



# City of Culver City

Mike Balkman  
Council Chambers  
9770 Culver Blvd.  
Culver City, CA 90232  
(310) 253-5851

## Staff Report

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**File #:** 23-214, **Version:** 1

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**CC - PUBLIC HEARING:** Introduction of an Ordinance Approving a City-Initiated Zoning Code Amendment (P2022-0234-ZCA), Amending Title 17: Zoning Code of the Culver City Municipal Code (CCMC) as it Relates to Minimum Required Off-Street Parking, Automated Parking/Parking Stackers, Bicycle Parking, and Loading.

**Meeting Date:** October 10, 2022

**Contact Person/Dept:** Gabriela Silva, Associate Planner;  
Andrea Fleck, Planning Technician;  
Erika Ramirez, Current Planning Manager

**Phone Number:** (310) 253-5736 / (310) 253-5737 / (310) 253-5727

**Fiscal Impact:** Yes [ ] No [X]

**General Fund:** Yes [ ] No [X]

**Attachments:** Yes [X] No [ ]

**Commission Action Required:** Yes [X] No [ ]

**Commission Name:** Planning Commission

**Date:** August 24, 2022

**Public Notification:** (Published) in Culver City News (09/22/2022); (Posted) City website (09/22/2022); (Email) Public Notifications - City Council (09/22/2022), Meetings and Agendas - City Council (10/05/2022)

**Department Approval:** Jesse Mays, Assistant City Manager (09/27/2022)

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### **RECOMMENDATION**

Staff recommends the City Council introduce an Ordinance approving Zoning Code Amendment P2022-0234-ZCA, amending Culver City Municipal Code (CCMC), Title 17: Zoning Code, relating to off-street parking, bicycle parking and loading, and adopting an exemption pursuant to California Environmental Quality Act (CEQA) Section 15061(b)(3).

### **PROCEDURE**

1. The Mayor seeks motion to receive and file the affidavit of mailing, publishing, and posting of public notice.

2. The Mayor calls on staff for a brief staff report and City Council poses questions to staff as desired.
3. The Mayor seeks a motion to open the public hearing and the City Council receives public comment.
4. The Mayor seeks a motion to close the public hearing after all testimony has been presented.
5. The City Council discusses the matter and arrives at its decision.

## **BACKGROUND**

Over the past few years, the City has been advancing several sustainability, mobility and transportation strategies related to off-street parking, including revisions to the Zoning Code reflective of changes in mobility trends and technology advancements. In addition, City parking policies have evolved toward requiring less parking, concentrating parking at key public areas, sharing parking among uses and in general downsizing the parking footprint in new development in favor of encouraging alternative modes of transit.

The City Council directed staff to prepare a Comprehensive Parking Code Amendment at the May 2020 Joint Study Session on Parking and Mobility. Staff presented the Planning Commission with summaries of the research conducted and the proposed parking code amendments for consideration and discussion on August 11, 2021 and October 13, 2021, and supplemental information was presented during a third discussion on May 25, 2022. Topics of discussion included minimum required parking ratios, parking maximums, parking reductions for mobility measures and transportation demand management (TDM), unbundled parking, codified TDM plan requirements, bicycle parking, and automated and stacked parking, among many other concepts. In addition, two stakeholder outreach meetings were held on April 6, 2022 and April 7, 2022 along with a parking questionnaire.

On June 27, 2022, the background of the preceding Planning Commission discussions, staff research, and outreach was presented to City Council as a discussion item providing additional opportunities for public input. Parking maximums were referred by the City Council to the Mobility, Traffic, and Parking (MTP) Subcommittee for further discussion. Initial discussion on this item with the MTP Subcommittee occurred on August 9, 2022, at which time direction was provided to proceed with stakeholder outreach and providing additional background information. The topic will continue to be discussed at the next MTP Subcommittee meeting on October 25, 2022. At the June 27, 2022 meeting, the City Council directed staff to proceed with drafting a Zoning Code Amendment that eliminates minimum off-street parking requirements, as well as revising on-site automated parking requirements, bicycle parking requirements, and loading standards. The ZCA was presented to the Planning Commission on August 24, 2022, at which time the Commission recommended that the City Council approve the proposed ZCA.

