

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA

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Staff: Padilla-LB
Staff Report: 9/26/97
Hearing Date: 11/4-7/97
Commission Action:



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STAFF REPORT: APPEAL
SUBSTANTIAL ISSUE AND DE NOVO HEARING

LOCAL GOVERNMENT: City of Los Angeles

LOCAL DECISION: Approval with Conditions

APPEAL NUMBER: A-5-VEN-97-183

APPLICANT: City of Los Angeles, Department of Transportation

PROJECT LOCATION: Between the boundaries of Brooks Avenue on the north, Electric Avenue on the northeast, North Venice Boulevard on the south, Mildred Avenue, Pacific Avenue, Windward Avenue, and Main Street on the west, in the Venice area of the City of Los Angeles, Los Angeles County. The north side of North Venice Boulevard, beginning at the centerline of Mildred Avenue and extending 200 feet easterly to the alley is excluded from the district.

PROJECT DESCRIPTION: Establish preferential parking for residential permit parking, with four hours of public parking, between the hours of 8:00 A.M. and 6:00 P.M. five to seven days a week. Residents purchasing parking permits will be exempt from the restrictions. Commercial areas will not be posted.

APPELLANTS: Coastal Commission Executive Director, Peter Douglas; Ms. Francine Dorsey; Mr. Hans Fossedahl; and Mr. Rex Frankel.

SUMMARY OF STAFF RECOMMENDATION:

The staff recommends that the Commission determine that a substantial issue exists with respect to the grounds on which the appeal has been filed because the project, as approved by the local government, raises issues with regards to restricting public access on public streets which could adversely impact access to the beach and to lower cost recreational facilities.

Staff further recommends that the Commission, after a public de novo hearing, deny the proposed development because it is not consistent with the public access and recreation policies of the Coastal Act. The parking restrictions of the proposed preferential parking district would reduce the ability of the general public to use public on-street parking for coastal access by limiting parking to four hours. The on-street parking supports public access to the public beach and lower cost recreation facilities along the Venice boardwalk and must be protected pursuant to the public access policies of the Coastal Act.

SUBSTANTIVE FILE DOCUMENTS:

1. Draft Final Report, Venice Traffic and Parking Study, prepared by KAKU Associates, Inc, April 1995.
2. Coastal Development Permit #5-90-664 (City of Los Angeles), plus subsequent amendments.

I. APPELLANTS' CONTENTIONS

City of Los Angeles Local Coastal Development Permit 94-02 approves a permit with conditions for the establishment of a preferential parking district for residents covering the public streets starting 1 1/2 blocks east of the Venice boardwalk and beach. The City's approval of the proposed project was appealed on June 25, 1997, by two residents, Ms. Francine Dorsey and Mr. Hans Fossedahl, of Venice and one resident, Mr. Rex Frankel, of the Westchester area of City of Los Angeles, and by the Executive Director of the California Coastal Commission on July 17, 1997.

The appeals by Ms. Dorsey and Mr. Fossedahl contend that:

1. The proposed parking restrictions will not offer a solution to the parking problems within the district. The public will continue to take up the available parking in the daytime.
2. Parking for residents after 6 PM is not a problem so requiring permit parking after 6 PM as an option will not benefit the residents.
3. The parking permit costs present an added financial burden to the residents.
4. The district is within a well known and popular visitor serving area and preferential parking for residents does not improve the inadequate public parking situation in the area. However, the provision of additional parking facilities would compound the already severe traffic problems.

The appeal by Mr. Frankel contends that:

1. Permit parking will block coastal access for users of the public beach and will limit the ability of the public to visit friends that live in the district.

The appeal by the Executive Director contends that:

- 1) Venice beach and the Venice beach boardwalk are popular beach and recreational areas with a very limited supply of public parking. Because of this situation the surrounding public streets are used by beachgoers, bicyclists, roller skaters, and strollers for alternative parking. Limiting public parking along the public streets used by beach visitors during beach use periods may adversely impact public beach access.

The appeal by the Executive Director also stated that there was insufficient information with regards to the parking within and surrounding the district to properly analyze the proposed project and make a determination of the project's consistency with the Chapter 3 policies of the Coastal Act. The

applicant has since provided all information necessary to properly analyze the project.

II. APPEAL PROCEDURES

Section 30600(b) of the Coastal Act provides that prior to certification of its Local Coastal Program, a local jurisdiction may, with respect to development within its area of jurisdiction in the coastal zone and consistent with the provisions of Sections 30604, 30620 and 30620.5, establish procedures for the filing, processing, review, modification, approval, or denial of a Coastal Development Permit. Pursuant to this provision, the City of Los Angeles developed a permit program in order to exercise its option to issue Local Coastal Development Permits in 1978.

Sections 13302-13319 of the California Code of Regulations provide procedures for issuance and appeals of locally issued Coastal Development Permits. Section 30602 of the Coastal Act allows any action by local government on a Coastal Development Permit application evaluated under Section 30600(b) to be appealed to the Commission.

After a final local action on a Local Coastal Development Permit, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice which contains all the required information, a twenty working day appeal period begins during which any person, including the applicant, the Executive Director, or any two members of the Commission, may appeal the local decision to the Coastal Commission (Section 30602).

At this meeting, the Commission will have a public hearing to determine whether a substantial issue exists with respect to the grounds on which the appeal has been filed. The Commission may decide that the appellants' contentions raise no substantial issue of conformity with the Chapter 3 policies of the Coastal Act, in which case the action of the local government stands. On the other hand, the Commission may find that a substantial issue does exist with the action of the local government if it finds that the proposed project may be inconsistent with the Chapter 3 policies of the Coastal Act of 1976.

If the commission finds that a substantial issue does exist, then the hearing may be opened and heard as a de novo permit request. Section 13321 specifies that de novo actions will be heard according to the procedures outlined in Section 13144 of the Code of regulations.

III. STAFF RECOMMENDATION ON SUBSTANTIAL ISSUE

The staff recommends that the Commission determine that a substantial issue exists with respect to the City's approval of the project with the provisions of Chapter 3 of the Coastal Act (commencing with Section 30200), pursuant to Public Resources Code Section 30625(b)(1).

MOTION. Staff recommends a NO vote on the following motion:

I move that the Commission determine that Appeal No. A-5-VEN-97-183 raises NO substantial issue with respect to the grounds on which the appeal has been filed.

SUBSTANTIVE FILE DOCUMENTS:

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The appeal by the Executive Director also stated that there was insufficient information with regards to the parking within and surrounding the district to properly analyze the proposed project and make a determination of the project's consistency with the Chapter 3 policies of the Coastal Act. The

applicant has since provided all information necessary to properly analyze the project.

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Sections 13302-13319 of the California Code of Regulations provide procedures for issuance and appeals of locally issued Coastal Development Permits. Section 30602 of the Coastal Act allows any action by local government on a Coastal Development Permit application evaluated under Section 30600(b) to be appealed to the Commission.

After a final local action on a Local Coastal Development Permit, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice which contains all the required information, a twenty working day appeal period begins during which any person, including the applicant, the Executive Director, or any two members of the Commission, may appeal the local decision to the Coastal Commission (Section 30602).

At this meeting, the Commission will have a public hearing to determine whether a substantial issue exists with respect to the grounds on which the appeal has been filed. The Commission may decide that the appellants' contentions raise no substantial issue of conformity with the Chapter 3 policies of the Coastal Act, in which case the action of the local government stands. On the other hand, the Commission may find that a substantial issue does exist with the action of the local government if it finds that the proposed project may be inconsistent with the Chapter 3 policies of the Coastal Act of 1976.

