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RE: 10/24 appeal of 320 Alamitos plan approval; insufficient parking

October 19, 2017

To all City Council members,

Parking has been mishandled for a long time here. We thought you should see the evidence.

**Parking in 320 Alamitos:** Only 17 of the 77 units are 640 square feet or less! See a summary of the parking and unit sizesin 320 Alamitos here <http://www.lbparking.com/320-alamitos> . Large units need more parking. This project also takes away a 50-space parking lot that has been full with a wait list for years.

The Planning Commission’s decision to approve the site plans for 320 Alamitos was based on the inadequate downtown parking policies and a steady refusal to review those policies despite evidence that they are doing harm. Please be aware that the City is actively pursuing policies that, "...provide parking in a manner that would reduce the number of vehicles” instead of basing parking requirements upon reality and data. We are in favor of alternate modes of transportation but the Downtown Plan left out adequate residential and employee parking, which is hurting our area badly. Other districts aren’t protected from this type of policy because staff left parking guidelines out of the LUE, making it easier for them to make zoning changes soon like they did Downtown and Midtown. Please carefully consider what is happening and the options that we’ve listed. More building approvals are coming soon (such as 135 Linden in about a month). We need someone to step in and stop this madness.

**The basic issue with denying approval of 320 Alamitos.** The city cannot require more parking in these buildings than the code requires. During the discussion at the August 17th Planning Commission meeting, staff left the Commission under the impression that they had no legal ability to deny the recommendation for approval.  I've included the transcript, below.   Staff’s statements left out some pertinent information such as the options for action that they could take and CEQA’s requirements.

**OPTIONS - What could you do?**   The city recently hired professional parking planners KOA to do a solution-oriented study of this area, including a review of the city policies. Those recommendations won’t be complete until late 2018. Many more buildings will be approved by then. You could ask KOA to advise you about what temporary actions could be taken. KOA told us that they will look into Conditions of Approval and other actions that could be taken now. Here are some options that we’ve presented many times.

1. Recommend that the City Council declare a moratorium on new project approvals until the parking study is completed.
2. Recommend a change to parking requirements so that developers must perform mini parking studies that will tell them how much parking is needed.  This method is not expensive for developers and is not new to Long Beach.
3. Notify developers that residential street parking passes will not be available to their residents.
4. Implement the recommendation from the city’s own previous parking consultant: Partner with some developers to add public parking to the new buildings. There is money coming from the RDA properties that is slated for downtown projects and could be used for this recommendation.

**Why review the Downtown Plan’s parking policy?**

**2012** The Downtown Plan’s parking requirements were not based on data. They lowered the parking requirements to one space per unit (regardless of the size), exempted the first 6,000 sf of commercial space, and allowed the guest parking to be used for staff and commercial space. The disappearance of parking lots was not addressed. In 2012, the skimpy evaluation of cumulative effects could not foresee the impact of more buildings added and changed over the next 5 years.

**2013** During the site plan approval for the first building under the Downtown Plan, the Planning Commission included a Condition of Approval JJ to protect our area if it was shown that there wasn’t enough parking in the new building. That condition was completely unenforceable.

**2015 and again in 2016** The Planning Commission asked staff for a study session on the parking requirements at the earliest time possible. One commissioner asked whether there was evidence as to whether those buildings were sufficiently parked. They still haven’t been given a study session or information.

**August 2017** Many new buildings have already been approved with inadequate parking. There is clear evidence that the first building under the Downtown Plan does not have enough parking. There are signs posted on the full parking lot next door saying, “PRIVATE PARKING. The Current and Starbucks PARKING ONLY. ” The second building will soon take away that lot. In the 3 blocks between the Current and 320 Alamitos, there will soon be 4 huge buildings, all with insufficient parking and taking away lots. This is along the border with Alamitos Beach where it was already seriously parking impacted.



**Site plan approval hearing August 17, 2017**

**Commission and staff comments**

Time stamps are from Video here: <http://longbeach.granicus.com/MediaPlayer.php?view_id=12&clip_id=9297>

Exact quotes are in green.

A commissioner asked if staff did a mini analysis for this project.

Staff answered, "...wouldn't say we went back to the drawing board...we went back and rechecked our work...there's nothing exceptional about this project..."  He said that it does qualify for the DTN Plan.

