

← WILMONT RECOMMENDATIONS DIVISION III

← PLANNING COMMISSION

← March 12, 2014

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← **1.) PARKING - ACTIVITY CENTERS**

- Recommend eliminating both Wilshire Activity Centers – and associated subterranean parking lots – from the Zoning Update, the LUCE and all Districting Maps.**

14<sup>th</sup>/Wilshire is a block from Lincoln Middle School in an area already congested with children, parents, bikes and cars. This area is ¾ mile from the nearest Expo Station. Creating a large parking lot here would not be neighborhood-serving. It would discourage Expo use and increase car trips. To access parking, thousands of employees and visitors would:

- Exit the 10 Freeway and drive across Downtown, already crowded and filled with tourists in summer and on holidays.
- Drive the length of Wilshire, soon to become Mixed Use with more pedestrians and bikers or
- Drive down San Vicente and cut through residential neighborhoods.

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← All of these options would increase traffic and green house gas emissions. Thousands of new drivers would also make adjacent residential streets less pedestrian and bike-friendly.

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Even if centralized parking lots were reserved for Wilshire Mixed Use residents and employees, *massive parking lots should not be built anywhere in Santa Monica*, much less so far from the Expo. In all cities lauded for best practices – Seattle, Boulder, Denver, Portland- shared parking is placed near transit. Large parking lots are not built far from Light Rail and bus terminals. The LUCE focused “additional housing opportunities on transit-rich commercial boulevards” and assumed 14<sup>th</sup>/Wilshire would be a transit hub. But now our city’s major transit hubs are Downtown, 17<sup>th</sup>/Colorado and Bergamot. If grant funds are to be used for subsidizing shared parking, they need to be used in an area that is truly within a “transportation zone.” Wilshire is clearly not.

The ZOU's Chapter on Transportation Demand Management directs us to "Decrease the City's need for additional parking facility construction." Construction of centralizing parking at 14<sup>th</sup> Street and Wilshire is not an appropriate solution to our City's or Wilmont's parking and traffic problems. Our City should base its decisions on good urban planning, not on the availability of grant funding. Funding availability does not make a solution appropriate. Mixed Use and other developments along Wilshire must "right size" parking. *Division III-57. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT. USC Price. A Before-and-After Study of the Impact of New Light Rail Transit Service (12/13/13). Parking Best Practices. NY Department of Planning. 2011. Denver Strategic Parking Plan. 2010. Reforming Parking Policies for Smart Growth. San Francisco Bay. 2007. Division VI. 9.53.010. Page 8. Transportation Demand Management. Purpose C.*

## **2. SUBTERRANEAN PARKING STRUCTURES 9.28.070**

- ☒ Recommend that under no circumstances can subterranean parking be joined across parcels in varying Districts.**
- ☒ Recommend Chapter 9.21.040 A of the proposed ZOU be retained and all other proposed codes that weaken, confuse or provide waivers to that code be eliminated.**

Consistency was touted as a key purpose for updating the City's zoning codes. Yet, consistency seems to be lacking when applied to commercial developments located on 2 or more separate parcels, in this case, to create subterranean parking garages. Proposed Chapter 9.21.040 clearly states that when a parcel is divided by a Zoning District boundary, the regulations applicable to each District shall be applied to the area within the District. A parcel cannot be developed as a single building site if it crosses Districts – above ground or below. This is in keeping with the LUCE, as it protects residential neighborhoods from encroaching commercialism. But 9.28.070 suggests that a common subterranean parking lot might serve Developments on Multiple Parcels. Linking subterranean parking in varying Districts degrades residential boundaries.

A-lots and residential land serve as the primary guardians between Wilmont and NEN's Low Density residents and Mixed Use development along Wilshire. Permitting common shared parking garages and linkages between subterranean facilities in different Districts would eliminate the buffer zones critical for residential quality of life. *Division III Page 69. B. Subterranean Parking. 3. Crossing Property Lines. Division III Page 6.*

### **3.) SURFACE PARKING REQUIREMENTS - EXCEPTIONS FOR EXISTING LOTS**

#### **☒ Recommend “grandfathering” of existing surface parking lots for all landscaping requirements.**

According to the draft ZOU Landscaping Chapter, surface parking lots require:

20% of surface lot to be permeable, one tree per 5 parking spaces, 5’ wide landscaped between any surface parking area and any property line adjacent to a public street and

- Abutting Interior Property Line: a 5ft wide landscaped area between any surface parking area and any adjacent parcel for the length of the parcel.

