

FINDINGS

General Plan / Charter Findings

1. Pursuant to Charter Section 556 and Section 13B.1.4.E.1.a. of Chapter 1A of the LAMC, the action substantially conforms to the purposes, intent and provisions of the General Plan.

- a. **General Plan Land Use Designation.** The project site is located within the Westchester – Playa del Rey Community Plan area, which designates the project site for General Commercial uses corresponding to the C1.5, C2, C4, CR, RAS3, and RAS4 Zones. The project site currently has an underlying zone of R4-1, which is not consistent with the land use designation. The project proposes a Zone Change from R4-1 to (T)(Q)C2-1 to allow a change of use of the existing building on the project site from a cultural center to office. The proposed Zone Change to (T)(Q)C2-1 will be consistent with the existing General Plan land use designation of General Commercial and will be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Westchester – Playa del Rey Community Plan.
- b. **Framework Element.** The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following goals, objectives, and policies relevant to the subject request:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

Objective 3.1: *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*

Policy 3.1.1: *Identify areas on the Long-Range Land Use Diagram and in the community plan sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.*

Objective 3.2: *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

Policy 3.2.1: *Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.*

Objective 3.4: *Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.*

Policy 3.4.1: *Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.*

The proposed project will contribute to the City's long-term fiscal and economic viability by repurposing the use of the existing building that has been vacant for some time to an office for Calop Aeroground Services, a company that offers terminal, baggage, and cargo and catering services for passengers of the nearby LAX. The proposed low-intensity office use will provide additional diversity to the neighborhood, which is currently developed with a mix of residential, commercial, and airport-related uses. The proposed project will provide valuable services to airport passengers while also being accessible to employees who commute from further away as it is in an area in proximity to public transit.

- c. **Westchester – Playa del Rey Community Plan.** The Community Plan text includes the following relevant goals, objectives, and policies:

Goal 2: *Encourage a strong and competitive commercial sector that promotes economic vitality and serves the needs of the Westchester – Playa del Rey community through safe, accessible, and well-designed commercial districts, while preserving the historic and cultural character of the community.*

Objective 2-1: *Preserve and strengthen viable commercial development in the community, and provide additional opportunities for new commercial development and services within existing commercial areas.*

Policy 2-1.3: *Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.*

Objective 2-3: *Enhance the land use compatibility, visual appearance, design and appeal of commercial development.*

Policy 2-3.3: *Smaller commercial areas in or adjacent to residential neighborhoods should be developed with low intensity neighborhood serving uses.*

The proposed Zone Change from R4-1 to (T)(Q)C2-1 to allow a change of use of the existing building on the project site from a cultural center to office will be consistent with the above-referenced goals, objectives, and policies. The proposed project will utilize the existing building, which has been vacant for some time, as an office for Calop Aeroground Services, a company that offers terminal, baggage, and cargo and catering services for passengers of the nearby LAX. As a low-intensity office use, the proposed project will be compatible with the surrounding land uses. From an architectural standpoint, the proposed project will not involve any changes to the building exterior and will maintain an existing surface parking lot at the rear to ensure that the project site is adequately buffered from adjacent residential development. As recommended, the proposed project will be consistent with the above-referenced goals, objectives, and policies of the Westchester – Playa del Rey Community Plan.

- d. Housing Element. The Housing Element 2021 - 2029 was adopted in November 2021 and identifies the City's housing conditions and needs, and establishes the goals, objectives and policies that are the foundation of the City's housing and growth strategy. The project is consistent with several objectives and policies of the Housing Element. The plan text includes the following relevant housing objectives and policies:

Goal 1: *A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.*

Objective 1.2: *Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.*

Policies 1.2.2: *Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.*

The existing structure does contain any dwelling units and the proposed change of use does not include any new dwelling units. The proposed Zone Change from R4 to C2 will continue to allow residential uses by right, however the change to C2 will facilitate a broader range of housing types and mixed-use structures that may incorporate dwelling units. Therefore, the Zone Change is consistent with the Housing Element goals, objectives, and policies of the General Plan.

No Net Loss of Housing Element Sites – Compliance Findings

California Government Code Section (GCS) 65863 generally prohibits local jurisdictions from approving development projects that result in fewer units by income category than were projected for any parcel(s) identified in the 2021-2029 Housing Element, unless a finding can be made that the Housing Element's remaining sites have sufficient capacity to meet the jurisdiction's unmet Regional Housing Need Allocation (RHNA) for each income category.

The project site is located on parcel(s) identified to accommodate 0.01 Lower Income units in the City's 2021-2029 Housing Element. The proposed development includes a total of zero dwelling units. Consequently, the City must make the following written finding, supported by substantial evidence, to approve the development project:

The remaining sites identified in the housing element are adequate to meet the requirements of Government Code Section (GCS) 65583.2 and to accommodate the jurisdiction's share of the regional housing need pursuant to GCS 65584. The finding shall include a quantification of the remaining unmet need for the jurisdiction's share of the

regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.

