Communication from Public

Name: Norman Beil
Date Submitted: 08/28/2019 08:31 AM
Council File No: 19-0942

Comments for Public Posting: For Agenda Item 14 at today’s meeting of the Transportation Committee (August 28, 2019), it is important that the committee members understand two points: 1. Excessive Parking Impact Requirement. The memo data August 8, 2019 from LADOT General Manager Seleta J. Reynolds to the Transportation Commission misquotes the Rules and Procedures for Preferential Parking Districts. Specifically, it inserts into Section C.3. Excessive Parking Impact Requirement, the phrase “on a minimum of four blocks as determined by the LADOT.” To be clear, those words do not appear in the Rules and Procedures adopted by the City Council on March 16, 2016. Pursuant to LAMC 80.58, any substantial change to the Rules and Procedures will not be effective until approved by the City Council. The Excessive Parking Impact Requirement protects against the overuse of preferential parking. By altering the text — and then cherry picking a few of the shortest blocks scattered across the area — the LADOT is attempting to circumvent the protection the City Council had hoped to achieve. In its Parking Study, the LADOT counted a total of 957 parking spaces, of which 590 were occupied. That works out to 62%, which, of course, is less than the 85% mandated by Section C. 3. That should have ended the matter. The City Council has no choice regarding PPD 292. You are not in a position to weigh the pros and cons of preferential parking in Brentwood Glen. Your decision is compelled by law. PPD 292 critically fails to meet the most basic requirement necessary for a Preferential Parking District — the “Excessive Parking Impact Requirement.” 2. The Petition Effort for PPD 292 was a flop. For all practical purposes, the petition effort failed. Only 57 homes — 10% of Brentwood Glen — are on blocks with permit parking. 36 of these homes are on two blocks. The other 21 are scattered across six block fragments. For every parking space subject to permit parking, there are more than 8 spaces that have no restrictions. Not a single non-resident parker will need to change their parking habits. Most important: THE BLOCKS THAT SIGNED UP FOR PERMIT PARKING ARE NOT THE SAME AS THE BLOCKS THAT PASSED THE FIELD TEST. According to the LADOT parking study data, parking on blocks that will have permit parking is already easy. Permit parking on these blocks would be overkill. Whatever the original reasons for
having a PPD in Brentwood Glen, the general lack of support for it has made it pointless. Please see the attached file for additional comments concerning this matter.
To: Transportation Committee  
From: Norman Beil  
Re: Comments re Agenda Item No. 0942, August 28, 2019

Preferential Parking in Brentwood Glen (CD11)

The Rules and Procedures for Preferential Parking—They Matter

There are people who do not want permit parking.

These people are protected by L.A.M.C. 80.58 and the Rules and Procedures adopted in compliance of 80.58. If a proposed preferential parking district does not meet the requirements of the Rules and Procedures, it cannot be established.

The City Council has no choice in this matter. They are not in a position to weigh the pros and cons of a PPD in Brentwood Glen. It does not matter that there are some people who really, really, really want permit parking. The decision of the City Council is compelled by law.

PPD 292 critically fails to meet the most basic requirement necessary for a Preferential Parking District — the “Excessive Parking Impact Requirement.”

Excessive Parking Impact Requirement

The most basic requirement for a Preferential Parking District is the “Excessive Parking Impact Requirement.” It is set out in Section C. 3. of the Rules and Procedures.

It says:

“Parking will be considered excessively impacted by on-street parking of commuter vehicles on streets in a proposed preferential parking district when more than 85 percent of the legal on-street parking spaces are occupied.”

On May 8, 2019, the LADOT conducted their so-called “Parking Study” for proposed PPD 292. They counted a total of 957 parking spaces, of which 590 were occupied. That works out to 62%, which, of course, is less than the 85% mandated by Section C. 3.

That should have ended the matter...

Not according to LADOT General Manager Reynolds. She has been operating under a different version of the Rules and Procedures than the one approved by the City Council. Under the approved version, PPD 292 doesn’t even come close to meeting the Excessive Parking Impact Requirement. Reynolds’ version alters the text by inserting the following phrase: “on a minimum of four blocks as determined by the LADOT.” To be clear, those words do not appear in the Rules and Procedures adopted by the City Council on March 16, 2016.

