

Malibu City Council
Zoning Ordinance Revisions and
Code Enforcement Subcommittee (ZORACES)
Special Meeting Agenda

Tuesday, March 17, 2020

10:00 A.M.

City Hall – Multipurpose Room
23825 Stuart Ranch Road

Councilmember Skylar Peak
Councilmember Jefferson Wagner

Call to Order

Approval of Agenda

Report on Posting of the Agenda – March 11, 2020

Public Comment *This is the time for the public to comment on any items not appearing on this agenda. Each public speaker shall be allowed up to three (3) minutes for comments. The Subcommittee may not discuss or act on any matter not specifically identified on this agenda, pursuant to the Ralph M. Brown Act.*

Discussion Items

1. Approval of Minutes – October 14, 2019

Recommended Action: Approve the minutes for the Zoning Ordinance Revisions and Code Enforcement Subcommittee Special meeting of October 14, 2019.

Staff Contact: Planning Director Blue, 456-2489, ext. 258

2. Local Coastal Program Amendment No. 17-005 and Zoning Text Amendment No. 17-005 – To allow stand-alone surface parking lots as a Conditionally Permitted Use

Recommended Action: 1) Review the proposed discussion items and draft Malibu Municipal Code (MMC) amendment concerning allowing stand-alone surface parking lots in the Commercial General (CG), Community Commercial (CC), and Commercial Neighborhood (CN) zoning districts as a conditionally permitted commercial use; and 2) Provide recommendations to staff.

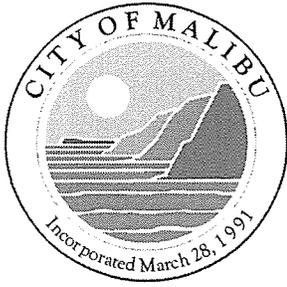
Staff Contact: Planning Director Blue, 456-2489, ext. 258

Adjournment

I hereby certify under penalty of perjury, under the laws of the State of California, that the foregoing agenda was posted in accordance with the applicable legal requirements. Dated March 11, 2020, 12:30 p.m.



Mary Linden, Executive Assistant



Zoning Ordinance Revisions and Code Enforcement Subcommittee Agenda Report

Zoning Ordinance
Revisions & Code
Enforcement
Subcommittee
Special Meeting
03-17-20

Item 1

To: Zoning Ordinance Revisions and Code Enforcement Subcommittee
(ZORACES) Members Peak and Wagner

Approved by: Bonnie Blue, Planning Director

Date prepared: March 10, 2020 Meeting date: March 17, 2020

Subject: Approval of Minutes – October 14, 2019

RECOMMENDED ACTION: Approve the minutes for the Zoning Ordinance Revisions and Code Enforcement Subcommittee (ZORACES) Special meeting of October 14, 2019.

DISCUSSION: Staff has prepared draft minutes for the ZORACES Special meeting of October 14, 2019 and hereby submits the minutes to the Subcommittee for approval.

ATTACHMENT: Draft Minutes for the October 14, 2019 ZORACES Special meeting

MINUTES
MALIBU ZONING ORDINANCE REVISIONS AND CODE ENFORCEMENT
SUBCOMMITTEE
SPECIAL MEETING
OCTOBER 14, 2019
CITY HALL – MULTIPURPOSE ROOM
3:00 P.M.

CALL TO ORDER

Councilmember Peak called the meeting to order at 3:00 p.m.

ROLL CALL

The following persons were recorded in attendance:

PRESENT: Councilmember Skylar Peak and Councilmember Jefferson Wagner

ALSO PRESENT: Reva Feldman, City Manager; Bonnie Blue, Planning Director; Jessica Cleavenger, Associate Planner; Richard Mollica, Senior Planner; Kathleen Stecko, Senior Office Assistant; and Jerry Vandermeulen, Fire Safety Liaison

APPROVAL OF AGENDA

CONSENSUS

By consensus, the Subcommittee approved the agenda.

REPORT ON POSTING OF AGENDA

Senior Office Assistant Stecko reported that the agenda for the meeting was properly posted on October 8, 2019.

PUBLIC COMMENT

None.

DISCUSSION ITEMS

1. Approval of Minutes – July 17, 2018

Recommended Action: Approve the minutes of the Zoning Ordinance Revisions and Code Enforcement Subcommittee (ZORACES) Special meeting of July 17, 2018.

