DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: **May 12, 2022***
Time: After 8:30 a.m.
Place: In conformity with Government Code Section 54953 and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [https://zoom.us/].

The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda publishedat: https://planning.lacity.org/about/commissions-boards-hearings and/or by contacting cpc@lacity.org.

Public Hearing: Not Required
Appeal Status: Not Appealable
Expiration Date: N/A

PROJECT LOCATION: **Citywide**

PROPOSED PROJECT: Update of Advisory Notice to Applicants Relative to Above-Grade Parking

REQUESTED ACTION: Endorse Advisory Notice to Applicants Relative to Above-Grade Parking, Attached as Exhibit A.

RECOMMENDED ACTIONS:

ENDORSE the Advisory Notice to Applicants Relative to Above-Grade Parking, Attached as Exhibit A.

Ken Bernstein, AICP
Principal City Planner

Michelle Levy
Senior City Planner

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Requirements for submission of materials can be found on the Department of City Planning website at https://planning.lacity.org/about/virtual-commission-instructions. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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PROJECT ANALYSIS

SUMMARY

Over the last several years, the City Planning Commission has continued to express concerns about the impact of above-grade parking on the pedestrian experience. In addition to the impact of parking on the public realm, the Commission has expressed concerns about the legacy of stand-alone parking structures, their carbon footprint, and their viability as a future land use as Los Angeles becomes less auto-centric. In 2019, the City Planning Commission addressed above-grade parking concerns through revisions to the Above-Grade Parking Advisory. The last Advisory endorsed by the City Planning Commission recommended such strategies as reducing parking overall and placing parking levels below ground, “wrapping” or “lining” above-grade parking with active uses, and screening parking levels with architectural features to reduce noise and light spillover effects.

On October 28, 2021 the City Planning Commission directed the Department to revisit the Above-Grade Parking Advisory to strengthen its guidance relative to adaptable parking structures. The updated advisory is meant to provide applicants with greater clarity from the outset of the design process regarding the Commission’s position on above-grade parking and is intended to provide additional strategies for aligning parking strategies more broadly with climate, equity, and resilience strategies outlined in recent State law, the City’s General Plan, and the Mayor’s Sustainable City pLAn 2019.

BACKGROUND

The City Planning Commission endorsed the first Advisory Notice Relative to Above-Grade Parking in October 2016 and the advisory was updated on October 24, 2019. The notice is intended to serve not as a new policy, guideline, or plan but rather as an informational document to call attention to the many existing goals, objectives, policies and programs in the City’s General Plan that address the design of above-grade parking. At the time of the first advisory, the accompanying staff report laid out a number of follow-up actions intended to provide further guidance on the design and extent of above-grade podium parking which included a recommendation to explore the feasibility of counting above-grade parking towards a project’s floor area ratio calculation, to update the Citywide and Downtown Design Guidelines, and to consider reducing parking requirements in areas well served by transit.

As a result of these recommendations a number of the Department’s current work efforts have focused on these topic areas. The Citywide Design Guidelines adopted by the City Planning Commission addresses “best practices” related to minimizing above-grade parking. The recently-released draft Downtown Community Plan and Zoning Code propose to disincentivize above-grade parking by including parking provided above grade within the calculation of allowable floor area.

In addition, the Department’s on-going update to the City’s zoning code includes a number of parking strategies that can be tailored to the specific character of the City’s many unique neighborhoods. These strategies will include a variety of parking design standards that acknowledge the reduced need for parking in locations well-served by frequent, high-quality transit, like Downtown Los Angeles and in Transit Oriented Communities (TOC) areas, while balancing the need for parking in areas that are under-served by public transit. The zoning code update includes a number of above-grade parking design standards that will be tailored to a variety of form districts that reflect the varying character of the City’s many neighborhoods. Nevertheless, the goal across the city is to improve the pedestrian experience, make parking less visually prominent, and to ensure that parking structures are better integrated into the

overall design of the building and allow for future conversions to housing and other beneficial uses.

