

## Proposed Statement of Work for MVCC Parking Study

Howard Weisberg

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### Objectives

1. To produce data and analysis regarding parking in the Venice Blvd. area in Mar Vista that meets the specifications in AB 744 for an "areawide or jurisdiction-wide parking study" as specified in Assembly Bill 744, Section Sec. 2 (p) (7), that would provide "substantial evidence" to enable the City of Los Angeles to impose vehicular parking ratio requirements in the studied area that are higher than the limits imposed in AB 744.
2. To provide data on parking availability, occupancy, and demand in the studied area that will enable the projection of parking "spillover" for any proposed new construction project in the area. That is, given the proposed location, tenant mix, and number of on-site parking spaces, the data will provide a valid basis for projecting the excess demand for on-street and nearby off-street parking spaces that will be generated, and the impact on on-street parking occupancy.

### Study Area

The study area will cover specified areas of Mar Vista that include commercial, multi-family, and single-family occupancy. It will include properties located both within and beyond one-half mile of major transit stops. It will include residential units that are occupied by low income and very low-income individuals, and by seniors and special needs individuals. Since the designation of "major traffic stops," if any, in the study area is in question, a relaxed definition of "major transit stop" may be used.

### Study Components

1. **Parking Inventory.** The study will conduct and present an inventory of available parking in the study area, both off-street and on-street, and in commercial, multifamily, and single-family properties. Owners of commercial and multi-family properties may be contacted to obtain inventory data not available by visual inspection. Final results may be obtained by statistical sampling.
2. **Parking Occupancy.** The study will measure and present parking occupancy, concentrating on peak occupancy and near-peak occupancy periods. Owners of commercial and multi-family properties may be contacted to obtain inventory data not available by visual inspection. Final results may be obtained by statistical sampling.
3. **Parking Demand.** The study will observe and report on parking demand. Commercial parking demand will be estimated from standard parking demand estimates such as from the Institute of Traffic Engineers. Residential demand, both multi-family and single-family, will be obtained by surveying residents via a mixture of mail, e-mail, telephone, and in-person questioning about the number of parking spaces currently in use. Statistical sampling methods will be used. For multi-family residents, contact information may be obtained using a mixture of publicly or commercially available contact information and the compilation of such data obtained from landlords, who will be asked to cooperate.

Data will be presented in terms of demand for the overall resident mix, and also for various subsamples, including residents within one-half mile of major transit stops, residents of low income and very low-income housing, and seniors and special needs individuals.

4. **Other Study Areas.** The study will summarize available information on differing levels of transit access, walkability access to transit services, the potential for shared parking, the effect of parking requirements on the cost of market-rate and subsidized developments, and the lower rates of car ownership for low income and very low-income individuals, seniors, and special needs individuals within the study area. The potential for shared parking will be assessed, taking into account only measures to promote such sharing that are practically and politically feasible in a near-term time frame.

# Parking Demand Study for 12444 Venice Blvd

Prepared for the West Mar Vista Neighborhood Association

By

Howard Weisberg, PhD

April 6, 2017

## Summary

Observations of on-street parking on five blocks in the vicinity of the proposed mixed-used building project at 12444 Venice Blvd, taken at peak parking hours, show that on-street **residential parking space occupancy was 99.6%**. In addition, a survey of residents shows that **parking demand in this area is 1.25 parking spaces per bedroom**. Since on-street parking is already fully occupied, any new parking spillovers will result in additional parking gridlock, degrading the quality of life for the residents in the area.

Based on the survey, **the projected parking spillover for 12444 Venice is 44 on-street spaces**. The City should have known that implementing the baseline parking bonus provisions of AB722 would lead to harmful parking spillover. Therefore, **the City should have sponsored and carried out a parking study, as allowed for in AB 744, which would enable them to override the parking bonus that AB 744 otherwise mandates**. The 12444 Venice project should not go ahead as currently approved, and should be modified to cause no projected parking spillover.

PREPARED BY: *Howard Weisberg*

# Parking Occupancy Survey

*Parking Occupancy* is the percentage of on-street parking spaces that are occupied at a given time. The following map denotes the area in the vicinity of the proposed 12444 Venice project, showing the location of the project.