CONSENSUS

By consensus, the Subcommittee approved the minutes of the ZORACES Special meeting of July 17, 2018.

2. Amendments to the Malibu Municipal Code and Local Coastal Program to Create a Fire Resistant Landscape Ordinance

Recommended Action: 1) Provide recommendations on an ordinance amending the Malibu Municipal Code (MMC) and Local Coastal Program (LCP) to create fire resistant landscape standards and refer such items to the Planning Commission for recommendation.

CONSENSUS

By consensus, the Subcommittee recommended that staff schedule a Planning Commission meeting to provide City Council with recommendations to establish standards for fire resistant landscaping including:

- Have the City Biologist create a list of 100 recommended trees and shrubs with a fire danger rating from 0 to 10
- Create a list of recommended landscape materials
- Make no change to the height of front yard fences, gates, and walls
- Ban palm trees that have the potential to grow over 18 feet in height
- Include five-foot defensible space for mulch and structures
- Prohibit wood fences within five feet of structures

ADJOURNMENT

CONSENSUS

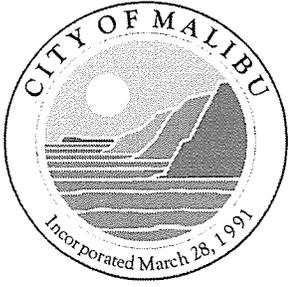
By consensus, the Subcommittee adjourned the meeting at 4:02 p.m.

Approved and adopted by the Zoning Ordinance Revisions and Code Enforcement Subcommittee of the City of Malibu on _____, 2020.

SKYLAR PEAK, Councilmember

ATTEST:

MARY LINDEN, Executive Assistant



Zoning Ordinance Revisions & Code Enforcement Subcommittee (ZORACES) Agenda Report

Zoning Ordinance
Revisions & Code
Enforcement
Subcommittee
Special Meeting
03-17-20

Item 2

To: Councilmember Peak and Councilmember Wagner

Prepared by: Joyce Parker-Bozylinski, Contract Planner

Approved by: Bonnie Blue, Planning Director

Date prepared: March 10, 2020 Meeting date: March 17, 2020

Subject: Local Coastal Program Amendment No. 17-005 and Zoning Text Amendment No. 17-005 – To allow stand-alone surface parking lots as a Conditionally Permitted Use

RECOMMENDED ACTION: 1) Review the proposed discussion items and draft Malibu Municipal Code (MMC) amendment concerning allowing stand-alone surface parking lots in the Commercial General (CG), Community Commercial (CC), and Commercial Neighborhood (CN) zoning districts as a conditionally permitted commercial use; and 2) Provide recommendations to staff.

DISCUSSION: On May 29, 2018, the City Council provided direction on policies to include in the amendments to the Local Coastal Program (LCP) and the Malibu Municipal Code (MMC) to permit parking lots as a primary commercial use in the CG, CC, CN zones.¹ The Council directed that the amendments address surface and subterranean parking (but not allow stand-alone above-ground parking structures), and that individual projects should be required to conduct parking circulation assessments.

On September 26, 2018 and November 1, 2018, a draft MMC amendment was scheduled for review by ZORACES, but the meetings were cancelled due to lack of quorum. To date, ZORACES has not discussed the proposed amendments.

After further consideration, staff is recommending several changes to the draft originally published (but not reviewed) in 2018. These changes include: 1) having the amendments

¹ The amendments were initiated by Council through adoption of Resolution No.17-21 on May 22, 2017 after it denied the appeal request of Pepperdine University to find that parking as a stand-alone use is similar to and no more objectionable than other commercial uses in the CC zone. Pepperdine was originally pursuing use of the "Wave Property" adjacent to and north of the County Civic Center parcel for a stand-alone parking lot but has not further pursued that project recently.

focus solely on surface parking lots and not addressing semi-subterranean parking facilities at this time; and 2) removing language that limited the use to public parking lots only.

The 2018 draft allowed only public stand-alone parking lots as a conditionally permitted use, and also addressed “semi-subterranean” parking facilities. Expanding the ordinance to allow public or private stand-alone parking lots will provide more opportunities to increase parking in the City. For example, private stand-alone parking lots could allow a business to propose a parking lot that would provide additional parking spaces (overflow spaces) beyond the code-required spaces to accommodate employee parking. These parking lots could also be rented out by the parking lot owner to provide additional beach or visitor parking. To simplify this amendment, staff is recommending that the consideration of semi-subterranean parking lots be postponed to a future amendment if it is determined standards are needed for such facilities.