The draft ZOU states: Where compliance with the interior landscaping provisions above would result in the loss of existing required parking spaces, the amount of parking required shall be reduced by the amount need to accommodate the minimum landscaping required. The new parking standards, in most cases, require less parking than the old standards. Therefore, this provision *appears* to mean that on any existing site where there are more than 10 spaces, owners would be required to forfeit multiple parking spaces and bear the unexpected cost of landscaping fees, including digging and maintaining sprinkler systems under large surface parking lots. In many cases, long-term shared and leased parking arrangements would have to be renegotiated. Who would be responsible for legal costs?

Residential neighborhoods near large grocery stores (Trader Joes/Pico, Bristol Farms/Wilshire and Whole Foods at 5<sup>th</sup> /Wilshire) already suffer from serious spillover. On Montana, this provision would decimate both the Whole Foods and Pavilions parking lots. These lots serve as unofficial shared parking for multiple businesses along the avenue. Eliminating spaces on Montana would force more customers onto already crowded Wilmont streets. Landscaping makes sense for new surface parking lots. But for owners, leasers and adjacent residents, it is punitive to require the same landscaping standards for existing surface parking lots. These lots must be grandfathered. ***Division III. Page 79. L. 1-2 Surface Parking Lot Requirements. Exceptions for Existing Parking Lots. Landscaping H Landscaping Parking Lots. Division III. Page 44-45. Surface Parking Lot Landscaping. a. Landscaped Buffer. c. and d.***

#### **4.) PARKING REGULATIONS BY DISTRICT TABLE 9.28.050**

**Exclude existing residential lots (A-lots or otherwise) from Mixed Use Transportation Districts.**

Under current municipal code, the underlying zoning for A-lots and residential lots is residential. This designation must be maintained in the new zoning ordinance update. Therefore, Table 9.28.050 must include existing residential parcels (A-Overlays or otherwise, and regardless of LUCE map designation) in the Residential and Commercial Conservation Districts category.

***Division III. Page 61 Table 9.28.050 PARKING REGULATIONS BY DISTRICT.***

#### **5.) MIXED USE PARKING – WILSHIRE**

**Recommend that parking minimum requirements be *slightly* increased for large Market Rate units along Wilshire Blvd - based on proximity to Expo.**

- **For 2 or more bedrooms: 1.75 spaces per unit**
- **For 2 or more bedrooms: 1 guest space per 7 units.**

Parking requirements for large Market Rate units should be based upon proximity to Expo. Boulevards beyond ½ mile from Light Rail should provide *slightly* more Market Rate parking than those within normal walking distance. A “hybrid approach” to Market Rate parking requirements on Wilshire is supported by the USC Price study finding that transit behavior is most impacted ½ mile from Light Rail. This approach would still move us toward our ultimate goal of reducing car dependence. ***Zoning Ordinance. 2012.***

***9.04.10.04. Division III-62. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT.***

#### **6.) ALTERNATE COMPLIANCE 9.28.190**

**Recommend a clear time limit and onerous financial penalties for failing to secure alternate Off-Site Parking facilities if a facility is no longer in operation or becomes unusable.**

The draft ZOU requires a guarantee that Off-Site Parking Facilities be maintained and reserved for as long as the uses are in operation. However, there is no provision, timeframe or penalty for failing to find an alternate facility. Without a clear time limit and escalating financial penalties, businesses may choose “out of operation” as a fiscally convenient option. When the parking lot for Whole Foods/Wilshire employees became a

Christmas tree lot, employees flooded Wilmont and NEN streets. That parking lot has been “out of operation” for a very long time. *Division III Page 89. Parking Agreement. B.*

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**7.) OFF-SITE SHARED PARKING 9.28.180**

- Recommend that notification of adjacent neighbors extend 3 blocks in all directions when applied to Off-site Mixed Use Shared Parking.**

According to the new ZOU, off-site shared parking decisions of 10+ spaces would be mailed to the applicant, to adjacent property owners and residents, and copies provided to the Planning Commission. Large Mixed Use projects along Wilshire could greatly impact R1 and R2 neighborhoods, not just “adjacent” neighbors. Historically, off-site parking arrangements have been problematic. Whole Foods/Wilshire employees continue to impact street parking for blocks. All impacted residents, not just those “next door” must be given the information to appeal decisions that may harm their quality of life. Alerting adjacent neighborhood associations about shared parking arrangements would be helpful, but not all residents belong to these associations. It is the City’s responsibility to keep its residents informed.