### **Planning Commission Public Hearing and Recommendation**

On August 24, 2022, the Planning Commission, by a split-decision of 3 to 2, adopted Resolution No. 2022-P016 (Attachment No. 2) recommending to the City Council adoption of a CEQA Exemption

and approval of Zoning Code Amendment P2022-0234-ZCA, to eliminate minimum required off-street parking requirements, and to revise automated parking requirements, bicycle parking requirements, and loading standards. During the public hearing, the Planning Commission considered the staff report and supporting materials, and comments from the public. Exhibit A of the proposed Ordinance (Attachment No. 1) reflects the language recommended by the Planning Commission, including a few subsequent minor non-substantive corrections necessary for internal consistency.

During the Planning Commission public hearing, several members of the public spoke regarding the proposed Amendment. Comments were both in support and in opposition of the Amendment as further detailed in the corresponding meeting minutes (Attachment No. 4).

Please reference the Planning Commission staff report and meeting minutes for further information (Attachment Nos. 3 and 4).

## **DISCUSSION**

### **Minimum Required Off-Street Parking**

The Zoning Code sets a minimum required amount of parking, allowing projects to incorporate surplus parking as needed and/or as feasible. The purpose of minimum parking requirements is to adequately plan for the parking needs of a development and ensure sufficient off-street parking is provided for each development/use to meet those needs. Further, the desire to address parking demand stems partly from the desire to avoid potential impacts to surrounding public streets, especially for commercial uses that are adjacent to residential neighborhoods. Under this approach, projects typically narrowly meet their required parking, and in some cases may include requests to modify stall and/or drive aisle dimensions, or even to reduce the number of required parking spaces. This signals that developments can manage their associated parking demand without meeting the minimum required amounts. In recent years, trends have shifted towards eliminating minimum required parking; this shift has been attributed to various factors, including concerns related to 'induced demand', traffic congestion, vehicle emissions, disincentivizing use of alternative transit modes, land use prioritization, and development costs (particularly as it relates to housing affordability).

In accordance with direction provided by the City Council, the Amendment proposes eliminating minimum required parking by deleting all of Table 3-3 - Parking Requirements by Land Use, of Section 17.320.020, as well as Table 2-7.1 - Commercial Downtown Parking Requirements by Land Use, of Section 17.220.035.C. In addition, all references to required parking are deleted throughout Title 17 - Zoning Code. All development standards for off-street parking remain to ensure any proposed parking complies with appropriate standards. Accordingly, certain sections throughout the Zoning Code are reworded to make clear the applicable standards when parking is provided. Various other sections of the Zoning Code are also eliminated or reworded to maintain internal consistency. For example, Section 17.610.020.B - Nonconforming Due to Parking is eliminated, as is the reference to the required amount of parking in Table 6-1 - Requirements for Major and Minor Improvements, while the reference to compliance with parking lot landscaping, paving, screening, and striping remains.

With the elimination of minimum parking for residential uses, it is necessary to anticipate situations in

which property owners propose to convert their existing garages to another use. Existing garages are laid out in various configurations. For example, it may be at the rear of the property accessed from a long driveway along the side of the property, at the rear of the property accessed from an adjacent public alley or attached to the residence at the front of the property. As we have seen from the numerous conversions to accessory dwelling units (ADU's), although no replacement parking is required, in practice residents will typically utilize the remnant driveway area to park their vehicles. Whether for conversions or new construction, it is important to anticipate that there will be a desire to provide uncovered parking within the current required front setback in residential zones. Accordingly, the provisions for placement of uncovered parking are revised to allow a portion of this front setback to be utilized for parking.

In response to City Council's direction regarding parking stackers, automated and semi-automated parking, the proposed revisions include requiring a Parking Plan review/approval rather than an Administrative Use Permit (AUP) when tandem parking is proposed in a non-residential zoning district. All other standards for tandem parking remain. Review through a ministerial Parking Plan will streamline the process while ensuring the tandem parking is implemented in a manner that is safe and compatible with surrounding uses.

