Open to Stakeholders who own a residence that is located within the NC boundaries.
2. Renter Stakeholder Board Members (2) – Open to Stakeholders who rent a residence located within the NC boundaries.
3. General Residential Stakeholder (2) – Open to Stakeholders who live within the NC boundaries, either as a homeowner, renter, person who experiences homelessness, or person who sublets or otherwise resides within the boundaries.
4. Business Stakeholder Board Members (3) – Open to Stakeholders who work at or own a business or business property within the NC boundaries.
5. Undergraduate Student Member (2)—Open to stakeholders who are undergraduate students at a university or college within the NC boundaries. Students need not be currently enrolled as long as they have been enrolled within the past 180 days and intend to re-enroll within the next 180 days.
6. Graduate Student Member (1)—Open to stakeholders who are current graduate or professional students at a university or college within the NC boundaries. Students need not be currently enrolled as long as they have been enrolled within the past 180 days and intend to re-enroll within the next 180 days.
7. University Staff or Administrative Member (1) – Open to stakeholders who work at a university or college within the NC boundaries in a capacity in which they spend the majority of their time neither conducting research nor teaching. Employee need not be currently employed as long as they have been employed within the past 180 days and intend to be re-employed within the next 180 days.
8. Faculty Member (1) – Open to stakeholders who work at a university or college within the NC boundaries in a capacity in which they spend the majority of their time conducting research and/or teaching. Employee need not be currently

employed as long as they have been employed within the past 180 days and intend to be re-employed within the next 180 days.

9. Worker Stakeholder (1) – Open to non-owner paid employees of a business, non-profit, or educational property within the NC boundaries.
10. Organizational Stakeholder Board Members (2) – Open to Stakeholders who actively participate in a religious organization, educational institution, community organization, non-profit organization, neighborhood association, chamber of commerce, business improvement district, sorority, fraternity, school/parent group, student association, arts association, service organization, cultural group, etc. that primarily operates within the NC boundaries.
11. At-Large Stakeholder Board Members (3) – Open to Stakeholders of any category.

The Department finds the proposed governing body to reflect the diversity of the North Westwood Neighborhood Council's stakeholders. The board structure also allows all stakeholders the ability to vote and run in at least one board seat. No majority of the board seats are allocated to a single stakeholder group in violation of the Plan, and the term of the board member is an allowable 2 years.

#### Method to Elect or Select the Governing Body

In Article X of the bylaws, the North Westwood Neighborhood Council identifies an election process for the governing body.

#### **Westwood Neighborhood Council Proposed Bylaws Amendments**

On June 13, 2018, the Westwood Neighborhood Council (WWNC) voted [to amend its bylaws](#) to account for the new subdivided North Westwood Neighborhood Council. The board lowered the number of total board seats from 19 to 17, eliminating the Student and Faculty or Staff seats that were set aside for a university or college within their boundaries. In addition, the board changed the terms of the seats from 2 years to 4 years.

The Department supports the changed board structure for the Westwood Neighborhood Council, which would result in the following seats:

1. Residential (4) – Directors must own and reside in a residential property located within the WWNC boundaries.
2. Renter (4) – Directors must rent and reside in a residential property located within the WWNC boundaries.
3. Business (4) – Director must own or manage a business located within the WWNC boundaries.

4. Non-Profit/Faith-Based/Education Community (3) – Directors must be a member of, or work for, a non-profit, arts, cultural civic, faith-based or other community-oriented organization, or be a parent, teacher or administrator in a public or private K-12 school, located within the WWNC boundaries.
5. At Large (2) – Directors must currently live, work, own real property or be a community interest stakeholder (as that term is defined in the Plan or amendments thereto) within the WWNC boundaries.

