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Public Comments Not Uploaded Today's Hearing: Case Nos. VTT-82288-2A and CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP-1A

1 message

'Jeffrey Kavin' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Tue, Nov 2, 2021 at 11:14 AM

Reply-To: clerk.plumcommittee@lacity.org

To: "clerk.plumcommittee@lacity.org" <clerk.plumcommittee@lacity.org>

Case Nos. VTT-82288-2A and CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP-1A

Project Address: [2102-2120 South Pacific Avenue](#) / 116-302 East North Venice Boulevard / 2106-2116 [South Canal Street](#) / 319 East South Venice Boulevard

Hearing Date: 11-02-21 Council file Nos. 21-0829 and 21-0829-S1.

The Reese

I submitted the comment posted below and the attached PDF as a public comment on the City's Portal. It is not showing online with the other comments. Please make sure that the comment and PDF are made available to the committee and added to the file ASAP before the hearing

Respectfully,

Jeffrey Kavin

I am strongly opposed to the Reese Davidson Project.

To justify its plans to replace the beach parking lots in the Venice Median with housing, the City of Los Angeles has adapted tactics on beach access normally used by wealthy beach towns to keep non-residents out, especially minorities. Any vote to approve the Reese Davidson Development is a vote to approve and continue these exclusionary practices restricting beach access at Venice Beach for the next 50+ years.

These exclusionary practices include prices for parking that are two to four times the market price and more than five times as much as many residents can afford, turning cars away from the public beach parking lots every weekend during the summer season, signs on Venice Blvd directing visitors away from the beach and parking, lengthy unnecessary 20++ minute waits in artificially created lines for parking, making it impossible for visitors to know about the pricing and availability of parking until they get to the front of those lines, the prominent display of an exclusionary price for parking on one of the main streets and the near total absence of effective signing directing people to the Venice Median and other beach parking lots. At Lot #731, site of the proposed Reese Davidson Project, the City has even made changes to the entrance and entrance procedures to prevent people from getting into the lot.

Equitable Beach access is an essential element for racial, social, and economic justice in the City of Los Angeles. Regular Visits to the Beach must be part of growing up for every child in our City and an affordable option for everyone. The Reese Davidson Development would permanently cap and reduce the number of beach parking spaces at a level that would make it impossible for the City to provide beach access for all. If the Reese Davidson is built, future generations of children in Los Angeles will grow up without ever spending a summer day at the City's beach in Venice because there will never be enough parking spaces to accommodate them. If nobody else was allowed to use the beach, the City would have 1 parking space for every 500 kids in the LAUSD.

A PDF with information and pictures documenting these exclusionary practices and some of the other the fatal flaws in the Reese Davidson Project is submitted with this comment to be included in the public record.

Respectfully,

Jeffrey Kavin

Reese Davidson Beach Access 2.pdf

11/2/21, 12:11 PM
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City of Los Angeles Mail - Public Comments Not Uploaded Today's Hearing: Case Nos. VTT-82288-2A and CPC-2018-7344-GP...

Case Nos. VTT-82288-2A and CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP-1A
Project Address: 2102-2120 South Pacific Avenue / 116-302 East North Venice Boulevard / 2106-2116 South Canal Street / 319
East South Venice Boulevard
Hearing Date: 11-02-21 Council file Nos. 21-0829 and 21-0829-S1.

The Reese Davidson Development

**A Plan to permanently eliminate equitable beach access at Venice beach,
destroy the Open Space in the Historical Canal District and evict tenants out of
low-cost housing units that they have lived in for 17 to 39 Years.**

1. The City of Los Angeles is charging 2 to 4 times the market rate and more than 5 times as much as low-income residents might be able to afford for beach parking in the Venice Median. These prices exclude about 50% or more of the people living in Los Angeles from their own City's beach parking lots.



Above: \$20.000 Winter rate in City Owned Median Beach Parking Lot #731, proposed location for Reese Davidson Development, one block from Venice Beach.



Anyone parking in the Venice Median will walk by these signs at the beach telling them that they had paid more than twice as much as they should have. Left Picture shows rate at privately owned lot right next to the beach & picture at right shows price at the beach on the same day. Any market or equitable rate for parking in Lot #731 would be much less than the price of the lots closer to the beach, instead of twice as much.

2. The Weekend Summer Rate for Beach Parking in the Venice Median is more than double the price in Santa Monica.



The price to park a block from the beach in the Venice Median is \$25.00, more than twice as much as the \$12.00 charge to park on the beach in Santa Monica. On most days, the City's price to park in the Venice Median is the highest posted price for beach parking in Venice.



Above: \$20.00 charge for parking in Venice Median Lot #701. Why is parking more expensive 2 blocks from the beach than at the beach? In a 2016 Statewide survey of California Voters by UCLA, limited affordable options for parking were seen as a problem by 78% of Voters. Only 4% of the people in the survey used public transportation to get to the beach. Most people surveyed said that nearby parking is essential. Half the people surveyed would not pay more than \$8.75 for parking. Given the extreme poverty found in the City of Los Angeles, the number excluded from beach access in Venice would be much larger.

3. Any equitable system of pricing for a publicly owned beach parking lot would set the price at the lowest level possible that does not cause the lot to exceed capacity.

In this case, the City of Los Angeles has been doing the opposite of this by systematically setting parking rates in the Median lots to levels designed to keep people out. Financial projections and other documents show that the Reese Davidson project would lock in even higher prices for the benefit of private developers that would continue to increase substantially without limits over a period of 60++ years

4. After adjusting for inflation, parking at the publicly owned beach parking lots in Venice costs 5 times as much as it did when the Coastal Act was passed in 1976.

Parking cost 50 cents on Weekends and Holidays at Venice Beach in 1952, which would be \$5.16 today after adjusting for inflation. When the Coastal Act was passed in 1976, it cost \$1.00, which would be \$4.82 today. In 1980, it cost \$2.00 to park at Venice Beach, which would be \$5.67 today. Today it costs \$25.00 to park a block from Venice beach and \$20.00 to park 2 blocks from the beach.

In the past, the price of Parking did not increase on Holidays in Venice. Today, the City charges as much as \$45.00 to park on Holidays which is more than nine times the price in effect when the Coastal Act was passed. Santa Monica charges \$12.00 on Holidays. The County of Los Angeles does not charge extra on Holidays. The \$45.00 price excludes a majority of the City's population on Holidays.

5. The City's current pricing and plans to increase rates further at the Reese Davidson development are in direct conflict with the goals of the Coastal Commission.