80.58 (c), does not allow the LADOT to make up its own rules. It requires that any substantial change to the Rules and Procedures will not be effective until approved by the City.

Changing a rule that provides a measure of protection into a rule that, for all intents and purposes, eliminates that protection is a substantial change.
I would understand it if the City Council approved new Rules and Procedures that allowed the LADOT to test a smaller core set of blocks and then included a buffer zone that did not pass the test. But that is not what happened here. Please look at the map of field test results. It is impossible to circle any grouping of blocks, large or small, that would pass the test. There is no core set of blocks to be found. There is no there, there. There is nothing to build a buffer zone around. Rather, the LADOT has cherry picked from the very shortest blocks where a single vehicle could make the difference between 50% occupancy and 100% occupancy. These blocks are spread far apart in locations that have nothing to do with Montana and the false hypothesis that UCLA students are parking in Brentwood Glen. In fact, the Parking Study data demonstrates that there are no UCLA commuters... or any other commuters, for that matter.

The Excessive Parking Impact Requirement protects against the overuse of preferential parking. By altering the text — and then cherry picking a few of the shortest blocks scattered across the area — the LADOT is attempting to circumvent the protection the City Council had hoped to achieve.

The Petition Effort Flopped

For all practical purposes, the petition effort was a flop. Only 10% of Brentwood Glen will have permit parking.

Only two regular-size blocks signed up for permit parking. On those two blocks, there are just 36 homes — 36 customers for permits.

In addition to those two blocks, 6 block fragments signed up for permit parking. There are a total of 21 homes on these 6 blocks:
- There are 2 cul-de-sacs with 4 homes each. These two cul-de-sacs with permit parking are separated by 7 blocks that will not have permit parking.
- There are 2 blocks on Church with no homes, just the sides of 2 homes. These two blocks with permit parking will be separated by 10 blocks that will not have permit parking.
- There is a single curvy block with 5 homes. With or without permit parking, parking is already undesirable for both residents and non-residents here.
- There is a block with 4 homes that is completely surrounded by blocks that will not have permit parking.

Because the Petition Effort Flopped, PPD 292 No Longer Has a Purpose.

Whatever the original reasons for having a PPD in Brentwood Glen, the lack of support for it has made it pointless. In fact, it has made it counter-productive.

First of all, nothing will change for non-resident parkers. Using the LADOT’s own numbers, exactly 100 parking spaces will be subject to permit parking and more than 800 spaces will not have permit parking. With an 8 to 1 ratio of free versus permit parking, not a single non-resident will need to change where they park.

As for the residents of permit parking blocks, nothing will change for them either. You need to know that the blocks that will have permit parking are not the same blocks that passed the
85% test. This is worth repeating: The blocks that will have permit parking are not the same blocks that passed the 85% test. According to the LADOT parking study data, parking on blocks that will have permit parking is already easy. Permit parking on these blocks would be overkill.

For the most ardent supporters of permit parking, the crazy quilt of permit parking blocks resulting from this botched petition effort is worse than no permit parking at all. For example, consider the two block fragments on Church that have permit parking. These fragments are nothing more than the undesired byproduct of a failed effort to get permit parking on the 4 perpendicular long blocks — none of which will have permit parking. For the residents of these corner homes, permit parking will push parkers from the sides of their homes to the front of their homes. Not what they had in mind.

Without a purpose, it is not reasonable to require anyone to pay for permit parking. Consider an individual who lives on a block that, according to the LADOT Parking Study, has no parking problem. The other people on the block signed petitions, but none of the surrounding blocks have permit parking. This individual is stuck with totally useless permit parking while their neighbors still enjoy free parking. In this situation, how can the City justify requiring permits for one block and not requiring them on surrounding blocks?