The City has purchased three parcels in the CG, CC, CN zones. In keeping with the goals for improving coastal access, addressing the increasing demand for parking, and satisfying the obligations of Los Angeles County Measure R and Measure M funding for the purchase, the City will develop parking on one or more of the recently purchased parcels. It is important to note that the proposed amendments do not commit the City to any particular project on these properties. The amendments will provide the City with additional options for addressing parking demands in the City generally.

Staff seeks review and comment from ZORACES on the attached draft code amendments. Please note that the attachment reflects changes to the MMC only; however, since the parking regulations of the MMC and LCP are the same, a matching amendment to the LCP would be prepared based on the comments received. Ultimately, the LCP amendment would require certification by the California Coastal Commission.

Existing Requirements for Parking Lots Associated with a Commercial Use

Today, parking lots can only be developed on a site with another use, such as a shopping center, office, etc. Here is a summary of the primary design standards that apply to the typical commercial parking lot:

- Spaces must be 9' x 20' (regular) and 8' x 15.5' (compact).
- No more than 20 percent can be compact spaces.
- Spaces can be located in rear yard and interior side yard setbacks; spaces cannot be located in front yard or street-side setback.
- Where abutting or across the street from a residential district, must provide 42-inch masonry wall screening. Landscape planting may be substituted with Planning Commission approval.
- Parking must be screened from scenic highways.
- Parking must provide interior circulation.
- Parking must accommodate vans, motorcycles and bicycles.

- Lot must have five-foot perimeter landscaped planter bed.
- Minimum of five percent of paved parking area shall be interior planter beds (exclusive of perimeter planting). Trees are encouraged.
- Center dividers between parking stalls must have tree wells at specified intervals.

Summary of Proposed Revisions in Draft Code Amendment

The intent of this amendment is to permit stand-alone surface parking lots and to provide additional pertinent regulations, particularly related to enhanced sustainability. Based on the Council direction to ensure that stand-alone commercial parking uses maintain the character of the area, this report outlines principles for sustainable design that support flexible use and a harmonious presence. The draft language included in the attachment addresses the following:

- Adds design requirements for the stand-alone surface parking lots to maintain or enhance the community character of the CG, CC and CN zones;
- Adds the “stand-alone surface parking lot” use to each zoning district’s conditionally permitted uses so that new stand-alone parking lots would have to be processed with a conditional use permit (CUP); and
- Explains how existing commercial development standards of MMC Section 17.40.080 apply to stand-alone surface parking lot.

The existing parking development standards that are located in MMC Section 17.48.050 and the commercial development standards found in MMC Section 17.40.080 would still apply, except as modified by the amendments. The recommended additional standards would support the City’s goals of sustainability, high aesthetic value, innovative transportation modes and safety.

Sustainability

The amendments address requirements for environmentally sustainable design such as:

- permeable surfaces and rainwater capture,
- more extensive tree coverage, and
- landscaping, including required tree cover to provide shade to reduce the heat island potential of paved surfaces.

New stand-alone surface parking lots would also be subject to the Dark Sky Ordinance (MMC Chapter 17.41), which means any new project would have to comply with Lighting Zone-1 of the California Building Code.

Aesthetics

In addition to supporting sustainable design, a requirement for enhanced landscaping also provides aesthetic value. Perimeter screening from all streets adjacent to the parking lot would be required, not just along residential districts.

Flexibility

Parking is currently in high demand, but transportation innovations that may reduce the need for parking are likely to increase. Staff included language to address parking use that supports the rise of ride-share/ride-hail services and bicycles, with requirements to accommodate pick-up and drop-off sites. Also included are requirements for bus or other high occupancy vehicle access that could support park and ride uses. All of these measures ensure that the long-term transportation changes can be accommodated in the new parking lots.

Efficiency and Safety

Optimizing parking utilization is a key component of reducing the required hardscape footprint of a parking lot. It will also improve safety of pedestrians using or walking through or around the parking lot. To support this goal, the standards require the parking lot developer to:

- 1) ensure efficient and logical transportation access;
- 2) minimize curb cuts;
- 3) support safe pedestrian pathways and access;
- 4) minimize heat island effect; and
- 5) accommodate alternative modes of transportation.