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MOTION. Staff recommends a NO vote on the following motion:

I move that the Commission determine that Appeal No. A-5-VEN-97-183 raises NO substantial issue with respect to the grounds on which the appeal has been filed.

A majority of the Commissioners present is required to pass the motion.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. Project Description

The proposed project involves the establishment of a preferential parking district. The district would restrict public on-street parking on the public streets within the district. Commercial areas within the district will not be posted. Only residents would be allowed to obtain permits (the permits would be available for a fee) which exempt them from the district's parking restrictions. The City has developed five different parking restriction options that the residents on each block within the district may select and petition for. Each option allows the public a minimum of 4 hours of parking throughout the day. The five options are as follows:

- 1) 4-hour parking 8:00 AM to 6:00 PM, Monday through Friday; vehicles with district no. 33 permits exempted.
- 2) 4-hour parking 8:00 AM to 6:00 PM, Daily; vehicles with district No. 33 permits exempted.
- 3) No parking 6:00 PM to 8:00 AM, Nightly; 4-hour parking 8:00 AM to 6:00 PM, Monday through Friday; vehicles with district No. 33 permits exempted.
- 4) No parking 6:00 PM to 8:00 AM, Nightly; 4-hour parking 8:00 AM to 6:00 PM, Daily; vehicles with district No. 33 permits exempted.
- 5) No parking 6:00 PM to 8:00 AM, nightly; vehicles with District No. 33 permits exempted.

The district consists mainly of residential development with some commercial development along along Main Street and Abbott Kinney Boulevard and along the fringes of the district boundaries. According to the City there are approximately 1,213 households (single and multiple-family dwellings) with a total of approximately 1,460 on-street parking spaces within the proposed district.

The district is bounded by the centerline of the following streets: Brooks Avenue on the north, Electric Avenue on the northeast, North Venice Boulevard on the south, Pacific Avenue, Venice Way, and Main Street on the west, in the Venice area of the City of Los Angeles (see Exhibit No. 1 and 2). The proposed district boundaries lie 1 1/2 blocks from the beach and Venice Promenade and extends to approximately 1/2 mile at its furthest inland distance.

VI. SUBSTANTIAL ISSUE ANALYSIS

As stated in Section II of this report, any local Coastal Development Permit may be appealed to the Commission. However, the grounds for an appeal of a Coastal Development Permit issued by the local government prior to certification of its Local Coastal Program are limited to the Chapter 3

policies of the Coastal Act. The Commission shall hear an appeal unless it determines that no substantial issue exists as to conformity with Chapter 3 policies of the Coastal Act. In this case, staff is recommending that the Commission determine that a substantial issue exists with respect to the grounds that the approved preferential parking district will reduce the public's ability to access the coast by restricting the use of available on-street public parking used by beach visitors.

One of the strongest goals of the Coastal Act is to protect, provide and enhance public access to and along the coast. Several Coastal Act policies require the Commission to protect beach and recreation access:

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30213 of the Coastal Act states in part:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred...

The City of Los Angeles is proposing the parking district for the purpose of limiting public parking in the area so that on-street parking will be freed up for residents. According to public testimony at the local level, the lack of on-street parking is due to: a) insufficient off-street parking, b) visitors to the area, c) customers destined to stores, shops and restaurants, and d) employees of businesses, and e) beachgoers.

The contentions made by the appellants that the restrictions will impact the public parking and traffic in the area raises substantial issues with respect to public access to the coast. Four of the five proposed parking restrictions will limit the public to a maximum of four hours of on-street parking between the hours of 8:00 AM and 6:00 PM. The fifth option will allow the public to park, unrestricted, between 8:00 AM to 6:00 PM.

As stated the proposed district is located just 1 1/2 blocks from Venice beach and Ocean Front Walk. Ocean Front Walk is a paved 20-30 foot wide cement and asphalt walk that parallels the beach and is adjacent to and seaward of the western edge of Venice's residential and commercial development. The approximately one mile stretch between North Venice Boulevard to the south to approximately the Venice/Santa Monica City boundary to the north is a popular visitor serving destination. This one mile stretch provides a mix of restaurants, retail stores and street vendors, that set-up temporary booths, offering a large

range of retail goods and food. Bike and skate rentals are also available. In addition, adjacent to the promenade, there are public outdoor basketball courts, racquetball and handball courts, paddleboard courts, a weight lifting area, and bikepath. Ocean Front Walk is also a popular skating area. Ocean Front Walk also attracts many street performers that perform along the walkway. This mix of shops, entertainment and recreational opportunities makes Venice Beach and the one mile stretch of Ocean Front Walk one of Southern California's most popular beaches for area residents and tourists.

Ocean Front Walk attracts approximately eight to nine million local, regional, national and international visitors throughout the year and is heavily attended during the summer weekends. According to the City, approximately five million visitors come to the Venice beach area during the summer (Transportation Committee, Inter-departmental correspondence, March 14, 1994).

The estimated 1,460 total on-street parking spaces within the boundaries of the proposed district are heavily impacted during the summer weekends by beachgoers, recreationalists and residents. A traffic and parking study conducted for the City of Los Angeles (prepared April 1995) indicates that the occupancy rate for on-street spaces within the district is at 95% to 97% during the summer weekend's peak beach use period, with an average of 84% to 87% throughout weekend days (see Exhibit No. 8).

By limiting the public to only four hours of parking and prohibiting parking after 6:00 PM the ability of the public to park and access the beach and Ocean Front Walk will be adversely impacted. The resulting loss of unrestricted on-street parking would limit public access in violation of the intent of the Access policies of the Coastal Act. First, in the summer months public beach use continues beyond 6:00 PM since sunset usually occurs after 8:00 PM, providing the public longer daylight hours and an opportunity to stay longer and enjoy the beach. Second, the four hour limit would restrict public beach use to four hours. Since Venice beach is visited by people from all over the state and country, which may require traveling long distances to get to the beach, many of the visitors may desire to spend more than four hours to enjoy the many activities offered along the beach. Furthermore, the loss of the opportunity to park for more than four hours in this area may force beach visitors to other beaches and neighborhoods overloading those beaches and facilities.

In filing this appeal the Executive Director's concern is based on the parking restriction in terms of limiting the public's time that they can park and access the beach area and its inconsistency with the public access policies of the Coastal Act. The streets within the district support a wide variety of beach visitors and passive recreational users, including pedestrians, skaters, bicyclists, sunbathers, swimmers, and surfers who utilize the public streets for beach and recreational access. By limiting the length of stay to 4 hours or restricting the availability to the public to only 6:00 PM, which is before sunset during the summer months, will impact the public's ability to find adequate parking for beach and recreational use.

Therefore, staff recommends that the Commission find that a substantial issue exists with the approval of Local Coastal Development Permit 94-02 on the grounds that it does not conform to the access policies of the Coastal Act regarding the protection of public parking for coastal access. The findings and information necessary for the de novo hearing are contained in the following section.

VII. STAFF RECOMMENDATION ON THE DE NOVO HEARING

Staff recommends that the Commission adopt the following resolution:

Denial

The Commission hereby denies a permit for the proposed development on the grounds that it does not conform to the City of Long Beach certified Local Coastal Program, is located between the first public road paralleling the sea and is not in conformance with the public access and recreation policies contained in the Coastal Act, and would have adverse impacts on the environment within the meaning of the California Environmental Quality Act.