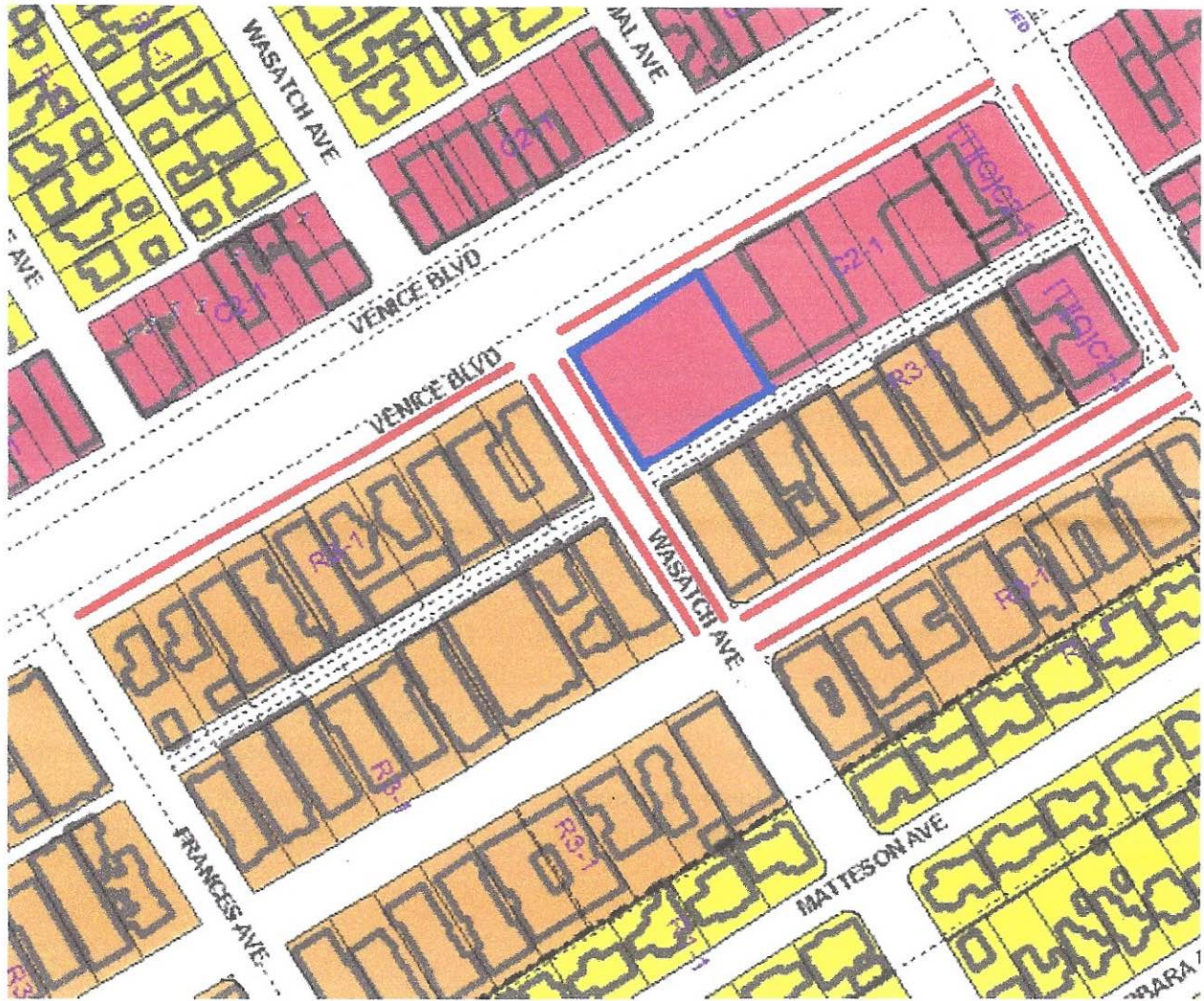


FIGURE 1. Map of the area of the surveys. Solid lines: the streets covered by the Parking Occupancy survey. Solid rectangle: location of 12444 Venice.