"Understanding that **even nominal costs can be barriers to access** preserving and providing for lower-cost-recreational opportunities such as parks, trails, surf spots, beach barbeque and fire pits, safe swimming beaches, fishing piers, campgrounds and associated free or low-cost parking areas. The conversion of lower-cost visitor serving facilities to high-cost facilities is also a barrier to access for those with limited income and contributes to increased coastal inequality. **The commission will strive for a no-net-loss of lower-cost facilities in the coastal zone, while implementing a longer-term strategy to increase the number and variety of new lower-cost opportunities.**" (Emphasis added) California Coastal Commission

As a measure of progress on economic justice and the success of the Coastal act in improving beach access in the State's largest Metropolitan area, the current beach pricing level and plans to increase the even more are a massive failure for the City and the Coastal Commission.

6. The City has no beach parking pass program to improve access for seniors, frequent beach visitors, low-income families minorities and others.

Discount beach parking pass programs are used by other cities to improve beach access. The City of Los Angeles does not have sell discount parking passes for beach parking. While the City does not currently have enough beach parking in Venice to support such a program during peak hours, it should sell them for some off peak time periods where there is enough parking available. Long standing plans to expand beach parking in the Median would make it possible to expand the number of passes and days available, but only if the Reese Davis Development is not built.

Many Low-income and minority residents in Los Angeles are more likely to live farther from the ocean. Free Parking and discount passes could be used to improve beach access for these groups, especially for children who have never been to the City's beach. The Cities plans to replace the Venice Median Parking lots with development would make eliminate the parking spaces needed to offer beach parking permits.

7. All three of the City owned parking lots on Venice beach consistently turned people away on Weekends during the 2021 Summer Beach Season, even though they were charging 30% more than the price in Santa Monica.



I visited the Beach Parking lot at the end of Venice Blvd every weekend from May 30 to September 11, 2021 to observe the parking situation. I took pictures showing that cars were turned away from the City's Venice Blvd beach parking lot 14 out of 15 of those Weekends, except for one weekend where I had to leave because I did not feel well.



The Washington Blvd and Rose Ave beach parking lots turn cars away with a similar frequency, probably more.

8. Long lines of Cars at City owned lots at Venice Beach form as the lots fill up on summer weekends. Most of the cars in these pictures will be sent away. They are never told that parking is available in the Venice Median.





According to the Venice Chamber of Commerce, 43.8% of Venice Beach Visitors come from outside of Los Angeles County and Southern California. Most of these people were not around when the cars were being turned away from all three of the City owned parking lots on Venice Beach this summer. The lines will be much longer and a lot more cars will be turned away from the beach when these visitors return.

9. Visitors waiting in lines at City owned parking lots are diverted to private lots charging even higher rates, resulting in financial hardship for many and creating another deterrent to beach access at Venice Beach for low-income residents.



Cars trying to park for \$18.00 in the City Owned Parking lot at Rose Ave are openly diverted all day long by workers for private lots standing in the street directing traffic. This person is directing traffic to a lot that charges as much as \$40.00 a day. This results in a severe hardship for many low-income beach visitors. The City could stop this easily by enforcing laws to require prices on signs for parking and posting signs with directions, prices and the number of spaces available on Venice Blvd, Washington Blvd and Pacific Ave.



Above, Left: The Rose Ave Lot fills up even with cars being diverted continuously all day long.

Above, Right: Cars are also diverted away from the \$18.00 Venice Blvd Lot to private lots charging as much as \$35.00.

10. While the Parking Lots at Venice Beach were full, the Beaches were empty when these pictures were taken this summer with travel bans and visitors scared away by local, National and international news stories about homeless camps, assaults, drug use and murders at Venice Beach.



July 4th, 2021 4:15 PM-Picture of Venice Beach almost empty with Pier in the Background. The Parking Lots will be overwhelmed when the tourists and locals return.



11. Median Parking Lot #731 has been re-engineered to make it is almost impossible to fill all of the spaces, even with cars lined up at the entrance continously for hours.

The City has artificially restricted the maximum number of cars that can get through the entrance to the 196+ space lot to about 45-65 cars per hour, a small fraction of what is needed.

A survey prepared by the City on July 20, 2019 showed an average of 43.5 cars per hour leaving the lot via the 3 exits throughout the afternoon, which is close to the maximum capacity of the entrance. This explains why the lot still has plenty of empty spaces after there has been a continious line of cars trying to enter running for most of the afternoon and into the evening.

Because Lot #731 is charging twice as much as lots closer to the beach, most cars show up around the same time in the afternoon after the other lots fill up. This leaves a relatively narrow time window for Lot #731 to fill up before the end of the day.

The City has added the following unnecesseary steps for the attendant to make sure that no more than about 65 cars an get into the lot per hour.

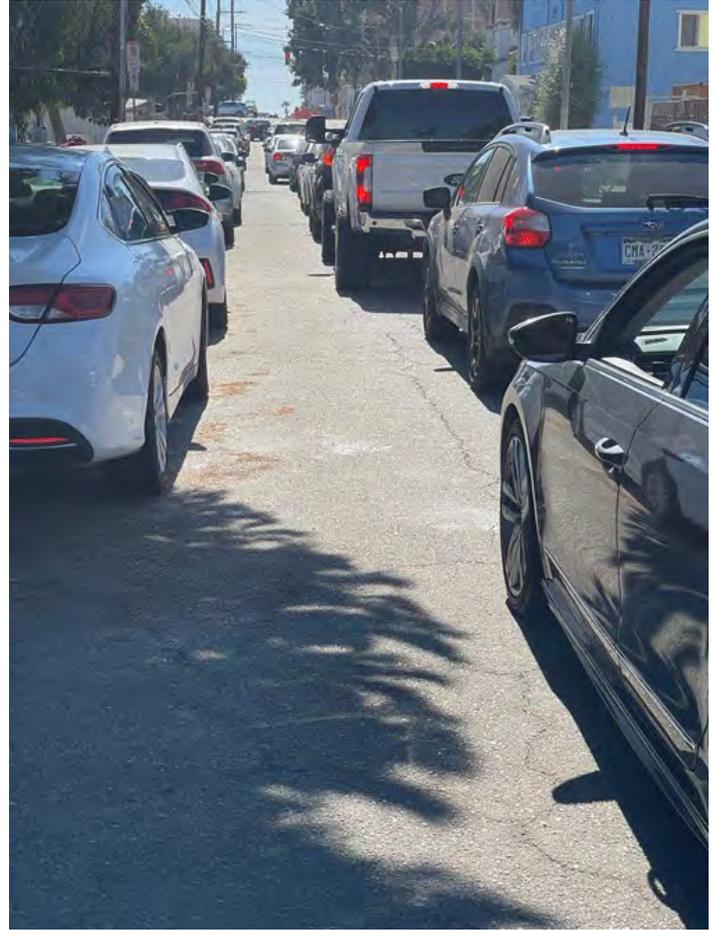
1. Walk back to the attendant stand after every car leaves.
2. Punch parking ticket three times on clock at attendant stand.
3. Walk back to rear of the car to look at the license plate.
4. Write down Vehicle License #.
5. Walk to front of car to put ticket on the Windshield
6. Check driver's license if using credit card
7. Process credit card on a terminal that takes about 40 seconds (Compared to less than 10 seconds at other parking lots.)
7. Have driver sign and return credit card slip
8. Give explicit directions to park on west side of lot to make east side look empty.