VIII. FINDINGS AND DECLARATIONS FOR DE NOVO HEARING

The Commission finds and declares as follows:

A. Project Description

The proposed project involves the establishment of a preferential parking district. The district would restrict parking on public streets within the residential portions of the district. Only residents within the district would be allowed to obtain permits (the permits would be available for a fee) which exempt them from the district's parking restrictions. The City has developed five different parking restriction options for the district. Each option allows the public a minimum of 4 hours of parking throughout the day. The City will allow each block within the district to choose among the five options. The five options are as follows:

- 1) 4-hour parking 8:00 AM to 6:00 PM, Monday through Friday; vehicles with district no. 33 permits exempted.
- 2) 4-hour parking 8:00 AM to 6:00 PM, Daily; vehicles with district no. 33 permits exempted.
- 3) No parking 6:00 PM to 8:00 AM, Nightly; 4-hour parking 8:00 AM to 6:00 PM, Monday through Friday; vehicles with district no. 33 permits exempted.
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- 5) No parking 6:00 PM to 8:00 AM, nightly; vehicles with District no. 33 permits exempted.

The proposed district is within a mixed residential area, consisting of single and multiple-family dwellings, and the Abbott Kinney and Main Street commercial area in the Venice area of the City of Los Angeles. The proposed district is comprised of approximately 20 streets traveling in both east-west and north-south directions. The district is bounded by the centerline of the following streets: Brooks Avenue on the north, Electric Avenue on the northeast, North Venice Boulevard on the south, Mildred Avenue, Pacific Avenue, Windward Avenue, and Main Street on the west (see Exhibit No. 1 and 2).

The western edge of the district is located 1 1/2 to 2 1/2 blocks from Ocean

Front Walk and beach. Ocean Front Front Walk is a paved 20-30 foot wide concrete and asphalt walkway that parallels the beach and is adjacent to and seaward of the western edge of Venice's residential and commercial development. The approximately one mile stretch between North Venice Boulevard to the south to approximately the Venice/Santa Monica City boundary to the north is a popular visitor serving destination. The Venice Ocean Front Walk attracts local, regional, national and international visitors during the week and weekends and is heavily attended during the summer weekends. Ocean Front Walk provides a mix of restaurants, retail stores and street vendors, that set-up temporary booths, offering a large range of retail goods and food. Bike and skate rentals are also available. In addition to the retail shops and restaurants, Ocean Front Walk offers outdoor basketball courts, a weight lifting area, and paddle board courts. The Venice promenade also attracts many street performers that perform along the walkway.

B. State Wide Commission Permit Action on Preferential Parking Programs and Other Parking Prohibition Measures.

The Commission has had before them a number of preferential parking programs state wide. The Commission has approved all of the programs except for one. While the approved programs regulated public parking they did not prohibit all public parking in favor of exclusive residential use. Because the programs were designed or conditioned by the Commission to preserve adequate public parking, the Commission found the programs consistent with the access policies of the Coastal Act.

All programs attempted to resolve a conflict between residents and coastal visitors over on-street parking. The Commission approved the programs only when the Commission could find a balance between the parking needs of the residents and the general public without adversely impacting public access. For example, in permit #P-79-295 (City of Santa Cruz) and #5-82-251 (City of Hermosa Beach) preferential parking was approved with mitigation offered by the City or as conditions of approval that were required by the Commission to make available day use permits to the general public, remote parking and a shuttle system. In #3-83-209 (City of Santa Cruz) because of a lack of on-site parking for the residents within a heavily used visitor serving area and adequate nearby public parking the Commission approved the project to balance the needs of the residents with the general public without adversely impacting public access to the area. In #3-87-42 (City of Capitola) the Commission approved the program for the visitor serving area (the Village) because it did not exclude the general public from parking in the Village but only limited the amount of time (2-hours) a vehicle could park and the City provided additional long-term parking nearby and within walking distance of the beach. However, preferential parking in the Neighborhood district, located in the upland area, was, for the most part, not approved since it excluded the general public from parking. The only area within the Neighborhood district that was approved with parking restrictions was those areas immediately adjacent to vista points. In these areas the Commission allowed the City to limit public parking to two-hour time limits.

In August 1997, the Commission approved Coastal Development Permit 5-96-059 for a preferential parking district in the City of Santa Monica. In that case, the Commission found that the proposed restrictions on public on-street parking could be approved because the streets were not heavily used by the general public for beach access. The streets were heavily used by people using the nearby stairs for exercise. Furthermore, the streets did not provide

a direct route to the beach and the hours of the parking restrictions were limited to evening and night hours (6 p.m.- 8 a.m.) so that the area could still be used during the day for coastal access parking.

Just recently, at the October 1997 hearing, the Commission denied a permit on appeal (#A-5-LOB-97-259) for a preferential parking district with a one-hour public parking limit next to a popular beach in the City of Long Beach. The Commission denied the project on procedural grounds but also found that the proposed one-hour parking limit would adversely impact the public's ability to access the beach.

Where a balance between residents and the general public could not be found and parking restrictions would adversely impact public access opportunities the Commission has denied the preferential parking programs, as in the case of #5-90-989 (City of Los Angeles) and appeal #A-5-LOB-97-259. If proposed parking prohibition measures can be proposed or conditioned so that private property owner concerns can be balanced with coastal access opportunities, where impacts to public access is minimized, the Commission may find such proposals consistent with the public access policies of the Coastal Act.

C. Public Access and Recreation

Pursuant to Section 30106 of the Coastal Act development includes a change in kind or intensity of use of land and changes in intensity of use of access to water. In this instance the change in intensity of use of land is converting the on-street parking spaces from public spaces to residential spaces-- a change in use from a public use, to a private residential use, which in this instance is located on public property. A change in intensity of use of access to the water will also result from the creation of a preferential parking district by limiting the amount of time one can park on the public street and restricting public parking to 6:00 PM. Furthermore, placement of the parking signs advising of the district also constitutes development.

One of the strongest goals of the Coastal Act is to protect, provide and enhance public access to and along the coast. The establishment of a residential parking zone within walking distance of a public beach or other recreational areas will significantly reduce public access opportunities.

Several Coastal Act policies require the Commission to protect beach and recreation access:

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212.5 of the Coastal Act states:

Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, or overcrowding or overuse by the public of any single area.

Section 30213 of the Coastal Act states in part:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30214 of the Coastal Act states:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

(b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.

(c) In carrying out the public access policies of this article, the commission, regional commissions, and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.

Section 30223:

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

In preliminary studies that led to the adoption of the Coastal Act, the Commission and the Legislature reviewed evidence that land uses directly adjacent to the beach were required to be regulated to protect access and recreation opportunities. These sections of the Coastal Act provide that the priority of new development near beach areas shall be given to uses that provide support for beach recreation. The Commission has required the dedication of trails in upland and mountainous areas near the beach to provide coastal viewing and alternatives to the beach for jogging, strolling and cycling. Furthermore, the Commission has consistently addressed both public and private parking issues in order to protect the ability of beach visitors who depend on the automobile to access the beach.

The City, in approving the proposed parking district found that the proposed hours are a compromise between the public and private right to park on City streets. The City's staff report states that:

....There is parking available along the beach and adjacent to the proposed parking district. There are also at least five parking lots within 2-6 blocks of the beach (two within the proposed district boundary). The proposed parking district will allow for 4 hour parking by the public. Those individuals wanting to remain beyond the 4 hour time limit will be encouraged to go to a nearby parking facility or take public transportation...

The proposed parking district is adjacent to one of southern California's most popular and famous beaches--Venice Beach. According to the City's figures approximately 5 million people visit the Venice beach area during the summer. Although the beach is an attraction in and by itself, the biggest draw is the one mile stretch of Ocean Front Walk. Because of the areas popularity parking and traffic on the surrounding streets are significantly impacted during summer weekends.

A traffic and parking study for the Venice coastal zone has been submitted. The study was prepared for the City of Los Angeles, in April 1995, by Kaku Associates, Inc., a traffic and parking consultant. The study included a parking space inventory, parking utilization survey and a parking user survey for the Venice area. For purposes of the study the study area which was defined as the costal zone was divided into twenty zones. Zones 12 and 13 roughly correspond to the boundaries of the proposed parking district (see Map, Exhibit no. 6).