Addressing efficient access, minimizing curb cuts, and requiring well-placed signage to ensure visible access and clear pedestrian path of travel designed for all levels of ability will benefit efficiency, as well as safety. All accessibility requirements shall apply.

Approval Process and Studies

The amendments require that stand-alone surface parking lots only be approved with a CUP. Through the CUP process, site-specific conditions of approval could be included to minimize or avoid any potential adverse impacts on the community.

A parking lot CUP application would be required to include a utilization analysis of other parking facilities within 500 feet. The Subcommittee could recommend adjusting this distance. By analyzing the other parking nearby, staff will be able to determine and ensure compatible access and the potential for shared use parking, thus allowing parking facilities in close proximity to each other to function at the highest level of efficiency, minimizing additional hardscape and excess parking in a concentrated area. Potential traffic impacts would also be addressed in this study.

Commercial Development Standards

Stand-alone surface parking lots would be treated as a commercial use, subject to the existing commercial development standards of MMC Section 17.40.080. However, the

amendments contain recommendations for exemptions or relaxation of certain standards in certain circumstances, generally when the purpose of the standard is met by the project in a different way.

For example, stand-alone surface parking lots are proposed to be allowed to have parking spaces in front and street-side setbacks since perimeter screening would be required along all street-sides, tree canopy coverage is required, and at least 20 percent of the parking lot must be permeable area. The standard commercial requirement for 40 percent landscaping plus 25 percent open space would also not apply due to the enhanced landscape standards. This would allow more efficient use of the site for parking without the potentially unappealing aesthetic effects, as these are mitigated by perimeter screening, tree canopy, interior landscaping and the permeability requirements.

Additionally, kiosks for parking lot attendants or for automated pay stations would be allowed in setbacks subject to certain size, bulk and height standards.

Additional Discussion Items

Other issues the Subcommittee could provide feedback on include but are not limited to:

- Requiring stand-alone parking lots to comply with the Art in Public Places Ordinance
- Adjusting the time for achieving the tree coverage standard
- Inclusion of stand-alone above-ground parking structures of limited height and scale
- Inclusion of stand-alone below grade or semi-subterranean parking structures
- Increase allowed percentage of compact spaces
- Add policies to the General Plan regarding stand-alone parking lots and structures.

ENVIRONMENTAL REVIEW: The stand-alone parking lot use amendments will require a LCP amendment and corollary amendment to the MMC to ensure consistency. In accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21080.9, CEQA does not apply to activities and approvals by the City as necessary for the preparation and adoption of an LCP amendment.

STAFF FOLLOW-UP: Based on the recommendations provided, staff will return to ZORACES with final proposed language for the MMC and LCP, or will proceed with the amendments to the Planning Commission for recommendation to the City Council. The LCP amendments will require review and certification by the California Coastal Commission before becoming effective.

ATTACHMENT: Draft MMC amendments

DRAFT MMC AMENDMENTS

The amendments are presented in underline/strikethrough format where underlined text will be added and stricken text will be deleted.

Chapter 17.02 INTRODUCTORY PROVISIONS AND DEFINITIONS

17.02.060 Definitions.

As used in this title:

“Kiosk” means a structure for the shelter of a parking lot attendant.

“Stand-alone surface parking lot” means a parking area established or operated to provide off-street parking and/or use, for which a fee may or may not be charged, and is not required parking for a related use.

Chapter 17.22 CN COMMERCIAL NEIGHBORHOOD DISTRICT

17.22.040 Conditionally permitted uses.

The following uses may be permitted subject to obtaining a conditional use permit:

Q. Stand-alone surface parking lot

Chapter 17.24 CC COMMUNITY COMMERCIAL DISTRICT

17.24.030 Conditionally permitted uses.

The following uses may be permitted subject to obtaining a conditional use permit:

L. Stand-alone surface parking lot.

Chapter 17.30 CG COMMERCIAL GENERAL DISTRICT

17.30.030 Conditionally permitted uses.

The following uses may be permitted subject to obtaining a conditional use permit:

I. Stand-alone surface parking lot.

Section 17.40.080 COMMERCIAL DEVELOPMENT STANDARDS

A. All commercial development shall be subject to the following development standards:

8. Site Development Criteria. All proposed commercial construction shall comply with the following site development standards:

a. The gross square footage of all buildings on a given parcel shall be limited to a maximum floor area ratio (F.A.R.) of 0.15, or fifteen (15) percent of the lot area (excluding any street rights-of-way). The city council shall have the authority to approve additional gross square footage, up to the maximum allowed for the parcel under the general plan, provided the increase complies with the provisions of subsection (A)(8)(e) of this section.