A commissioner said, "I have issue with page 63, item F regarding parking, '...would the project result in inadequate parking capacity? With more than 30 parking garages and numerous places to park on the street, the DTN Plan PEIR found there is an adequate supply of DTN parking spaces...' The part I don't agree with is there are numerous places to park on the street."

1:49:40  Staff interrupts Commissioner and answered, "The law changed in September 2013. IT's state law that when we do parking analysis, we only look at consistency with the standard. The overall availability of parking in the urban landscape is not a CEQA impact.....What you look at is whether the project complies with the relevant standard, in this case PD 30 and the DTn Plan..."

Commissioner said,  "That puts us between a rock and a hard place because we have to follow legal findings in order to approve or disapprove. There have to be legal findings to go either way..."  She also said it puts a knot in her stomach.

1:57 (approx)  Commissioner Van Horik asked what the Downtown Plan's reason was for reducing parking.

Staff answered the Mobility Plan, reducing greenhouse gases, the park once strategy, and to encourage alternate modes of transportation.  She said to, "...provide parking in a manner that would reduce the number of vehicles that were driving and encourage people to use alternative modes of transportation such as biking, walking, and public transit..."

2:01:12  Commissioner said that a significant part of the population feels that parking requirements in PD 30 are not adequate.  Asked what is the process to modify PD30?

Staff responded that it would take a zoning code amendment.  Staff's position is that given the DTN Plan has only been in place 3 - 4 years (note: actually 5 ½ years since January 2012), and only one completed project (note: they didn’t include the Edison that’s being occupied), then it's premature to consider changes.  Staff thinks it deserves time and additional projects.

 Commissioner responded, "It's kind of late to use it as an experiment and it ends up affecting a large number of people."

Staff responds that it was a conscious policy decision at the time based on the direction of state law and the vision of the City Council.

Commissioner responded that it's a double whammy to eliminate existing parking and add buildings with less than traditional parking, that it's expecting a different lifestyle that doesn't exist yet.  She said, "I'm almost positive that we can't do anything about it tonight.  We're going to have to act on a legal basis for this project but what I'd like to see happen is to continue having open discussions about what impact these zoning laws are having and at some point they need to be modified."

**The truth about CEQA requirements.**

While our attorneys and staff have been disagreeing on whether parking is an impact to be considered under CEQA law, the City's own CEQA attorney seemed to agree that it was.  You could verify this information with her (Kathryn Jenson).   We think you’ll find legal reasons to evaluate the impact of the inadequate parking before approving this project.

* Staff told the PC that since the law changed in 2013, they only need to look at consistency with the standard.  The Downtown Plan was an area-wide PEIR.  Those are not intended to be the final "rubber stamp" for projects.  If a project may have negative environmental impacts, further review is required.  Impacts that were not considered under the PEIR were the loss of parking lots and the cumulative impacts of additional developments and changes to some of the projects' plans.  Obviously, you also have proof that the first project under the DTN Plan does not have adequate parking.
* Staff said that parking was not a CEQA impact. See the letter from our CEQA attorney [at this link](http://docs.wixstatic.com/ugd/6bc6d2_e606344d19bc418697d9756fb15d4536.docx?dn=Supplemental%20Objection%20Letter%20MB%20Draft%203%20061417.docx) that clearly explains, “…a project’s overall effects on parking conditions must be considered if they may have a potential impact on the environment.” Precedents regarding parking are shown.

Please make sure these new buildings have enough parking for their own use!

Debbie Dobias

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Board of Directors, TAPS

## PUBLIC CONCERNS

You can find collections of comments from the public here. It’s a folder that we sent to KOA as part of the ongoing parking study.

<https://www.dropbox.com/sh/kvb1trkoztuoned/AAAIxUcoGV97wMLRoxW7W_2za?dl=0>

There you’ll find public comments from:

**The Petition** has over 1200 signatures and over 600 comments.

You can see our collection of the best comments (highlighted) in the Drobox folder

Or view the full petition at <https://ipetitions.com/petition/fix-our-parking> . We stopped asking people to sign over a year ago because no one at the City was listening.

**Our online letter at Hellosign.com.** 77 people signed. You can see a sample letter and collection of comments in the drobox folder. The link to read and sign the letter is at the top of our home page LBparking.com.

**Social media.** We used Nextdoor.com and Facebook as well as email to collect comments and suggestions. There’s a collection of parking impacted stories in the dropbox folder.