The amendments also contain boundary adjustments to include the Los Angeles National Cemetery to retain the connection to the Westwood Hills area and multiple proposals for overlapped boundaries in order to share alleged major thoroughfares and other locations or landmarks designed for a public use. These proposed overlapped areas are generally:

1. Veteran Avenue from Weyburn Avenue to Wilshire Boulevard, which would include Fire Station #37 and the UCLA Rehabilitation Center
2. The Westwood Village Specific Plan area plus nearby streets, such as Gayley Avenue, Lindbrook Drive and Le Conte Avenue as well as south of the area to Wilshire Boulevard
3. Westwood Boulevard from Wilshire Boulevard to Ohio Avenue
4. Wilshire Boulevard from Veteran Ave to Malcolm Avenue
5. East side of Hilgard Avenue from Le Conte Avenue to Weyburn Avenue

The Department finds that the inclusion of the Los Angeles National Cemetery to retain the area known as Westwood Hills to be allowable under the Plan. Most of the proposed overlapping areas, however, are not only against the Plan, but also the will of the voters who approved the subdivision for North Westwood Neighborhood Council.

#### Inclusion of Los Angeles National Cemetery Allowed

Article III, Section 2 of the Plan states that Neighborhood Council boundaries “should, to the maximum extent feasible, follow historic and contemporary community and neighborhood borders, and shall utilize natural boundaries or street lines and be geographically compact and contiguous.” This section further states the “inaugural boundaries of all Certified Neighborhood Councils shall be the limits of the City of Los Angeles (City). The boundaries of a Certified Neighborhood Council are encouraged to remain within the City limits because the City can only guarantee delivery of its services to City residents.”

Without the inclusion of the Los Angeles National Cemetery, the Westwood Neighborhood Council would not be able to maintain the Westwood Hills community, which is north of the cemetery, south of the Sunset, west of the 405 freeway and east of Veteran Avenue, because its borders would not be compact and contiguous. The cemetery was initially not included within the original Westwood Neighborhood Council certified boundaries because it is federal land and not considered under the jurisdiction of the City of Los Angeles. Staff confirmed, however, that the cemetery does receive City services, which allows the area to be included within a Neighborhood Council. As such, the Department finds that this boundary adjustment is allowable per the Plan.

### Allowable Neighborhood Council under the Plan

Westwood Neighborhood Council is a viable Neighborhood Council under the Plan without its proposed shared areas. Within its [Executive Summary for its Boundary Adjustment Petition](#), the Westwood Neighborhood Council argues that the overlapping areas are required because without them, the “Westwood NC is almost exclusively residential” and does not meet the Plan Article II, Section 1 of the Plan that “Certified Neighborhood Councils shall be diverse...”

While Westwood Neighborhood Council will be mostly residential, approximately 121 parcels along Santa Monica Blvd., Westwood Blvd., and Sepulveda Blvd., are zoned commercial while nearly 40 parcels are zoned light-industrial providing for a diverse enough mix of residential to commercial parcels with its boundaries. In addition, there are other Neighborhood Councils within the system with majority residential parcels, such as Bel-Air Beverly Crest, Granada Hills North, and Foothills-Trails District Neighborhood Councils. Therefore, the Westwood Neighborhood Council’s boundary, without having any overlapping areas with North Westwood Neighborhood Council, is allowed under the Plan.

### Westwood Village Is Not a Shareable “Area”

Under Article III, Section 2 of the Plan, “the boundaries of two or more Certified Neighborhood Councils may not overlap with one another, unless the area for proposed inclusion into each Certified Neighborhood Council is designed for a public use, such as a park, school, library, police or fire station, major thoroughfare, or contains a landmark or facility with historical significance.” The Westwood Neighborhood Council claims that the historic buildings contained within the Westwood Village Specific Plan makes the entire region shareable because Westwood Village is an area with “a landmark or facility with historical significance.