DISCUSSION

Proposed Advisory Notice

Subsequent to the Commission's direction to update the Advisory Notice, Department staff held two meetings with Commissioners Helen Campbell and Renee Dake-Wilson to discuss opportunities for strengthening the Advisory Notice with respect to its policy intent and desired outcomes to encourage adaptable parking structures. As a result of these meetings, the Department has prepared an update to the Above-Grade Parking Advisory Notice. The update provides a more detailed background section, framing the Advisory Notice around policy goals aimed at reducing Vehicle Miles Traveled (VMT) and reducing greenhouse gas emissions, consistent with state law. The background also provides references to specific policies from the adopted Mobility Plan 2035 that can help to support mandated Findings. The Advisory Notice recognizes the adverse influence that above-grade parking can have on a community while also acknowledging the challenges that development teams often encounter when incorporating required parking spaces into a constrained site.

The updated notice applies to all types of stand-alone and attached parking structures, with particular attention to visible parking areas above grade. The notice first lays out a rationale for heightened scrutiny of above-grade parking, based upon the three design approaches that are the cornerstone of the Citywide Design Guidelines. The notice's background section articulates how de-emphasizing parking, in building function and appearance, can enhance the public realm and protect the pedestrian environment.

Second, the notice lays out two Priority Parking Strategies that direct applicants first to pursue available zoning tools and incentives to reduce the amount of space required for parking, and second, to place all project parking below ground. The notice has been updated to provide information on advanced mechanical parking technologies that have been approved by Los Angeles Department of Building and Safety, as well as additional ways that the parking footprint can be further reduced, for instance through tandem parking or inclusion of compact parking stalls.

Where below-ground parking is not feasible due to physical site constraints, the notice provides a series of Above-Grade Parking Design Strategies that focus on the importance of integrating the parking into the design and form of the project, and minimizing the visibility of the parking. These design strategies have been adapted from the new Zoning Code which sets out objective development standards based on frontage districts. Strategies such as wrapping above-grade parking with active uses to a minimum depth of 15 feet from the building's street frontage, and requiring a set percentage of opacity for parking screening material can go a long way in concealing above-grade parking structures and ensuring they are architecturally integrated into the building design.

The design strategies also emphasize the importance of designing parking garage structures so that the above-grade parking can be adaptively reused for housing or other beneficial uses in the future as transit becomes more robust and demand for parking declines. Adaptable parking design strategies include: maintaining minimum floor-to-floor heights; accounting for commercial office building occupancy loads; and ensuring that levels are largely flat aside from ramps and other vertical elements required for connections between floor levels. Lastly, the strategies encourage parking structures with a top deck to provide maximum community benefits by incorporating green roofs, solar panels or open space amenities.

Projects that do include above-grade parking are instructed to meet with the Department's Urban Design Studio. This added design review will allow the Department to engage directly with the development team to better understand project constraints while also facilitating design solutions that reinforce City policy goals.

CONCLUSION

The Department recommends that the Commission endorse the proposed Advisory Notice, in order to strengthen and clarify the Commission's expectations. With the enhanced policy background and targeted design strategies proposed, the notice can be applied with greater rigor, enabling parking design that contributes to a more harmonious urban form and a more engaging public realm.

Exhibit A

EXHIBIT A
UPDATED ADVISORY NOTICE RELATIVE TO ABOVE-GRADE PARKING

TO: PROJECT APPLICANTS WITH ABOVE-GRADE PARKING
FROM: THE CITY PLANNING COMMISSION
EFFECTIVE DATE: MAY 12, 2022

APPLICABILITY AND INTENT OF THIS NOTICE:

This notice serves to advise applicants of the Commission's concerns and position on the potential impact that parking facilities, and especially above-grade parking, can have on the quality of the public realm and the pedestrian environment. To address these concerns, the Commission has outlined below its expectations and a set of strategies that should be considered during the project design phase for at-grade and above-grade parking facilities, including stand-alone parking garages, podium parking, and surface level parking in new projects.