*Division III Page 87. Permit Required- Shared Parking of 10 or More Spaces. b. Findings and c. Director.*

**8.) EXCEPTIONS FOR NEW BUILDINGS UNDER 10,000 SF**

- Recommend that a waiver or reduction in the number and/or dimensions of loading areas and spaces be permitted by the Director for projects that will result in a total of less than 3,000 SF, not 10,000 SF as proposed.**

The proposed code would permit the Director to grant waivers and reductions for the number and/or dimension of loading areas and spaces for projects that would result in a total of less than 10,000 SF on a property if it is determined that the only feasible location for a loading zone will detract from the project’s pedestrian orientation and thereby not meet the City’s intent to create a lively streetscape. “Feasibility” is subjective. Large developments that are likely to impact adjacent neighbors require the oversight of the Planning Commission.

*Division III. Page 73. I. Exceptions for New Buildings.*

**9.) PARKING DESIGN AND DEVELOPMENT STANDARDS 9.28.120**

- Recommend a revision in the scope of authority for the Director and**

his/her designees.

**Develop oversight and an appeals process for their decisions.**

According to the proposed ZOU, the design, location or position of any parking layout, entry, driveway, approach or accessway from any street or alley shall be approved by the Director. No matter how talented one person may be, this constitutes excessive discretion in the hands of a single individual. *Division III- Page 74. Parking Design.*

**10.) ALTERNATE PARKING DESIGNS**

**Recommend a revision in the scope of authority for the Director for approval of alternate parking designs.**

**Develop oversight and an appeals process for his/her decisions.**

The proposed ZOU states that: Where an applicant can demonstrate to the satisfaction of the Director that variations in the dimensions otherwise required in this section (Parking Design and Development Standards) are warranted, an alternate parking area plan may be approved. Zoning standards must be enforced consistently and transparently. If waivers are to be granted, the process must be transparent and the Planning Commission must have oversight. *Division III-Page 78. Alternative Parking Area Designs.*

**11.) PARKING IN RESIDENTIAL DISTRICTS**

**Recommend that Elderly and Long Term Care with 6 or fewer residents both require a minimum of 1 parking space per facility in R2 Districts.**

**Recommend that Hospice, General and Limited both retain a minimum of 2 spaces per bed in R2 Districts, consistent with existing code.**

**Limit Elderly and Long Term Care, Hospices, Residential Care General and Residential Care Senior and Hospice facilities to 1 per block radius in R2 Districts.**

Proposed code suggests that with 6 or fewer residents, there is no need for parking. But these facilities house *patients* who require trained staff, plus frequent visits from nurses, physicians, psychologists, physical therapists, as well as visits from family members. Parking impacts are also cumulative. Multiple “patient” and elder care facilities within close proximity would eliminate residential street parking for blocks, especially in Wilmont. While these facilities belong in R2 Districts, impacts can be minimized by including appropriate parking and spacing requirements in the new zoning codes. *Division III. Page 62-63. Zoning Ordinance*

2012. Page 468.

**☒ Recommend that Community Assembly require Loading Spaces that do not count as parking spaces.**

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← The Zoning Update is silent on Community Assembly loading spaces. Though often treasured institutions, houses of worship in Wilmont reserve *hundreds* of passenger loading spaces on the street. (Example: a small, well-regarded house of worship at 19<sup>th</sup>/CA serves 250 families. It is 0.7 from the nearest Expo Station and *has no parking lot*. 14 teachers, plus other staff park on the street and also reserve 5 street spaces 6 days /week. Without worshippers, this one Community Assembly eliminates 22 residential street spaces 5 days a week, including many evenings. This organization is very eager to expand. Only parking and loading standards will keep them from doing so. If existing institutions are allowed to expand or others are added without loading zones, Wilmont's already limited supply of street spaces will be decimated. ***Division III- Page 64.***

## **12.) WILSHIRE - NEIGHBORHOOD-SERVING & PEDESTRIAN FRIENDLY**

- ☒ **Recommend maintaining current standard of 1 space per 300 SF for Business/Professional/Creative 2,500 SF+ on Wilshire.**
- ☒ **Limit Business/Professional/Creative and Medical/Dental to no greater than 4,000 SF and (1) per block along Wilshire and prohibit new uses on ground floor.**

← The new zoning code proposes 1 parking space per 450 SF for Business/Professional 2,500 SF+. The Wall St Journal projects 151 SF of office space per worker by 2017. It projects less than 100 SF per worker in the future - *4.5 times as many workers/space as the proposed code*. Current code was written long before this data was released, but it remains appropriate for Business/Professional/Creative away from Expo. Large offices attract sub-regional clients and workers who are more likely to drive. The proposed code encourages the development of these traffic-generating buildings on Wilshire. Medical buildings are known to generate traffic and belong in the Healthcare District.

