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**EXHIBIT A  
UPDATED ADVISORY NOTICE RELATIVE TO ABOVE-GRADE PARKING**

TO: PROJECT APPLICANTS WITH ABOVE-GRADE PARKING  
FROM: THE CITY PLANNING COMMISSION  
EFFECTIVE DATE: MAY 12, 2022

**APPLICABILITY AND INTENT OF THIS NOTICE:**

This notice serves to advise applicants of the Commission's concerns and position on the potential impact that parking facilities, and especially above-grade parking, can have on the quality of the public realm and the pedestrian environment. To address these concerns, the Commission has outlined below its expectations and a set of strategies for projects that include above-grade parking that should be considered during the project design phase.

**BACKGROUND:**

Faced with the climate emergency, Los Angeles is at a vital crossroads and must transition from an auto-oriented metropolis to a more transit-oriented and pedestrian-friendly city to reduce carbon emissions and clean our air. Toward this end, and consistent with Mobility Plan 2035, L.A.'s Green New Deal Sustainability pLAn 2019 policies, and the work of the City's Climate Emergency Mobilization Office (CEMO), vehicular parking strategies of the past must be reconsidered in favor of creating vibrant, walkable places that support active transportation.

California's SB 743, aimed at reducing auto-oriented development, was signed into State law in 2013. Starting on July 1, 2020, agencies analyzing the transportation impacts of new projects must now look at a metric known as vehicle miles traveled (VMT) instead of Level of Service (LOS). VMT estimates how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact. Parking strategies can have a direct effect on travel behavior and can support alternatives to vehicle travel.

Mobility Plan 2035, Policy 4.13 speaks to the need to balance on-street and off-street parking supply with other transportation and land use objectives.

“An oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multi-modal mobility system. An abundance of free parking has the effect of incentivizing automobile trips and making alternative modes of transportation less attractive. Moreover, parking consumes a vast amount of space in the urban environment, land which could otherwise be put to any number of valuable alternative uses. Large parking lots create significant environmental impacts, detract from neighborhoods’ visual quality, and discourage walking by increasing the distances between services and facilities....”

Furthermore, L.A.’s Green New Deal, [Sustainability pLAn 2019](#) identifies milestones and targets related to parking, energy demands, and reduction of reliance of vehicular travel:

- Reduce Vehicle Miles Traveled (VMT) per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050;
- Increase the percentage of all trips made by walking/biking and transit to at least 35% by 2025
- Require all newly built parking structures to have solar (2021);
- Update parking regulations to allow for adaptive reuse of space, bike and car-sharing infrastructure, and reduced parking requirements (2024); and
- Promote cooling strategies and “softening” of hardscape in alleys and parking lots (2028)

Few design features can so easily detract from a vibrant public realm as above-grade parking. Parking podium design demands concerted attention from the Commission to make such garages consistent with the City’s three design approaches that serve as the basis for the Citywide Design Guidelines: Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design.

**Pedestrian-First Design:** Project designs should be configured to promote an active public realm with “eyes on the street,” to enhance safety, economic vitality, and the quality of public space. Parking podiums physically separate residents and commercial users, do not promote an active street and detract from the ability of pedestrians to fully engage with more active uses in the built environment. Multiple curb cuts and driveways to access garages interrupt safe sidewalk paths for pedestrians, compromising the City’s goal to eliminate pedestrian fatalities and collisions. Driveway aprons impede the ability to place new street trees that can capture stormwater and provide shade to passersby.

**360 Degree Design:** All sides of a building matter, and new projects should thoughtfully relate to their surrounding context, in all directions. Exposed parking podium levels can create significant impacts for neighboring uses, directing views of car headlights and noise from turning movements into nearby residences or businesses. Above-grade and podium-style parking has also often resulted in unarticulated facades that can appear as

a single uninviting mass, creating an imposing visual relationship to its surrounding community.

**Climate-Adapted Design:** The design of above-grade parking facilities should carefully consider energy performance, the unique Mediterranean climate of Southern California, and future adaptability to other uses. Design treatments that reduce visual impacts of parking, such as fully enclosing above-grade garages, may involve environmental trade-offs by requiring mechanical ventilation.