Section A of the Rules and Procedures of Preferential Parking Districts states that:

“The purpose of a preferential parking district (PPD) shall be to limit instruction of non-residential and/or commuter parking into residential area neighborhoods…”

Since unrestricted parking spaces outnumber permit spaces 8 to 1, not a single non-resident will be deterred. Any intrusion felt by the supporters of permit parking will in no way be limited just because a few blocks will have permit parking. The purpose defined in the Rules and Procedures will not be served.

[The Rules and Procedures also mention one other purpose: “to encourage carpooling.” The supporters of permit parking have complained that UCLA and Archer School students, park in Brentwood Glen and then carpool to school. Had there been a successful petition campaign, such carpooling would have been impossible. Thankfully, as it stands, not a single student will be discouraged from carpooling. The petition supporters’ loss is a gain for the carpoolers.]

Revenue Projection

A request for the Financial Impact Statement has gone unanswered.

However, it is possible to make a rough estimate of revenues… and they are paltry.

There are a total of 36 homes on the two regular size blocks. There is generous off-street parking, so many of these homes will not need permits. I estimate total revenue from these 36 at no more than $3,000 per year.

There are another 21 homes on the six block fragments. These fragments are so small, that a Visitor pass tied to the block is of little value. This is particularly true because the fragments of permit parking are surrounded by tons of unrestricted parking, either right around the corner or on an immediately adjacent block. Since unrestricted parking is never more than two or three houses away, there will be virtually no sales of Visitor or Guest permits to these 21 homes.

All 21 of these homes have off-street, either in a long driveway or in a garage. Most have at least two spaces. Many have three spaces. There is little need for annual permits. In a pinch,
residents can always park around the corner or two or three homes down the street. I estimate total revenue from these 21 homes at no more than $1,000 per year.

Grand total for permits: Under $4,000 per year.

Parking enforcement revenue will be far less than the average PPD. There are only 100 parking spaces subject to permit parking versus more than 800 unrestricted spaces. Those 8 to 1 odds in favor of non-resident parkers tell only half the story. Almost half of 100 spaces are located in tiny clumps in the least convenient places for non-residents. For each of these permit parking spaces in the boonies of Brentwood Glen, there are dozens of unrestricted spaces more convenient. The odds in favor of the parkers is more like 15 to 1. These are terrible odds for ticket-writers.

I imagine the bulk of the tickets will be given to residents who purchase permits but forget to use them. As LPR technology becomes more prevalent, such as the ticketless smart parking in Century City, residents will start demanding virtual permits to eliminate the inadvertent ticket.

With Brentwood Glen’s random configuration of blocks with and without permit parking, it is quite possible that within a year or two, some blocks might not meet the 51% requirement stated in Section C. 7. c. Parking signs will go up... and then they will come down.

The bottom line is that the bottom line will be red.

The Issue of “Vacant” Dwelling Units

What happens when a petition solicitor rings the doorbell and no-one answers?

Well, here is what happened in PPD 292:

Kiel Avenue has 6 homes. Only 4 signed the petition. That’s less than the 75% minimum needed to have permit parking. Because no one answered the door at one of the homes one day, the petition solicitor wrote “Vacant” in the place where the signature would have gone. The DOT, without bothering to check if the home was actually vacant, removed the “vacant” home from the block count and declared Kiel to have only 5 homes. While 4 out of 6 doesn’t pass, 4 out of 5 does. Kiel was put on the list of blocks that would have permit parking.

To be clear, the Municipal Code, including the Chapter that contains the preferential parking provisions, defines “Dwelling Unit” as: “one or more rooms containing a kitchen, located in a building, and designed for occupancy by one family for living and sleeping purposes.”

The definition does not require occupancy, only that it be “designed for occupancy.” A vacant dwelling unit is no different than an inhabited dwelling unit.

Someone at the LADOT re-defined “dwelling unit” to require occupancy, although that individual was never identified. Aron Thompson of the LADOT could not produce any formal or informal document that backed up this definition. He could not define “vacant” and he admitted that he does not verify if a dwelling unit is vacant. Is a dwelling unit “vacant” if someone is away on a 2-week vacation? What about a 6-month sabbatical? Does it matter if you leave your clothes behind? For Aron Thompson, if the petition solicitors can’t reach you because you are playing loud music in your bedroom, your house is vacant.