The Average Credit Card Transaction takes about 2 minutes at Lot #731. The line to get into the lot doesn't move for about two minutes or more everytime someone pays with a credit card. If one or two cars in a row pay with a credit card, it can take 6+ minutes for three cars to get into the lot. Some cars spend almost four minutes at the attendant station. Most people leave before they get to the front of the line, especially when it is a block or more long. People don't wait in a line that doesn't move.

The problem with then entrance to Lot #731 would have been obvious to any parking expert visiting the lot. It would be very easy to fix and any upgrade in parking systems would be recouped very quickly. Just removing the unnecesary steps would be a big improvement that would produce a huge increase in revenue at no cost.

The entrance to Lot #731 is capable of accepting from about 300 to 800 cars per hour depending upon the systems used. Those numbers would double if the City used the second driveway on Venice Blvd which looks like it was originally the main entrance. As discussed below, the problem with the entrance capacity for the proposed Reese Davidson project is much worse and cannot be fixed.

12. Long Continuous lines of cars cannot fill up the spaces at Median Lot #731.



(Left) Line of Cars trying to get into Median lot #731 at 2:05 pm. (Right) Same Line at 2:56 pm. Most people give up before they get to the entrance because it looks like the lot is full and there is no way to know the cost until you get to the front of the line.

These two pictures were taken around 3:05. The lot was still "empty" after accepting cars continuously for an an hour.



The two pictures above were taken around 4:15 on the same day. With a continuous line of cars trying to get into Lot #731 for over two hours, it was still "empty."





I found a long line of cars still waiting to get into the lot when I returned to Lot #731 after 6 pm on the same day. The pictures above show that Lot #731 was still "empty" at 6:30 with a long line of cars waiting to get in.



More pictures of cars waiting to get into lot #731. You will have a long wait, as a car at the front of the line can take more than 3 ½ minutes to enter the lot when there are plenty of spaces available. The only way to find out how much it costs to park (\$25.00) or if there are spaces available is to wait in this line until you get to the entrance. On most days, 50% or more of the people in line give up, even when the line is much shorter.

13. The City has Modified the entrance to Lot #731 so that only one or two cars get get on the lot at a time to pay the attendant. Combined with the restricted entrance, this creates a line anytime there are more than one or two cars trying to get in.



14. The City Closes Lot #731 during peak hours at least once a day when there are still spaces available as an additional deterrent to beach access.



15. The System for After Hours Pay at Lot #731 is also designed to discourage the use of Lot #731 and beach access.

The after-hours pay system for lot #731 has 100 numbered slots to put coins in for parking in a lot with 176 marked spaces and about 25 additional unmarked spaces. People parking in half the spaces have to walk back to their cars when they find that there is no way to pay. There is no sign on or around the box letting people know how much they are supposed to pay and no way to pay with credit cards. The sign at the front of the lot shows a \$5.00 charge after hours, which does not easily fit in the slot designed for quarters.



16. The City has keeps Median Lot #701 locked to the public on most days of the year instead of using it as a 365 day low cost beach parking option for residents who cannot afford to pay the \$20.00 winter rate at Lot #731.



Lot #701 was closed on one of the busiest weekends of 2021 in March before the Media coverage about the Homeless problems blew up.



The City even keeps Lot #701 locked when it is charging \$20.00 to park in lot #731, instead of providing an affordable option for beach access. Simple Parking Pay Stations would provide affordable beach access for low income residents and minorities 365 days a year and a lot of new revenue for the City.

17. There are two signs like this on North Venice Blvd diverting cars away from Lot #731 before they get there. These signs direct beach visitors away from lot #731, to Lot #701 which the City keeps closed and locked most days of the year.