#### Parking Stackers, Automated and Semi-Automated Parking - Section 17.320.025

The City desired a robust process to vet installations of parking stackers, automated and semi-automated parking, while allowing some flexibility for installations in the Hayden Tract and Smiley Blackwelder Parking Districts at the time these were incorporated into the Zoning Code. Accordingly, in these parking districts automated and semi-automated and stacked parking could be provided subject to a Parking Plan approval by the Director or subject to Site Plan Review approval for a new building or a building addition greater than 5,000 square feet. Subsequently, the Zoning Code was revised to allow for these installations outside these parking districts, in Commercial, Industrial, Planned Development or Special Purpose Zoning Districts, subject to Conditional Use Permit (CUP) approval or subject to Site Plan Review approval for any parking associated with a new building or a building addition greater than 5,000 square feet. In all cases, a request for this type of parking is required to submit various materials, including technical studies demonstrating that the proposed design and operation of the parking will not be detrimental to surrounding uses and properties in the vicinity relative to noise, visual impacts, area parking and circulation, and existing on-site improvements.

Based on the feedback from the Planning Commission and direction of the City Council, the proposed Amendment will revise the procedural requirements so these types of parking installations can be processed administratively but will maintain the same submittal requirements. This will help facilitate the provision of parking in more space-efficient ways while still maintaining a process for assessing compatibility with surrounding properties and uses. Accordingly, for the Hayden Tract and Smiley Blackwelder Parking Districts, all such parking installations will be subject to Parking Plan approval by the Director and outside of these districts will be subject to an Administrative Use Permit (rather than a CUP) as shown in Exhibit A of the proposed Ordinance.

#### Bicycle Parking - Section 17.320.045

The current Zoning Code standards require bicycle parking to be provided as a percentage of the number of required vehicle spaces, 10% for multi-family uses and 5% for retail, commercial, and other non-residential uses. This method yields very little bicycle parking. In addition, the current

Code simply indicates bicycle spaces must be at least 2 feet in width, separated from motor vehicle parking spaces by at least 5 feet, and conveniently located and generally within proximity to the main entrance of a structure.

For several years, staff has worked with applicants to provide more than the minimum required amount of bicycle parking for discretionary projects based on number of dwelling units and floor area, using the requirements of the City's Bicycle and Pedestrian Action Plan, as well as the requirements of the City of Los Angeles and City of Oakland for reference. Using number of dwelling units and floor area by use as the basis for required bicycle parking is becoming the more widely used method for requiring bicycle parking. In addition, requiring both short-term and long-term bicycle parking to serve the needs of the different types of users is also a common standard that is also not currently addressed in the Zoning Code. Similarly, more detailed location and design standards have been implemented through the discretionary review process.

In order to advance bicycling as an alternative mobility option, sites must be planned appropriately to provide adequate bicycle parking spaces, as well adequate access and supporting infrastructure (e.g., showers, lockers, etc.) to encourage bicycle use. In addition, codifying such standards will make the review process for projects more streamlined and standardized. Given prior feedback to look to the bicycle requirements from City of Los Angeles as a desirable model, the proposed bicycle parking requirements and standards follow that model as shown in Exhibit A of the proposed Ordinance.

#### Loading Requirements - Section 17.320.050

The Zoning Code currently requires off-street loading based on the size of door openings and accessibility of said doors by vehicles. Although this may occasionally be an indicator of what a building or site will need for loading, it is not a reliable way of determining the loading needs of a site and adequately planning for those needs. In addition, in the lowest threshold, the loading space required by the Zoning Code is the same size as a standard parking stall (i.e., 8.5-feet by 18-feet). If not adequately planned for and designed, loading can pose a definite conflict on the street when trucks need to deliver products, supplies, and other goods to a site and there is no off-street loading. Such conflicts include idling in the traffic lane where vehicles must maneuver around a stopped truck, or parking in a center aisle where delivery personnel must cross one or more lanes of traffic to drop off or pick up packages, and sometimes this can even mean obstructing a bicycle lane.