b. Forty (40) percent of the lot area shall be devoted to landscaping. An additional twenty-five (25) percent of the lot area shall be devoted to open space. Open space areas may include courtyards, patios, natural open space and additional landscaping. Parking lots, buildings, exterior hallways and stairways shall not qualify as open space. This requirement shall not apply to stand-alone surface parking lots.

c. Commercial buildings and stand-alone surface parking lots located within floodplains, liquefaction or earthquake fault zones shall comply with any other site specific hydrologic, geologic and seismic conditions based on the required hydrology soils and geotechnical reports and final recommendations from the city geologist or city engineer.

Chapter 17.48 OFF-STREET PARKING AND LOADING REQUIREMENTS

17.48.050 Development standards.

The following development standards shall apply to all parking areas with six or more spaces:

A. Location.

1. Required parking facilities shall be on the same lot as the structure they are intended to serve, except that with proper legal agreement, the planning commission may approve parking on a separate lot. In no event shall required parking be farther than three hundred (300) feet from the use it is required to serve. This distance shall be measured along a legal and safe pedestrian path from the parking space to the nearest entrance of the building or use for which the parking is required.
2. The required parking spaces may be located in interior side and rear setbacks. Except for stand-alone surface parking lots, schools and public

safety facilities, no parking space, either required or otherwise, shall be located in any required front or street-side setback area, unless regulations provide otherwise.

3. Kiosks, automated pay structures and vehicle charging stations may be located within required setbacks if they do not exceed ten feet in height. Such kiosks shall not exceed 50 square feet in floor area.

B. Access. There shall be a minimum ten (10) foot wide, three-inch thick, asphaltic or cement concrete, paved, vehicular accessway from a public street or alley to off-street parking facilities.

C. Screening.

1. Where a parking area abuts or is across the street from a residential district, it shall be separated therefrom by a solid masonry wall not less than forty-two (42) inches in height. The planning commission may waive this wall requirement if additional setback and screening planting, or landscaped berms are to be provided.
2. Where a parking area is across the street from a residential district, there shall be a border of appropriate landscaping not less than five feet in depth, measured from the street right-of-way line, along the street frontage.
3. Parking areas shall be screened from view from all designated highways.
4. Additional screening shall be required for stand-alone surface parking lots in the form of landscape screening that has the effect of a solid hedge that obstructs the view of vehicles. Said screening may incorporate trees at appropriate intervals, and shall be not less than forty-two (42) inches high along where the front or street side yard lot line abuts a street and not less than forty-two (42) inches and not more than seventy-two (72) inches along a rear and side yard that does not abut a street.

D. Layout and Paving.

1. Parking areas shall provide for a twenty-five (25) foot outside turning radius within the facility and a thirty (30) foot outside turning radius into public alleys.
2. Except in residential parking facilities with less than six spaces, parking spaces shall be arranged so that vehicles need not back onto or across any public sidewalk.
3. Off-street parking facilities shall be designed so that a vehicle within the parking facility shall not be required to enter a street to move from one location to any other location within that parking facility. Separate noncontiguous parking facilities may be provided with independent entrances for employee and visitor parking, provided the use of each lot is clearly identified on proposed plans and at the entrances to each lot.

4. No dead end parking aisles serving more than five stalls shall be permitted unless the aisle is provided with a turnaround area installed in a manner meeting the approval of the director.
5. Tire stops shall be provided within all parking areas.
6. All parking areas shall be surfaced with asphaltic or cement concrete paving which is at least three inches thick or permeable paving of comparable load-carrying capacity and durability.
7. Parking stalls shall be at least nine feet by twenty (20) feet minimum, and shall be marked with lines or indicated with special paving materials. The access lanes shall be clearly defined and shall include directional arrows to guide internal movement traffic. Compact parking spaces are permitted, but shall not exceed twenty (20) percent of the total number of required spaces. Compact stalls shall be a minimum of eight feet by fifteen (15) feet six inches and shall be marked for compact use only.
8. Off-street parking facilities shall be designed so that provision is made, to the satisfaction of the director, for the accommodation of vans, motorcycles, and bicycles.
9. Stand-alone surface parking lots shall:
 - a. Support safe and efficient transportation access, minimize curb cuts, support safe pedestrian pathways and access, minimize heat island effect and accommodate alternative modes of transportation, as determined by the director, with input from the Public Works Director and Building Official;
 - b. Address and incorporate where appropriate and feasible the potential for alternative transportation such as ride share/ride-hail services, bicycles and personal transport devices, and to accommodate pickup and drop off for shuttles and other private or public high occupancy vehicles; and
 - c. Clean energy sources to service the facility.