The study indicates that within the Venice Coastal zone there are approximately 11,486 on-street public parking spaces and 2,555 off-street public parking spaces for a total of 14,041 parking spaces available for general public use. Of this total, the City estimates that there are approximately 1,460 on-street public parking spaces within the boundaries of the proposed parking district.

Focusing on the area immediately surrounding the visitor serving one mile stretch of Ocean Front Walk (zones 1,2,3,4,11,12 and 13. See Exhibit no. 6), which includes the proposed parking district, there are a total of approximately 4,096 parking spaces available for general public use. Of this total there are approximately 2,546 on-street spaces and 1,550 off-street spaces. The proposed parking district provides approximately 35% of the total parking spaces available to the general public within the immediate area of the boardwalk and 83% of the on-street spaces.

Within the proposed district the peak on-street utilization rate for the summer weekends surveyed was at 97% (see Exhibit No. 8). The area surrounding the district (zones 1, 2, 3, 4, and 11) showed an on-street utilization rate ranging between 84% to 102% (exceeds 100% due to some vehicles parking in front of driveways) during the weekends. As can be seen by the utilization rates the streets are heavily used. However, it should be noted that the study also shows that during the early morning (8-9AM) the utilization rate for the district and surrounding areas range between 69% and 85%. The study suggests that the early morning high rate indicates that the amount of existing residential parking is not adequate to satisfy the demand generated by the existing uses within the area.

Based on the study it is evident that the parking in the area is heavily impacted. However, although beach parking contributes to the parking problems in the area it is also evident that the existing uses, such as retail, commercial and residential uses that are within and surrounding the district, contribute to the overall parking problem.

The parking problem in the area surrounding the Venice Beach and Boardwalk is not a recent occurrence. Venice, which was developed in the 1920's when the Pacific Electric Railway was the primary means of transportation, has experienced parking problems prior to the enactment of the Coastal Act. In the 1960's residents and commercial establishments depended on the many vacant lots in the area for off-street parking. Through the years the parking problem has been exacerbated due to lack of sufficient off-street parking for the older structures that were built during a time that required little or no off-street parking, garages converted to additional dwelling units, and increased development.

Recent commercial development along Abbott Kinney Boulevard has also contributed to the parking problems along the eastern boundary of the proposed parking district. Abbott Kinney Boulevard is located near and runs parallel to the eastern boundary of the proposed parking district. Abbott Kinney Boulevard was once an older neighborhood commercial strip with a mix of residential development that was developed back in the 40's. The businesses along the Boulevard began to decline over the years and have not generated a significant amount of traffic to the area. Recently, however, the Boulevard has been experiencing a revitalization with new trendy shops replacing the older shops. Since these older, less popular, shops had little or no off-street parking and depended on the limited on-street parking along Abbott Kinney Boulevard, the larger crowds attracted by the new establishments overflow into the surrounding residential streets as parking is taken up along Abbott Kinney Boulevard. Further, since parking on Abbott Kinney Boulevard is limited to 1-hour, employees of these new establishments park within the residential areas for long term parking.

Furthermore, residential development between Ocean Front Walk and Pacific Avenue is so dense with inadequate off-street parking and limited on-street parking that residents park along Main Street and along the streets of the proposed district. A number of the multiple-family residential structures in this area are converted hotels that were built during the time of the operation of the railway. As they converted to residential structures tenants began to use on-street parking which compounds the parking problems in the area.

In 1983 the Commission certified an LCP with modifications for the Canals/Marina Peninsula area of Venice (the City never adopted the

modifications and the approval lapsed). In certifying the LCP the Commission found that existing development discourages beach use because it creates severe traffic congestion and residents use up almost all of the available on-street parking. Furthermore, in approving a permit [5-90-664 (City of Los Angeles)] for road improvements along Venice Boulevard, the Commission found that the existing on-street parking was important for public beach access and required as a condition of the permit that all existing parking be replaced once the road improvements were completed. A number of those protected spaces were located within the district boundaries on the north side of Venice Boulevard.

Because of the popularity of Venice Beach and Ocean Front Walk the limited amount of off-street beach parking within the beach parking lots is not adequate to support the amount of visitors that come to the area. The parking survey indicates that the utilization rate for the beach lots range between 66% to 128% during peak period (see Exhibit no. 9). Visitors that know the area avoid the beach traffic and parking fees charged for the beach lots and park on the nearby residential streets. Once parking within the beach lots reaches capacity during busy weekend days people that are turned away from the beach lots look for alternate parking on the streets within the nearby neighborhoods. People also park on the neighborhood streets because the parking is within easy walking distance from Venice Beach and Ocean Front Walk. Because of the large number of visitors to Venice and the crowding of the beach lots during summer months, the City also operates a number of inland lots throughout the Venice area to help alleviate the parking and traffic problems along the beach.

The proposed restriction on the amount of time a vehicle can park on the street and limiting the time to no later than 6:00 PM will negatively impact the public's ability to access the beach and recreational opportunities in the area. During the summer months when sunset typically occurs around 8:00 PM, a large number of beachgoers and visitors to Ocean Front Walk stay later into the evening due to the longer daylight hours and warmer evening temperatures. By restricting public parking to 6:00 PM the public will not be allowed to park on the public streets within the district. Furthermore, because of the number of visitors and limited amount of off-street parking the on-street parking surrounding Venice Beach and Boardwalk supplements the off-street beach parking within the pay lots.

People visiting Venice Beach come from all over the Los Angeles area, the state and country, with many visitors traveling long distances to reach the beach. Because of the long distances traveled people may stay the entire day. Moreover, since Venice Beach offers numerous recreational facilities and amenities people may tend to spend more time at Venice Beach as opposed to other beaches with less visitor-serving attractions.

The City's parking study included a parking user survey that was conducted Saturday, August 18, 1990. The user survey was taken throughout various areas of the study area. According to the study a total of 1,329 individuals were surveyed within the Venice Beach Impact Zone. According to the survey 67% of the people surveyed estimated that their length of stay in the area is between 15 minutes to 4 hours. Thirty-three percent stayed from 4 hours to over 8 hours.

The survey does not support a four-hour time limit for street parking for this area. First, the survey was taken on only one weekend day during the summer,

and that was over seven years ago. Second, the survey did not distinguish between people parking within the proposed district and other areas of Venice. The survey was a general survey for a larger area and did not focus on the people that parked within the district boundaries. The user survey does not support the conclusion that those people parking on the street within the district park less than four hours. Furthermore, according to the parking survey, the peak period for on-street parking within the proposed district boundaries occurs between 2:00 PM and 5:00 PM. Visitors that park on the street in the district in the late afternoon will be forced to leave by 6:00 due to the parking restriction, and this may possibly shorten their stay at the beach.

Because of Venice's shortage of public beach parking, restricting the hours available to the public along the neighborhood streets will exacerbate the parking problems in other surrounding neighborhoods by forcing those that want to park and stay at the beach longer than four-hours onto other streets outside of the parking district. Once the traffic and parking congestion move into other neighborhoods there will be requests for the establishment of additional preferential parking districts. Such an effect will cumulatively adversely impact access to the beach and coastal recreational areas in this area by reducing the amount of public parking. Furthermore, the City is not proposing to mitigate the loss of this all day parking supply with the provision of additional public parking. The Commission, therefore, finds that the proposed project is inconsistent with Sections 30210, 30211, and 30213 of the Coastal Act and is denied.

D. Local Coastal Program

Section 30604(a) of the Coastal Act states that:

Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).