Under the guidance of the Office of the City Attorney, the Commission and Department have never interpreted this provision in this manner, i.e. an entire region would be shareable because it contains a landmark or facility with historical significance. If the Plan language was read in this manner, then the many historical landmarks within the City of Los Angeles could be included in Neighborhood Councils citywide, making existing boundaries meaningless. The word “area” in this context has always been considered more in line with the word “parcel” since it is referring to a single location designed for public use – a park, a school, a library, a police or fire station, a landmark, or a facility with historical significance. The Department acknowledges and agrees that many buildings within Westwood Village have historical significance per Westwood Neighborhood Council’s petition documents, but that does not mean that the entire region can now be shared.

Further, because boundaries must also be compact and contiguous, the Commission has only approved a shared location if it was located right on the border between two or more Neighborhood Councils. In the case of Westwood Village, the Westwood Neighborhood Council would have to go past its own boundaries and into the boundaries of the North Westwood Neighborhood Council in order to share Westwood Village. The following map for the Westwood Village specific plan from the City of Los Angeles Planning Department illustrates the problem of this proposal to share



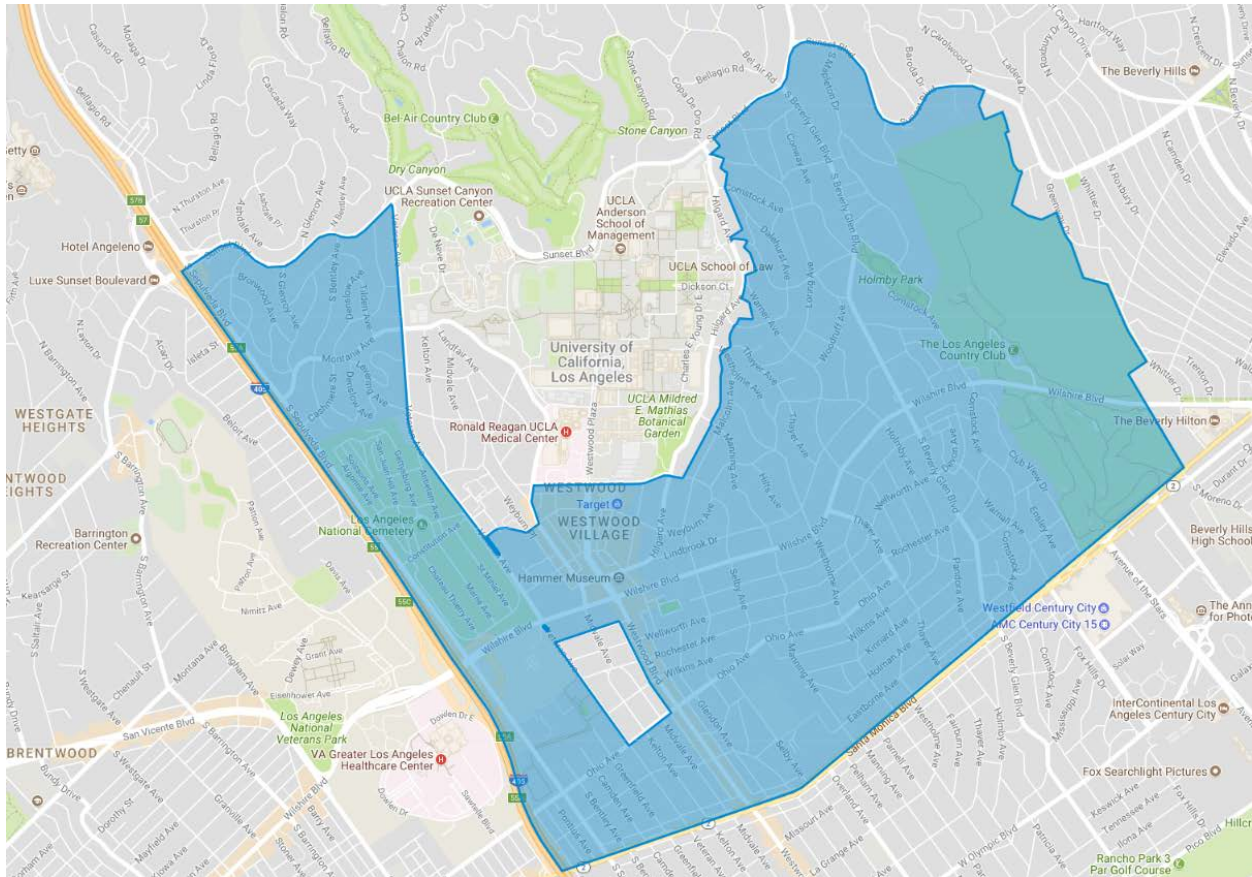
Westwood Village. The proposed North Westwood Neighborhood Council boundaries include both sides of Wilshire Boulevard from Veteran Avenue to Malcolm Avenue so at this point on the map, both sides of Wilshire Boulevard would be within the North Westwood Neighborhood Council boundaries.



