

May 22, 2024

To: LUPC Chair and Members  
From: Richard Stanger, Member  
Subject: Proposal to Conform with the Policy Direction of the Coastal Commission on Replacement Parking for Garage Conversions within the Venice Coastal Zone

**Issue:**

Legislation over the past few years has allowed the conversion of a garage to an Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU) without the requirement to replace the parking spaces lost in the conversion. The Coastal Act, on the other hand, prioritizes protection of coastal access. Within the state’s coastal zone, the parking lost through garage conversions, therefore, conflicts with the priorities of the Coastal Act. In a memo to coastal zone planning agencies, the Executive Director of the Coastal Commission provided guidance on how to deal with this issue. (Memo dated January 1, 2022 at link below.)

<https://documents.coastal.ca.gov/assets/rflg/ADU-Memo.pdf>

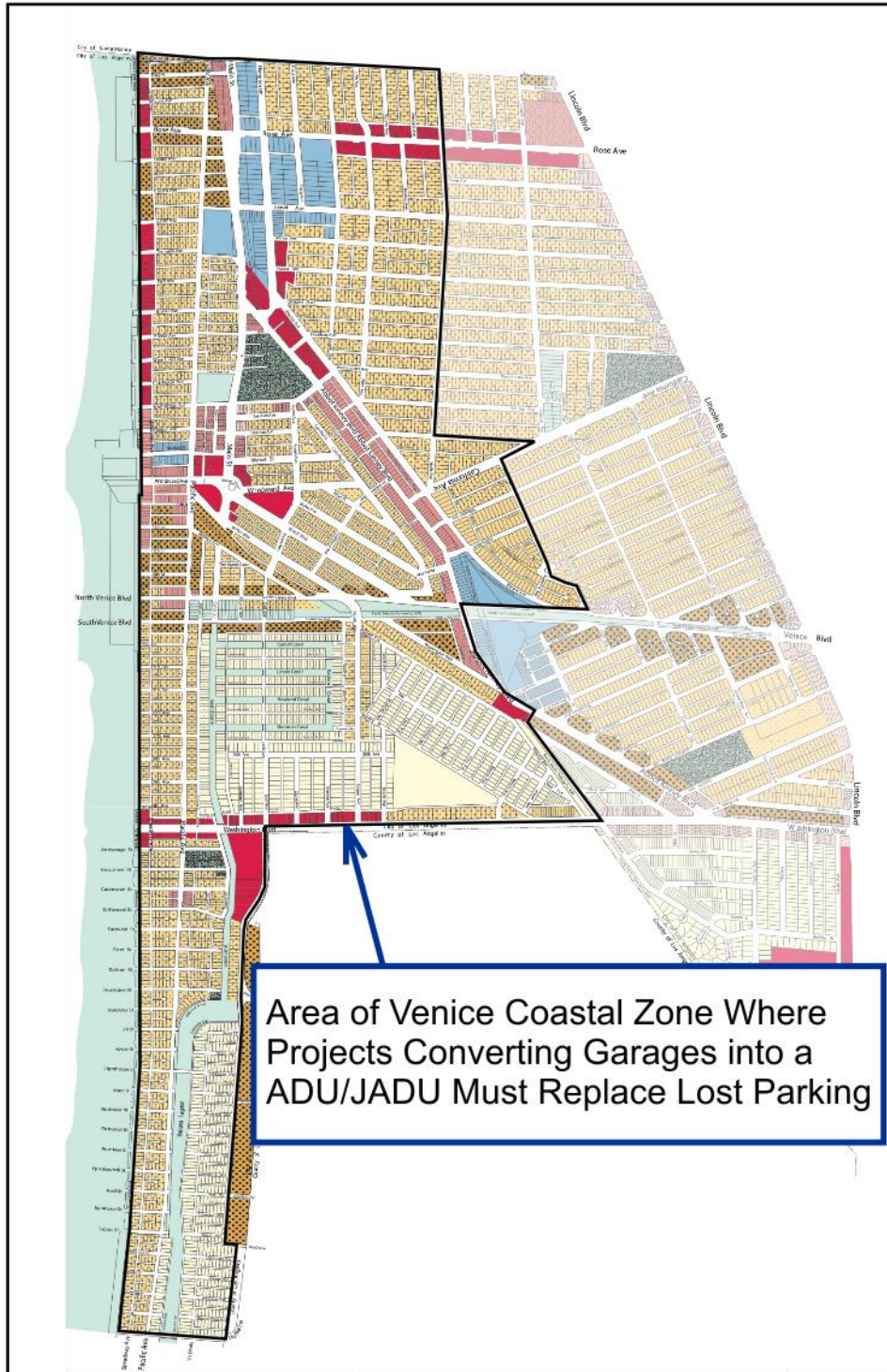
**Recommendation:**

VNC recommends to the City and Coastal Commission that any conversion of a garage to an ADU or JADU be required to replace the parking lost if the property is located in the Venice Coastal Zone west of the following boundary: 6<sup>th</sup> Avenue to Santa Clara Avenue, then east to California Avenue, then south on Shell Avenue to Venice Boulevard, then west to Abbot Kinney Boulevard, then south to the Marr Street jog to Oxford Avenue to Washington Boulevard, then west to Via Dolci, then south to the Marina Channel. This area is shown in Figure 1.