← Large Office & Medical buildings should not be allowed to dominate Wilshire, deadening the streetscape for pedestrians and reducing the variety of neighborhood-serving retail shops and restaurants that will guarantee fewer car trips. Through the zoning code, these businesses must be encouraged to locate near our Expo, rather than ¾ mile away. ***Division III-65- 66. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT. Wall Street Journal Market Watch 2-28-12.***

- ☒ **Recommend that General Markets 5,000 SF+ require 1 space per 250 SF on Wilshire, consistent with current standard.**
- ☒ **Require escalating financial penalties if employees park in residential neighborhoods.**

← The draft ZOU recommends a reduction to 1 space per 300 SF for a 5,000+ SF General Market. This means a 25,000 SF grocery store would have 83 parking spaces. On a fairly busy day, a 25,000 SF market would require about 50 workers. These workers must not be permitted to ignore the City's TDM efforts and park on residential streets. TDM is only effective when paired with easy access to public transit. On Wilshire, grocery store employees cause continual problems for City staff and residents. One purpose of updating the zoning code is to avoid these problems in the future. ***Interview. Manager Pavilions/Montana. 2-2-14. Division III-66. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT.***

- ☒ **Recommend Restaurants 5,000 SF+ require 1 space per 80 SF on Wilshire, similar to commercial entertainment.**

The ZOU proposes restaurants of 2,500+ require 1 space per 125 SF. To ensure a lively streetscape with a variety of neighborhood-serving businesses, block-long restaurants should be discouraged. Also large “big box” restaurants are more likely to attract sub-regional diners who would arrive by car.

- ☒ **Recommend Recreation (Exercise Facilities) 1,500 SF+ require 1 space per 80 SF on Wilshire, consistent with Conservation Districts.**

← An exercise studio can pack hundreds of exercise clients into a small space. The proposed code requires 1 space per 300 SF for 1,500+SF exercise studios. A Montana yoga studio reported that on weekends and summer evenings, many of her clients walked or biked, but her <1,500 SF studio still continuously reduced residential street parking by *30-50 spaces per hour*. Large “name brand” facilities tend to generate more neighbor complaints than small local studios; they also attract more sub-regional patrons who will drive, rather than will walk or bike. Exercise facilities should be discouraged from dominating blocks along Wilshire. ***CBS Channel 2. CrossFit Gym Rats Too Noisy. Luxe CrossFit Gym in a Heavy-weight Battle with Building Residents. 12-6-13. Good+ Well. 10-30-13. Division III-Page 65. Resident Parking Survey/Montana. March 2013. Page 10. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT. Staff Attachment A. 1/8/14 Existing and Proposed Uses in Mixed-Use Commercial Zoning Designations. Page 16. Footnote 6.***

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### **13.) MONTANA - SMALL-SCALE & NEIGHBORHOOD-SERVING**

- ☒ **Recommend that General Markets 5,000+ SF require 1 space per 125 SF on Montana.**

- ☒ **Require high financial penalties if employees park in residential neighborhoods.**

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← The draft ZOU recommends the same parking requirement for a 2,500-5,000 SF General Market as for a 5,000+ SF General Market: 1 space per 250 SF. The code also permits a General Market of 25,000 SF on Montana. (A market this size would require approximately 50 employees/shift.) Montana already has 3 grocery stores and severely limited parking. A low parking space requirement encourages the development of another large market on a corner parcel or the demolition of Pavilions, the last mid-priced grocery store in the area. This market is truly neighborhood serving for Wilmont residents, many of whom are middle or lower income. A large “Bristol Farms/Trader Joes” would cause many Wilmont residents to drive out of the District and would attract sub-regional shoppers, increasing traffic, green hous gas emissions and parking problems in the District. ***Division III-66. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT.***

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- Recommend 1 space per 200 SF for Business/Professional/Creative 2,500 SF SF+ along Montana.**
- Recommend 1 space per 200 SF for Medical/Dental 1,000 SF+ on Montana.**
- Limit Business/Professional/Creative and Medical/Dental to no greater than 2,500 SF and (1) per block along Montana.**