Or, at least he won’t question it. Mr. Thompson also stated that the petition solicitors designation of “vacant” would not be challenged by the LADOT. Nor could it be challenged by anyone else because a designation that a home is vacant is not made public. Petition solicitors
have free rein to designate any home they want “vacant” without oversight — and that is exactly what they did.

It took months and an intense and frustrating CPRA campaign to find out about this “vacancy” loophole and then pin it to Kiel. I battled Aron Thompson on the legal validity of this definition of “dwelling unit.” But it did not occur to me that he would have his facts wrong also. It turned out that the home in question was, indeed, occupied. It took way too long, but ultimately Mr. Thompson had to admit that there were no vacant homes on Kiel. He was forced to scratch Kiel off the list of homes that would have permit parking.

If this had been any other PPD, Kiel would have been posted with permit parking restrictions and no one would be the wiser. It took the teamwork and efforts of about a dozen people to get to the bottom of Kiel.

While Mr. Thompson accepted that the house in question was not vacant, he has never accepted the definition of “dwelling unit” used in the Traffic Code. That battle will continue.

It would be helpful if the City Council weighed in on the definition of “dwelling unit.”

**Two More Blocks Bite The Dust**

Kiel was not the only block the LADOT was forced to admit did not qualify for permit parking.

Cashmere also had an issue that took several months to resolve. It was only until the Transportation Commission considered the issue that the LADOT relented and removed Cashmere from the list of blocks slated to have permit parking. Again, it took an enormous amount of work from many individuals to get to the bottom of this problem.

There was a third block that was removed after it was discovered that, with the apparent complicity of the petition solicitor, a resident signed her own name and then signed the names of two neighbors. This was discovered by my colleagues by pure chance. To protect the people involved, all three names were removed by way of a counter-petition.

Of the 13 blocks that the LADOT officially accepted, two were removed by counter-petition, leaving 11. Then three were removed after uncovering shenanigans. Wow! A whopping 25% of the petitions the LADOT approved turned out to have some sort of monkey-business, forcing the LADOT to backtrack. 25% is too high.

Petition solicitors were not properly trained, supervised or monitored. What they were was aggressive and snarky to anyone who did not sign. Opponents of permit parking were sometimes accused of being bad neighbors. Residents who signed petitions were often rushed and rarely shown the required Information Sheet. City officials befriended and sided with anyone who wanted permit parking. If you didn’t want permit parking, City officials treated you like the enemy.

**Bait & Switch — Size of the PPD**

The size of a PPD has two important ramifications. From the perspective of the LADOT, it allows them to add permit parking blocks anywhere within the district without having to demonstrate a need for them. To the extent the LADOT wants free rein to expand the number of streets with permit parking, they want the PPD to be as large as possible.
For residents of a PPD, a large PPD means that more people will have access to parking permits. Naturally, if you want to limit who parks on your street, you would want to limit the size of the PPD. This issue is really about daily Guest permits — you can get up to 25 per day. Perfect for large parties — guests, caterers, valet parkers. Guest permits can also be used for large construction sites on hills with narrow roads. The construction workers can park in areas with easier parking and then shuttle to the construction site.

Brentwood Glen is the perfect example. Brentwood Glen has traditionally been thought of as the 58 blocks that were mapped out at the time the petitions had been circulated. It has its own neighborhood association (the “BGA”). People don’t considered the hilly streets that start at Acari and go up to Sunset as part of Brentwood Glen. They have their own homeowners’ association. These two neighborhoods have a different feel and they are connected only by a single, steep, curvy and narrow street (Acari) which does not have a sidewalk. You would never park on Acari to visit someone in (the flats of) Brentwood Glen. Although, if you are having a party or doing construction on Acari, parking in Brentwood Glen is very appealing. But not the other way around.