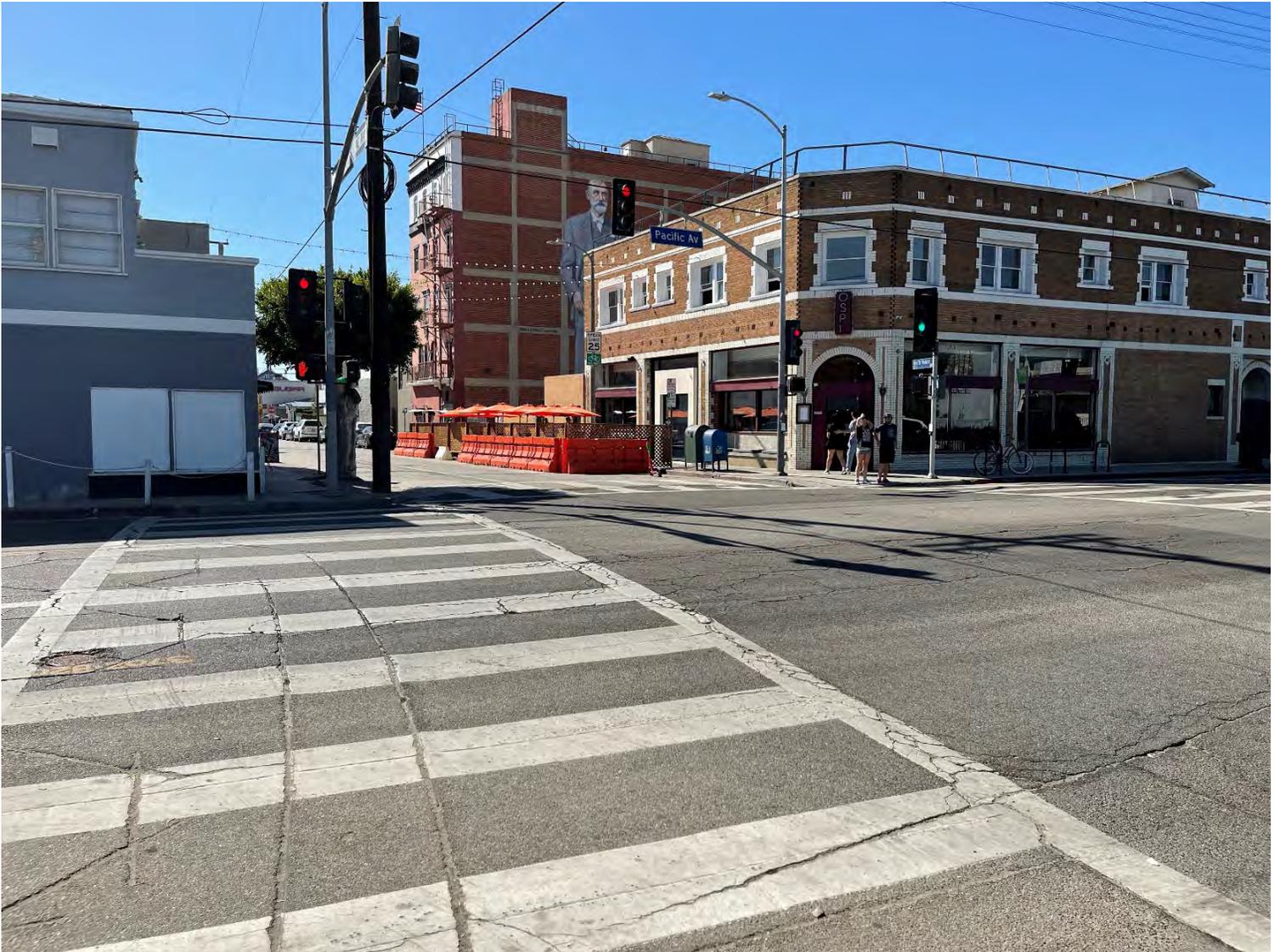


This permanent sign and a second sign just like it direct beach visitors on Venice Blvd away from Median Lot #731 and the City owned lot at the beach. Instead, Visitors who follow the City's signs are directed to Lot #701, which the City keeps locked to the public most days of the year. After being directed to the closed parking lot, visitors wind up on South Venice Blvd, which is a one way street heading away from the beach and lot #731.

Misleading signs and a lack of signs have replaced signs telling minorities to stay away in many wealthy white beach communities. In her 2015 article, Architectural Exclusion: Discrimination and Segregation through Physical Design of the Built Environment, Sarah Schindler discusses the use of confusing signs by white communities to keep minorities out. These exclusionary practices should not be tolerated by the Coastal Commission or the City of Los Angeles.

18. For all practical purposes, there is no signing system to direct Visitors to available parking in the City owned Lots in Venice.

Wayfinding, using signage to help orient visitors and point them to parking, is an essential element for tourist areas and public beaches. Visitors need to be informed of Parking facility locations, space availability, time restrictions and rates in order to reach their destination successfully with a minimum amount of stress.



Westbound cars going to all three of the City Owned Parking Lots on Venice Beach cross signalized intersections at Pacific Ave where there are no signs to let them know (1) that the City's beach parking lot is at the end of the block (2) how much it costs to park (3) whether or not it is full and (4) where else they can find available parking if they are full.



Finding affordable parking at Venice Beach is a stressful obstacle course for anyone of modest means. Signs like this for private lots are all over Venice. Most of these signs do not show prices on busy weekend days. Some of these lots charge whatever the market will bear on busy weekend days, most commonly \$30.00 to \$40.00. These practices are enabled by the City of Los Angeles which does not post directions to the City Owned Parking Lots and Prices where people can see them, sets a high floor for parking by charging too much in the City lots and does not enforce laws requiring prices to be posted for parking lots.



This is the only sign in all of Venice where Visitors find any information about the price of beach parking in the City owned lots, unless they wait in line to get to the small signs near the attendant stations in the parking lots. This sign probably does more harm than good because it lists the highest posted price in Venice. The prices posted on this sign are consistently higher than other lots in Venice, commonly twice as much, sending a clear message to Low-Income residents and minorities driving by that Venice Beach is not for them.

The sign is located on Lot #731, but the the signs on the street direct cars to Lot #701 discouraging people from using Lot #701 with the price posted.

This sign is not visible to people using Venice Blvd to get to the beach and the Median parking Lots. There is no sign with prices on Venice Blvd until you get to the front of the line at Lot #731. The Median Lots would be packed on summer beach days if there was a sign like this on Venice Blvd with the kind of prices the City should be charging to restore equity to beach access in Venice.

19. The Footprint allocated for the East Parking Structure in the Reese Davidson Project is too small to build a workable parking structure for beach parking.

The Architect's plans for the Reese Davidson project were released in the summer of 2017. At the time, the developers provided an "Approximate Timeline" showing that the final designs and other architectural work would be completed in July or August 2017. The Developer also promised a complete environmental impact report and related public hearings to be completed by September 2018. The developers never completed the environmental impact report promised the community and have repeatedly tried to stonewall public requests for information about the beach parking structure.

Documents show there is still no workable plan for the east parking structure. The developers have spent the last four years hiding this problem while trying to come up with a workable design for the parking structure without success.

The developers represented that the east parking garage would have 252-301 spaces. The Parking Design Group engaged by the Venice Community Housing Corporation concluded that the only "financially feasible" approach to parking in "the available building envelope" would yield 209 spaces, which is less than the minimum number required.

Recently discovered documents discuss two competing plans for the parking garage, both of which are unfinished and totally unworkable. The developer has been working on what they call a Hybrid System which uses tandem parking and parking lifts in an effort to cram the required spaces into the undersized structure. This proposal would be a train wreck, in part because the facility would be overwhelmed by the number of cars going in and out during peak hours:

1. One of the documents produced shows that the Hybrid System would have a maximum capacity of 90-120 cars per hour going in and out if the maximum 6 parking attendants have been scheduled and showed up. Assuming that half the cars were going out in a given hour, the maximum number of cars coming in would be 45 to 60 which would be totally inadequate for beach parking at this location where most of the cars show up in a relatively narrow time window starting in the early to mid-afternoon after the lots closer to the beach fill up. It would take 5 ½ hours to fill all the spaces in the lot if no cars left, which means that that lot would never fill up which beachgoers go before sundown. With the normal number of cars leaving, it would take much longer.

The existing parking lot #731 could accommodate about 300 to as much as 1000 cars per hour coming in depending upon the system used. The three exits in the existing lot are rated about 320-400 cars per hour each, which means that they will easily be able to handle any peak demand. The number of cars that the Hybrid Structure could accommodate for cars coming out is fixed at a level that is wildly insufficient to meet demand.

