



October 18, 2017

**To:** Tom Rothmann, Phyllis Nathanson, Erick Lopez, Department of City Planning; Lee Einsweiler and Colin Scarff, Code Studio

**From:** LApplus, Council of Infill Builders, Fixing Angelenos Stuck in Traffic, Los Angeles Walks, At Home Housing, Michael Lens, Richard Wilson

**RE: Comments on draft re:code LA parking rules**

We are encouraged to see that the Re:code LA discussion draft dealing with Parking and Access would reduce parking requirements in parts of the city and would modify some parking rules that have negatively impacted mobility, affordability, urban design and sustainability in Los Angeles.

We believe that the following proposals contained in the draft are steps in the right direction:

- (a) eliminating mandatory parking minimums in Downtown Los Angeles
- (b) allowing a stepping-down of parking requirements in some other areas of the city where linked, compact, and linked-compact contexts are applied during community plan updates
- (c) not requiring additional parking for changes of use in buildings constructed before July 1, 1974
- (d) not requiring additional parking in linked compact areas when a commercial use changes to another commercial use
- (e) allowing unbundled parking citywide
- (f) requiring unbundled parking downtown and in linked-compact areas
- (g) not including the first 2,000 sf of nonresidential floor area in the calculation of building square footage for parking requirements
- (h) counting the first 15,000 sf or 5% of total square footage of retail space in a large office building as office rather than retail for parking for calculating parking requirements
- (i) calculating residential parking requirements based on number of bedrooms vs number of habitable rooms
- (j) allowing developments with multiple uses to request reductions in parking requirements by submitting a shared parking analysis
- (k) requiring one space per dwelling unit for narrow lots or rental units from the conversion or additions to a single unit dwelling
- (l) allowing changes to parking ratios based on submission of alternative parking plans

- (m) requiring driveway access from alley when site is served by an improved alley (20 feet or wider)
- (n) allowing tandem parking when attendants are used to park or when 2 tandem spots are assigned to the same dwelling unit
- (o) permitting use of the mechanical car lifts / robotic parking structures
- (p) allowing abutting on-street parking spaces to substitute for required off-street parking
- (q) allowing required parking spaces (except accessible spaces) to be located off site within 1500 feet in the same or more intense zone
- (r) lower commercial parking requirements in former redevelopment project areas
- (s) lower parking requirements for affordable housing reflecting city and state policies
- (t) not require covered parking for single unit homes

These types of reforms are a good start. We congratulate staff for working to reduce parking requirements and for including newer thinking on parking management.

Given the city's housing crisis, expected changes in mobility patterns and technologies, state and local climate change goals, and the experiences of other cities in making parking reforms, however, we strongly encourage re:code LA to do more to address parking rules that serve as obstacles to positive change. We suggest the following changes to encourage more sensible, equitable, sustainable, and efficient development and management of mobility and parking resources in LA.

### **1. Eliminate vehicle parking requirements (especially downtown and near transit)**

There is growing consensus that the wisest, clearest and simplest reform would be to eliminate all vehicle parking requirements, as, for example, Buffalo, London, Sao Paulo and Mexico City have done. Eliminating these requirements is one of the most effective steps that the city could take to advance its own goals of making housing more affordable, reducing greenhouse gas emissions and harmful air pollution, reducing injuries and deaths from vehicles, and promoting economic development. In addition to these substantial benefits to prosperity, sustainability and quality of life, ending parking requirements would also send a message to the rest of the state, country, and the world that Los Angeles is ready to lead on climate change, housing and other challenges.

Even before the City of Los Angeles adopted parking requirements in the 1930s, builders still provided off-street parking regularly as part of new construction. If we eliminate requirements, parking will no doubt continue to be built in some developments while driving and parking trends evolve. But the city will get out of the business of harming the environment, public health, housing and jobs by forcing builders to provide more parking than is needed. We also note that recent reports on transportation and parking in LA, such as "Urban Mobility in a Digital Age: a Transportation Technology Strategy for Los Angeles" by LADOT's Transportation Technology Strategist; and "Wasted Spaces: Options to Reform Parking Policy in Los Angeles" by the Council of Infill Builders, encourage the City to eliminate parking requirements. The code

could still regulate parking that is provided by rules on accessible spots, driveway placement, unbundling etc.