BACKGROUND:

Faced with the climate emergency, Los Angeles is at a vital crossroads and must transition from an auto-oriented metropolis to a more transit-oriented and pedestrian-friendly city to reduce carbon emissions and clean our air. Toward this end, and consistent with Mobility Plan 2035, L.A.'s Green New Deal Sustainability pLAn 2019 policies, and the work of the City's Climate Emergency Mobilization Office (CEMO), vehicular parking strategies of the past must be reconsidered in favor of creating vibrant, walkable places that support active transportation.

California's SB 743, aimed at reducing auto-oriented development, was signed into State law in 2013. Starting on July 1, 2020, agencies analyzing the transportation impacts of new projects must now look at a metric known as vehicle miles traveled (VMT) instead of Level of Service (LOS). VMT estimates how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact. Parking strategies can have a direct effect on inducing or minimizing demand for VMT.

Mobility Plan 2035, Policy 4.13 speaks to the need to balance on-street and off-street parking supply with other transportation and land use objectives.

> "An oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multi-modal mobility system. An abundance of free parking has the effect of incentivizing automobile trips and making alternative modes of transportation less attractive. Moreover, parking consumes a vast amount of space in the urban environment, land which could otherwise be put to any number of valuable alternative uses. Large parking lots create significant environmental impacts, detract from neighborhoods' visual quality, and discourage walking by increasing the distances between services and facilities...."

Furthermore, L.A.'s Green New Deal, Sustainability pLAn 2019 identifies milestones and targets related to parking, energy demands, and reduction of reliance of vehicular travel:

- Reduce Vehicle Miles Traveled (VMT) per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050;
- Increase the percentage of all trips made by walking/biking and transit to at least 35% by 2025
- Require all newly built parking structures to have solar (2021);
- Update parking regulations to allow for adaptive reuse of space, bike and car-sharing infrastructure, and reduced parking requirements (2024); and
- Promote cooling strategies and "softening" of hardscape in alleys and parking lots (2028)

Few design features can so easily detract from a vibrant public realm as above-grade parking. Parking podium design demands concerted attention from the Commission to make such parking facilities consistent with the City's three design approaches that serve as the basis for the Citywide Design Guidelines: Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design.

Pedestrian-First Design: Project designs should be configured to promote an active public realm with "eyes on the street," to enhance safety, economic vitality, and the quality of public space. Parking podiums physically separate residents and commercial users, do not promote an active street and detract from the ability of pedestrians to fully engage with more active uses in the built environment. Multiple curb cuts and driveways to access garages and other parking areas interrupt safe sidewalk paths for pedestrians, compromising the City's goal to eliminate pedestrian fatalities and collisions. Driveway aprons impede the ability to place new street trees that can capture stormwater and provide shade to passersby.

360 Degree Design: All sides of a building matter, and new projects should thoughtfully relate to their surrounding context, in all directions. Above-grade and podium-style parking has also often resulted in unarticulated facades that can appear as a single

uninviting mass, creating an imposing visual relationship to its surrounding community. Exposed parking levels trap vehicle exhaust and are required to be mechanically or naturally ventilated. Exposed openings required for ventilation can create significant impacts for neighboring uses, directing views of car headlights and noise from turning movements into nearby residences or businesses.

Climate-Adapted Design: The design of above-grade parking facilities should carefully consider energy performance, the unique Mediterranean climate of Southern California, and future adaptability to other uses. Design treatments that reduce visual impacts of parking, such as fully enclosing above-grade garages, may involve environmental trade-offs by requiring mechanical ventilation.

In particular, to help address the updated Citywide Design Guideline #5, “Express a clear and coherent architectural idea,” the spatial mass of structured parking should also be incorporated into a project’s design in a way that it becomes a cohesive element of the overall design strategy. Parking podiums that are wider and/or deeper than a project’s overall structure can draw undesired visual attention to the parking and undermine the public realm.

