

September 20, 2023

Jose Mendevil, Associate Planner
City of Culver City
Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232
Sent via email to jose.mendevil@culvercity.org

**RE: REQUEST FOR MODIFICATION TO STANDARD CONDITIONS
Case No. P2022-0361-SPR-AUP
8960-8966 Washington Boulevard**

To Whom It May Concern:

three6ixty represents the Applicant, Lindblade Media Center (LA) Owner, LLC, in the above referenced case. The subject application is for the demolition of an existing single-story commercial building and the construction, use and maintenance of a new 4-story office building with ground floor and subterranean automobile parking (the "Project"), located at 8960-8966 Washington Boulevard. The Project will provide 11 on-grade vehicular parking spaces, 171 subterranean parking spaces in addition to 32 bicycle parking spaces. The subject request is for Site Plan Review for a building having approximately 63,692 square feet of Floor Area in the Commercial General (CG) and Industrial General (IG) Zones, and an Administrative Use Permit for tandem parking, and otherwise conforms to all other zoning standards.

The Applicant initially filed plans with Planning staff for a Preliminary Project Review ("PPR") meeting in March 22, 2022, with a plan resubmittal on June 13, 2022. The Project's PPR meeting was finally scheduled 6 months following our formal submittal on November 3, 2022. The case proceeded through the City's standard project review process including two Community Meetings (August 9, 2022 and January 12, 2023) and two meetings with the City's Project Review Committee ("PRC") on December 3rd and 15th of 2022, at which time the Applicant received written comments and conditions from all City departments. There were only a few members from the general public in attendance at the community meetings, and comments to date have been relatively positive and generally been of an informational nature. Since January 2023, the Applicant has had a fully designed and preliminarily engineered project that has been fully vetted by all City departments, and the Applicant has been waiting patiently for many months for a public hearing in front of the Planning Commission.

As part of the project, the Applicant has incorporated a required 5-foot dedication along Washington Boulevard, and also proposes an additional voluntary 5-foot setback from the post-dedication property line to allow for more generous, enhanced pedestrian amenities and experience, such the installation of public art along the Washington frontage and additional streetscape landscaping at the building's primary entrance. The project as currently designed is consistent with the City's Washington National TOD District Streetscape Plan, as well as the City's policy to ensure that all public

art remain unobscured from public view. Throughout the review process, all comments of various city departments have been incorporated in a timely manner into the project by the Applicant team. As such, the project has been scheduled for public hearing with the Planning Commission on September 27, 2023.

The Applicant was recently informed on September 5, 2023, via an email at the request from the Department of Transportation (“DOT”), that the Project should now relocate the existing bus stop currently west on the same block, provide related improvements directly in front of the Property’s primary building entrance, as well as install a City bench directly on the Applicant’s property. Additionally, DOT is requiring a new bus shelter to be installed and located directly on the sidewalk in front of the primary building entrance, thereby rerouting pedestrian traffic directly onto private property and potentially obstructing the building’s primary lobby entrance. This last-minute requirement is highly concerning to the Applicant team and problematic for the viability of the Project, as both the bus stop itself and the bus shelter conflict with the previously coordinated visual and physical improvements of the Project, obscure the impact of the public art pedestrian amenity, and generally reduce the usable sidewalk area at its narrowest pinch point along this stretch of Washington Boulevard, negating the intent of the City’s streetscape improvements. At this point in time, the current bus stop design is the sixth alternative scheme that DOT has circulated internally at the city, but only the first attempt to coordinate with the Applicant. For successful implementation and project success, it is critical for the project team to gain better certainty about any potentially imposed offsite improvements, especially if their final design remains in flux at this moment.

