

May 2, 2009

Honorable Councilmember Bill Rosendahl
7166 W. Manchester Avenue
Westchester, CA 90045

Re: PARKING OF TAXICABS IN RESIDENTIAL AREAS - CF-07-3326

Dear Councilmember,

The Neighborhood Council of Westchester/Playa (NCWP) has reviewed the Council File 07-3326 which would amend Los Angeles Municipal Code (LAMC) Section 80.69.2 to exempt taxis from being subject to enforcement of parking restrictions in residential areas (hereinafter referred to as "Exemption"). The NCWP has heard from a number of stakeholders who are concerned about the possible negative impacts of this exemption. The concerns include but are not limited to issues that are consistent with those raised in the City Attorney's analysis of the proposal, i.e., blight, precedence, and enforcement.

In a memo dated March 12, 2009 from Rita Robinson, General Manager, Department of Transportation (hereinafter referred to as "Memo"), the City Council Transportation Committee was cautioned about "considering requests by a small number of taxi operators for the City to revise the LAMC to exempt taxicabs from restrictions on commercial vehicles parking in residential areas. Taxicabs are, of course, not the only type of commercial vehicles with drivers who might like to park their working vehicles in residential areas beyond the three-hour limit. The statute applies to all manner of other businesses, including delivery services, carpet cleaners, plumbers,

building contractors, etc., each of whom could make just as compelling an argument as taxicab operators for an exemption.”

The unanticipated consequences of an Exemption for taxis could certainly have a seriously negative impact on our residential communities with the associated blight caused by taxis parked on residential streets and ultimately, the inclusion of other commercial vehicles similarly parked. This concern is not unfounded, as broadening the exemption to include other commercial vehicles was discussed by Councilmembers during the hearing on April 22, 2009. This is a precedent - setting slippery slope and it is of great concern to our neighborhood council district.

Another important point made in the Memo, was that this issue is a “request(s) by a small number of taxi operators”. The impacts of these relatively few taxi/commercial vehicle operators cannot be overstated. The relatively small number of those that will benefit by the Exemption will negatively impact residential neighborhoods on an exponential basis. Indeed, the proposed modified ordinance does not appear to address a widespread problem. Ms. Robinson reported that “The data clearly show that there are relatively few citations issued for taxis parked in residential areas. In addition, the number of drivers for whom such tickets appear to be an ongoing problem is very small.”

Ms. Robinson also advised “...the restriction has been in place because the City Council determined many years ago that property owners, homeowners, and renters were entitled to expect that commercial vehicles would be restricted from parking for extended hours in residential areas. It appears unlikely that granting exceptions to the commercial vehicle parking restrictions would be well received by local residents and property owners.” The property owners and other residents in Westchester, Playa Vista and Playa del Rey are still concerned about these issues that gave rise to the ordinance in the first place. Parking is scarce in many parts of our community already. The addition of commercial vehicles will greatly compound this problem.

Enforcement of the proposed Exemption will be challenging for many reasons, not the least of which is the increased cost of enforcement and further straining already stretched public safety resources during the current economic crisis.

We understand that the proposal would only permit the parking of a single taxi per each verifiable residence; however, enforcement of this practice will be very challenging for the Department of Transportation, especially in areas with a high concentration of apartment buildings, as was discussed at the hearing on this matter. In the particular case for Westchester and Playa del Rey, with its close proximity to LAX, stakeholders are concerned about the possibility of taxis using residential streets as a free parking lot, even if the owners of those taxis do not live in the area. The proposed ordinance as drafted does not indicate how taxis will be visibly permitted for parking so as to make enforcement possible nor does it require that the taxis must be parked at the residence of the taxi’s owner.

For the foregoing reasons, the NCWP respectfully requests that the Exemption is denied. Short of that, we urge you to ensure that the modified ordinance be written in a way to control this issue to the greatest extent possible and that required funding for administration and enforcement is provided. The NCWP looks forward to continuing its support of ordinances and policies that preserve and enhance the quality of life enjoyed by its stakeholders; the proposed Exemption simply does not meet this criteria.

Thank you for your consideration.

Sincerely,

Cyndi Hench
President

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