DIRECTION FOR PROJECT APPLICANTS:

The strategies described below shall be used to guide applicants during project development with respect to the extent, placement, design, and environmental performance of all on-site parking. Particular attention should be given to ensure that projects are designed in a uniform and cohesive manner, inclusive of any parking elements.

Priority Parking Strategies:

1. Reduce the Total Parking Footprint
Minimize the amount of parking provided to the fullest extent, utilizing available zoning tools and incentives, including the City’s bicycle parking ordinance, compact spaces and tandem parking, and Density Bonus and the Transit Oriented Communities Guidelines incentives. Use available technology such as smart parking systems, automated lifts, and puzzle shift parking systems approved by LADBS and LAFD to reduce the parking footprint.

2. Place All Parking Below Ground to Prioritize Building Space for Active Uses
All project parking should be placed below ground such that ground floor spaces remain safe and accessible for pedestrians and bicyclists.

Above-Grade Parking Design Strategies:

While below-grade parking may not be feasible in every instance, the design of any above-grade parking will be carefully scrutinized by the City Planning Commission. All projects that include above-grade parking shall be reviewed by the Department of City Planning's Urban Design Studio, either through the Professional Volunteer Program or a project review meeting. The Project Planner shall share the Studio's feedback with the applicant team and discuss the outcome of the PVP or project review recommendations in the staff recommendation report where the application of the following strategies will be evaluated:

Minimize impacts to the public realm and the surrounding community through intentional site planning and design.

- Fully integrate parking into the design and form of the project. The parking should reflect the overall design intent of the project and should not be recognizable as parking during either day or nighttime hours.
- Minimize the visibility of parking:
    - Buffer parking from view by wrapping the parking with active uses such as entry lobbies, offices and/or residential spaces to a minimum depth of 15 feet from the building frontage, for all levels of above grade parking. On larger sites with multiple buildings, isolate the parking in a single stand-alone structure internal to the site, surrounded by other uses.
    - Where it is not possible or desirable to wrap the parking with active uses (e.g., due to proximity to a freeway, an industrial use, or alley), the parking should not be expressed as a separate element but instead should be concealed with visually opaque materials or treatments.
    - As a benchmark, projects should utilize screening methods that achieve an average opacity of 60 percent to prevent light and glare spillover.
- Ensure driveways are placed as far as possible from primary pedestrian access points.
- Incorporate art work to enliven the facades of above-grading parking and provide space for in-ground landscaping to soften the building form

Enhance the sustainability of parking facilities.
In consideration of long-term community needs, an upfront investment in the design of visible structured parking can have a significant impact in minimizing future costs, enhancing the long-term value of the property, and ensuring that the structure can serve future economically viable uses as demand for parking decreases, without the need for significant and structural alterations.

- To facilitate the future adaptive reuse of parking areas to active uses without significant structural renovation, parking facilities should incorporate the following design measures when being engineered. The first 30 feet of depth from any street-facing building facade shall meet the following standards:

a) Floor plates shall be level except to the minimum extent required for drainage and access between levels.
b) Structure shall be constructed to accommodate occupant loads associated with office building corridors above the first floor as indicated by the Los Angeles Building Code.
c) Floor to floor heights shall be a minimum of 11 feet.

- If a parking structure has a top deck, incorporate green roofs, solar panels, or open space amenities.
- Provide a ratio of EV-ready parking spaces greater than 30% of the total spaces provided.

Additional Resources:

CA State Law SB-743, Governor's Office of Planning and Research

LAFD Requirement 74: Mechanical and Automated Parking Design -

New City Zoning Code:

- Above-grade parking screening, wrapping, and adaptable parking strategies are adapted from the draft Zoning Code, Chapter 1A, Article 4, Section 4C.4.5, "Parking Structure Design" intended to be introduced through Development Standards Districts selected and applied during Community Plan updates.
- Additionally, Citywide Adaptive Reuse provisions in Article 9, Section 9.4.6 will enable and incentivize the adaptive reuse of existing parking structures.