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← In Conservation Districts, new zoning proposes the same parking ratios for small and very large Business/Professional Offices: 1 parking space per 300 SF. The ZOU also proposes the same ratio for small and large Medical/Dental Offices: 1 space per 250 SF. These ratios incentivize the development of Offices on Montana and underestimate parking space required by future office workers. The Wall St Journal projects less than 100 SF/per worker. Offices and Medical facilities are known to generate traffic. Montana’s unique character depends on a varied, small scale, lively streetscape. Permitting offices to dominate that streetscape would deaden the pedestrian experience and exacerbate traffic and parking problems. Medical facilities belong in the Mixed Use Health District. Large offices that generate car trips should not be located 1.5 miles from Expo. ***Division III-65-66. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT. Wall Street Journal Market Watch 2-28-12.***

- Recommend 1 parking space per 50 SF for Restaurants 3,500 SF + along Montana, consistent with Bars and Nightclubs.**

The draft ZOU proposes the same parking standards for large restaurants on Montana as it does in Mixed Use Districts: restaurants 2,500+ SF require 1 space per 125 SF. In practice, this means a new, block-long restaurant would need only about 56 parking spaces. On Montana, there are a few parcels that include large A lots or residential land that could provide those spaces. **But a 7,000 SF restaurant actually seats ~280 patrons, not including outdoor dining, and would require additional parking for employees.** A restaurant that size would push out multiple shops and cafes that serve nearby residents. It would also attract sub-regional patrons who are more likely to drive.

The proposed code already discourages Bars/Lounges on Mixed Use and in NC Districts by requiring 1 space per 50 SF. Over-scaled restaurants on Montana should be discouraged the same way. *Division III. Page 65. 9.28.060: PARKING REGULATIONS BY USE AND DISTRICT. Running a Restaurant. The Restaurant E-Book. Restaurant book.com. Interviews R&D Kitchens. General and Regional Managers. 1/29-30 /13.*

#### **14.) MONTANA - APPLICABILITY 9.28.020**

**Recommend that changes in use that create an increase of 2 or fewer parking spaces not be required to provide additional parking and loading spaces.**

← It is proposed that changes in use that create an increase of *three* or fewer parking spaces not be required to provide additional parking. This higher standard may work on a boulevard, but it's not appropriate for Montana's much smaller scale. For example, the 1400 block of Montana has 7 businesses that range in size from 1,500 SF (Blue Plate) to 1,100 SF (Brentwood General Store). Other blocks have businesses with somewhat larger footprints (R&D Kitchens 3,300 SF), but the average scale on Montana is small. If we permit the "loss" of 3 parking spaces each time there is a change of use, there could an eventual be "loss" of 21 parking spaces *per block*. Adjacent neighborhoods already suffer from significant Montana spillover. *Division III-58. B. 2. Applicability Reconstruction, Expansion and Change. Interviews R&D Kitchens. General and Regional Managers. 1/29-30 /13. Interview Manager. Brentwood General Market. 1/9/14. Interview Manager. Blue Plate. 1/9/14.*

## **TRANSPORTATION DEMAND MANAGEMENT DIVISION VI**

#### **15.) EMPLOYEE TRIP REDUCTION PLAN 9.53.060**

- Recommend that all Employee Trip Reduction Plan management commitment letters include agreements that employees will not park on residential streets.**
- Recommend that Employee Trip Reduction Plans provide warnings that employees who park on residential streets will receive negative notices in their personnel files.**
- Recommend that complaints about employees parking on residential streets be included in AVR Target Reports.**

The ETRP includes multiple strategies to encourage employees to rideshare, use public transit, walk, bike, etc. but there is no discouragement of parking on residential streets. Shifting parking to the neighborhoods will not help us reach our AVR targets and will negatively impact adjacent residents. *Division VI. Page 20. Employee Trip Reduction Plan. 1.*

## **16.) AVR PERFORMANCE REQUIREMENTS FOR EMPLOYEES SUBMITTING ETRP**

### **9.53.060**

- Recommend 6-month time limit for achieving AVR Target, even when Good Faith Effort demonstrated.**
- Recommend 2-month time limit for achieving AVR Target related to employees parking on residential streets.**