The Applicant was only notified of DOT’s updated requirements *after* submittal of the final package for the upcoming Planning Commission hearing scheduled for September 27th, almost a year after the initial PPR meeting on the project, and after many meetings with the City to finesse the design and programming of the project. It appears that at this late stage, DOT is requiring these improvements based upon City Council’s very recent action on September 11, 2023 in support of a 24-month extension of the pilot program for Move Culver City; it is our understanding that the specifics on this pilot are still subject to reevaluation and may or may not become permanent public infrastructure standards. We also understand that this is requested of the Applicant solely on the basis of its current Site Plan Review application, without which there is no mechanism to accomplish these improvements for the City. This places an unfair and unreasonable burden solely on the Applicant’s project, leaving no adequate time for its design team to appropriately coordinate with all impacted City departments (i.e. Building & Safety, Public Works, Forestry). Ultimately, all parties are seeking a mutually-agreeable solution that provides the City of Culver City with incremental mobility improvements, while also allowing individual development projects to move forward with the security of a defined extent of any offsite improvements.

The Move Culver City revised pilot program was very recently approved for a two year lifespan, to sunset in 2025. In fact, the requested bus stop layout reflects the sixth version of the proposed draft layout internally circulated within the City, but only the first externally shared version with the project team. The Applicant’s timeline for project completion extends well beyond the life of this pilot program, for completion in 2027, by which time the current pilot improvements may change again based upon the findings of this current effort. As such, it is unreasonable to expect the Project to

incorporate mobility improvements that the City of Culver City inherently acknowledges are by definition, temporary and undefined as a permanent condition. Furthermore, the Applicant should not be required to comply with any last minute condition imposed by an individual City department that was not captured in the policies or project requirements provided for more than a year of PPR and SPR review. Lastly, it should not be the Applicant's sole responsibility to mitigate conflicting City policies of different internal departments, at its own project cost.

Based on these factors, the Applicant respectfully requests that the Planning Commission consider a modification to the City's standard condition language traditionally imposed on projects with regards to (future/potential?) bus stop improvements. A modification to this language can provide flexibility to the Applicant, as well as all City departments to defer the necessity of this action until such time as a permanent mobility solution is determined by the City.

On behalf of the Applicant, I hereby request that the Planning Commission consider the following alternate language to the City's standard condition of approval in regard to DOT requirements:

~~The Project shall upgrade adjacent bus stop(s), as applicable, to each include new bus shelter, bench, trash receptacle, bus stop sign, real-time information display, sign post, twelve-foot (12) wide concrete bus pad (same length as the bus stop zone), red curb (same length as the bus stop zone), and widen the sidewalk to a minimum of ten (10) feet. The bus stop furniture shall be located to the back of sidewalk adjacent to the property to accommodate pedestrian clearance and comply with ADA accessibility and bus stop standards.~~

The Project may be required to upgrade an adjacent, existing bus stop along Washington Boulevard in accordance with City standards for bus shelters. The final design and extent of such relocation and improvements shall be determined through coordination between the Transportation Department, Planning and Development Department, (Public Works and/or any other impacted City Department) and the Applicant. Furthermore, any such improvements shall not impede the ability for the project to comply with its required onsite Public Art program nor the Washington National TOD District Streetscape Plan, unless otherwise mutually agreed-upon by the Planning and Development Director or their designee. Such deviations shall not be deemed as non-compliance of the Applicant with the streetscape plan. As applicable and required, the final location and layout of the streetscape shall be specified on the construction set of plans prior to the Issuance of Building Permits and such improvements shall be installed prior to Certificate of Occupancy. The Applicant shall only be responsible to fund those improvements that are located along the Applicant's property frontage.

Feel free to contact me at (310) 204-3500 should you have any questions or need further clarification about any of these requested corrections. Thank you in advance for your attention to these contextual details and consideration of the project's review history.

Sincerely,

Case No. P2022-0361-SPR-AUP
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Page 4 of 4

three6ixty



Sara Houghton

CC: Lina Lee, Applicant
Dana Sayles, three6ixty (Representative)
Jeff Anderson, Current Planning Division