It is largely understood that even small commercial buildings with no large door openings and with no direct access for vehicles may have needs for deliveries by large trucks including typical commercial delivery (e.g., UPS, FedEx, etc.) that do not typically fit in a standard parking space and that often need additional height clearance than the minimum standard required height for passenger vehicles. To adequately plan for the loading needs of the various non-residential operations throughout the City, such that these activities are done in a safe manner and which does not create the potential for circulation conflicts in the public right-of-way, more robust standards are necessary. Based on staff's research, typical requirements are based on use, floor area, and number of dwelling units. Accordingly, staff proposes to change the basis upon which the loading spaces are required, as well as to adjust the size requirements to reflect actual needs and sizes of delivery vehicles as reflected in Exhibit A of the proposed Ordinance.

## **PUBLIC OUTREACH AND PUBLIC COMMENT**

Various Planning Commission discussions and City Council discussions have been held with regard to the topic of parking, including the dates noted in the background above. During the public comment period for the Planning Commission public hearing, two comments in support of the proposed Amendment were received (Attachment No. 7). During the public hearing several comments were received in support and in opposition of the proposed Amendment (Attachment No. 4).

CCMC Section 17.630.010 requires public notification via a publication in the Culver City News, a minimum of fourteen (14) days prior to the formal Public Hearing. Accordingly, a public notice was published on September 22, 2022, and posted on the City website and distributed electronically via GovDelivery on September 22, 2022. As of the writing of this report, staff has not received any public comments, in writing or any other form, regarding the proposed Zoning Code Amendment in response to the public notice.

## **ENVIRONMENTAL REVIEW**

The proposed Zoning Code Amendment is considered exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3), Common Sense Exemption, because it can be seen with certainty that there is no possibility the Project to amend the Zoning Code will have a significant effect on the environment. The Project, by itself, does not result in any physical changes in the environment because it will only amend the Zoning Code to eliminate the requirement for a minimum amount of off-street parking but continues to allow the provision of such parking and provides for more robust and appropriate bicycle parking and loading requirements. In addition, the Zoning Code Amendment allows for administrative review of parking stackers and automated parking while still requiring the same technical studies and analysis as the current Zoning Code requirements. As such, the Project does not result in changes to existing land use, density, or an intensification of development beyond what the Zoning Code currently allows.

## **SUMMARY/CONCLUSION**

The proposed Zoning Code Amendment serves to advance various City goals and objectives relating to mobility, sustainability, and housing affordability. The elimination of minimum parking requirements will not preclude projects/sites from providing parking but will allow for parking to be provided at lesser rates than the current requirements as may be better suited for a given project. Similarly, administrative review of automated parking and parking stackers will streamline the process to facilitate parking that is more space efficient. Updated bicycle parking requirements will work to facilitate bicycle use and encourage it as a viable alternative transit mode. The proposed revisions to loading requirements serves to improve accommodations for loading needs on-site and minimize ad hoc use of the public right-of-way for loading activities. The Amendment will benefit the general public interest, safety, convenience, and welfare of the City, and serve to improve parking management, encourage bicycle use as a transit alternative, and better plan for the needs of future development.

## **FISCAL ANALYSIS**

There is no fiscal impact associated with the introduction of the proposed ordinance approving the subject Zoning Code Amendment.

## **ATTACHMENTS**

1. Proposed Ordinance (including Exhibit A: Proposed Zoning Code Text Changes in “strikethrough/underline” format)
2. Planning Commission Resolution No. 2022-P016 with Exhibit A
3. August 24, 2022, Planning Commission Staff Report (without attachments)
4. August 24, 2022, Draft Planning Commission Minutes
5. City of Los Angeles Bicycle Parking Requirements
6. Examples of Loading Requirements
7. Public Comments for Planning Commission
8. Public Comments for City Council

## **MOTION**

That the City Council:

Introduce an Ordinance approving a Zoning Code Amendment P2022-0234-ZCA, amending Title 17: Zoning Code, relating to off-street parking, bicycle parking and loading, and adopting an exemption pursuant to California Environmental Quality Act (CEQA) Section 15061(b)(3).