



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

SECOND SUPPLEMENTAL MEMO TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED: November 28, 2023

MEETING DATE: 11/29/2023 AGENDA ITEM: 8

PROJECT NUMBER: 2022-003630 (1-5)

PROJECT NAME: Multifamily Residential Parking Ordinance

PLAN NUMBER(S): Advance Planning Case No. RPPL2023004576
Environmental Plan No. RPPL2023005132

PROJECT LOCATION: Countywide (Unincorporated)

PROJECT PLANNER: Alyson Stewart, Principal Regional Planner
astewart@planning.lacounty.gov

This item is the Multifamily Residential Parking Ordinance, which is an amendment to Title 22 (Planning and Zoning) of the Los Angeles County Code to revise parking regulations for multifamily housing.

Since the posting of the supplemental memo on November 22, 2023, staff received additional materials in the form of comment letters, which are attached here.

- Nine additional letters were received in support of the project.
-

Memo Reviewed By: A. Bruce Durbin
Bruce Durbin, Supervising Regional Planner

Memo Approved By: [Signature]
Connie Chung, Deputy Director

Alyson Stewart

From: DRP Public Comment
Sent: Wednesday, November 22, 2023 12:01 PM
To: Alyson Stewart; Bruce Durbin
Cc: Elida Luna; Rafael Andrade
Subject: FW: Please support parking reform for new multifamily housing in LA County

FYI

ELIDA LUNA (she/her/hers) COMMISSION SECRETARY, Operations & Major Projects (OMP)

-----Original Message-----

From: sankark1991@everyactioncustom.com <sankark1991@everyactioncustom.com>
Sent: Wednesday, November 22, 2023 11:25 AM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Please support parking reform for new multifamily housing in LA County

CAUTION: External Email. Proceed Responsibly.

Dear Regional Planning,

I'll keep this simple. I'm writing to ask you to support a reduction in parking requirements in multifamily residential homes. Although I support the staff recommendation, I urge you and your fellow commissioners to go even further. Strict parking minimums are bad for LA County.

High parking minimums mean that housing (1) has higher construction costs (which gets passed to new tenants) and (2) has higher land footprint (which both increases rent and creates a housing shortage). This is a justice issue, as it shuts out low-income residents.

The high land footprint of public infrastructure in LA means that residents are heavily incentivized to own and drive a car to get anywhere. This is a climate issue (the transportation sector is the largest source of emissions in California), and is also a safety/justice issue (for anyone who does not drive a car, or cannot afford to do so).

Reducing parking minimums facilitates the construction of small multifamily complexes, often called "missing middle" housing. These are the small apartment buildings that may fit within the fabric of a neighborhood but for which a large parking garage would never be financially or architecturally feasible.

I am not asking you to altogether eliminate construction of parking infrastructure for buildings ; rather, if we reintroduce the removal of parking requirements for developments 10 units or smaller, then developers can build the right-sized projects to suit their needs, rather than being forced to build parking lots and structures which spend the majority of their time mostly empty.

Climate, affordable housing, and equity are all connected through this major issue. Will you take this important step for us?

Sincerely,
Krishanu Sankar
Pasadena, CA 91104
sankark1991@gmail.com

November 27, 2023

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Los Angeles Regional Planning Commission
320 W. Temple Street
Los Angeles, CA 90012

Re: Multi-Family Residential Parking Ordinance

Dear Los Angeles County Regional Planning Commissioners:

As a place-based community organization dedicated to realizing a more sustainable, equitable, and livable San Gabriel Valley, ActiveSGV strongly supports the adoption of vehicle parking standards consistent with the County's climate and housing goals.

Los Angeles County has over 18.6 million parking spaces and counting, an incredible amount of valuable real estate for vehicle storage in a region with a severe shortage of affordable housing for people. Much of the space devoted to parking is also impermeable pavement that contributes to stormwater loss and urban heat island impacts, problems expected to worsen as the region faces a hotter, drier future.

Rigid parking mandates consume land and resources that could be used to support more housing for people, as well as jobs, services, and park/open space. Parking mandates also increase the cost of housing – and decrease the production of smaller, infill housing projects - at a time when housing affordability remains a major burden to County residents. And they encourage more vehicle use when we urgently need to reduce Vehicle Miles Traveled, undermining the County's climate, clean air, and public health goals.