On the streets covered, there are 69 unrestricted on-street parking spaces and 5 spaces restricted by parking meters and a one-hour time limit from 8 AM to 8 PM. The metered spaces are analyzed separately since they are not suitable for residential parking. Note that *there are no unrestricted on-street parking spaces on the block of Venice where the proposed project will be located.*

On two consecutive weekday nights in the early evening, when occupancy should be near peak since residents have returned home after work, I observed the occupancy of the spaces. The results are tabulated below. For each block studied, the number of empty parking spaces is tabulated. In addition, the total occupancy, averaged over the four trials, is shown.

Un-Restricted Spaces	Total Avail	3/27/2017 7:43 PM	3/27/2017 8:38 PM	3/28/2017 7:50 PM	3/28/2017 8:52 PM
Venice btw Frances Ave & Wasatch (south side)	21	0	0	0	0
Centinela btw Venice & Pacific (west side)	4	0	0	0	0
Pacific btw Centinela & Wasatch (both sides)	22	0	1	0	0
Wasatch btw Pacific & Venice (both sides)	22	0	0	0	0
<b>Total Available Spaces</b>	<b>69</b>				
<b>Occupancy</b>	<b>99.6%</b>				

Restricted Spaces	Total Avail	3/27/2017 7:43 PM	3/27/2017 8:38 PM	3/28/2017 7:50 PM	3/28/2017 8:52 PM
Venice btw Wasatch & Centinela (south side)	7	3	4	2	1
<b>Total Available Spaces</b>	<b>7</b>				
<b>Occupancy</b>	<b>64%</b>				

TABLE 1. Tabulation of the observed number of unoccupied spaces, and the average total occupancy.

For the unrestricted spaces, the **average occupancy was 99.6%**. This means that if one were to drive along the surveyed streets on successive nights, it would be necessary to repeat a complete circuit on each of three separate nights to have a 50% chance of finding a space at least once. Making successive circuits on one night, the number of circuits required would be even more than this.

Parking spillover<sup>1</sup> from 12444 Venice or any other new parking demand in the area would spread to the area starting two blocks south of Venice, where lots are zoned R1 (single-family homes).

## Parking Demand Survey

*Parking Demand* is a measure of the number of parking spaces that an average tenant requires for their vehicles. We have determined an estimate of Parking Demand in the area of the 12444 Venice project by surveying the residents in the vicinity. I conducted a preliminary survey of the tenants of 18 residential apartment units at 12415-12421 Pacific Ave by email during the weeks of February 20 and 27, 2017. The reply rate, after sending a follow-up request to those not initially responding, was 67 percent. I then sent a survey by U.S. Mail to the 194 additional

<sup>1</sup> Parking spillover is defined as off-site tenant parking that occurs because of insufficient on-site parking.

tenants on the surveyed blocks marked in Figure 1. The reply rate for the U.S. Mail survey was 9.4 percent. No follow-up U.S. Mail survey was sent. The reply rate for the combined 212 email and U.S. Mail surveys was 14.2 percent.

The raw results of the combined surveys are as follows.

Type of Unit	Number of Adults	Parking Spaces Used On Site	Parking Spaces Used Off Site	Years of Residency	Total Spaces Used	Number of Bedrooms	Total Spaces Used Per Bedroom
3+ BR	3	2	1	1	3	3	1.0
2 BR	1	2	0	4	2	2	1.0
2 BR	2	2	0	11	2	2	1.0
1 BR	2	1	1	3	2	1	2.0
1 BR	2	1	1	5	2	1	2.0
1 BR	2	1	1	3	2	1	2.0
1 BR	2	1	1	2	2	1	2.0
2 BR	2	2	0	4	2	2	1.0
1 BR	2	1	1	1	2	1	2.0
1 BR	2	1	0	3	1	1	1.0
2 BR	2	1	1	4	2	2	1.0
1 BR	1	0	1	2	1	1	1.0
2 BR	3	2	1	3	3	2	1.5
1 BR	1	1	0	8	1	1	1.0
1 BR	2	1	0	1	1	1	1.0
1 BR	1	1	0	6	1	1	1.0
2 BR	2	2	1	12	3	2	1.5
2 BR	2	2	0	1	2	2	1.0
2 BR	3	1	2	9	3	2	1.5
2 BR	2	2	0	35	2	2	1.0
2 BR	3	1	1	14	2	2	1.0
1 BR	2	1	1	8	2	1	2.0
2 BR	3	2	1	1	3	2	1.5
2 BR	3	0	3	25	3	2	1.5
1 BR	1	1	0	2	1	1	1.0
1 BR	1	0	0	27	0	1	0.0
3+ BR	2	1	2	7	3	3	1.0
2 BR	2	2	2	3	4	2	2.0
2 BR	1	1	0	38	1	2	0.5
1 BR	2	1	1	2	2	1	2.0

TABLE 2. Raw data for combined surveys.