The City of Los Angeles has prepared a draft Land Use Plan for this planning subarea. the City's draft Local Coastal Program considers on-street public beach parking spaces as an issue for this area of the City. The proposed development will adversely impact the available supply of public parking for the area and will adversely impact coastal access. The Commission, therefore, finds that the project, as proposed, will not be consistent with the Chapter 3 policies of the Coastal Act and will prejudice the ability of the City to prepare a certifiable Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

E. California Environmental Quality Act.

Section 13096 of the Commission's administrative regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of

approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

The City did not analyze or mitigate for the potential impacts the parking restrictions could have on the surrounding areas of Venice, including the walkstreets, commercial areas, and other residential areas. Without such an analysis a finding can not be made that this proposed project is the most feasible alternative and will not significantly adversely impact the surrounding area.

The proposed project is not consistent with the applicable policies of the Coastal Act. There are feasible alternatives or mitigation measures available, such as providing nearby replacement parking, which would substantially lessen any significant adverse impact which the activity may have on the environment. The proposed project is found not consistent with CEQA and the policies of the Coastal Act. Therefore, the project is denied.

0051G

LOS ANGELES CO.

49

SEE MAP

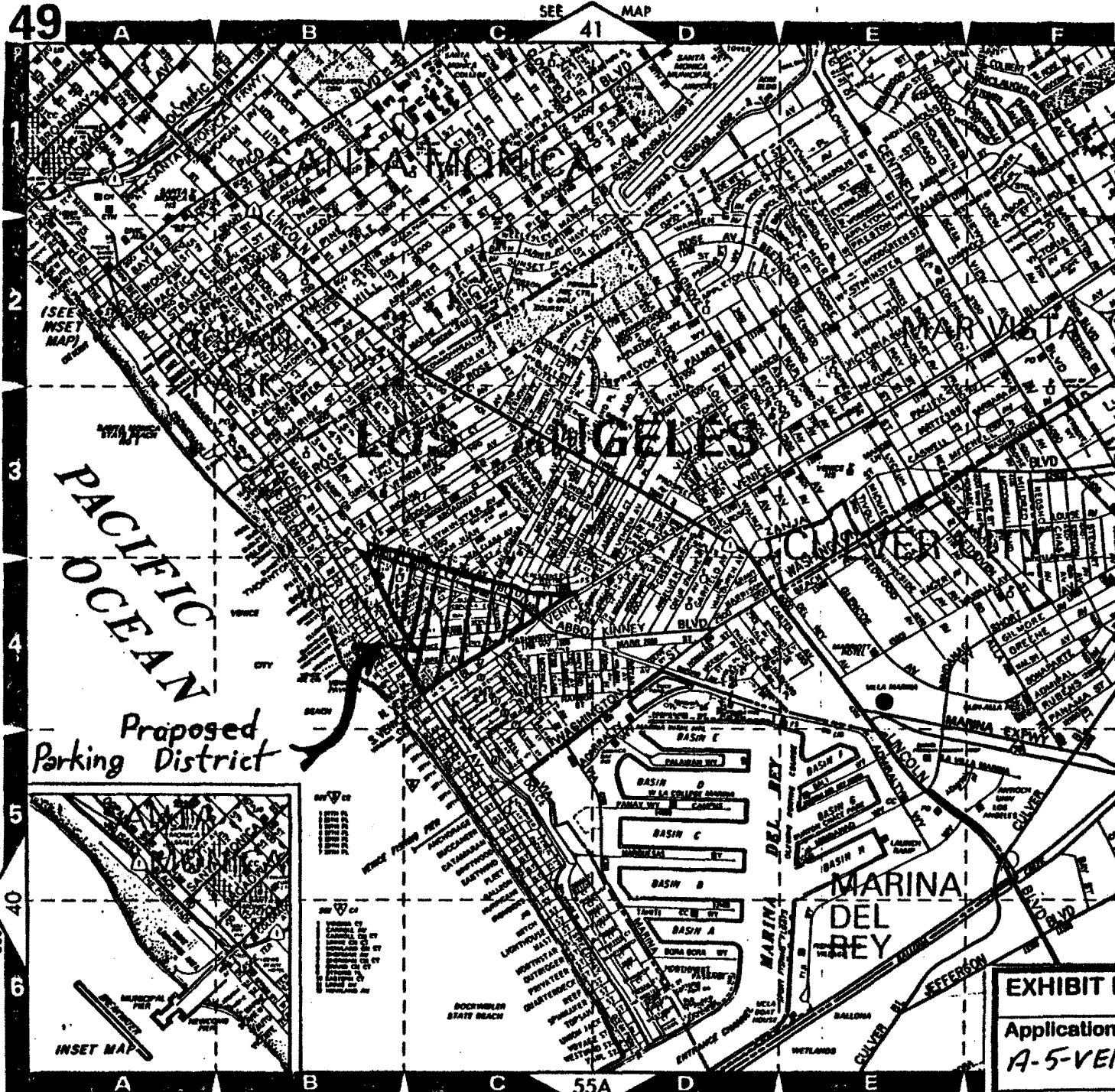
41

DETAIL

SEE MAP

Proposed
Parking District

INSET MAP



SEE MAP

55A

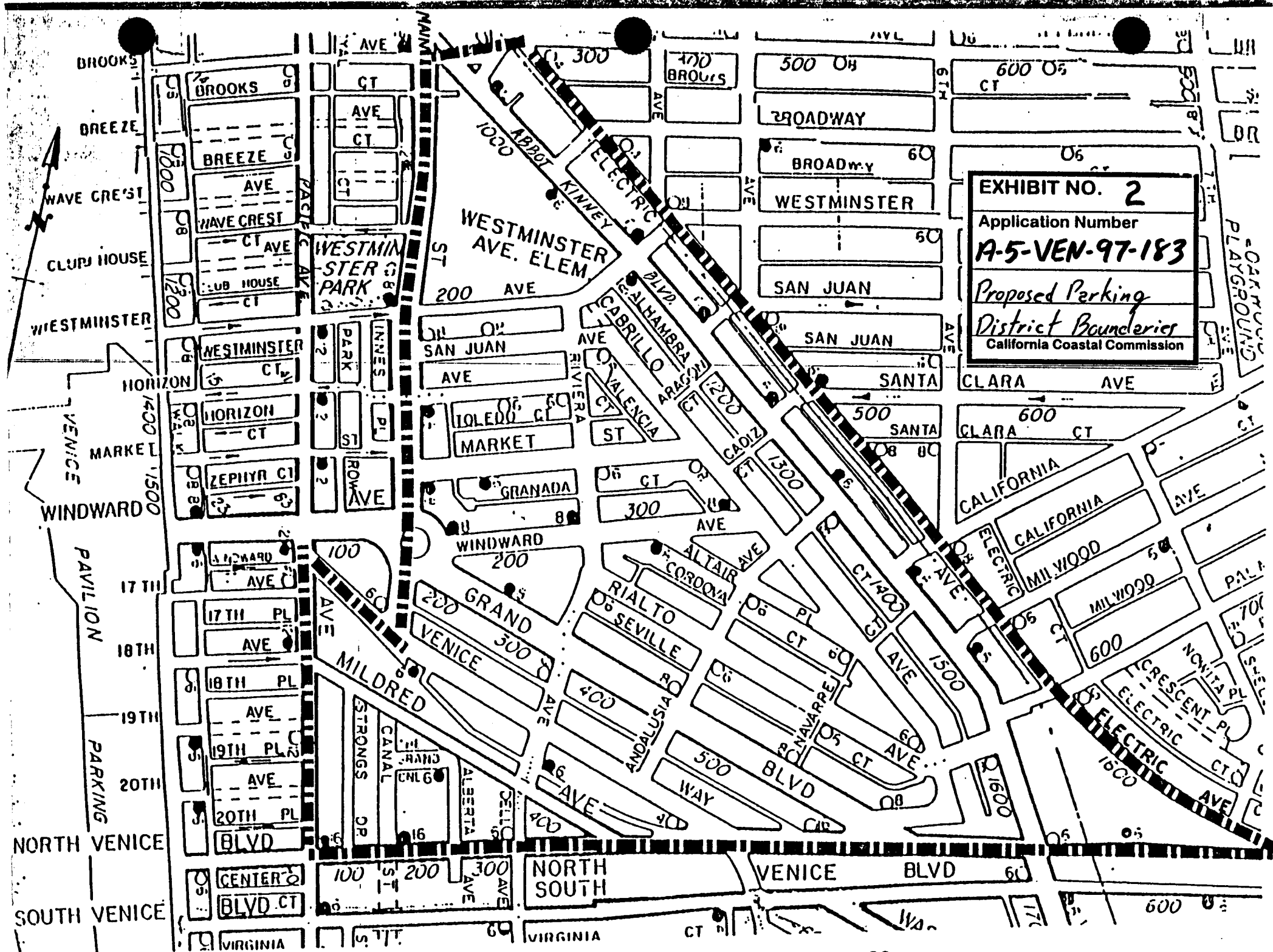
EXHIBIT NO. 1

Application Number

A-5-VEN-97-183

Vicinity Map

California Coastal Commission



Sat. Aug. 2, 1997
Venice, Calif.

An Appeal To:

California Coastal Commission

Appellant:

Hans Jacob Fossedahl

542 Rialto Ave. #5

Venice, Calif. 90291

Rece	EXHIBIT NO. 3
	APPLICATION NO.
	A-5-VEN-97-183
	Appeal Letter from
From:	Mr. Fossedahl
	California Coastal Commission

pg 1

Honorable Members:

This letter is my appeal regarding the preferential parking permit decision by the City of Los Angeles; Department of Transportation's appeal number A-5-VEN-97-183 to this Commission.

The City of Los Angeles; Bureau of Engineering has offered the residents of my neighborhood in Venice 5 preferential parking options. The first 4 options would allow 4 hour public parking and option 5 limits nightly parking from 6PM to 8AM.

The goal of preferential permits is to improve parking conditions for neighborhood residents. Unfortunately none of the above options offer parking improvements. Unlike other areas of the City which experience daily parking problems, congestion in our neighborhood is seasonal. The worst congestion is in the summer, during the weekends, from motorists visiting the beach. The rest of the year parking congestion sharply declines, except for occasional weekends. Restricted nightly parking from 6PM until 8AM would offer no change because only residents park there at night since beach-goers do not visit the beach at night.

Since the worst parking problems happen on summer weekends I would like to ask the City of Los Angeles look into other possible solutions such as:

- 1) The use of vacant City land for overflow parking.
- 2) The opening of more school yard playgrounds like the Westminster Elementary School is already doing.
- 3) More shuttle bus service to the beach from parking lots.
- 4) And especially for the residents of my neighborhood the City might examine the option of parallel parking. The 3 blocks on Grand Ave. from Cabrillo Ave. to the Post Office Circle the street is wide enough for parallel parking. Riviera Ave., Market St., and Rialto Ave. are wide enough to use parallel parking on one side of these streets.

I believe that these ideas and other ideas offered by the City Department of Transportation would relieve parking congestion in our neighborhood and parallel parking would make it easier for the residents to park at night.

Therefore I appeal to this Commission to deny the appeal of the City of Los Angeles: Department of Transportation until the Department may find solutions to this parking problem by examining options which would benefit residents and visitors.

The present preferential parking permit options offer no solutions.

Sincerely,

Hans Jacob Fossedahl