This map clearly shows that the south border of Westwood Village stops a street (Lindbrook Avenue) before Wilshire Boulevard, which Westwood Neighborhood Council is also proposing to share. Even if the Wilshire Boulevard overlap is allowed under the

sharing of “major thoroughfares,” the Westwood Neighborhood Council would still have to cross through the buildings between Wilshire and Lindbrook Avenue as well as Lindbrook Avenue itself to reach Westwood Village, which is not allowable under the Plan because the location to be shared is no longer on the boundaries between two Neighborhood Councils

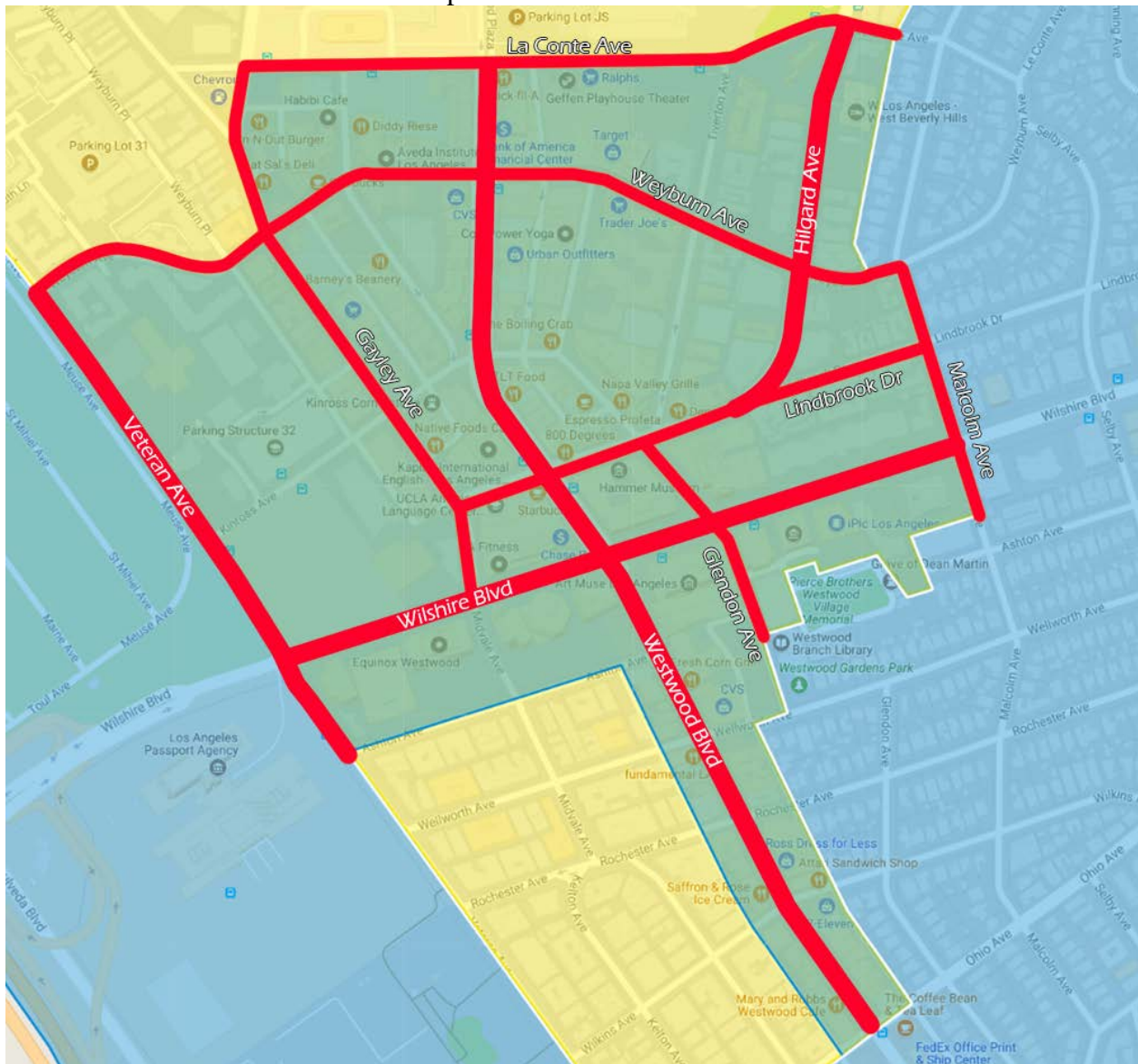
If the Westwood Village overlap were to occur, it would also create a donut hole within the boundaries of the Westwood Neighborhood Council that is not compact and contiguous as shown in this map.