2. Another document that was produced shows that the peak capacity would be even lower at 35 cars inbound at peak hour on high volume weekends and holidays.
3. The documents produced do not explain how the parking structure would function. Based upon the drawings, it couldn't. There is no designated space for people to drop off their cars other than the narrow traffic lanes. The narrow traffic lanes would be totally backed up with (1) Cars pulled out of tandem spaces to get the car behind out and (2) Cars pulled out of the lift spaces to get the cars above out and (3) visitors blocking traffic while taking forever to unload and load their families and beach gear.
4. At Lot #731, visitors have all the time that they need after they park to remove and organize their family members and beach gear. For many, this is a lengthy and complicated process. People have to locate, organize and unload children, strollers, coolers, beach clothing, sunscreen, drinks, bicycles, bicycle accessories, umbrellas, sunglasses, beach shoes, hats, swimming gear, surf boards, skateboards, skates and all sorts of other sports equipment. Having people do this in the narrow traffic lanes in the proposed parking structure would be a train wreck bringing the flow of cars to screeching halt. They would also have to walk in that same traffic lane to the exit further blocking the flow of cars. All of this would add stress and unpleasantness to their beach visit and be a severe safety hazard.
5. Even if no cars were coming in, it would take almost 3 hours to get all of the cars out of the Hybrid Structure in case of an emergency, special event at the beach or dangerous condition in the area. This would happen every July 4th, everytime that the beach was forced to close because of lightening and anytime that there was an emergency where people had to leave the area or get home quickly. With Reese Davidson onsite cars entering, it could take six hours for all the cars to get out. This one fatal flaw alone makes the Hybrid Plan totally unacceptable from safety and practical points of view.
6. A document entitled "ATTACHMENT C Project Trip Generation" notes that the existing parking demand at Lot #731 was used to prepare the trip generation projections. Given the City's efforts to suppress beach access at Lot #731, the projected number of trips would be wildly inadequate to meet the real demand for beach parking during peak hours.
7. The Minimum number of parking spaces to be provided for beach parking is supposed to be 260 per page 2 of the Tierra West Parking Study. The Hybrid proposal only provides for 252 and a proposed change to convert all lift spaces to 9' wide would reduce that number that number to 230.

20. Robotic Parking would be a disaster for this beach parking in this location.

Because of the obvious problems with the Hybrid plan, the developer got another proposal for robotic parking. This proposal is for 180 spaces, which is well under the 260 minimum number called for. This plan is even worse than the Hybrid Plan as it can only handle 60-80 cars an hour going in and out which is a small fraction of the number needed in this beach location where most of the cars show up around the same time.

The robotic option would cost the City \$24,558,930, not including cost of maintenance, repairs, replacement equipment and staffing over the next 50++ years and lost revenues during construction.

One of the insurmountable problems with any robotic option for beach parking at this location is the exceptionally long amount of time that people spend getting out of their cars, organizing their kids and possessions and unloading their cars. All of this would bring the entrance to a screaming halt. It would create another huge backup of cars when people had to reload their cars to leave. None of this is a problem at the existing lot where people have all the time in the world to get everything out of their cars.

21. Most of the parking that is supposed to be dedicated for beach parking would be displaced by onsite use at the Reese Davidson Project.

Under the Venice Specific plan, 677 parking spaces would be required for a mixed use project the size of Reese Davidson. According to documents submitted to the Coastal Commission, only 108 spaces would be provided in the West Site Garage that is supposed to meet all of the demand for onsite use by the 450+ people who are expected to be there at one time. The West Site Garage would have 61 spaces provided for 140 residential units, no spaces for the onsite offices or parking employees, and 6 spaces for meeting rooms that would normally require 42 parking spaces.

The Tierra West Study done for the City recommended additional floors of parking for both parking structures on the property noting that "more parking spaces need to be assigned for affordable housing unit uses and are studio uses to meet ITE standards." This additional parking for onsite use recommended by their own expert were never added.

The plan to replace the existing parking lot with housing has been justified by the claim that there is no unmet demand for beach parking. At the same time, the developer's financial projections show that the car counts in the new parking structure will be about 2.7 times the 2017-2019 counts. This projected increase in traffic would come from onsite parking, effectively eliminating most of the promised beach parking. The location of the parking structure as far away from the beach as possible and the lack of capacity to handle peak hours of beach traffic add to the overwhelming evidence that the replacement beach parking is mostly intended for onsite use.

The developer's financial projections showing more than two full turns of the lot 365 days a year also confirm that they are expecting onsite parking to dominate the lot as beach parking is highly concentrated with longer stays on weekends in the beach season.

About 50% of beach parking is on the weekends and about half of that is in the summer. Beach parking cannot produce the 365 day a year traffic projected by the developers.

22. The Reese Davidson Project was conceived and designed to restrict beach access for low-income and minority residents.

As discussed above, the parking structure promised for beach parking is actually intended for onsite parking for the Reese Davidson Project. There will not be enough spaces for both. Even if there were, the capacity of the entrance will be much too low to accommodate the volume of cars that would arrive at peak hours for the beach.

The current price of parking at Lot #731 is so high that it effectively excludes about half of the City's population from using it. The financial plans and projections for the Reese Davidson project show that they plan to lock in much higher pricing designed to generate profits for investors.

This Pacific Design Group Proposal calls for Parking at the Venice Beach Publicly Owned Parking lots to be sold "like seats on a commercial airline" so that the City can "do more with less spaces by "leveraging the best performing spaces in real-time." The plan actually talks about the "segregation of user groups" by selling the best spaces to the highest bidder. PDG also describes each parking space as a "individual profit center" to be managed with a "demand-driven rate structure."

The PDG plan also includes a surcharge of "approximately" \$3.50 per hour once a person exceeds 2.5 to 3 hours at the beach, ignoring the long-standing practice of all day parking rates at California Beaches. Just by itself, this provision would make "a day at the beach" unaffordable for a huge percentage of City Residents.

The financial projection shows an average ticket of \$18.40 which effectively excludes about half of the City's population. This reflects a recent increase of \$4.29 in this number over the last financial projection. The increase alone is about what you would want to be charging as an affordable rate low-income residents.

It gets even worse. A draft of the plan for tiered pricing by the Parking Design Group states "The economy tier (80% of patrons), intended to be priced to stay in line with, or slightly below, prevailing rates in the area." This would allow them to profit from the never ending increase in prices resulting from the ongoing and increasing shortage of parking. Also, while parking a block and half from the beach should cost half as much as at the beach, this plan would be in line with or slightly below those prices creating another 50% surcharge for city residents and premium for the developers that they call "economy tier."

23. The Reese Davidson Project was conceived and designed to restrict beach access for the Handicapped, elderly and others with mobility issues.

Under the ADA, all new development projects must be designed so that the handicapped parking spaces are located to provide the shortest route to the entrance of the Facility. The existing parking lot has the handicap parking spaces located at the west end of the property, closest to the beach. The Reese Davidson plans have the parking lot for access to Venice Beach located on the east side of this 2.7 acre property. This design would require elderly, handicapped, families with small children and people with mobility issues to travel a long distance to get to the beach and back from the parking structure.

One out of every 7 adults and 2 out of 5 over 65 have mobility issues. This design would limit beach access by these groups in violation of the ADA and the California Coastal Act. The narrow 5 foot sidewalks between the parking lot and the beach would add another barrier to handicap access because they would not be wide enough to accommodate the traffic moving in both directions at this crowded and busy beach location. The path for people in wheelchairs would be blocked by large crowds of people some of them pushing strollers and/or carrying a bulky beach equipment and people with bikes and scooters. The narrow sidewalk would make it impossible for a person in a wheelchair to get to the beach if another person in a wheelchair was returning to the parking lot at the same time.