**Discussion:**

A number of state laws (AB 68, AB 587, AB 881, AB 670, AB 671, SB 13, and AB 3182) have been adopted with the goal of increasing statewide availability of smaller, and potentially more affordable, housing units including ADUs and JADUs. However, within the coastal zone local ADU/JADU provisions must be consistent with the requirements of the Coastal Act.

One issue that may not be consistent with the Coastal Act is when a garage, carport, or covered parking structure is demolished in conjunction with the construction of an ADU or JADU, no replacement parking space(s) are required. *“The Commission has often found that when private residential parking needs are not accommodated onsite, it can lead to increased use of on-street parking to address such needs, thereby reducing the availability of on-street parking to the general public. This may adversely affect public coastal access if it occurs in high visitor-serving areas and/or areas with significant public recreational access opportunities, and where on-street parking is heavily used.*



**Figure 1: Proposed Area Where Projects That Convert Garages into ADUs Must Replace Lost Parking**

*The result will be that the general public could be displaced from on-street parking by J/ADU parking needs, which may violate the Coastal Act's requirements to protect, provide, and maximize public coastal access and recreational opportunities.”<sup>1</sup>*

The Venice Coastal Zone attracts a large number of visitors, especially in the summer months. The Los Angeles Chamber of Commerce determined that Venice was the second-most visited location in southern California after Disneyland. The Coastal Commission has been clear that ensuring and protecting public access in the Venice Coastal Zone is a high priority.

The reality is, however, that there are parts of the Venice Coastal Zone that are simply too far away from the beach to be used for peak demand coastal access parking. Experience and studies have shown where peak demand for coastal access parking occurs. This allows for a reasonable determination of at what locations conversion of a garage into an ADU or JADU would not be required to replace the lost parking and where it would be required to replace the parking.

The analysis that follows uses information from the *Parking Utilization and Transportation Management Strategies Report Venice Coastal Zone, November 2021* done by Fehr & Peers for the Department of City Planning, found in the link below.

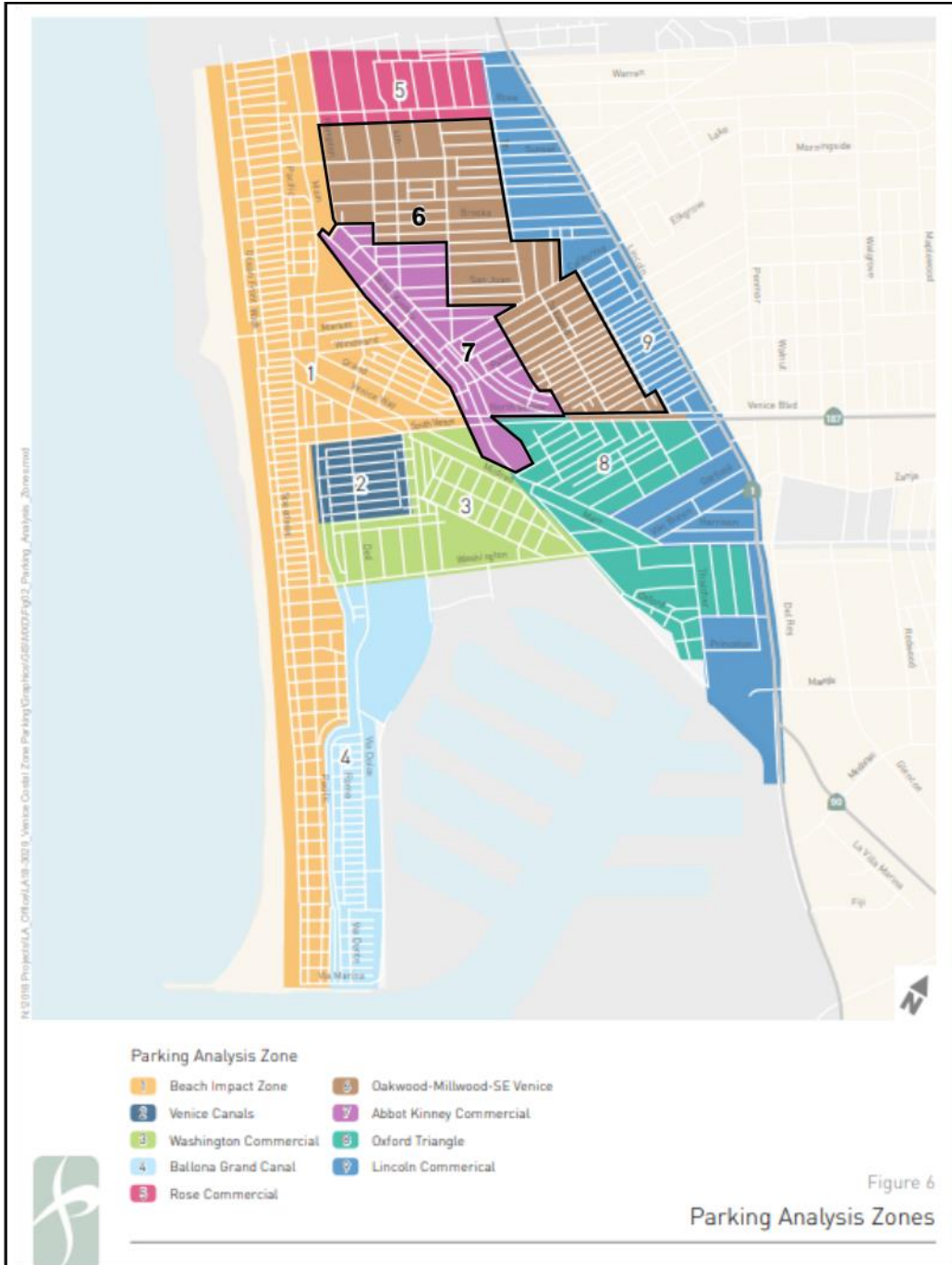
<https://www.venicenc.org/assets/documents/5/meeting657e2669be498.pdf>