Hans Jacob Fossedahl

pg 2

EXHIBIT NO.

APPLICATION NO.



California Coastal Commission

Francine Dorsey
417 Rialto Avenue
Venice, California
90291
August 12, 1997

Received at Commission
Meeting

AUG 11 1997

From: _____

This document which I am submitting to the Coastal Commission for consideration at their August 12, 1997 meeting is the same one I submitted to appeal the decision to adopt preferential parking for District 33. It states my unchanged position.

ATTACHMENT TO APPEAL FROM COASTAL DEVELOPMENT PERMIT ACTION

II. GROUND'S FOR APPEAL

On the SUMMARY OF PROVISIONS OF PREFERENTIAL PARKING DISTRICT 33, the projected allowed restrictions Numbers 1 through 4 will in reality offer no solution to the parking problems in the district. Unless a resident who is returning home in a vehicle arrives when a parking place is being vacated, there will be no more residential parking opportunity than exists without the restrictions. On busy beach days, there is a steady stream of slow moving vehicles searching for parking. One will leave, another will take it's place. In reality, most people seeking to park are not headed for the sand and sea. They come to promenade on Ocean Front Walk. In that they do not avail themselves of the cooling ocean, I make the assumption that four hours of walking in the hot sun is enough for most of the visitors. So most of them would be gone in that amount of time anyway.

Projected restriction Number 5 will prevent the valet parking that occurs along Cabrillo, and eliminate the problem of motor homes and other vehicles taking up residence around the Post Office facility bordered by Windward, Riviera, Grand, and the Traffic Circle. At this time, those are problems isolated in those two areas. To adopt that restriction provides the rest of us with no benefit. In fact all five projections offer little or no advantage to the neighborhood. What it does provide is a tax to park in our own district, and a penalty for inviting guests to one's home. Not only will we have to pay \$1 per visiting vehicle before we ever begin to pay for food, drink, and other costs of entertaining; but if we haven't planned far enough in advance to arrange for visitor parking by mail, we will have to find the time to drive miles to collect the temporary passes. This most certainly seriously curtails the possibility of spontaneously deciding to have friends over.

In addition, any block rejecting the restrictions when others have them, would be subject to the overflow from the restricted blocks. We are damned if we do, and damned if we don't, but mostly better off WITHOUT the preferential parking restrictions offered to the district at this time.

I do have empathy for those who are more impacted than myself. However, I also have more than a little concern for those citizens coming for recreation into my neighborhood. We have all made the decision to live here knowing that those masses of people will regularly make their way in our direction for recreation and relief from the heat of the city. Rather than looking for more places to park for them, couldn't a better solution be found in making public transportation more attractive. Free bus access during peak summer weekends would take a lot of cars off the streets, and in addition to offering a transportation alternative would be environmentally beneficial.

II. STATEMENT OF FACT

pg 1

EXHIBIT NO. 4
APPLICATION NO. 17-5-VEN-97-183
Appeal Letter from Ms. Dorsey
California Coastal Commission

The possible restrictions available for parking within District 33 as indicated in the SUMMARY OF PROVISIONS OF PREFERENTIAL PARKING DISTRICT 33 in keeping within the confines of Coastal Commission requirements do not offer a viable solution to the neighborhoods parking problems.

Attachment to appeal from coastal development permit action.
Francine Dorsey
417 Rialto Ave
Venice, CA, 90291

III. SUMMARY OF ISSUES

Numbers One through Four of the projected potential restrictions listed in the SUMMARY OF PROVISIONS OF PREFERENTIAL PARKING - DISTRICT 33 which are within the limits allowed under California Coastal Commission do not offer a solution to District 33 parking problems, because the steady stream of drivers seeking parking on hot days would fill empty places the minute they became available after the four allowed hours. There would still be no place for residents to park.

In most areas of the district, parking after 6 PM is no problem all year round, so potential restriction Number Five provides no benefit to residents while restricting their ability to have guests.