As far as I can tell from the drawings, the parking structure does not have any public restrooms for beach visitors who would want to clean up and use the restroom before starting what could be a long drive home. This is particularly important for low-income and minority residents who are much more likely to live a great distance from the beach. While it would be easy to add amenities and make changes at the existing parking lot, the configuration and attributes of the Reese Davidson parking structures would be fixed and unchangeable for 50 years.

24. Any Development in the Venice Median would permanently cap the number of parking spaces at Venice Beach in "perpetuity" and destroy long standing plans to use these properties for increased beach access.

The Reese Davidson Development would permanently cap the number of parking spaces available at Venice Beach at a level that is not even enough for current beach traffic. A parking proposal prepared for the developers by PDG confirms that the maximum number of parking spaces at Venice beach will be capped in "perpetuity."

There are long standing plans to use the Venice Median properties to increase the amount of parking at Venice Beach with a trust fund put aside specifically for that purpose. The Venice Coastal Zone Specific Plan provides that the Venice Coastal Parking Impact Trust fund moneys will be used for parking mitigation measures, including "Venice Boulevard median public parking facility improvement, including land acquisition and improvement" and the development of public parking facilities on the MTA lot.

Plans to use the Venice Median have also been proposed by the City Planning Department, former City Councilpersons for the district and the Venice Neighborhood

Council, including a plan to build 1,450 spaces. With housing planned for the MTA lot, the Venice Median properties are the only large properties in Venice that the City can use to add additional parking in Venice now and for the next 50 years.

Median Lots #701 and #731 can be adapted to meet any current or future need for beach access in Venice including increased demand for parking and new transportation methods we haven't even imagined yet. The Parking Facility in the Reese Davidson Project would be fixed and unchangable in perpetuity and probably obsolete when it opened. Using today's robotic parking technology for the next 60 years would be worse than buying a Betamax 45 years ago to use in today's world.

25. The City's plans to bulldoze the beach parking lots in the Venice Median rely upon a "Study" by Tierra West that was carefully designed to reach a pre-determined result, ignoring all of the obvious facts and equity issues in conflict with that result.

The Conclusion in the Tierra West report that "Overall, the parking supply in the Parking Study Area is sufficient and meets local parking demand" for Weekend Midday and Weekend PM is in direct conflict with what I saw on my visits to the Venice Beach where cars were consistently being turned away from all three of the City owned parking lots on Venice Beach on Weekend days with the Venice Blvd Lot closest to the Median turning cars away from the beach on 14 out of 15 summer weekends in a row. (I got sick and had to leave on that one weekend.)

The fact that there is a shortage of beach parking at Venice Beach has been thoroughly documented and universally acknowledged for more than 30 years in parking studies, City Planning documents, newspaper stories, public discussion and campaign statements from City Officials. The Venice Community Plan specifically talks about "inadequate parking for beach visitors during the peak tourism season." The 2012 Westside Mobility Plan states: "The shoreline access issues in the Venice Coastal Zone include inadequate on-street parking, and off-street parking near or on the beach frontage for Visitors and residents..."

Los Angeles County hired Dixon Resources Unlimited for a 2015 Parking Evaluation Report on beach parking lots that they operate, including the three Venice Lots on the Beach. The report states that the Washington Blvd lot reached "maximum capacity on most weekends" and was "backed up all of the way down Washington Blvd with vehicles trying to enter the lot." The Dixon report also noted "consistently high occupancy levels" at the Venice Beach Lot. The Study specifically recommended that steps be taken to "educate patrons of alternative parking options elsewhere in the immediate area", which was never done by the County or the City. Those alternative options would be the beach parking lots in the Venice Median.

The many newspaper stories about the beach parking shortage in Venice include a May 18, 2008 Los Angeles Times article describing cars lined up for four blocks on Washington Blvd to get into the beach parking lot during a heat wave.

The "Venice Parking Study" prepared by Tierra West Advisors to justify the plan to demolish the parking lots in the Venice Median ignored all of the obvious facts showing

that the City was actively discouraging minority beach access and that the demolition of the median parking lots would have a disastrous impact on minority beach access in the short and long term.

Tierra West visited selected parking lots to count unused spaces, turning a blind eye to anything and everything that would effect the predetermined result of their "Study", including:

1. While they were counting spaces, the parking lot on the site for the Proposed Reese Davidson project (Lot #731) was charging \$30.00 for parking, an amount that effectively excludes about half of the City's residents from using it for beach access. The fact that this price made the lot inaccessible to about half the City's population invalidates the results of the study on parking lot demand.
2. While they were counting spaces, Median Lot #701, located two blocks from the beach. was charging \$25.00 for parking, an amount that also excludes about half of the City Residents.
3. While the City was charging \$30.00 to park in Lot #731 and \$25.00 to park in Lot #701, the City owned lot on Venice Beach was charging \$18.00.
4. About half of the people living in the City of Los Angeles cannot afford to pay \$18.00 for parking. Even less can afford to pay \$25.00 or \$30.00.
5. The entrance to lot #731 has been modified to eliminate the reservoir for cars entering the lot, forcing lines to form on the street anytime more than one or two cars were trying to enter the lot.
6. While they were counting spaces, there were long lines waiting to get into the lots to fill those spaces which were not reported in the study.
7. The cars in those lines were waiting for an excessive amount of time and many of them left before they got to the entrance.
8. The City owned lot at Venice Beach and the other City owned parking lots on the beach were turning away cars without telling people that there was parking available in the Median.
9. The entrance to the parking lot did not have the capacity to handle the volume of cars trying to get into while they were counting unused spaces. (This should have been obvious to any parking expert.)
10. The City Beach Parking Lots at Washington Blvd and Rose Ave which turn large numbers of cars away on summer weekends were excluded from the study.

Counting the unused spaces to determine unmet demand for beach parking in a lot charging four times the market price when there are signs directing people away and an

entrance reengineered to prevent people from getting in is an exercise in deception, not a study.

From a social, racial and economic Justice point of view, the only equitable measure of unmet demand for beach parking in Venice is the huge number of people in Los Angeles who do not have beach access, including many children who have never even seen the ocean. Given the fact that the City has only about 1200 parking spaces for 4 million City residents in a County with 10 million people at a beach that gets 43% of its visitors from out of state, it is obvious that the the City does not have enough parking spaces to meet unmet demand, particularly among the 5 million county residents who cannot afford to pay the rates the City is currently charging.

26. The Tierra West Study concluded that the Reese Davidson Project would freeze the number of parking spaces for the next 50+ years and that the current amount of parking could be insufficient in the future.

The Tierra West report concluded that “Public parking spaces will become effectively ‘frozen’ for the next 50+ years after the completion of the project” and “the current proposed parking inventory could be insufficient in the future.” This conclusion alone should have compelled the City to cancel the Reese Davidson project.

