

**City of Culver City, California
Agenda Item Report**

Meeting Date: 9/10/2012		Item Number: PH-1	
CITY COUNCIL AGENDA ITEM: PUBLIC HEARING – Introduction of an Ordinance Amending Section 17.230.015, Table 2-8 and Section 17.610.010 of the Culver City Zoning Code to Allow for the Expansion of Existing Private Schools Located in the Industrial General (IG) Zone, Subject to Approval of a Modification to an Existing Conditional Use Permit (Zoning Code Amendment ZCA P-2011154)			
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Fiscal Impact: Yes ☐ No ☒		General Fund: Yes ☐ No ☒	
Public Hearing: ☒		Action Item: ☐ Attachments: ☒	
Commission Action Required: Yes ☒ No ☐ Date: 08/08/12			
Public Notification: On August 23 rd and August 30 th , 2012 a notice was published in the Culver City News; Meetings and Agendas – City Council (09/05/12)			
Department Approval: Sol Blumenfeld: (08/29/12)		City Attorney Approval: Carol Schwab (by H. Baker) (08/29/12)	
Chief Financial Officer Approval: Jeff Muir (09/05/12)		City Manager Approval: John Nachbar (09/05/12)	
<u>RECOMMENDATION:</u> Staff recommends the City Council introduce the proposed Ordinance amending Title 17, Zoning, of the Culver City Municipal Code, Section 17.230.015, Table 2-8 (Allowed Uses and Permit Requirements) and Section 17.610.010 (Nonconforming Uses), to allow for the modification and/or expansion of nonconforming private school uses in the Industrial General Zone subject to approval of a Modification to an existing Conditional Use Permit (Attachment No. 1). <u>PROCEDURE:</u> 1. Mayor seeks motion to receive and file affidavit of mailing and positing of public notice. 2. Mayor calls on staff for a brief staff report and City Council poses questions to staff as desired. 3. Mayor seeks motion to declare the public hearing open, providing the applicant the first opportunity to speak, followed by the general public. 4. Mayor seeks a motion to close the public hearing after all testimony has been presented. 5. City Council discusses the matter and arrives at its decision.			

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BACKGROUND:

The Willows Community School (the "School") submitted a Zoning Code Amendment (ZCA) application to amend Section 17.230.015, Table 2-8 (Allowed Uses and Permit Requirements) and Section 17.610.010 (Nonconforming Uses), to allow for the modification and/or expansion of nonconforming private school uses in the Industrial General Zone subject to approval of a modification of an existing Conditional Use Permit. On July 11, 2012, the Planning Commission held a public hearing to consider the proposed ZCA request and a concurrent request for a Conditional Use Permit Modification (CUP/M). The modification request would approve the phased expansion of the school, which includes an increase in student enrollment from 425 students to 575 and the use of three abutting properties for School facilities, the demolition and removal of existing School facilities, and the construction of new buildings, recreation areas, and parking areas to accommodate the anticipated enrollment increase. The hearing was continued to August 8, 2012, in order to address questions presented to staff and the applicant by the Commission.

At the August 8, 2012 public hearing and after thorough discussion, the Planning Commission adopted Resolution No. 2012-P006 (Attachment No. 2) recommending the City Council approve the proposed ZCA and approved the CUP/M subject to final adoption of the ZCA and adopting the project's Mitigated Negative Declaration.

The ZCA is the only portion of the School's application under consideration by the City Council. As noted above, the CUP/M was approved by the Planning Commission and will only become effective upon final adoption of the ZCA by the City Council.

Brief History of Private Schools in the Industrial General Zone

Zoning Code Update

During the preparation of the Zoning Code update in 2005, the issue of permitting private schools in the City's industrial zoning districts was discussed. The Zoning Code at the time permitted private schools in the industrial zones with the approval of a CUP. Concern was raised due to a recent influx in the number of private schools wishing to locate in the City's industrial zones, in particular, recent applications for the expansion of Turning Point School and a proposal for a new private school called Park Century. Staff noted that the

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influx was due to the high commercial rents and land costs on the Westside of Los Angeles, which made the less expensive industrial areas in Culver City more attractive to private schools. However, by allowing private school uses in industrial areas, concerns had been raised about the potential for impacts on the City's existing industrial use and economic base. Staff noted that by permitting private schools in industrial zones, land use conflicts and adjacency issues may be created. Schools are considered sensitive receptors and as such, industrial or commercial development adjacent to schools may be affected due to environmental issues related to noise, vibration, odors, and air quality. Furthermore, schools and certain industrial or commercial uses may conflict in terms of traffic and circulation. In addition, private schools as non-profit entities would have an economic impact on the City due to the loss of property tax, business tax, and sales tax revenue that would otherwise be generated by a commercial or industrial use.