In particular, to help address the updated Citywide Design Guideline #5, “Express a clear and coherent architectural idea,” the spatial mass of structured parking should also be incorporated into a project’s design in a way that it becomes a cohesive element of the overall design strategy. Parking podiums that are wider and/or deeper than a project’s overall structure can draw undesired visual attention to the parking and undermine the public realm.

## **DIRECTION FOR PROJECT APPLICANTS:**

The strategies described below shall be used to guide applicants during project development with respect to the extent, placement, design, and environmental performance of all on-site parking. Particular attention should be given to ensure that projects are designed in a uniform and cohesive manner, inclusive of any parking elements.

### **Priority Parking Strategies:**

#### **1. Reduce the Total Parking Footprint**

Minimize the amount of parking provided to the fullest extent, utilizing available zoning tools and incentives, including the City’s bicycle parking ordinance, compact spaces and tandem parking, and Density Bonus and the Transit Oriented Communities Guidelines incentives. Use available technology such as smart parking systems, automated lifts, and puzzle shift parking systems approved by LADBS and LAFD to reduce the parking footprint.

#### **2. Place All Parking Below Ground to Prioritize Building Space for Active Uses**

All project parking should be placed below ground such that ground floor spaces remain safe and accessible for pedestrians and bicyclists.

### **Above-Grade Parking Design Strategies:**

While below-grade parking may not be feasible in every instance, the design of any above-grade parking will be carefully scrutinized by the City Planning Commission. All projects that include above-grade parking shall be reviewed by the Department of City

Planning's Urban Design Studio, either through the Professional Volunteer Program or a project review meeting. The Project Planner shall share the Studio's feedback with the applicant team and discuss the outcome of the PVP or project review recommendations in the staff recommendation report where the application of the following strategies will be evaluated:

**1. Minimize impacts to the public realm and the surrounding community through intentional site planning and design.**

- Fully integrate parking into the design and form of the project. The parking should reflect the overall design intent of the project and should not be recognizable as parking during either day or nighttime hours.
- Minimize the visibility of parking:
  - Buffer parking from view by wrapping the parking with active uses such as entry lobbies, offices and/or residential spaces to a depth of 15 feet from the building frontage. On larger sites with multiple buildings, isolate the parking in a single stand-alone structure internal to the site, surrounded by other uses.
  - Where it is not possible or desirable to wrap the parking with active uses (e.g., due to proximity to a freeway, an industrial use, or alley), the parking should not be expressed as a separate element but instead should be concealed with visually opaque materials or treatments.
  - As a benchmark, projects should utilize screening methods that achieve an average opacity of 60 percent to prevent light and glare spillover.
- Ensure driveways are placed far from primary pedestrian access points.
- Incorporate artwork to enliven the facades of above-grading parking and provide space for in-ground landscaping to soften the building form

**2. Enhance the sustainability of parking facilities.**

In consideration of long-term community needs, an upfront investment in the design of structured parking can have a significant impact in minimizing future costs, enhancing the long-term value of the property, and ensuring that the structure can serve future economically viable uses as demand for parking decreases, without the need for significant and structural alterations.

- To facilitate the future adaptive reuse of parking areas to active uses without significant structural renovation, parking structures should incorporate the following design measures when being engineered. Areas used for vehicle parking shall meet the following standards:
  - a) Floor plates shall be level except to the minimum extent required for drainage and access between levels.

- b) Structure shall be constructed to accommodate occupant loads associated with office building corridors above the first floor as indicated by the Los Angeles Building Code.
- c) Floor to floor heights shall be a minimum of 11 feet.
- If a parking structure has a top deck, incorporate green roofs, solar panels, or open space amenities.
- Provide a ratio of EV-ready parking spaces greater than 30% of the total spaces provided.

Additional Resources:

[CA State Law SB-743, Governor's Office of Planning and Research](#)

[LAFD Requirement 74: Mechanical and Automated Parking Design](#) -

New City Zoning Code:

- Above-grade parking screening, wrapping, and adaptable parking strategies are adapted from the draft Zoning Code, Chapter 1A, Article 4, Section 4C.4.5, "Parking Structure Design" intended to be introduced through Development Standards Districts selected and applied during Community Plan updates.
- Additionally, Citywide Adaptive Reuse provisions in Article 9, Section 9.4.6 will enable and incentivize the adaptive reuse of existing parking structures.