If the two neighborhoods were in different PPD’s, the residents of Brentwood Glen would be protected from such intrusion. By combining the PPD’s into one, the residents of Brentwood Glen lose that protection. Clearly, anyone who wants permit parking wants to be protected from an onslaught of guest permits from a different neighborhood.

Everyone who signed a petition was told that only the 56 blocks of Brentwood Glen would be included in the PPD. A map of the proposed PPD was widely circulated. Now, without notice or approval, the Brentwood Glen PPD has been expanded to include the hilly streets to the north of Brentwood Glen — to the detriment of Brentwood Glen residents. This is like changing the terms of a waiver after the waiver is signed.

What the Parking Study Tells Us

Please look at the field test map attached to this paper. It is clear that General Manager Reynold’s assertion about UCLA students is plain wrong. Of the 13 blocks that “passed” there are only 5 full-length blocks. Of these 5 blocks, 4 of them are more than 1/3-mile from the Montana Ave, — the only portal that connects Brentwood Glen to Westwood Hills (which is then another ½ mile to the western edge of UCLA). In other words, if UCLA students are looking for a place to park in Brentwood Glen, they would not be parking on the streets that passed the field test. (With respect to the anecdotal evidence of UCLA student sightings, it should be noted that UCLA students live in some of the multi-family units.)

As for the “other non-residents,” it has long been a scare tactic of the proponents of permit parking that employees of the hotels north of Sunset park in Brentwood Glen and pose a danger. I see that General Manager Reynolds has dropped this claim from her Recommendations… and for good reason. A recent LADOT study confirmed what the opponents have been saying all along — the hotels provide parking for all employees.

There may be another reason Reynolds omitted the hotel workers issue: most of the blocks closest to Sunset have not opted to have permit parking. If these residents don’t see a problem of workers crossing Sunset Blvd. to park on their blocks, maybe there isn’t a real problem; or maybe they are generous of spirit and willing to share their ample parking availability with anyone who needs it.

It is now blazingly clear that Councilmember Bonin’s Letter of Support is ludicrous. There is no “regular onslaught of student and employee related parking…Rather than pay to park elsewhere, drivers park their vehicles in the neighborhood and crowd residential streets, leaving few, if any spaces for residents.”
What the Parking Study Does Not Tell Us

The methodology used by the LADOT in its field test is calculated to be misleading and to camouflage the plentiful parking availability. The LADOT field test does not include the number of vehicles. Rather, for each block, it determines the number of unmarked virtual parking spaces. Then, for each virtual space, it determines whether it is occupied. This methodology can lead to the absurd result that 100% of the spaces are occupied, but there is still room for another car to park. Here’s how: One car parks straddling both spaces #1 and #2. A second car straddles #3 and #4. All four spaces are occupied. However, there is room for a third car to park by straddling spaces #2 and #3.

It is also important to point out that since 2016, the LADOT does not check to see if a vehicle is owned by a resident, which leads to another absurd result. A block without a single non-resident can be deemed to have too many non-residents. You cannot get more Orwellian.

The supporters of permit parking knew the time and day of week of the test — in fact, they selected it. They were also told the test would be on one or more of three dates. There is evidence that some supporters gamed the system by moving cars from their garages and parking them on targeted blocks in a coordinated effort.

The LADOT “parking study” is hardly a parking study. It is a simplistic and mechanical acid test that looks at a handful of blocks during a short period of time, without any control group or common sense. There is no analysis of the likely consequences of creating a preferential parking district — will it work for its intended purpose? The data is not explained nor used to support a recommendation. No context is provided. There is no description of the neighborhood and the surrounding areas. The Parking Study did no identify anything that would attract large numbers of non-resident parkers. It did not identify who is parking in the area. It did not estimate how many non-residents were parking. It did not indicate why parking in Brentwood Glen was their most convenient option.

The Parking Study contains no statements of individuals who have first-hand knowledge of the problem. (Hearsay has been one of the biggest problems in ascertaining if there is, in fact, a problem at all. The supporters of permit parking say that someone else has a problem, but not themselves.)