The San Gabriel Valley is home to one of the most architecturally treasured forms of local housing design - the famous bungalow court. These iconic local designs were built prior to the adoption of strict parking regulations and are a cherished amenity within our region. They also provide residents who are open to living a car-lite lifestyle an attractive option to do so. Yet the latest draft ordinance would continue to prohibit their construction.

As a community-based organization committed to improving the health and well-being of residents of the San Gabriel Valley, ActiveSGV urges the Commission to strengthen the proposed ordinance by eliminating parking minimums for developments of 10 or fewer units. If you have any questions regarding our support for evidence-based parking reform, please contact me at david@activeSGV.org.

Thank you for your time and consideration,



David Diaz, MPH
Executive Director

Alyson Stewart

From: DRP Public Comment
Sent: Monday, November 27, 2023 12:36 PM
To: Bruce Durbin; Alyson Stewart
Cc: Elida Luna
Subject: FW: Please support parking reform for new multifamily housing in LA County

FYI

-----Original Message-----

From: spikey@everyactioncustom.com <spikey@everyactioncustom.com>
Sent: Monday, November 27, 2023 12:33 PM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Please support parking reform for new multifamily housing in LA County

CAUTION: External Email. Proceed Responsibly.

Dear Regional Planning,

Los Angeles is at the cross of multiple crises: housing, transportation and climate change. Before you is an opportunity to take action on all of them in one motion, by embracing parking reform. I write in support of calls to reduce parking requirements in multifamily residential. Although I support the staff recommendation, I urge you and your fellow commissioners to go even further. Strict parking minimums are bad for LA County.

Of particular concern is their impact on the cost of housing. Not only do high parking minimums raise the cost of construction, which then gets passed down to tenants in new multifamily buildings; these overly prescriptive rules also limit the amount of housing getting built at all. In a housing shortage, driven by the scarcity of available homes, that makes housing more expensive for everyone.

This matters, especially because the County of Los Angeles is under an imperative to dramatically increase its housing production in order to meet its Regional Housing Needs Assessment targets. To do so it must build new housing at all income levels. Parking reform is a key tool to help local governments do just that. Research into the City of San Diego found that, when parking minimums were abolished locally, what followed was a significant boost in the production of market-rate housing, units in 100% affordable housing projects, and affordable units in mixed-income housing projects. The increase in deed-restricted affordable units was particularly dramatic.

Reducing parking minimums also facilitates the construction of small multifamily complexes, often called “missing middle” housing. These are the small apartment buildings that may fit within the fabric of a neighborhood but for which a large parking garage would never be financially or architecturally feasible. Empirical research has shown that eliminating parking minimums does not eliminate the construction of off-street parking by developers. Rather, parking reform allows builders to right-size parking for their particular projects. In some cases, that simply means building less parking.

Parking reform even aligns with LA County’s climate goals. Oversupply of parking incentivizes driving and increases carbon emissions. With transportation constituting the greatest source of emissions in California, parking reform holds the promise of addressing both housing affordability and climate change.

But for all its ambition, this ordinance does still have room for improvement. Even though the item represents an important step forward you have the opportunity to do something bigger. A previous version of the ordinance would have placed no parking minimum on housing developments 10 units or smaller. This was the kind of change that would have allowed for the construction of bungalow courts and many of the smaller apartments Angelenos love because of their ability to help facilitate walkable, architecturally interesting

neighborhoods. Local buildings like these were built predominantly in the pre-war era, before the advent of such strict parking regulations, and they help make Los Angeles County the beautiful place it is today.

Despite overwhelming support for parking reform from both the public and from the commission in a July 26 hearing, planning staff introduced a new parking requirement for complexes of this size. This change was without merit, and I encourage the commission to reintroduce the removal of parking requirements for developments 10 units or smaller. Again, this would not mean the end of parking, but rather just an opportunity for developers to build the right-sized project to meet their needs.

I am thrilled about this exciting opportunity to help us build a more affordable, sustainable and livable region and hope that you will join us in supporting parking reform for LA County.