Under all five restrictions, the attendant Parking Permit Costs present an added financial burden while offering no benefit to most District 33 residents, and very little, if any, deterrent to the visiting public seeking places to park their vehicles.

Finally, the district lies within a publicly favored natural recreational area which all residents knew when they decided to live in District 33. Preferential parking for residents does nothing to provide more parking for the public which is a dire need in the area. However the provision of actually adequate parking facilities would compound already severe traffic problems.

Considering that there is very little benefit, and some penalty, District 33 would be better off with no preferential parking restrictions.

However, if a real solution to my own parking problems and preferences were to be considered without regard to non resident needs, I would request for preferential parking at all times for permit holders only. That would insure a place to leave our cars when we come home, prevent the restaurants from sending their valet parking staffs to park their customers vehicles in our residential neighborhood, and eliminate the people living in vehicles along our streets (many of whom tend to pee out their doorways onto the sidewalks - a severe public health problem - just try breathing as you are walking by when the sunlight hits one of those random latrines).

pg 2
EXHIBIT NO.
APPLICATION NO.

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

State briefly your reasons for this appeal. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)

Permit parking blocks Coastal Access for users
of the public beach, and to visit my friends
who live in Windward Ave. neighborhood. Coastal
access is a right of all citizens, not just a few
rich people who've lobbied City hall for this special-
interest giveaway of public streets.

Note: The above description need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.

Alex Frenkel
Signature of Appellant(s) or
Authorized Agent

Date 6/26/97

NOTE: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby authorize _____ to act as my/our
agent and to bind me/us in all matters concerning this

EXHIBIT NO. 5

Application Number

A-5-VEN-97-183

Appeal From

Mr. Frenkel

California Coastal Commission

Signature of Appellant(s)

Date _____

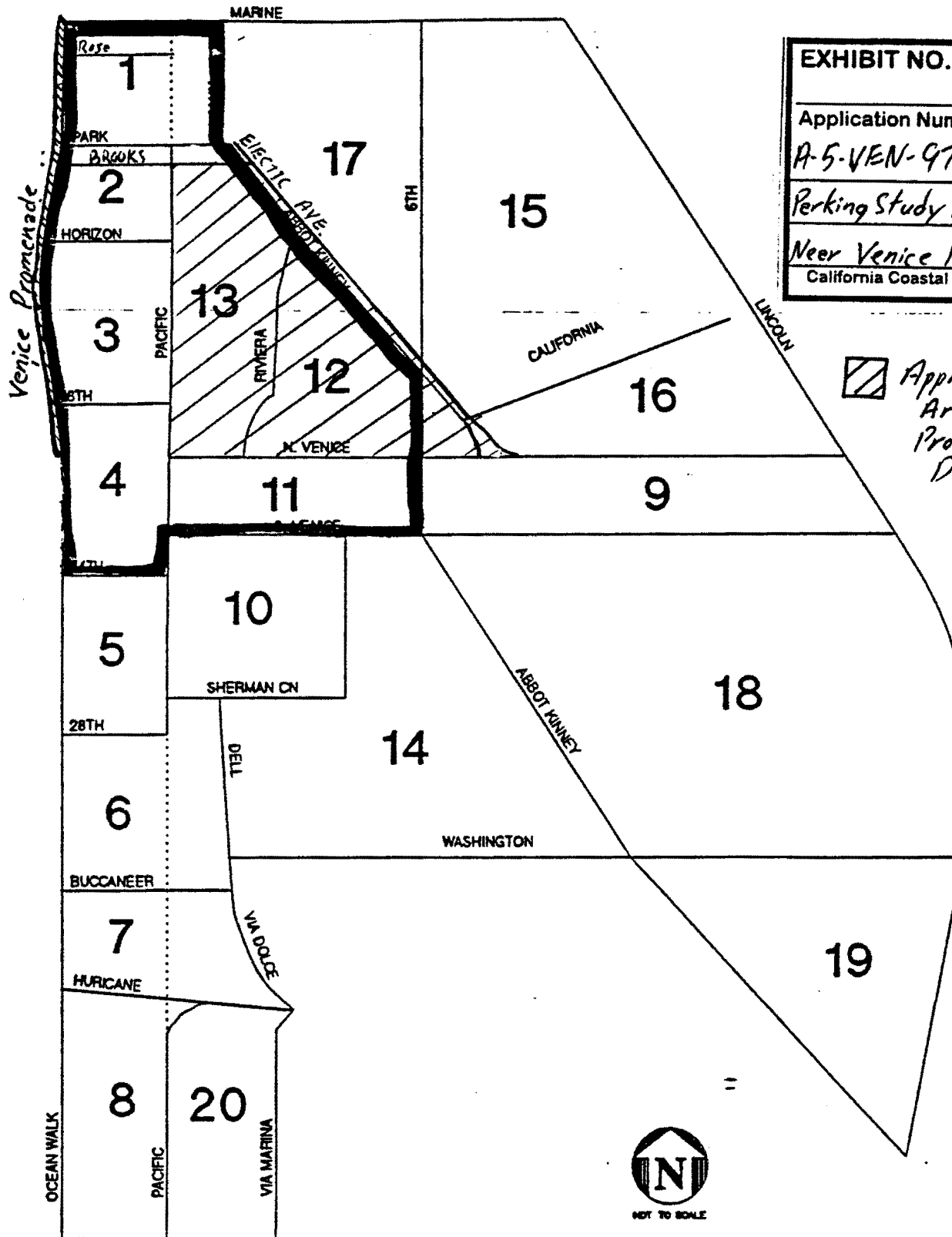


EXHIBIT NO.	6
Application Number	A-5-VEN-97-183
Parking Study Subareas	Neer Venice Promenade
California Coastal Commission	

Approximate Area of Proposed Parking District



K&K ASSOCIATES

FIGURE 5
PARKING ANALYSIS ZONES

From Venice Traffic and Parking Study, April 1995

**TABLE 10
TOTAL WEEKEND PARKING UTILIZATION (SUMMER 1991)
EXPANDED BEACH IMPACT ZONE**

ZONE	CAPA- CITY *	NUMBER AND PERCENT OF SPACES OCCUPIED																PEAK								
		8-9am		9-10am		10-11am		11-12pm		12-1pm		1-2pm		2-3pm		3-4pm					4-5pm		5-6pm		6-7pm	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	TIME
1	1,371	390	28%	434	32%	613	45%	678	50%	749	55%	858	63%	1013	74%	1041	76%	971	71%	800	58%	708	51%	1041	76%	3-4
2	301	151	50%	168	56%	180	60%	200	66%	217	72%	219	73%	228	76%	228	75%	220	73%	204	68%	187	62%	228	76%	2-3
3	485	118	24%	149	31%	175	36%	237	49%	344	71%	432	89%	489	101%	465	96%	435	90%	414	85%	340	70%	489	101%	2-3
4	548	199	36%	286	52%	372	68%	507	93%	508	93%	547	100%	530	97%	531	97%	479	87%	371	68%	282	51%	547	100%	1-2
5	43	38	91%	40	93%	38	88%	44	102%	40	93%	43	100%	42	98%	41	95%	38	91%	38	88%	38	88%	44	102%	11-12
6	1,108	198	18%	207	19%	321	29%	400	36%	518	47%	600	54%	652	59%	668	60%	620	56%	523	47%	423	38%	668	60%	3-4
7	288	208	72%	210	73%	228	79%	241	83%	252	87%	272	94%	277	96%	275	95%	261	90%	241	83%	224	78%	277	96%	2-3
8	264	138	52%	159	60%	193	73%	199	75%	221	84%	241	91%	248	94%	242	92%	224	85%	206	78%	205	78%	248	94%	2-3
9	138	18	14%	15	11%	20	14%	22	16%	33	24%	40	29%	45	33%	35	26%	37	27%	25	18%	19	14%	45	33%	2-3
10	131	133	102%	37	28%	138	105%	129	98%	145	111%	145	111%	152	116%	177	135%	160	122%	143	109%	128	98%	177	135%	3-4
11	371	68	18%	77	21%	94	25%	138	37%	237	64%	357	96%	398	107%	387	104%	317	85%	257	69%	182	49%	398	107%	2-3
12	890	620	70%	636	71%	632	71%	658	74%	729	82%	824	93%	844	95%	858	96%	800	90%	618	69%	726	82%	890	97%	4-5
13	1,052	623	59%	652	62%	718	68%	825	78%	918	87%	950	90%	968	92%	966	92%	954	91%	908	86%	853	81%	968	92%	2-3
TOTAL	6,981	2,900	41%	3,068	44%	3,723	53%	4,280	61%	4,912	70%	5,528	79%	5,885	84%	5,912	85%	5,577	80%	4,948	71%	4,313	62%	5,912	85%	3-4

* Available capacity differs from inventory total shown in Table 9 since some private lots were not open during survey.