That study divided the Venice Coastal Zone into nine Study Zones as shown in Figure 2 below. These zones attempt to relate to types of uses that might influence parking demand, for example, the immediate coast, the Abbot Kinney commercial/retail strip, the Lincoln Boulevard commercial zone, etc. The analysis is based on actual parking counts performed by the consultant. Emphasized on the map is the study's boundary of Study Zones 6 and 7, which we will discuss below.

The next two graphics, Figures 3 and 4, show the peak parking use within Venice for non-summer weekends and for summer weekends, the peak demand times in both seasons. It is clear that the demand for access to both Ocean Front Walk/beach and Abbot Kinney Boulevard is substantial. The darkest color on these two graphics indicates that over 91% of parking spaces are used the fewer parking spaces are available both on the street and in off-street parking lots. The next darkest color indicates that 81-90% of spaces are occupied. Clearly, on a typical summer weekend demand for parking is substantial but decreases as one approaches Lincoln Boulevard and within the Oxford Triangle Study Zone.

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<sup>1</sup> Memo to Planning Directors of Coastal Cities and Counties from Jack Ainsworth, Executive Director, California Coastal Commission, dated January 21, 2022. Page 8.



**Figure 2: Fehr & Peers Study Areas**



**Figure 3: Peak Non-Summer Weekend Parking Occupancy**



**Figure 4: Peak Summer Weekend Parking Occupancy**

Parking demand would not change as abruptly as the map implies. For example, parking demand would not go from intense west of Hampton Dr. to not intense just east of Hampton Dr., the western boundary of Study Area 6. In fact, more detailed maps in the Fehr & Peers Report, too detailed to reproduce here, indicate that parking demand on weekends in the northern part of Study Area 6 does in fact extend beyond Hampton Dr. to 6<sup>th</sup> Avenue before falling off.

The Fehr & Peers Report, however, indicates that the report's Study Area demand for parking near Abbot Kinney Boulevard decreases east of Study Area 7. Therefore its eastern boundary seems appropriate for determining the eastern limit for replacement parking. One note: the area of the Abbot Kinney Study Area 7 south of Venice Boulevard is light industrial with no available beach access parking nor residential garages to convert to ADUs (see Figure 2).

In determining what areas of Venice should require projects that convert garages into ADUs or JADUs to replace lost parking spaces, a logical option is to use the darker areas (non-yellow) of Figure 3 and 4 to establish the boundaries.

Therefore it is recommended to use the following as the boundary to the west of which garage conversions for ADUs and JADUs must replace lost parking spaces: 6<sup>th</sup> Avenue to Santa Clara Avenue, then east to California Avenue, then south on Shell Avenue to Venice Boulevard, then west to Abbot Kinney Boulevard, then south to the Marr Street jog to Oxford Avenue to Washington Boulevard, then west to Via Dolci, then south to the Marina Channel, as shown in the in Figure 1, above.