Sincerely,
Grace Peng
Redondo Beach, CA 90278
spikey@gmail.com



November 27, 2023

LA County Planning Ordinance Studies Section
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Planning Commissioners,

The League of Women Voters of Los Angeles County has long championed meeting the [Basic Human Needs](#) of all people, including the needs of [Housing](#) and [Transportation](#). We have also been following the Regional Housing Needs Assessment/Allocation process and are alarmed by the slow progress in meeting those goals.

We have read the modest proposed parking minimum adjustments in [staff's draft Multi-Family Residential ordinance 11292023](#), and urge you to adopt it in full.

Los Angeles County needs to prioritize housing for people over housing for vehicles. We remind you that [seniors are increasingly falling into homelessness](#) due to their inability to find housing on their fixed incomes and the inadequate supply of new ADA-compliant accessible homes. Housing vouchers often go unused because there are no units available and few landlords who will accept them.

The best family car for many households may not be a car at all. It may be a golf cart, an electric-assist bicycle/tricycle, or an electric wheelchair. Elderly and disabled people should not be denied housing because a small site cannot accommodate parking for vehicles that they do not own. Low income renters should not pay inflated rents to pay for car parking when they can't afford to own cars.

Our preference is to drop parking minimums altogether following the lead of many other communities. No parking minimum does not mean no parking. It just means that developers and residents can decide for themselves the amount of parking they require and are willing/able to pay for.



Sincerely,

Margo Reeg,

A handwritten signature in blue ink that reads "Margo A. Reeg". The signature is written in a cursive style.

President
Los Angeles County League of Women Voters
margolwv@gmail.com

Teri Neustaedter,

A handwritten signature in black ink that reads "Teri Neustaedter". The signature is written in a cursive style.

Chair, LWV California Housing & Homelessness Interest Group
tmufic@gmail.com

Alyson Stewart

From: Grace Peng <gspeng.lwv@gmail.com>
Sent: Monday, November 27, 2023 9:22 PM
To: Alyson Stewart; Drp Parking Study
Subject: MFR parking reform

CAUTION: External Email. Proceed Responsibly.

I am the Natural Resources Director for League of Women Voters of Los Angeles County, but I am writing today representing only myself, a scientist that has been studying climate change and advocating to reduce automobile use since 1993 and atmospheric CO₂ was 360 parts per million. It is now 417 ppm.

The modest parking reforms in the draft ordinance 11292023 are a good start, but I would go further. We should abolish parking minimums altogether. Let people decide how much parking they need and are willing and able to pay for. Developers do a lot of market research and know how much parking they need to provide. If they need more parking than they can economically provide on-site, they can rent additional spaces nearby.

We know from numerous studies, especially the [San Francisco housing lottery study](#), that having readily available parking encourages people to purchase cars. And we also know that owning cars induces people to drive more. Thus, every parking spot induces demand for more cars, more driving, more pollution, more congestion, more climate change.

I urge you to adopt these modest parking requirements reductions in full. Then invest in nearby roads to make areas multi-modal so that households can shed cars while still meeting their mobility needs. Then you can reduce parking again, in a virtuous cycle that is good for residents' health and pocketbooks.

thank-you,
Grace Peng, PhD
Chemical Physics

Alyson Stewart

From: DRP Public Comment
Sent: Tuesday, November 28, 2023 7:18 AM
To: Alyson Stewart; Bruce Durbin
Cc: Elida Luna
Subject: FW: Please support parking reform for new multifamily housing in LA County

FYI

-----Original Message-----

From: theorangefedora@everyactioncustom.com <theorangefedora@everyactioncustom.com>
Sent: Monday, November 27, 2023 9:38 PM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Please support parking reform for new multifamily housing in LA County

CAUTION: External Email. Proceed Responsibly.

Dear Regional Planning,

Los Angeles is at the cross of multiple crises: housing, transportation and climate change.

Before you is an opportunity to take action on all of them in one motion, by embracing parking reform. I write in support of calls to reduce parking requirements in multifamily residential. Although I support the staff recommendation, I urge you and your fellow commissioners to go even further. Strict parking minimums are bad for LA County.

Of particular concern is their impact on the cost of housing. Not only do high parking minimums raise the cost of construction, which then gets passed down to tenants in new multifamily buildings; these overly prescriptive rules also limit the amount of housing getting built at all. In a housing shortage, driven by the scarcity of available homes, that makes housing more expensive for everyone.