### Not All Streets Are Major Thoroughfares

Not all of the streets that are listed by the Westwood Neighborhood Council are major thoroughfares and should not be shared. While the Commission has not set a standard for what constitutes a major thoroughfare, the Department proposes considering using the types of highways as a method of determining what streets are considered a major thoroughfare under the Plan.

This map shows which streets in red that the Westwood Neighborhood Council is proposing to share with North Westwood Neighborhood Council. These streets are all within the North Westwood Neighborhood Council proposed boundaries.



According to an Environmental Impact Report cited on page 63 of the Westwood Neighborhood Council's petition, Wilshire Boulevard is classified as a Major Class I Highway with Sunset Boulevard and Westwood Boulevard being classified as Major Class II highways. Veteran Avenue, Hilgard Avenue, Gayley Avenue and Le Conte Avenue are classified as a Secondary Highways. Wilshire Boulevard carries about 69,500 vehicles per day (VPD) and Sunset Boulevard, carries 45,000 VPD, while Veteran Avenue and Hilgard Avenue carries 21,500 VPD and 8,000 VPD respectively.

Depending on how the Commission views what constitutes a major thoroughfare, both Wilshire and Westwood Boulevards could meet that qualification since they are classified as Major Class highways or only Wilshire Boulevard if the Commission decides that Major Class I and not Class 2 Highways should be considered as a major thoroughfare.

In consideration of traffic volume and street classification, the Department recommends that Hilgard Avenue, Le Conte Avenue, Gayle Avenue, Veteran Avenue, Glendon Avenue and Lindbrook Drive not be considered major thoroughfares. As noted above, because Westwood Village is not shareable, Gayley Avenue, Le Conte Avenue,

Weyburn Avenue and Lindbrook Drive within the Village would also not be shareable for that reason. Wilshire Boulevard from Veteran Avenue to Westwood Boulevard would also not be shareable because Westwood Neighborhood Council is again reaching beyond the edges of its borders into the North Westwood Neighborhood Council to include Wilshire Boulevard at that point.

