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City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012
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June 24, 2011

Re: Proposed Modified Parking Requirement District
CPC-2007-2216-CA/ ENV-2011-308-ND
City Planning Commission Hearing Date: July 14, 2011

Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Brentwood Residents Coalition
Crests Neighborhood Assn.
Encino Property Owners Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
La Tuna Canyon Community Assn.
Laurel Canyon Assn.
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Outpost Estates Homeowners
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Studio City Residents Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Whitley Heights Civic Assn.

Dear Commissioners:

The Federation of Hillside and Canyon Associations, Inc. (the Federation) was founded in 1952 for the purpose of conserving the natural habitat and appearance of the Santa Monica Mountains and other hillside and canyon environs of the Greater Los Angeles area. The Federation's membership includes 33 residential and homeowner associations spanning the Santa Monica Mountains, including many along the Mulholland Scenic Parkway Specific Plan area, a treasure of the Santa Monica Mountains.

At its June 1, 2011 meeting, the Federation voted unanimously to recommend changes to the Modified Parking Requirement District (MPRD) Ordinance. The Federation joins with Councilmembers Koretz and Rosendahl (see letters attached) and community organizations across the City in voicing our concern that the Ordinance, which creates a mechanism for reducing parking requirements, is not properly balanced to protect against spillover parking and traffic impacts on the surrounding neighborhoods. The Federation is particularly concerned that MPRDs not be created within Specific Plan areas. Doing so would undermine the extensive efforts that have gone into creating Specific Plans, such as the Mulholland Scenic Parkway Specific Plan. If parking reductions are desired within these areas, Specific Plans can be amended through the existing procedure for doing so.

CHAIRPERSONS EMERITUS
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Gordon Murley
Polly Ward

CHAIRMAN IN MEMORIUM
Brian Moore

There are other deficiencies in the current draft, which fail to adequately protect the community. We recommend the following changes:

1. Exempt Specific Plan areas.
2. Increase the minimum size of a District from three to six acres.
3. Require a District to be comprised of more than one project.
4. Locate Districts near transit stations, public parking facilities or other capacity as demonstrated by traffic and parking studies.
5. Incorporate the findings from the current code under section 12.32.L into this new MPRD Ordinance.
6. Expand notification to within 1500 feet of the proposed District and to Neighborhood and Community Councils.

The current draft of the Ordinance must be revised to ensure that parking reductions do not unduly burden the surrounding neighborhoods with spillover traffic and parking impacts.

Sincerely,

Marian Dodge

Marian Dodge, President

cc: Councilmember Paul Koretz (paul.koretz@lacity.org)
Councilmember Bill Rosendahl (councilman.rosendahl@lacity.org)
Councilmember Tom LaBonge (councilmember.Labonge@lacity.org)
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