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7/2/20 PLUM agenda item 3 Council File 20-0652 Early Childcare Educational Facilities

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Posted in group: **Clerk-PLUM-Committee**

I have become aware of the PLUM Committee's consideration of a measure brought forth by Councilmember Krekorian to streamline approval of Early Childhood Educational facilities in Los Angeles. While it is critically important that there be an increased number of such facilities, and that costly and unnecessary barriers to their operation be removed, I would like to know that the following concerns have been addressed by the City before any streamlined measure is approved:

- Issues related to the number of such facilities on a block. Should there be a limit? Is there such a thing as over-concentration of child care facilities? (Should there be a process for addressing an impact on neighbors from an over-concentration of any non-residential uses in a residential zone. How can community input be included and considered?)
- Issues related to proximity to uses that may not be appropriate good neighbors for child care facilities. Are there locations where they should not be adjacent? (Sober living homes? Halfway houses?)
- Number of ECE facilities relying upon the use of a nearby park. Is there such a thing of too many facilities relying on a single neighborhood park? Relationship between size of park and numbers of ECE facilities that can rely upon a specific park? Should Parks and Recreation Dept. have the ability to review intended reliance upon a specific park? Will they need to schedule use of parks? Impact on public usage?
- Traffic/congestion issues related to nearby uses. (For example, the operation of an ECE business across the street from an elementary school where children are dropped off and picked up at the same hours could create major issues for congestion and safety.) If located on a corner of a busy arterial are there traffic control issues that need to be defined/specified as part of the approval process?
- The Conditions for Streamlined Approval as listed in the motion's attachment as related to exemptions from parking requirements are unenforceable and unnecessarily vague. They state that there will be exemptions to on-site parking if: "Staff commute using public transit." Should say: Staff commute REGULARLY using public transit and do so more than they drive or get dropped off at the facility. "Staff plan on carpooling." Planning is nice, but it isn't enough. Should say: Staff actively participate in a workplace carpool at least ___% of worktime. Exemptions should be clearly defined and enforceable. The third permitted exemption relates to there being "ample street parking within City parking limits." There is always ample street parking somewhere within City parking limits. What kind of availability should be required? Are there nearby users whose employees or clients make parking difficult on a daily basis?
- What kind of input would be solicited from neighbors, neighborhood councils, etc. and is there any input mechanism for comment?
- Once open, is there a proposed complaint process/process of logging of issues for periodic review?
- In communities or areas that are considered to be "park poor," should there be incentives to provide open space in certain types of new construction so that facilities such as child care facilities can be located there?

- Does the locating of an ECE facility have impacts on the living arrangements of others such as registered sex offenders, parolees?
- Does rooftop space comply with an ECE facility's open space requirements? If so, could there be reduced hours of operation for rooftop use (such as not before 9 am)?
- Can there be a prohibition to disallow ECE facilities from operating within 500 feet of a freeway? Exposure to fine particulate pollution can be especially harmful to young children when regularly exposed. Similarly, should ECE facilities be permitted to rely upon open space in parks if those parks are located within 500 feet of a freeway.
- Should they be permitted by right in severe high fire zones? Is there adequate access/egress/substandard roadways?

On a slightly different but somewhat related topic: There are currently numerous opportunities that allow new development projects to REDUCE the required amount of open space provided onsite in those buildings. However, as density increases citywide, there need to be mechanisms to develop new locations where the public can access open space. Has the City considered establishing a mechanism to accept an in lieu fee to fund open space purchases in those buildings where reduced open space is granted onsite? An additional source of revenues for the purchase of open space could be where residential buildings are constructed within 500 feet of a freeway -- making required/ provided on-site open space an unhealthy offering! Instead, the value of that open space should be collected by the City and placed in a fund to purchase open space within an accessible geographic area of that building. If funds could be gathered in a defined area around given projects, and a goal developed for what is deemed to be adequate public open space, a policy to foster such land use could be developed and ECE facilities (and all nearby residents) would benefit from this availability.

Issues such as the streamlining of ECE facilities are being heard with little public awareness in these times of Covid-19. This is a matter that should be discussed at local neighborhood councils. Any actions that remove the opportunity for public participation should have robust outreach prior to consideration.

Thank you,
Barbara Broide