### Possible Shared Locations

There are two locations on Veteran Avenue that could be considered as shared under the Plan while maintaining compact and contiguous boundaries for both Neighborhood Councils even without the Commission determining the street to be shared: Fire Station #37 and the UCLA Rehabilitation Center. Both of these locations are on the east side of Veteran Avenue within the proposed boundaries for North Westwood Neighborhood Council. Because the proposed boundaries for Westwood Neighborhood Council run on the west side of Veteran Avenue past these locations, the boundaries could be extended to include these 2 buildings.

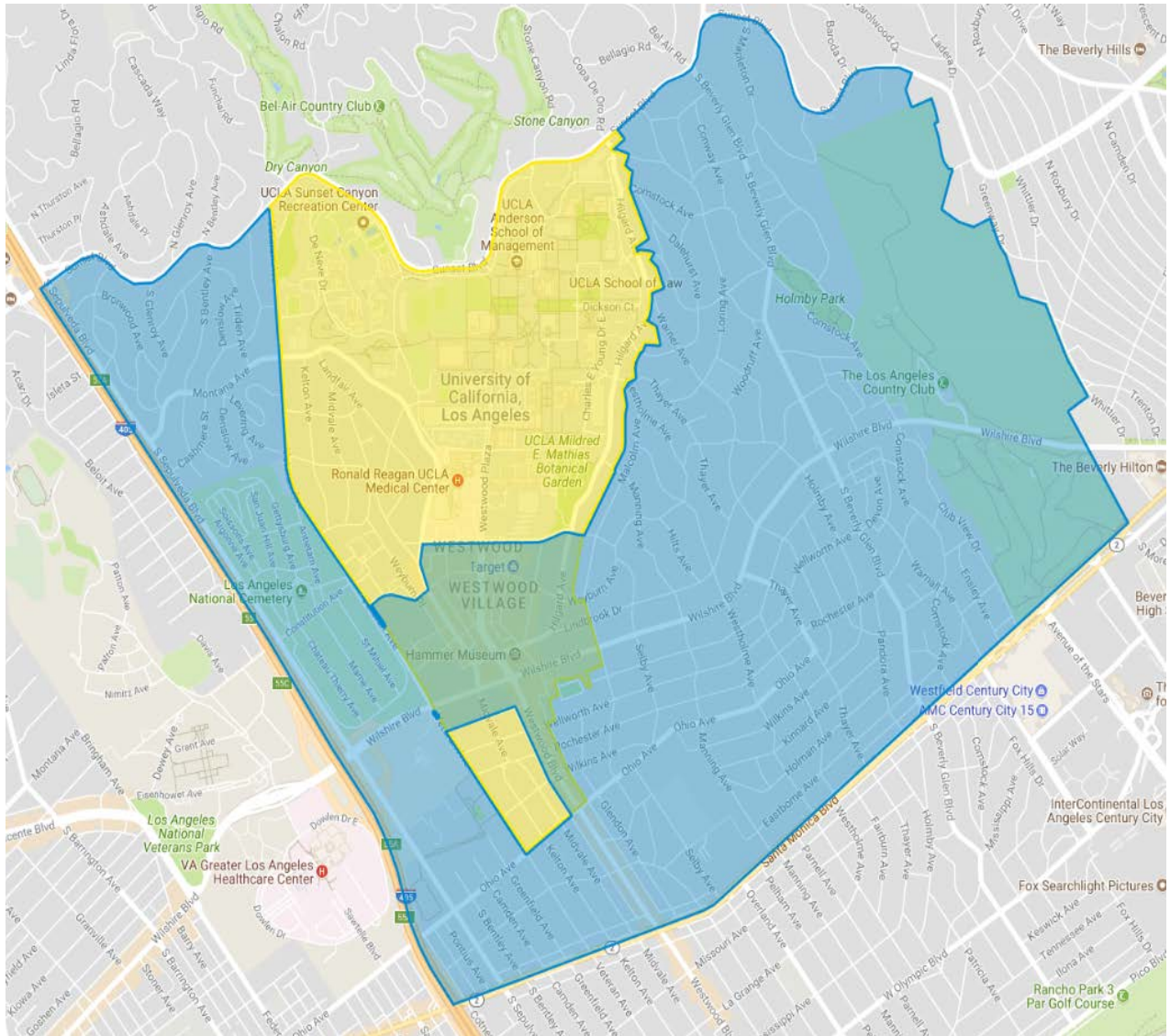
Any other shared locations should follow past practice of having to be on the boundaries between two or more Neighborhood Councils and is considered for public use.