This matters, especially because the County of Los Angeles is under an imperative to dramatically increase its housing production in order to meet its Regional Housing Needs Assessment targets. To do so it must build new housing at all income levels. Parking reform is a key tool to help local governments do just that. Research into the City of San Diego found that, when parking minimums were abolished locally, what followed was a significant boost in the production of market-rate housing, units in 100% affordable housing projects, and affordable units in mixed-income housing projects. The increase in deed-restricted affordable units was particularly dramatic.

Reducing parking minimums also facilitates the construction of small multifamily complexes, often called “missing middle” housing. These are the small apartment buildings that may fit within the fabric of a neighborhood but for which a large parking garage would never be financially or architecturally feasible. Empirical research has shown that eliminating parking minimums does not eliminate the construction of off-street parking by developers. Rather, parking reform allows builders to right-size parking for their particular projects. In some cases, that simply means building less parking.

Parking reform even aligns with LA County’s climate goals. Oversupply of parking incentivizes driving and increases carbon emissions. With transportation constituting the greatest source of emissions in California, parking reform holds the promise of addressing both housing affordability and climate change.

But for all its ambition, this ordinance does still have room for improvement. Even though the item represents an important step forward you have the opportunity to do something bigger. A previous version of the ordinance would have placed no parking minimum on housing developments 10 units or smaller. This was the kind of change that would have allowed for the construction of bungalow courts and many of the smaller apartments Angelenos love because of their ability to help facilitate walkable, architecturally interesting

neighborhoods. Local buildings like these were built predominantly in the pre-war era, before the advent of such strict parking regulations, and they help make Los Angeles County the beautiful place it is today.

Despite overwhelming support for parking reform from both the public and from the commission in a July 26 hearing, planning staff introduced a new parking requirement for complexes of this size. This change was without merit, and I encourage the commission to reintroduce the removal of parking requirements for developments 10 units or smaller. Again, this would not mean the end of parking, but rather just an opportunity for developers to build the right-sized project to meet their needs.

I am thrilled about this exciting opportunity to help us build a more affordable, sustainable and livable region and hope that you will join us in supporting parking reform for LA County.

Sincerely,
Theora Kvitka
Los Angeles, CA 90046
theorangefedora@gmail.com

Nov 27, 2023
Los Angeles Regional Planning Commission
320 W. Temple Street
Los Angeles, CA 90012



Dear Los Angeles County Regional Planning Commissioners,

We write to you because we are deeply concerned about the impact of our current housing crisis on our community and neighbors. Every day, we see working- and middle-class residents of the Eastside become more rent-burdened, and home ownership becomes less feasible. Parking reform is a vital pillar of making housing reform more viable. **We therefore urge you to amend the current ordinance to eliminate all parking minimums on new multi-family buildings of 10 or fewer units.**

Parking minimums are one of the most significant cost drivers of new construction. Estimates show that adding each parking space can cost, on average, [\\$55,000 for new housing in Los Angeles](#). By some measures, [17% of all rent burden can be attributed to the cost of parking](#). This cost is disproportionately borne by the poorest Angelinos, who are most likely to use public transportation and [least likely to use mandatory parking spots](#). Moreover, studies have found that [up to 33% of parking spots in residential complexes sit empty overnight](#).

Parking reform allows builders to right-size parking for their particular projects, to eliminate these underutilized spaces. In the case of deed-restricted affordable housing and naturally affordable “missing middle” housing, the answer is often none. Thus, **removing parking minimums is one of the best ways to increase missing middle and affordable housing development**. San Diego [saw its affordable housing production increase 6-fold when it eliminated parking minimums around transit](#). Missing-middle housing has not been built at scale on the Eastside for decades, and housing developers cite parking requirements as one of the critical cost barriers to building missing-middle typologies of 2-10 units. No one benefits when these projects are not produced; working families lose access to affordable units, and workers lose good jobs.

Most of all, though, the Eastside would disproportionately benefit from seeing less driving in Los Angeles. Because of the historical legacy of racism, our neighborhood is disparately impacted by air pollution from freeways, leading to some of the highest asthma rates in the nation and tragically shortening the lives of thousands of residents. [A pedestrian is killed in LA once every three days, a rate four times the national average](#). The status quo is simply unacceptable. Our community has enough density to support walkable streets; car traffic is the only thing standing in the way. Parking minimums are as, if not more, onerous to the entrepreneurs in our community who often see [their businesses become unprofitable due to all the parking](#) they are required to provide. Research has found that [walkable streets benefit local small businesses](#), as pedestrians are likelier to engage in retail shopping and dining. This is why [people living in walkable places tend to cherish residing](#) there.