Pursuant to GCS 65863(b)(2), the City finds that while the proposed project would result in fewer units by income category than anticipated for that site in the 2021-2029 Housing Element, the remaining sites identified in the Housing Element of the General Plan are adequate to meet the requirements of GCS 65583.2 and accommodate the jurisdiction's share of the regional housing need pursuant to GCS 65584. As noted in Chapter 4 of the 2021-2029 Housing Element, the City assumed the identified Housing Element Sites would individually have a very low likelihood of redevelopment into housing. Therefore, the Housing Element assigned very low projected density/capacity figures that are well below the maximum zoned capacity of each individual Housing Element Site. Chapter 4 of the 2021-2029 Housing Element also notes that the City followed guidance from the California Department of Housing and Community Development (HCD) by setting a target capacity that is 10% higher than the RHNA for lower-income units, and 15% higher than the RHNA for moderate-income units.

Based on the sites inventory and inventory of candidate sites included in the 2021-2029 Housing Element, as well as the most recent Annual Progress Report on the Housing Element submitted to HCD, the City has an unmet need of 110,694 Very Low Income Units, 62,625 Low Income Units, 74,249 Moderate Income Units, and 139,842 Above-Moderate Income Units. In addition, as of April 1, 2025, the City has a remaining capacity of 306,137 Very Low Income Units, 306,137 Low Income Units, 53,188 Moderate Income Units, and 885,801 Above-Moderate Income Units. The excess Above-Moderate Income Unit capacity may accommodate both Moderate and Above-Moderate Unit RHNA Allocations. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the planning period, and in compliance with the requirements of GCS 65583.2.

- e. **Mobility Element.** The Mobility Element of the General Plan (Mobility Plan 2035) is likely to be affected by the recommended action herein through the imposition of street improvements along the property frontages at Sepulveda Eastway and Westchester Parkway. Sepulveda Eastway is a Collector Street under Mobility Plan 2035 with a designated right-of-way width of 66 feet and roadway width of 40 feet. Westchester Parkway is a Boulevard II under Mobility Plan 2035 with a designated right-of-way width of 110 feet and designated roadway width of 80 feet. The Bureau of Engineering is requiring street improvements to remove the existing sidewalks and reconstruct new sidewalks along both streets to complete the full width of the sidewalks as required by Mobility Plan 2035. Conditions for the street improvements have been imposed under the (T) Tentative Classification in accordance with the Collector Street and Boulevard II standards of Mobility Plan 2025.

The street improvement requirements will continue to advance Mobility Plan 2035's policies in recognizing walking as a component of every trip to ensure high-quality pedestrian access. The new sidewalks, gutters, and curbs will be widened to ensure safety and accessibility. The proposed project as designed and conditioned will meet the following policies of Mobility Plan 2035:

Policy 2.3: Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.

- Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City’s transportation system.
- Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.
- Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

The proposed project will reconstruct the full border width sidewalks along both property frontages. The new sidewalks will improve pedestrian activity along Sepulveda Eastway and Westchester Parkway. The project site is in a major employment center with nearby commercial buildings, single- and multi-family residential buildings, and airport-related services and transit service. The project site is located within a Transit Priority Area and within one-half mile of the Los Angeles County Metropolitan Transit Authority, Culver CityBus, and Big Blue Bus stops, which qualify as Major Transit Stops.

Zone Change / “T” and “Q” Classification Findings

2. **Pursuant to Charter Section 558 and Section 13B.1.4.E.1.b. of Chapter 1A of the LAMC, the proposed ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.**

Public Necessity: Approval of the Zone Change will allow the project site to be utilized consistently with the goals and objectives of the General Plan and Community Plan as outlined above. The proposed project involves a change of use of an existing building from a cultural center to an office. The proposed project will optimize the use of the existing building and project site through the introduction of an office for Calop Aeroground Services, a company that offers terminal, baggage, and cargo and catering services to passengers of the nearby LAX. According to the Applicant, the existing building’s prolonged vacancy and non-operation have created public safety risks. The proposed project will provide a public necessity that will address these concerns by occupying the existing building, thereby deterring unauthorized access and reducing fire and safety hazards.

Convenience: The proposed project will occupy an existing building that has been vacant and in nonoperation, on a property that is located within proximity to single- and multi-family residential buildings and commercial buildings along a major commercial corridor. Public convenience will be served by the occupation of the empty building and by the required street improvements, which will improve the safety, aesthetic, and walkability of the area.