Important data was observed but not reported: The number of vehicles, the type of vehicles, the number of spaces each occupied. No effort was made to identify obviously invited vehicles: delivery trucks, construction workers, gardeners, pool service people, etc. No effort was made to determine where vehicles are registered.

Mike Bonin’s Letter of Support Did Not Even Attempt to Be True

Several CPRA requests yielded some of the emails between Lisa Cahill, Cori Solomon and Aron Thompson. They tell a story of stating facts, not because they are true, but because they need to be true.

Apparently, Ms. Solomon’s letter requesting a preferential parking district was deemed insufficient by someone at City Hall. Better reasons had to be given. Ms. Cahill attempted to draft the Letter of Support. She was told that her initial drafts were inadequate because they lacked a sufficient reason for preferential parking. Lisa responded: “... the reasoning is that the community wants it and we support that.” Note that Cahill did not think she needed to say there is a parking problem.
Mr. Thompson rejected Cahill's attempts. He explained that the Letter of Support can't merely say the community wants it. He emailed Cahill: “Refer to the previously attached letters as samples. The letter must indicate where the problem is coming from (the source... i.e. customers, employees of a commercial district, airport, hospital, bar, restaurant, etc., etc.) and the nature of the parking problem it is causing in the community (i.e. lack of available parking, no available parking, blocking driveways, residents’ difficulty finding parking on their own blocks, etc. etc etc). Take a look at those letters as an example. You can email me the letter when you're ready.”

Meanwhile, Solomon put pressure on Cahill to get her the Petitions. Following Thompson's coaching and using the sample letters Thompson provided, Cahill did what she needed to do to get Thompson to provide Cori with the Petitions she was demanding. She copied and pasted the parking problems of a different district into a letter about Brentwood Glen. There is no indication that Cahill even attempted to gather information about Brentwood Glen's parking situation.

No one believes the statements made in the Letter of Support or has any evidence of their truth. Aron Thompson is aware that the Letter of Support is hogwash. His position seems to be that fact-checking statements made by a Councilmember is not his responsibility. The City's general attitude is that helpful facts need no verification.

**Why We Don't Want Permit Parking in Brentwood Glen**

Brentwood Glen is unique. It is unlike any other PPD in Los Angeles. Between the solid concrete wall of the 405 and the tree-filled hill leading up to the VA, Brentwood Glen is a virtual walled city, well protected from any intrusion of non-resident commuter parking. Preferential permit parking will simply not make a perceptible difference.

Permit parking is annoying, stressful and expensive. A common complaint is too much parking enforcement.

Realtors say that needless permit parking hurts property values. Some say their clients won’t look in neighborhoods with permit parking.

We do not want to create a parking problem for ourselves that does not currently exist. The LADOT has warned us that even if your block does not have a parking problem now, it will have a parking problem if the blocks around you get permit parking. Why go down that road?

We don’t buy the argument that preferential parking reduces crime. We don’t buy into the Purple Line scare tactics. The Purple Line is not an issue until at least 2026.

Realistically, permit parking will not solve the problems people have expressed. The permit parking statute was enacted to address severe parking problems. Its off-label uses -- deterring crime, reducing litter, pushing out the homeless, keeping away strangers, and securing the spot in front of your house -- will not work to anyone’s satisfaction. For Brentwood Glen, the number of cars that would be shooed away by a 2-hour parking restriction is hardly worth putting up with permit parking. If the PPD is established, residents will be disappointed.

Permit parking will change the character of the neighborhood we have lived in a loved for decades. It will make it feel more urban and commercial and less residential. Parking signs are an eyesore. They are poorly maintained. The visual clutter -- and the tree-trimming they require for visibility -- will erode the attractiveness of Brentwood Glen for both residents and prospective buyers. The leaning, faded and bent preferential parking signs of Westwood Hills are everywhere you look. The clutter of parking signs and the way Los Angeles fails to
maintain them result in the opposite of the neat, well cared for, and attended to neighborhood recommended by police to deter crime.