Thank you for your service, and we look forward to continued engagement and any questions you might have.

Sincerely,

Thomas Irwin
Lead Organizer and Policy Director
Eastside Housing for All

Alyson Stewart

From: Therese Mufic Neustaedter <tmufic@gmail.com>
Sent: Tuesday, November 28, 2023 11:22 AM
To: Alyson Stewart; Drp Parking Study; DRP Public Comment
Subject: MFR Parking Reform: Support for reduced required minimum parking standards

CAUTION: External Email. Proceed Responsibly.

I am the Housing & Homelessness Director for League of Women Voters of Los Angeles County and Chair of LWV's state Interest Group on this topic, but I write today representing only myself, someone who has been actively involved with Housing and Homelessness in LA County for the past 10 years. I've read the modest proposed parking minimum adjustments in your staff's draft Multi-Family Residential ordinance 11292023 and urge you to adopt it in full. Existing minimum parking requirements add significant costs and uncertainty to the development process, ensuring that only expensive multi-family units get built, requiring developers to pass on these costs to renters.

Los Angeles County needs to prioritize housing for people, not vehicles. LA County's slow progress on meeting RHNA goals is concerning. Parking requirements discourage housing construction and add costs to already strapped renters. Why shelter vehicles when so many of our residents need places to live? Seniors are increasingly falling into homelessness due to their inability to find housing on their fixed incomes and the inadequate supply of new ADA-compliant accessible homes. Housing vouchers often go unused because there are no units available and few landlords who will accept them. Many seniors and lower income individuals cannot afford cars and instead use golf carts, the bus, bike or walk.

The modest parking reforms in the draft ordinance 11292023 are a good start, but I would abolish parking minimums altogether as many other communities successfully have. Let people decide how much parking they need and are willing and able to pay for. Developers do a lot of market research and know how much parking they need to provide. If they need more parking than they can economically provide on-site, they can rent additional spaces nearby.

We know from numerous studies, especially the [San Francisco housing lottery study](#), that having readily available parking encourages people to purchase cars. This direction is the opposite of where we need to be going. Every parking spot induces the demand for more cars, more driving, more pollution, more congestion, more climate change.

I urge you to adopt these modest parking requirements reductions in full, then invest in nearby roads to make areas multi-modal so that households can shed cars while still meeting their mobility needs. Then you can reduce parking again, in a virtuous cycle that is good for residents' health and pocketbooks. This may also create more community as our residents interact more.

Thank you for your time and consideration.

Teri Mufic Neustaedter
918 9th Street
Hermosa Beach, CA. 90254
913 568 5466

November 28, 2023

Submitted via email: comment@planning.lacounty.gov; ELuna@planning.lacounty.gov;

Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Re: Support – Multifamily Residential Parking Ordinance, Item #7

Dear Chair Michael Hastings,

The Los Angeles/Ventura County Chapter of the Building Industry Association of Southern California, Inc. (BIASC-LAV) is a non-profit trade association of nearly 1,000 companies employing over 100,000 people, all affiliated with building housing for all. I'm writing you today to express our support for the updated Multifamily Residential Parking Ordinance.

It has been a privilege to work with Regional Planning staff, specifically, Supervising Regional Planner, Bruce Durbin, and Alyson Stewart. Together, they worked with our membership to ensure we didn't put additional burdens on the production of market-rate housing while adjusting the ordinance to meet new state requirements.

Regarding guest parking, this updated ordinance would require 1 guest parking space for every 10 units, for apartment buildings of 11 or more units. We support the updated ordinance as written, but would also like to suggest that the County consider tiering the required guest parking ratios to the following:

- First 50 units - provide 1 guest space per 10 units;
- Next 150 units - provide 1 guest space per 20 units;
- All units above 200 - provide 1 guest space per 40 units;

Please feel free to reach out to us with any questions. If you have any questions, please contact dvalencia@bialav.org.

Sincerely,



De'Andre Valencia, Senior Vice President
BIASC/LA Ventura Chapter