General Welfare: Approval of the Zone Change from R4-1 to (T)(Q)C2-1 will allow for the use of a vacant building on the project site in a sensible manner. The proposed use will be an office for a business serving the airport and its users. The use of the existing building will be safer for the community than having one that sits vacant. The proposed project will enhance the urban environment by providing a use that will be consistent with the new zoning and by improving public facilities surrounding the project site to be in line with Mobility Plan 2035 street standards. The proposed use will generate increased tax revenues and the required public street improvements will improve the aesthetic of the neighborhood.

Good Zoning Practices: The project site is presently zoned R4-1 but has a land use designation of General Commercial. The General Commercial land use designation includes

the corresponding zones of C1.5, C2, C4, CR, RAS3, and RAS4. Approval of the Zone Change to (T)(Q)C2-1 will bring the project site's zoning to be consistent with its land use designation, in keeping with good zoning practice. The Zone Change will accommodate the proposed change of use from an existing cultural center to a new office. The proposed office use will be consistent with the type of development allowed in the (T)(Q)C2-1 Zone and encouraged by the General Plan and Community Plan.

"T" and "Q" Classification: Pursuant to LAMC Sections 12.32-G.1 and G.2, the current action, as recommended, has been made contingent upon compliance with new "T" and "Q" conditions of approval, and project specific conditions of approval imposed herein. Such limitations are necessary to ensure the identified improvements are completed to meet the public's needs, convenience and general welfare served by the required actions. The conditions that limit the operations, scale and scope of development, are also necessary to protect the best interests of and to assure a development more compatible with surrounding properties and the overall pattern of development in the community, to secure an appropriate development in harmony with the General Plan.

For the reasons stated above, the requested Zone Change will be beneficial in terms of the public necessity, convenience, general welfare, and good zoning practice and is consistent with the General Plan.

Environmental Findings

3. **Categorical Exemption.** A Categorical Exemption, ENV-2024-8092-CE, has been prepared for the proposed project consistent with the provisions of the California Environmental Quality Act (CEQA) and the City CEQA Guidelines. The proposed project is the change of use of an existing 7,744 square-foot one-story cultural center to a new office on a 10,738 square-foot lot. The project is proposing interior tenant improvements only. There are no proposed changes to the building exterior. The Categorical Exemption prepared for the proposed project is appropriate pursuant to CEQA Guidelines, Sections 15301 (Class 1) and 15303 (Class 3).

The Class 1 Categorical Exemption includes interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances. The proposed project involves interior tenant improvements primarily to reconfigure the space for a new open office area and private office rooms.

The Class 3 Categorical Exemption allows for conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The project involves a change of use of an existing cultural center to a new office with no proposed changes to the building exterior.

- a. **Location.** *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

The proposed project is not located in a sensitive environment, and the area is not identified as an environmental resource. The project site is not located in a Very High Fire Hazard Severity Zone, Flood Zone, Fault Zone, Landslide Area, or Liquefaction Zone. Although the proposed project is located within Airport Hazard Areas, whose boundaries impose height limitations on the land, the proposed project will not change or increase the height of the existing building.

- b. **Cumulative Impact.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The proposed project is consistent with the type of development permitted for the area to be zoned (T)(Q)C2-1 and designated for General Commercial land uses. The proposed project includes the change of use from an existing cultural center to a new office with the associated interior tenant improvements, which will not exceed thresholds identified for impacts to the area (i.e., traffic, noise, etc.). The proposed project will not result in significant cumulative impacts.

- c. **Significant Effect.** *A Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

The proposed project includes a change of use of an existing building from cultural center to an office with interior tenant improvements only. The neighborhood consists of a mixture of different uses with commercial buildings, single- and multi-family dwellings, and airport-related service and the proposed project will be compatible with the surrounding properties. There are no proposed changes to the size and height of the existing building. This type of project is not unusual for the vicinity of the project site and is similar in scope to other existing commercial uses in the area. Thus, there are no unusual circumstances which may lead to a significant effect on the environment, and this exception does not apply.

- d. **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. The project site is located approximately 12 miles southeast of this State Scenic Highway. Therefore, the proposed project will not result in damage to any scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway, and this exception does not apply.

- e. **Hazardous Waste.** *A Categorical Exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

According to EnviroStor, the State of California's database of hazardous waste sites, neither the project site nor any site in the vicinity is identified as a hazardous waste site. Furthermore, the building permit history for the project site does not indicate that it may be hazardous or otherwise contaminated and this exception does not apply.

- f. **Historic Resources.** *A Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The project site has not been identified as a historic resource by local or state agencies, nor has it been determined to be eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, the Los Angeles Historic-Cultural

Monuments Register, or any local register. It was also not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. Furthermore, the City does not choose to treat the project site as a historic resource. Consequently, the proposed project will not result in a substantial adverse change to the significance of a historical resource, and this exception does not apply.

4. **Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 186,952, have been reviewed and it has been determined that this project is located in Zone X, areas of minimal flood hazard. The proposed project shall conform with both the specific provisions and the intent of the Floodplain Hazard Management Ordinance.