

**BRENTWOOD
RESIDENTS
COALITION**



May 16, 2011

Los Angeles City Planning Commission
200 N. Spring Street
Room 272
Los Angeles, CA 90031

Re: Modified Parking Requirement District Ordinance—Support with Modifications

Dear Commissioners:

We jointly support the City Planning Department's work to make our plans more responsive to local community needs. The proposed Modified Parking Requirement District (MPRD) ordinance could provide important benefits to specific communities that choose to adopt MPRDs, but we have concerns that the current draft of the ordinance has significant flaws that should be corrected before it is adopted. Following are our specific recommendations:

1. **Specific Plan Areas.** There are many areas of the City that have adopted Specific Plans. These Specific Plans were established over periods of years, with extensive buy-in from the communities they cover. They are comprehensive and represent significant investments of time and money. If an area covered by a Specific Plan were to adopt a Modified Parking Requirement District (MPRD) as well, it is likely that MPRD and the Specific Plan could compete, contradict each other, entail inconsistent boundaries, or otherwise create confusion and potentially negative outcomes unnecessarily. The areas with established Specific Plans already have the vehicle to modify their approach to parking regulation if they choose to do so—namely, the Specific Plans themselves—there is no added value for these areas to adopt MPRDs, only potential downside. Since this ordinance provides enabling tools, it is not needed in Specific Plan areas, which already contain the necessary tools to modify parking requirements. The best example of this is Eagle Rock, where the Specific Plan was modified to address the parking needs of the entire plan area. ***As such we urge the Commission to make Specific Plan areas ineligible for MPRDs.***

2. **Minimum District Size.** Quite simply, the recommended minimum size of an MPRD, three acres, is too small. In some cases, three acres represents a little over half of one city block. ***MPRDs should be areas large enough truly to be considered districts – a minimum of either six acres or two full city blocks, whichever is less.***

3. **Single Projects Should not be Eligible for MPRDs.** We understand that it is the intent of the MPRD ordinance to provide whole districts with alternative regulatory tools for parking, but not to extend these tools to stand-alone projects. While the size constraints in #2, above, would make many stand-alone projects ineligible to apply for an MPRD, it is conceivable that some large projects, such as big-box retailers, very large single family home projects, or other unitary developments may surpass these minimum size standards. In those cases, parking variances are the proper entitlement action to pursue. ***Thus, we recommend that the ordinance include the stated policy that only districts and not unitary projects should be eligible for their own MPRDs.***

4. **Transit & Public Parking Facilities.** *Modified Parking Requirement Districts should be located within walking distance of transportation resources, such as public parking facilities, public transit stations, available street parking, lots or dedicated public parking structures (as confirmed by studies and accepted by the potentially impacted communities).* If Districts are imposed in areas lacking such public parking facilities, there is a much greater risk of spillover parking and traffic circulation impacts into the local residential neighborhoods.

5. **Notification.** *We recommend that all property owners within 1,500 feet of a proposed District be notified and that notice also be provided to the Neighborhood and/or Community Councils in the area.* This will ensure a fair and transparent process.

6. **Impact on Housing Incentives.** We are strong proponents of low income, affordable and senior housing. We believe that in certain circumstances, MPRDs could conceivably incentivize the loss of existing affordable housing units. To protect against this possibility, *the ordinance should require that any proposed parking reduction in any MPRD not apply to properties with existing rent-stabilized and/or covenanted affordable units.*

7. **Parking Management.** It is not uncommon for an area that has ample off-street commercial parking still to create spillover problems that impact nearby residential areas. In many cases, spillover problems can be attributed to inadequate management of existing parking—whether it be parking meter policies (time limits that do not work for commercial patrons, pricing that disincentivizes use of off-street parking), a lack of employee parking, or inadequate restrictions in residential neighborhoods/incentives in commercial districts. *MPRDs should create a vehicle for assessing and improving the management of parking meters, time restrictions, employee parking policies and restrictions on residential streets.*

8. **Parking Meter Revenues.** Historically, L.A. neighborhoods kept their parking meter revenues for the purposes of improving their local parking facilities. In other cities, notably Pasadena, parking meter revenues are the key revenue source that pays for street cleaning, tree maintenance, and lighting. *MPRD areas should be allowed to keep their meter revenues for use in improving the public rights-of-way in those districts.*

Thank you for this opportunity to provide input into this important discussion. We hope you consider our recommendations and include them in an amended version of the ordinance.

Best regards,



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Brentwood Residents Coalition



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