If it is currently politically infeasible to eliminate vehicle parking requirements citywide, they should be eliminated first downtown and near transit. Many cities in the United States do not impose parking minimums downtown (i.e. New York, New Orleans, Cleveland, Pittsburgh, Columbus, San Francisco, Sacramento, Portland, Austin). We support the recommendation that no parking requirements should exist in the downtown context and look forward to this policy being implemented through the adoption of the DTLA2040 community plans. We also support eliminating requirements close to transit, as is the policy in Oakland, Chicago and Newark. Assuming that the re:code LA 'linked-compact' designation will correspond to the city's walkable, transit-accessible places, we recommend eliminating vehicle parking requirements in these areas. We also recommend eliminating parking requirements in former redevelopment zones.

**2. Only require parking in other 'urban' parts of the city after completion of a parking study**

In the parts of the city that re:code LA classifies as 'compact' or 'linked' (not as dense, transit rich and walkable as some areas, but not remote and entirely car-dependent), we suggest that there be a presumption of zero parking requirements. Parking can only be required if the city completes a study showing that off-street parking is scarce and that all other avenues of parking management have been exhausted. If parking management strategies are not sufficient to address the parking required in the geography of a plan, then minimum parking requirements up to the levels suggested for the appropriate contexts could be imposed.

**3. Expand and improve parking reductions in the rest of the city**

In parts of the city where car dependence is highest, we recommend expanding some of the smart reductions and exemptions contained in the draft. This will help ensure that we are not mandating over-parking, adding costs to housing and commercial space, or encouraging bad and dangerous urban design in neighborhood and similar contexts.

- A. Set the maximum parking requirement for residential at 2 spaces per dwelling unit. Multi-family buildings should not have higher requirements for 3+ bedroom dwellings than single unit dwellings with the same number of (or more) bedrooms.
- B. Collapse all commercial requirements to be the same as office: a maximum of 2 spots per 1,000 sf.
- C. Do not require any additional parking when uses change. This will help encourage adaptive reuse and remove a major barrier to small businesses.
- D. Do not include the first 2,000 sf or 20% of commercial space (whichever is larger) when calculating parking requirements. This will promote mixed-use buildings.
- E. Exempt all multi-unit residential, commercial or industrial lots of 10,000 sf or smaller and/or with frontages of less than 80 feet from vehicle parking requirements. This

will encourage small-scale infill development and a safe and active pedestrian environment.

- F. Allow 'check the box' options for smaller projects to have shared parking without the need for an analysis and tandem parking without the need for attendants. (Otherwise the cost will not allow smaller sites to take advantage of these reforms.
- G. Not require vehicle parking for units and guest units of permanent supportive housing (as proposed in the city's draft ordinance).
- H. Not require vehicle parking for 100% affordable housing developments.
- I. Not require vehicle parking for co-housing and co-ops.
- J. Require no more than 1 parking space for every 2 'micro-units' of 350 sf or less.
- K. Discourage large surface lots which contribute to the heat island effect and reduce absorption and infiltration of rainwater. Require more shade and reflective and permeable materials when surface lots are constructed.
- L. Not require parking for narrow lots, very small lots and rental units added to single family lots via ADUs. This will help small scale infill.

Parking policies are one of the most fundamental land use requirements that determine the quality of – and mobility within – neighborhoods. With LA's nation-leading investment in new transit infrastructure, changing demographics, and pressing need to address the housing crisis, air pollution and climate change, the city should focus on these parking policy reforms to improve its economy, quality of life, and environment.

Thank you for considering our views. We look forward to working with you on parking reforms.



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