EXHIBIT NO. 7
Application Number A-5-VEN-97-183
Total Weekend Parking Demand
California Coastal Commission

Zones 1, 2, 3, 4, 11 - located Immediately adjacent to Parking District and Beach/Promenade

Zones 12, 13 - Roughly Correspond to Boundaries of Proposed Parking District

From Venice Traffic and Parking Study, April 1995

**TABLE 11
ON-STREET WEEKEND PARKING UTILIZATION (SUMMER 1991)
EXPANDED BEACH IMPACT ZONE**

ZONE	CAP	NUMBER AND PERCENT OF SPACES OCCUPIED												PEAK													
		8-9am		9-10am		10-11am		11-12pm		12-1pm		1-2pm					2-3pm		3-4pm		4-5pm		5-6pm		6-7pm		
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	TIME	
34	1	311	229	74%	239	77%	256	82%	249	80%	269	86%	266	86%	284	91%	278	89%	267	86%	267	86%	266	82%	284	91%	2-3
	2	84	71	85%	77	92%	83	99%	85	101%	85	101%	86	101%	84	100%	84	100%	84	100%	82	98%	84	100%	85	101%	11-2
	3	116	87	76%	110	96%	110	96%	113	98%	116	100%	116	100%	114	99%	111	97%	110	96%	104	90%	109	95%	116	100%	12-2
	4	120	93	78%	100	83%	118	98%	123	102%	114	95%	118	98%	117	98%	118	98%	113	94%	109	91%	112	93%	123	102%	11-12
34	5	43	39	91%	40	93%	38	88%	44	102%	40	93%	43	100%	42	98%	41	95%	39	91%	38	88%	38	88%	44	102%	11-12
	6	336	184	49%	155	46%	238	71%	290	86%	316	94%	329	98%	322	96%	331	99%	312	93%	300	89%	281	84%	331	99%	3-4
	7	289	208	72%	210	73%	229	79%	241	83%	252	87%	272	94%	277	96%	275	95%	291	90%	241	83%	224	78%	277	96%	2-3
	8	204	124	61%	142	70%	150	74%	168	82%	178	86%	184	90%	189	93%	182	89%	165	81%	154	75%	148	72%	189	93%	2-3
	9	108	16	15%	12	11%	16	14%	16	15%	22	20%	25	23%	25	23%	24	22%	22	20%	17	16%	18	17%	25	23%	1-3
	10	131	133	102%	137	105%	138	105%	129	98%	145	111%	145	111%	152	116%	177	135%	160	122%	143	109%	128	98%	177	135%	3-4
34	11	167	81	37%	88	41%	80	48%	90	54%	98	59%	124	74%	134	80%	140	84%	131	78%	121	72%	103	62%	140	84%	3-4
	12	882	618	70%	633	72%	630	71%	654	74%	725	82%	820	93%	841	95%	854	97%	855	97%	813	92%	722	82%	855	97%	4-5
	13	867	599	69%	609	70%	668	77%	762	88%	828	96%	825	95%	840	97%	829	96%	819	94%	809	93%	757	87%	840	97%	2-3
TOTAL		3,657	2,442	67%	2,532	69%	2,760	76%	2,904	81%	3,185	87%	3,351	92%	3,421	94%	3,444	94%	3,338	91%	3,198	87%	2,978	81%	3,444	94%	3-4

EXHIBIT NO. 8
Application Number A-5-VEN-97-183
ON-Street Parking
Demand
California Coastal Commission

Zones 1, 2, 3, 4, 11 - located Immediately adjacent to Parking District and Beach/Promenade

Zones 12, 13 - Roughly Correspond to Boundaries of Proposed Parking District

From Venice Traffic and Parking Study, April 1995

TABLE 12
OFF-STREET WEEKEND PARKING UTILIZATION (SUMMER 1991)
EXPANDED BEACH IMPACT ZONE

ZONE	CAPA- CITY *	NUMBER AND PERCENT OF SPACES OCCUPIED												PEAK													
		8-9am		9-10am		10-11am		11-12pm		12-1pm		1-2pm					2-3pm		3-4pm		4-5pm		5-6pm		6-7pm		
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	TIME	
1	1,060	161	15%	195	18%	357	34%	430	41%	480	45%	592	56%	729	69%	763	72%	704	66%	533	50%	450	42%	763	72%	3-4	
2	217	80	37%	91	42%	97	45%	115	53%	132	61%	134	62%	144	66%	142	65%	130	63%	122	56%	103	47%	144	66%	2-3	
3	370	29	8%	39	11%	65	18%	124	34%	229	62%	317	86%	375	101%	354	96%	325	88%	310	84%	231	62%	375	101%	2-3	
4	428	106	25%	186	43%	257	60%	384	90%	394	92%	429	100%	413	96%	413	96%	306	86%	262	61%	170	40%	429	100%	1-2	
5	6	772	32	4%	52	7%	83	11%	110	14%	203	26%	271	35%	330	43%	337	44%	308	40%	223	29%	142	18%	337	44%	3-4
	8	60	14	23%	17	28%	43	72%	31	52%	45	75%	57	95%	59	98%	60	100%	59	98%	52	87%	59	98%	60	100%	3-4
	9	30	3	10%	3	10%	5	17%	6	20%	11	37%	15	50%	20	67%	11	37%	15	50%	8	27%	1	3%	20	67%	2-3
11	204	7	3%	9	4%	14	7%	49	24%	139	68%	233	114%	262	128%	247	121%	186	91%	136	67%	79	39%	262	128%	2-3	
12	8	2	25%	2	25%	2	25%	4	50%	4	50%	4	50%	3	38%	4	50%	5	63%	6	75%	4	50%	6	75%	5-6	
13	185	24	13%	43	23%	59	27%	83	34%	90	49%	125	68%	129	70%	137	74%	135	73%	99	54%	66	52%	137	74%	3-4	
TOTAL	3,334	458	14%	637	19%	873	26%	1,316	39%	1,727	52%	2,177	65%	2,464	74%	2,468	74%	2,239	67%	1,751	53%	1,335	40%	2,468	74%	3-4	

NOTE: Zones 5, 7, and 10 have no off-street parking facilities.

* Available capacity differs from inventory total shown in Table 9 since some private lots were not open during survey.

EXHIBIT NO.	9
Application Number	45-VEN-97-183
Off-Street	
Parking District	
California Coastal Commission	

Zones 1, 2, 3, 4, 11 - located Immediately adjacent to Parking District and Beach/Promenade

Zones 12, 13 - Roughly Correspond to Boundaries of Proposed Parking District

From Venice Traffic and Parking Study, April 1995