### Voter Approval of Boundaries

Lastly, if the Commission were to approve the sharing of Westwood Village or any of the streets proposed by Westwood Neighborhood Council, it would go against the will of the voters who approved this subdivision with the understanding that the boundaries of North Westwood Neighborhood Council would not contain such an overlap of boundaries with Westwood Neighborhood Council.

The Formation Committee made the following statement regarding the overlap. The Formation Committee opposes “Westwood Neighborhood Council's proposed shared boundary requests and all other suggested boundary adjustments effecting our areas on the grounds that A) we feel that subdivision voters understood themselves to be removing these areas from the jurisdiction of WWNC, as evidenced by the centrality of the discussion of how WWNC's positions on proposed businesses, housing developments, bike lanes, etc. have held our community back and necessitated a change in leadership that reflected the progressive values of North Westwood and B) we feel that it would be an undue burden for every proposed business and development to have to go before 2 different councils and their respective committees, especially when the demands of these councils would be expected to tug applicants in irreconcilable directions.”

The North Westwood Neighborhood Council subdivision was to provide different representation to its stakeholder group, and if the Westwood Neighborhood Council proposed overlaps were approved, it would result in approximately a third of the new Neighborhood Council to boundaries to be shared as illustrated by this map.



This map shows the combined areas of North Westwood and Westwood Neighborhood Councils showing both the significant overlap and donut hole if the proposed shared areas are approved.

### Ability to Weigh In on Issues

It should be noted that the Westwood Neighborhood Council still has the ability to weigh in on the proposed shared areas even if the Commission does not approve the proposed boundaries overlap. All Neighborhood Councils can comment on any part of the City.

## Recommended Findings

Because the North Westwood Neighborhood Council has satisfied the criteria to subdivide from the Westwood Neighborhood Council, the Department of Neighborhood Empowerment recommends that the Board of Neighborhood Commissioners:

1. FIND that the North Westwood Neighborhood Council's bylaws satisfy Los Angeles Administrative Code Section 22.819(d) and Article III Section 2 of the Plan for a Citywide System of Neighborhood Councils making North Westwood Neighborhood Council the 98<sup>th</sup> Neighborhood Council in the City of Los Angeles.
2. FIND that the Westwood Neighborhood Council's new board structure, which included reducing the number of seats from 19 to 17 and eliminating the Student and Faculty or Staff seats, to be in compliance with Article III, Section 2 of the Plan for a Citywide System of Neighborhood Councils.
3. FIND that the North Westwood Neighborhood Council and Westwood Neighborhood Council's boundary adjustments to keep Westwood Hills within and to add the Los Angeles National Cemetery to the Westwood Neighborhood Council to be in compliance with Article III, Section 2 of the Plan for a Citywide System of Neighborhood Councils.

If the Board of Neighborhood Commissioners approves the sharing of the facilities Fire Station #37 and the UCLA Rehabilitation Center on Veteran Avenue, then also:

4. FIND that North Westwood Neighborhood Council and Westwood Neighborhood Council will share the public use locations of Fire Station #37 and the UCLA Rehabilitation Center on Veteran Avenue because they are a permissible overlap of boundaries under Article III, Section 2 of the Plan for a Citywide System of Neighborhood Councils.
5. AUTHORIZE the Department of Neighborhood Empowerment to adjust the bylaws of the North Westwood Neighborhood Council and the Westwood Neighborhood Council accordingly.