Instead of cancelling the development, the City told Tierra West to walk back their own conclusion about future need. Tierra West responded with a “Study Addendum” in a lame attempt to do just that: “As indicated in the City’s mobility policies and capital infrastructure, increased access to popular destinations, like Venice Beach, may be met through alternative modes of travel. Future parking demand may be further offset through increased efficiencies of existing parking resources.”

In the addendum contradicting its own conclusion that the parking inventory could be insufficient in the future, Tierra West ignored and failed to address (1) the huge unmet demand for beach access among low-income and minority residents (2) that all of the City owned parking lots not in the Median are already turning cars away (3) that the Venice Median Parking lots are the only properties capable of being used to increase parking in the future (4) that only 4% of beach visitors use public transportation (5) the anticipated increase in demand for beach access because of global warming (6) the likelihood that future attractions, facilities, restaurants and events will almost certainly bring additional crowds to the 3 mile beach at some point in the future (5) the potential for the return of people who have stopped going to Venice Beach because of the cost of parking and bad experiences with traffic, parking, homelessness (7) the fact that most of the private parking lots in Venice are located on properties that will be developed in the not too distant future leading to a substantial reduction in the parking supply.

27. These pictures show that the City was charging almost twice as much as the lots on the beach at site of the proposed Reese Davidson Development while Tierra West was counting unused spaces to determine the feasibility of the project.

The Tierra West Study states that they counted empty parking spaces in Lots #701 and #731 on September 1, 2019 between 2 and 3 pm. While riding my bike to the beach that day during the same time window, I stopped to take some pictures because of the excessive price discrepancy between Lot #731 and the City parking lot on the beach.



Lot #731 was charging \$30.00 at the same time that the Lot on Venice Beach was charging \$18.00 while the demand study was being conducted. Measuring unmet demand for parking by counting unused spaces at a lot charging almost twice as much as another nearby lot in a much more desirable location is not a valid method to determine demand for affordable and realistically priced parking. The Tierra West Study has no discussion about the impact of this pricing differential on parking demand or on equitable beach access.

Tierra West also fails to discuss the lines of cars waiting to get into this and the other lots, cars flooding the streets looking for parking and what happened to all the cars being turned away from packed beach parking lots while they were there.

28. This Picture shows the entrance to Median Lot #701 blocked off on the same day and around the same time that Tierra West says that they were counting unused spaces in the lot.



This picture was taken at 2:40 pm during the same 60 minute period that Tierra West was counting unused spaces in Median Lots #701 and #731. The attendants for Lot #701 coned off the entrance and posted the Lot Full Sign while there were still a number of unused spaces in the lot. Tierra West reported 20 unused spaces. The number of unused spaces in Median Lot #731 when this picture was taken was about the same as reported by Tierra West. This picture also shows that Median Lot #701 was charging \$25.00 for parking 2 blocks from the beach at the same time that the lot on the beach was charging \$18.00 which Tierra West ignored in reaching its conclusions.

29. The Reese Davidson Project would block Bicycle access to Venice Beach.

The only way safe way to get to and from Venice beach on Venice Blvd is through Median Parking Lots #701 and #731 over the Short Line Bridge which has been used for beach access since 1905. The Reese Davidson Project would block both sides of the bridge eliminating beach access. Four generations on my family on my mother's side and three on my dad's side have used this bridge for beach access.

The "bike lane" on North Venice Blvd is a death zone that runs through the middle of the street between two narrow lanes of traffic that are packed with cars on weekend beach days. Bicyclists coming back from the beach on South Venice Blvd must ride in an unprotected bike lane next to speeding cars with parked cars on the side. Riders are often forced into the traffic lane by people getting beach gear out of cars and other obstructions.

The Coastal Transportation Corridor Specific Plan and the West Los Angeles TAMP Specific plan call for Protected Bike Lanes (Or Cycle Tracks) on both North and South Venice Blvd along the Median. The developers of the Reese Davidson Project ignored this and failed to include a protected bike lane in their plans. As planned, this project would make it impossible to build a bike path to the beach on Venice Blvd.

The risk of death to a bicyclist hit by a car in a surface parking lot is very low. On the other hand, a bike rider in an unprotected bike lane would have a 95% chance of being killed if hit by a car driving at 40 Miles Per hour on Venice Blvd. This Beach location sees a lot of heavy traffic on days with good weather. Many drivers and bicyclists from other states and countries get very confused. Cars try to drive against traffic in the one-way lanes on Venice Blvd all day long, further adding to the risk to bicyclists. A very large percentage of the drivers and bicyclists in this beach tourist location have been drinking making the situation even more dangerous. The Reese Davidson Project is in direct conflict with the Vision Zero plan to eliminate traffic fatalities.

30. Any Development in the Venice Median would eliminate the Open Space in the Historical Canal District which is supposed to be protected, preserved and expanded.

In the early 1990's. members of the Venice Community received a \$420,000 grant to plant 1000 California Sycamore Trees in Venice, including 400 on Venice Blvd to create a "European-Style thoroughfare" that would be a "Los Angeles version of the Champs Elysees."



The East end of Lot #731 with Lot #701 on right.



Above: The Venice Median with Lot #701 in the Foreground. The Venice Community Plan calls for the preservation of existing Open Space including the Venice Median. The plan also calls for expanding open space where possible.

Above, Median Lot #731. Below, Median Lot #701

31. The Reese Davidson Project would block beach access using the Short Line bridge, which has been used for that purpose since 1905.

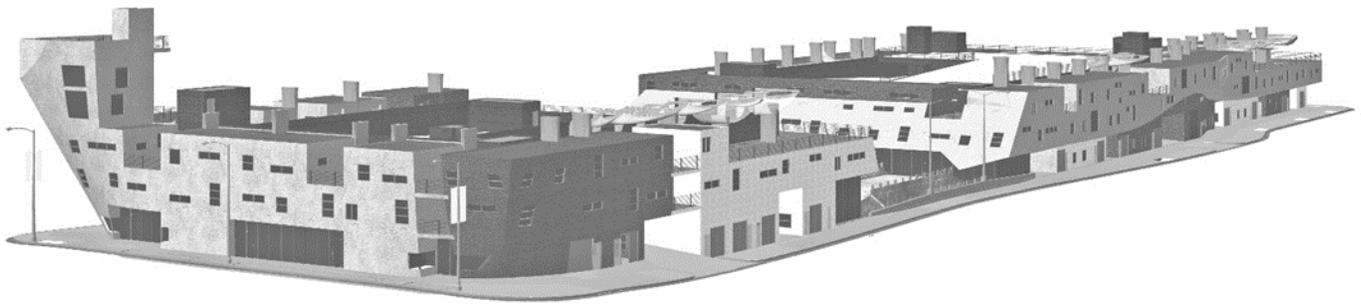


The proposed development site is part of the Venice Canal Historic District which is listed on the National Register of Historic Places. This Pictures shows the Grand Canal and the Short Line Bridge on the property. The Short line Bridge was built in 1905 and is the oldest bridge in the City of Los Angeles. The Reese Davidson Project, known locally as "The Monster on the Median", would surround the Canal and the Bridge blocking views and Bike Access across the bridge. The oversize mass of and Brutalist Design of the Reese Davidson are totally out of place in this iconic and historic location.