The Lack of Due Process

Vehicle Code Section 22507 gives local authorities broad power to restrict parking on public streets in order to address local parking problems in residential neighborhoods for the benefit of residents who are negatively impacted by non-resident parking. But that power is not absolute. By its own language, provisions adopted pursuant to 22507 must be “reasonable and necessary.” Moreover, a residential parking program must bear a reasonable relationship to its objectives and those most impacted by such a program must be accorded adequate notice and a hearing. Most importantly, Section 22507 is not a license to exploit and abuse the residents it was enacted to protect.

Like most Americans, residents have parked freely in Brentwood Glen for decades and have come to expect and rely on free parking. Permit parking will make a substantial and long-term impact on their lives on a daily basis and on the value of their property. Opponents of permit parking are justifiably concerned about the expense, the inconvenience, the visual clutter, and other negative aspects of permit parking. The notice and hearing requirements that are in place for permit parking are not in line with the importance of those concerns.

The City, through its express and de facto ordinances, policies and procedures, has created an unlawful and irrational system that allows and encourages official misconduct in order to convert free street parking into paid street parking, with no regard as to whether or not permit parking makes any sense for any particular set of blocks.

The slavish use of numerical tests for petitions and field tests violates the California Constitution, the California Vehicle Code and the Due Process Clause of the 14th Amendment to the United States Constitution. The policy of the DOT and Council District 11 is to blindly recommend the establishment of a preferential parking district if it passes their field test of 85% occupancy for any 4 blocks. Officials of the City have publicly stated that if those two tests are passed, the rest is automatic. These same officials warned that it would be a waste of time to attend any hearing to voice opposition.

Looking at the map of permit parking blocks in Brentwood Glen, there appears to be no rhyme or reason for why some blocks are included and some are not. There are blocks with restrictions that are nowhere near other blocks with restrictions. Blocks that passed the field test hurdle of 85% occupancy will not have permit parking, while blocks that are virtually empty will have permit parking. This is not the act of a rational legislative body. The reason, of course, is that it is not the act of the City Council. The legislative body does not decide which blocks to include or exclude. They unconstitutionally delegate those decisions to a vote of the residents of each individual block.

Council District 11 has made its position clear. They believe that the validity of a PPD has nothing to do with the means by which it is established. They have taken an “anything goes—take no prisoners” approach to preferential parking. LADOT is no better. Once the Council District authorizes a field test, they bury their head in the sand and conduct a meaningless field test (again and again, if necessary, until it “passes”.)

Neither the Traffic Commission nor City Council concern themselves with procedural matters in the establishment of a PPD. They have poorly noticed pro-forma hearings to rubber stamp the Council Office and DOT recommendations. The PPD machine is broken. Someone needs to fix it.
The 8 blocks indicated in RED will have permit parking… if the PPD is approved by the City Council.

The other 48 blocks did not get enough support from the residents.
Any impact of Luxe Hotel employee parking was ruled out by LADOT’s Engineer Guevara in June 2019 Traffic Report. The LADOT did not include hotel parking as an issue in its August 8, 2019 memo to the Commission.

PROPOSED PREFERENTIAL PARKING DISTRICT
COUNCIL DISTRICT 11

LADOT’s Field Test Results
May 9, 2019

The hilly streets above Brentwood Glen were included in the field test, but this area may or may not be part of the PPD. Less than 30% of potential parking spaces were occupied. In fairness, this area was excluded from calculations for Brentwood Glen proper, the original PPD.

The blocks in green offer the most convenient parking for non-residents heading to Sepulveda, Westwood Hills and from there to UCLA.

Yet the percentage of occupied parking is actually less than the rest of Brentwood Glen (62% versus 66%)

This 2-block stretch along Church offers the MOST convenient non-resident parking, yet only 3 out of 10 spaces were occupied per LADOT. You would expect close to 100%. You find 30%.

Clusters of parking congestion can be random. While this block exceeded 85% occupancy, neighboring blocks along Beloit — from Berwick to Denair — had less than 35% occupancy in aggregate.

This area in yellow is the absolute least convenient place to park for non-residents, yet it is had the densest parking in Brentwood Glen. These blocks did not submit any petitions.