E. Landscaping and Drainage.

1. A landscaped planter bed of at least five feet in width with a six-inch high cement concrete berm shall be installed along the entire perimeter except for those areas devoted to perpendicular access ways.
2. A minimum of five percent of the paved parking area shall be devoted to interior planting areas. Extensive use of trees is encouraged. All planting areas shall be at least three feet wide. Perimeter planting shall not be considered part of this required interior planting.
3. Where topography and gradient allow, parking lots should be depressed and/or screened from view by landscaped berms and hedges.
4. Where trees already exist on the property, the design should make the best use of this growth and shade. Such trees shall be protected by a tree well with a diameter sufficient to insure their continued growth.
5. Planting areas should be distributed throughout the lot as evenly as possible, but variations from this pattern may be granted by the director

- when a different pattern would result in the overall aesthetic improvement of the project. Innovation in design and materials is encouraged.
6. Wherever a center divider separates parking stalls facing each other, tree wells shall be established not more than fifty (50) feet apart for large trees (exceeding twenty (20) feet spread at maturity), or not more than thirty (30) feet for small and medium-sized trees.
 7. All plantings shall be permanently and regularly maintained free of debris and in conformity with the accepted practices for landscape maintenance.
 8. Required landscaping shall be irrigated with greywater, where feasible.
 9. Stand-alone surface parking lots shall comply with the following additional landscaping standards:
 - a. Provide one tree per twelve hundred (1,200) square feet of area that accommodates vehicular traffic and dispersed throughout the paved area. The trees planted in compliance with this section shall be designed to result in canopy coverage of fifty (50) percent of the parking lot hardscape within five (5) years and shall be approved by the City Biologist. Subsection (E)(6) above shall not apply. Trees planted in conjunction with the screening required in Subsection (C)(4) may contribute to this requirement.
 - b. Permeable surfaces, as determined by the Building Official, shall constitute not less than twenty (20) percent of the lot area, exclusive of perimeter planting, and should be landscaped wherever feasible.
 - c. Permeable surfaces and grading shall be coordinated so that storm water can infiltrate the surface in areas with less than five (5) percent slope. Permeable surfaces are encouraged in areas of low traffic or infrequent use wherever feasible.
 - d. The parking area shall be properly drained, consistent with the requirements of the Regional Water Quality Control Board and subject to the approval of the Director of Public Works.
 - e. Parking areas shall be designed so that surface water runoff will not drain over any sidewalk or adjoining property.
 - f. Cross-grades shall be designed for slower storm water flow and to direct storm water toward landscaping, bio-retention areas, or other water collection/treatment areas.
 - g. Landscape areas, excluding drivable surfaces, shall be protected by a curb at least 6 inches wide and 6 inches high. Such curbs shall be designed to allow storm water runoff to pass through.

Chapter 17.66 CONDITIONAL USE PERMITS

17.66.030 Application requirements for commercial development.

In addition to all other required information, any proposed commercial development which involves new development or expansion of existing buildings totaling at least five hundred (500) square feet shall submit the following information:

A. A market analysis indicating a clear and compelling economic and social need in the city for the proposed development, and demonstrate its economic viability, and impact on city services;

B. A geotechnical and hydrological report to be reviewed by the city geologist and other appropriate city representatives;

C. Reports indicating anticipated impacts on existing utility service, sewage and wastewater systems;

D. Applications for stand-alone surface parking lots within 500 feet of other parking facilities (whether these facilities are a primary use or accessory use) must provide an access and utilization analysis that demonstrates any potential opportunities for more efficient usage through shared use or access. Potential traffic impacts must also be addressed as required by the Public Works Department.

E. Subsection A. above shall not apply to stand-alone surface parking lots.

D. F. Submittal of other studies or environmental analysis as provided for under the California Environmental Quality Act (CEQA), as determined by the city. The city shall also have the authority to require the submittal of appropriate fees to cover the cost of independent analysis of such issues.