Prominent features include:

- All but one of the tenants in one-bedroom units owned at least one vehicle requiring parking.
- Among all tenants in one-bedroom units, 50% owned two vehicles requiring parking.
- Among the one-bedroom units inhabited by two adults (married couples or un-related roommates), 78% used two spaces.
- All but one of the tenants in two-bedroom units owned at least two vehicles requiring parking.
- Among the tenants with two or more bedrooms, 46% used three or more spaces.
- Among all tenants, only two complied with the AB 744 limit of 0.5 parking spaces or fewer per bedroom.
- Although the units are well within a half mile of the so-called “major transit stop” created by the bus stops at the intersection of Venice and Centinela, there is no evidence that a significant number of tenants have given up their cars.

The following table is a summary of the combined survey results:

Combined Parking Demand Survey Results		
Number of units:	212	
Number of responses:	30	14.2%
Number of bedrooms:	48	
On-site spaces used:	37	0.77
Off-site spaces used:	23	0.48
Total spaces used:	60	
<b>Total spaces used per bedroom:</b>	<b>1.25</b>	
<b>Standard error:</b>	<b>0.16</b>	

TABLE 3. Summary of survey results.

The key finding is that the **parking demand is 1.25 spaces per bedroom, with a standard error of 0.16 spaces per bedroom.** This exceeds, by 150 percent, the 0.5 spaces per bedroom mandated by AB 744 for “mixed income developments within ½ mile of a major transit stop that include the maximum number of very low- or low-income units under Density Bonus Law.” It even exceeds, by 25 percent, the baseline LA Code requirement for one and two bedroom units, which is effectively 1.0 spaces per bedroom. The implications of this for parking spillover are discussed in the next section.

## Projected Parking Spillover

The following table summarizes the projected parking spillover that will result from the 12444 Venice Project.<sup>2</sup>

12444 Venice - Projected Parking Spillover	
Residential spaces required under City Code:	92
Residential spaces required by AB 744:	46
Actual residential spaces provided by developer:	71
Number of bedrooms:	92
Projected parking demand per bedroom:	1.25
Projected residential parking demand:	115
<b>Projected spillover relative to City Code:</b>	<b>23</b>
<b>Projected spillover relative to proposed project parking:</b>	<b>44</b>

TABLE 4. Predicted spillover from the 12444 Venice Project.

Based on the estimated parking demand, 1.25 total spaces per bedroom, as determined in this study, **the estimated residential parking demand is 115 spaces. Projected residential spillover is 44 spaces** – more than two thirds of the total available residential on-street parking that exists in the nearby blocks surveyed!

If the residential parking bonus were merely eliminated, thereby conforming to the baseline City Code requirement, we estimate that there would still be a spillover of 23 spaces. This would reduce spillover by 21 spaces, nearly half, compared to the currently planned project.<sup>3</sup>

Since, as determined by this survey, on-street parking is already fully occupied, the large projected parking spillover will severely degrade the quality of life for residents in the area.

## The Parking Survey Provision in AB 744

The original draft of AB 744 was written by a real estate developer, Domus Development founding partner Meea Kang. However, before passage, the following provision, Sec. 2 (p) (7), was added, in response to criticism that the parking bonuses were too aggressive.

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<sup>2</sup> The developer has added 25 commercial and residential parking spaces beyond the AB 744 requirement. Since we do not have a demand estimate for the commercial units, we conservatively have assumed that all 25 are added to the residential spaces. We neglect spillover from the commercial spaces, although in actuality the developer's initial proposal calls for only six commercial spaces, hardly enough even for the employees. So we are likely underestimating the actual combined spillover.

<sup>3</sup> If this trend is supported by a wider survey, it shows that there is a need for new state legislation that will allow cities to *increase* the required number of parking spaces in areas like Mar Vista.