This picture of the Grand Canal was taken across the street from the Lot #731. People paddle under the bridge to get to the section of the Grand Canal on Lot #731.

32. The Reese Davidson Project would be a massive oversized, impenetrable mass replacing Open Space and blocking access to the beach in a key location between the Historical Canals and the Iconic Venice Beach.



The Rendering released by the Developers create the false impression open space by featuring the canal and bridge. The project covers almost every inch of the property creating an impenetrable mass that blocks views and beach access in this iconic historical location from all four sides.

These renderings show that the massive structure of the project covering everything except for the substandard 5 feet wide sidewalks with no open space except for the small area immediately surrounding the Canal and no outdoor recreational space at all.

The Massive Size and Brutalist Style Architecture is remarkably inappropriate in the Historic Canal District where the lots are only 2850 square feet.

33. Documents discussing the use of this publicly owned property to exploit the most vulnerable residents of the City to make profits for a rich New York Investor and the Venice Community Housing Corporation should have raised huge red flags.

The August 14, 2020 PDG Parking Proposal prepared for the Venice Community Housing Corporation states that a wealthy New York Investor will serve as a “financial sponsor” of the parking project and that PDG would be responsible for achieving the “demand and revenue” levels needed to make the project “financially sustainable.” In other words, publicly owned land will be dedicated to price gouging of poor, low-income and minority residents of Los Angeles for the benefit of a wealthy New York Investor.

The PDG proposal also talks about a quid pro quo for the benefit of the Venice Community Housing Corporation whereby it would also benefit from the exploitation of low-income visitors and minorities at this publicly owned property: “We will be encouraging the City /LADOT to invest a considerable share of (revenue) back into the Reese Davidson and Venice Community over the 30 year term.”

A memo dated June 12, 2020 showing the agenda for a conference call about a “Public-Private Partnership for Public Parking” is particularly alarming. It states that the developers “should lead selection and negotiations with Parking Developers.” It also states “We can independently select a partner, no additional bid process is required.”

The June 12, 2020 memo also calls for a separate parking agreement between the City and Parking Developer “50-60 years.” Another provision states “Operating Agreement-Minimum term to private Return on Investment, with opportunities to renew. (Approximately 20-30 years.)”

The most recent Hybrid and the Robotic proposals for parking both include \$226,800.00 annually for Park Green Licensing Fee. Park Green is described as a unit of PDG. One proposal from the Pacific Design Groups talks about a “4% annual royalty calculated on gross receipts in perpetuity.” (Emphasis Added)

34. The Reese Davidson project would demolish 4 Units of Low-Cost Housing to build a restaurant, retail space and a large meeting room to be used to promote the activities of the Developer.

The Reese Davidson project would demolish 4 units of low-cost housing in which the tenants have lived in for an average of more than 25 years. One tenant has lived there for 39 years. Another for 30 years. The other two tenants have both lived there for 17 years. One of these families has three children, one with special needs, who have lived there their entire lives.

It would have been easy to build around these existing low-cost units. The developer found the space to build their office, a restaurant and retail space for rental income along with a 3155 square foot meeting room that they call an “Art Studio” that will be used to promote their business, but did not have room for these families to stay in their homes.

Virtually every decision made in regard to the Reese Davidson Project benefited the Venice Community Housing Corporation over the needs and interests of these tenants, the handicapped, people with mobility issues, the homeless, the neighborhood, the Venice Community, Beach Visitors, low-income residents, minorities and the Finances of the City.

35. At over a million dollars per unit, the Reese Davidson Project would be one of the most expensive low-cost housing projects ever built in the United States, probably the most expensive.

The Reese Davidson Project was originally supposed to cost \$304,000 per unit. The last revised estimate from the developers was \$540,000 per unit, which average 460 square feet. At \$1173.00 per square foot, the cost is obscene. To get to that lofty number for the cost per unit that they needed to keep the project alive, the developers excluded the cost of building the east parking garage (\$120,000 to \$175,000+ per unit, lost parking revenue during construction that would add \$18,000 per unit and value of the land which would add \$215,000 to \$715,000 per unit. These costs also do not include the cost of operating the automated garage for the next 35 years with up to 6 valet attendants at one time, maintenance and multiple replacements of the mechanical equipment and computer systems over a period of up to 60+ years.

The land alone might be worth well over 100 million dollars as a recent property listing for 1410-1422 Main Street, a much less desirable location, was priced at 38 million dollars per acre.

The County of Los Angeles and others have been buying and renovating hotels for \$100,000 to \$200,000+ per unit. At \$150,000 per unit, the \$24,558,930 budgeted for the robotic parking option alone would house more people than the Reese Davidson Project without doing any damage to beach access. Hotel conversions can be online with housing for homeless in a matter of months.

The City Controller has recommended that housing funds put spent on lower cost housing projects, including interim housing facilities and adaptive reuse projects which are cheaper than ground up developments. For the cost of the Reese Davidson Project, you could buy at least 2 units of new luxury units from private developers within a few months instead of years.

The City Controller's report on HHH projects recommends that the remaining HHH funds should be put toward lower-cost projects - such as those planned as part of the Measure HHH Housing Challenge - and also urges officials to focus on more interim housing facilities and adaptive reuse projects, which are cheaper than ground-up developments.

Conclusion

The City of Los Angeles must bring an immediate end to all the current policies, practices and plans that exclude low-income residents and minorities from using the beach parking lots in Venice. The City should take immediate steps to make these beach

parking lots accessible to all regardless of income, race or mobility limitations by addressing all of the issues raised in this report.

In order to provide for the most equitable use of the City's beach parking resources, the price of parking in all 5 of the City owned parking lots in Venice should be reduced to a level that will provide access to the maximum number of people regardless of their income race. In this case, reducing prices is likely to lead to a substantial increase in revenue by maximizing use.

All three of the City's parking lots on the beach are at full capacity and turning people on summer weekends during the summer season and on some winter season days. It will be impossible to restore and improve beach access at Venice Beach for Low-Income and Minority residents unless the existing parking lots and open space in the Venice Median are preserved and expanded to meet existing demand and provide for continuing and improved beach access in the future. Just restriping the lots will add additional capacity, especially in Lot #731.

All funds currently allocated for the Reese Davidson Project should be diverted to other projects where a much larger number of the City's homeless population can be housed in a much shorter time without destroying beach access and this historical and iconic neighborhood.