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June 06, 20007

S. Gail Goldberg
Director of Planning

Los Angeles Department of City Planning
200 North Spring St., 5th Floor
Los Angeles, CA 90012

Re: Proposed Code Amendment, Parking Reduction by ZAA
Cases: CPC-2007-2216-CA
ENV-2007-2217-CE

Dear Ms. Goldberg:

The Silver Lake Neighborhood Council was recently notified (via the bi-weekly CNC Report) about the Department's application for Citywide Code Amendment to allow parking reduction by ZAA. We realize that this proposal is not finalized, and would greatly appreciate it if you could forward the text as soon as it becomes available.

Our preliminary understanding is that this would effectively make it easier to reduce parking requirements for sites located within 1500 feet of transit, if certain findings can be made. Among those findings are the availability of a local flex car system and the on-site provision of bicycle parking. We salute your Department's effort to encourage transit usage.

However at this time we cannot support this Code Amendment. Given that it's still early in the process, we offer a number of observations, concerns and suggestions below.

"BEEN THERE, DONE THAT"

Silver Lake is an older community, where apartments from the 60's are considered new buildings. As such, many of the existing multi-family buildings were built with little or no parking. Over the last few years, there has been a shift, with lower-income car-less households being replaced to a large extent by households with higher incomes. Given rising rents, many of these new households consist of singles sharing a unit, each with his or her own car. And these singles' employment and leisure time activities do not mirror those of a family household (making single-car households less likely).

The result has been parking congestion, documented by the LADOT in its parking survey of Sunset Blvd.

So, in a sense we are already trying out the concept of reduced parking, and the result has been a diminished quality of life for local residents. Are the new residents taking transit? Anecdotal remarks from local transit users suggest no, that it was actually the displaced lower-income residents who used transit. (The recent MTA fare hike hearing brought out the fact that the median annual household income of bus-riding households is \$12,000.)

A few years ago, the MTA attempted to increase usage on Line 26 (W. 7th-Virgil-Franklin). A slick brochure was mailed to local households listing the hip destinations along that line. Last year, the Franklin leg was cancelled due to low ridership. Low usage of the Holly Trolley also suggests that transit can be a hard sell to the Creative Class. But the clearest information comes from a different neighborhood.

A few months ago, the LA Downtown News reported that few of the residents in new and recently converted buildings downtown take transit. This in an area with relaxed parking standards and the densest public transit network in Southern California. Please don't ignore this reality. Reduced parking does not automatically translate into increased transit usage.

In Silver Lake moreover, we have specific topographical concerns.

"AIN'T NO MOUNTAIN HIGH ENOUGH"

A recent local development proposal made clear that the 1500 foot radius, a fair distance on flat land, becomes very questionable in hillside areas. Another (enacted) code amendment allows extra units and reduced parking for projects that include affordable units and that are located within 1500 feet of transit. When a new building was proposed at 940 Maltman Ave. in Silver Lake, 2 extra affordable units were proposed with reduced parking requirements for those units (the assumption being that the tenants in those units would use transit).

This was an automatic reduction. So the fact that the site is located on a hill 130 feet higher in elevation than the bus stops on Sunset Boulevard was not considered. Moreover, the nearest bus stop (at Sunset Blvd. and Micheltorena St.) is at the base of the Micheltorena steps, where the street turns into a staircase for two blocks. In our area, multi-family buildings from the streetcar era are not located more than half a block from transit (with the exception of southwest Silver Lake, the flattest portion of the community). This is not just a quaint fact, but a guide for what worked in the past (for an even more transit-friendly populace).

"WE CAN WORK IT OUT"

Please keep trying and don't give up. The benefits of increased transit usage are undeniable. But as stated above, we cannot support this Amendment, based on the current realities. Here are a few suggestions on where this discussion might go.

- **STUDY: In new unsubsidized developments, who takes transit? What makes for increased transit usage in these developments? How far do unsubsidized residents walk to transit?**
- **COORDINATE: Work with the MTA and DOT/DASH to increase funding, improve service and develop effective promotions. Work with DOT on providing bus stops with amenities, more bike paths and more pedestrian friendly streets.**
- **TAKE SMALL, SENSIBLE STEPS: Once a realistic plan has been developed, roll this out in transit intense areas, ones with employment and amenities as well as rail and bus lines. Find out what works, and turn transit usage into a trend to be copied by the rest of the City.**
- **TAKE topography and historical patterns of development into account (as discussed above).**

We look forward to participating in this discussion, which we feel would benefit from the broadest possible Citywide input. Again, please forward the amendment text as soon as it becomes available, along with information on any public meetings and/or hearings.

Sincerely,

Wes Joe
Member SLNC-Urban Design & Preservation Advisory Committee

Elizabeth Bougart-Sharkov, Assoc. AIA
Chair SLNC-Urban Design & Preservation Advisory Committee

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