“... if a city, county, city and county, or an independent consultant has conducted an areawide or jurisdictionwide parking study in the last seven years, then the city, county, or city and county may impose a higher vehicular parking ratio not to exceed the ratio described in paragraph (1) [which requires a parking limit similar to the current baseline City code], based upon substantial evidence found in the parking study, that includes, but is not limited to, an analysis of parking availability, differing levels of transit access, walkability access to transit services, the potential for shared parking, the effect of parking requirements on the cost of market-rate and subsidized developments, and the lower rates of car ownership for low- and very low income individuals, including seniors and special needs individuals. The city, county, or city and county shall pay the costs of any new study. The city, county, or city and county shall make findings, based on a parking study completed in conformity with this paragraph, supporting the need for the higher parking ratio.”

Given the amount of projected environmental degradation resulting from the AB 744 parking limits, the City should have been aware of this potential degradation and never should have allowed the 12444 Venice project, or any project with parking limits reduced by the provisions of AB 744, to be approved without exercising the parking survey option in AB 744. The 12444 Venice project should be put on hold until such a study is performed and, if indicated, the parking allowances should be increased to the maximum allowed by State law.

## Comments

As already indicated for the project under consideration, there would still be parking spillover even if there were no mandated parking bonus. Back in the 1940s and 50s, when much of the housing in the subject area was built, the amount of parking required by the City Code was considerably less than at present. There were a number of increases in subsequent decades, but for several decades the limit has been effectively 1.0 spaces per bedroom for 1-bedroom and 2-bedroom apartments. In the meantime, apartment tenant demographics have changed, but no change has been made to the Code. This has evidently led to a very harmful trend: parking gridlock. In the opinion of the author, it is the responsibility of the City to ensure that, going forward, no new project is approved unless it includes enough parking to accommodate its projected parking demand. This demand should be determined by scientific survey and not by legislative fiat.

The passage of AB 744 was opposed by the City of Los Angeles and about twenty other California Cities. The City has the obligation to see to it that appropriate changes are made at the state level so that the harmful effects of parking spillover are abated and even remediated.

At the hearing before approval of the 12444 Pacific project, the developer stated,

“One of the purposes of the new parking allowance is to make it painful for people to have cars. The state is trying to force us to stop our dependence on cars.”

Similar thinking has long been manifested by various planning theorists. For example, see the article, “How do you ease traffic in Los Angeles? Make it harder to park” by Andrew Fraser, Mikhail Chester, and Juan Matute in the December 15, 2016 edition of the Los Angeles Times. See also, “How parking requirements hurt the poor,” by Donald Shoup in the March 3, 2016 edition of the Washington Post, where the author states,

“City planners cannot do much to counter the inequality of wealth in the United States, but they can help to reform parking requirements that place heavy burdens on minorities and the poor. Removing minimum parking requirements may be the cheapest and simplest way to achieve a more just society, and will produce a cascade of benefits for cities, the economy and the environment. Best of all, cities don’t need to wait until cars disappear before they remove their unwise parking requirements. They can remove their parking requirements now.”

This study does not find any evidence to support the idea that parking gridlock motivates residents to get rid of their cars.

In 2010, the Mar Vista Community Council surveyed their members on various community-related issues. One of the results was the following (out of a total of 280 responses):

<b>Developers should be required to:</b>	<b>Number of Residents Voting Yes</b>
Adhere to current city regulations regarding parking spaces	87
Provide more parking spaces than currently required to keep cars off of nearby residential streets	156
Create less parking spaces in order to force people to use their cars less and use mass transit instead	18
I don't know	17
I don't care	2

TABLE 5. Mar Vista residents survey.

Note that only *six percent* (18 out of 280) of residents think it is a good idea to create fewer parking spaces in order to force people to use their cars less and use mass transit instead. Residents of Mar Vista may have more common sense than ivory tower academics and the real estate developer creators of the parking requirements in AB 744.

## About the Author

The author is a retired physicist who has taught and carried out research at a number of universities and laboratories including U.C. Berkeley, the University of Pennsylvania,

Brookhaven National Lab, Caltech, Fermi National Lab, and the RAND Corporation, and has worked as a software engineer for several startups and other companies in Los Angeles.

Expertise applicable to this parking study include: scientific method; design of experimental research; statistical treatment of experimental data.