The proposed code states: “Employers must continue to demonstrate a Good Faith Effort towards achieving the applicable AVR target for the peak period. If the worksite AVR decrease or does not improve, the strategies must be modified.” For years, City Staff has been conferring with Whole Food/Wilshire and Trade Joes about employees parking on residential streets. One assumes those discussions were in good faith. Meanwhile, employees are ignoring our TDM efforts. Problem resolution, even in good faith, must have time limits. *Division VI – Page 22. AVR Performance 6.c.*

## **← 17.) CONTENTS OF WORKSITE TRANSPORTATION PLANS 9.53.070**

- Recommend that all employers of more than 10 employees be required to inform employees in writing that parking in adjacent neighborhoods is against company policy and that failure to comply will result in negative notices in personnel files.**
- Recommend that all employers of more than 10 employees be required to place the above information on a kiosk or bulletin board, along with other important Workforce Transportation information.**

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← The Worksite Transportation Plan already include a kiosk or bulletin board. This information site should incent appropriate behavior, as well as strongly discourage inappropriate behavior. ***DIVISION VI. Page 28 A and B.***

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← **18.) MULTI-SITE EMPLOYERS OF TWO HUNDRED FIFTY OR MORE EMPLOYEES**

- Recommend Planning Commission oversight in the approval and disapproval of emission reduction and worksite transportation plans for Multi-Site Employers.**

← According to the ZOU, after an employer submits a plan for 250+ employees on multiple sites, “the Planning Director must approve or disapprove the plan...” A project of this proportion benefits from the expertise and oversight of the Planning Commission. ***Division VI Page 30. Multi-Site Employees I.***

**19.) ADMINISTRATIVE APPEALS 9.53.100**

- Recommend a revision in the scope of Director authority for Emission Reduction and Worksite Transportation planning processes.**
- Develop oversight and an appeals process for Director’s decisions.**

In the draft ZOU, it states, “A decision made by the Director or Hearing Officer shall be final except for judicial review and there shall be no appeal to the Commission or City Council.” Good city government retains a system of checks and balances. ***Division VI. Page 33. F.***

**20.) CONTENT OF DEVELOPER TDM PLAN 9.53.130**

- Recommend that new employee orientation include written and verbal information about parking in adjacent neighborhoods stating that it is against company policy will result in negative notices in personnel files.**
- Require On-Site Employee Transportation kiosks or bulletin boards include the above information.**

**21.) RESIDENTIAL PROJECTS AND RESIDENTIAL COMPONENTS OF MIXED USE**

- Recommend that before a lease is signed or a unit is sold in a building with unbundled parking, the potential renter/owner is informed that no person at that address is eligible for a Preferential Parking Permit.**
- Include in lease documents or other agreement of occupancy that the resident is ineligible for a Preferential Parking Permit.**

- ☒ **Include reminder about street parking in the Transportation Welcome Package for Residents.**
- ☒ **Ensure that no person who lives at an “unbundled” address receives a Preferential Parking permit.**

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← Potential renters may assume free street parking is available and therefore decline bundled parking. New residents must not be permitted to bypass our City’s TDM measures by parking on residential streets. Matching mailing addresses to developments that “unbundle” parking will add another layer to the Preferential Parking process, but will protect existing residential neighborhoods. *Division VI. Page 35. A On-Site Transportation Information.*

**22.) REMEDIES FOR VIOLATION 9.53.140**

- ☒ **Recommend that AVR targets count as a Developer Violation.**
- ☒ **Recommend that employees parking on residential streets be included in AVR Targets.**
- ☒ **Enforce violations consistently and transparently.**

The draft ZOU states: “If a developer commits a violation *other than not achieving the applicable AVR target*, the developer is subject to a fine of \$5/residential unit/day and \$5/employee in the project/day.” Until developers face onerous fiscal penalties, they will not take the City’s AVR efforts seriously. One of the most egregious violations is AVR related: employees parking on residential streets. While it is not easy to prove that employees are parking on residential streets, it is possible through photos of license plates. If developers were fined when employees broke the rules, if employees were strongly warned to desist, they would be much more inclined to follow the City’s TDM guidelines and we would reach our goals more quickly. *Division VI. Page 38. Remedies for Violation. 1.*

Thank you for your consideration!

← Sincerely,  
Taffy

← Taffy Patton  
← Member At-Large, Wilmont Coalition

← On behalf of the Wilmont Executive Committee

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← **Wilmont Executive Committee**

← Alin Wall, Chair

← Reinhard Kargl, Vice-Chair

← Laurence Eubank, Secretary

← Elizabeth Vandenburg, Treasurer

← Taffy Patton, Member At Large

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← CC: Santa Monica City Council and City Clerk

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