In response to the issues outlined above, private school uses were subsequently prohibited in the IG zone in the adopted Culver City Zoning Code, and permitted with a Conditional Use Permit in the IL zone. The new Zoning Code was adopted by the City Council on October 24, 2005 and became effective on November 25, 2005. As outlined above, upon the effective date of the Zoning Code, existing private schools in the IG zone became legal non-conforming uses and are allowed to continue their operations pursuant to their existing CUP. However, private schools are currently prohibited from expanding their operations, including both physical and student body expansions. The Zoning Code presently provides no mechanism to modify the operations of the three existing private schools in the IG Zone.

Willows Community School

The Willows Community School is a private, non-profit, educational institution (Grades K-8) located in the Hayden Tract. The School is located on the east side of Higuera Street between Hayden Avenue and Eastham Drive, with frontage on both Warner Drive and Higuera Street. The School was originally approved on July 11, 1994, through an Administrative Site Plan Review (ASPR No. 94-02) to operate at 8509 Higuera Street with a maximum student enrollment of 180. At that time a private school was a permitted use in the M1 zone, and a CUP was not required.

Subsequent to the original approval, the school has had three expansions. A Phase 2 expansion of the school was approved by the Planning Commission on March 26, 1997 (CUP No. 96-04) to allow the expansion of school operations onto the property located at 8490 Warner Drive with a maximum student enrollment of 261. On January 12, 2000, the Planning Commission

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approved an application to modify CUP No. 96-04 to permit the Phase 3 expansion of the School into the property at 8479 Higuera Street and to increase the maximum enrollment of the school to 425 students. On September 12, 2002 the Planning Commission approved a modification to CUP No. 96-04 to allow a Phase 4 expansion of the school into the property at 8520 Warner Drive for a gymnasium/multi-purpose use. This modification did not authorize an increase in student enrollment.

Turning Point School

Turning Point School is a private school for pre-school (age 2) through eighth grade located at 8780 and 8794 National Boulevard south of Washington Boulevard. A CUP was approved on December 8, 1999, allowing the school to operate at 8780 National Boulevard (the "East Campus") with a maximum of 480 students. A CUP modification was approved on March 8, 2006 to allow the school to expand onto the property located at 8794 National Boulevard (the "West Campus"). The expansion included new classrooms, studios, office space, flexible artistic spaces, playground area, and additional parking and a second drop-off and pick-up queuing area. The modification request did not seek to increase the maximum number of students enrolled at the school.

Park Century School

Park Century School is a private school for children with learning disabilities, ages seven through 14, located at 3939 Landmark Street south of Washington Boulevard. A CUP was approved on November 14, 2005 allowing the conversion of a 37,000 GSF industrial building into a private school use. The school was limited to a maximum enrollment of 120 students and 47 staff. As part of the CUP modification approval, Park Century School voluntarily agreed to reimburse the City on an annual basis for lost property tax revenue as a result of the change of use in the industrial building to a non-profit school use.

The City Council adoption of the proposed ZCA would allow the three private schools located in the IG Zone – The Willows Community School, Turning Point School and Park Century School - to submit an application for a Modification to their existing Conditional Use Permit with a Master Plan document, which thoroughly outlines the extent of the future physical expansion and any proposed student and staff increases, and an economic impact study to determine the fiscal impacts of the proposed expansion on the City, should they wish to expand beyond their current floor area and operational limitations. The proposed ZCA will not permit new private school uses in the IG Zone.

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DISCUSSION:

Procedures to Permit Modification to a Conditional Use Permit

The ZCA (See Attachment No. 1 Exhibit A) will modify two sections of the Zoning Code. Section 17.230.015, Table 2-8 will be amended to include a footnote citation under permit requirements for private schools in the IG Zone. The footnote language will direct the reader to Section 17.610.010 for nonconforming school uses.

Section 17.610.010, the Nonconforming Use section of the Zoning Code, will be amended to include Subsection F. The new subsection will identify requirements for the submittal and review/approval of a Modification to an existing Conditional Use Permit for private schools in the IG Zone, including:

1. The modification and/or expansion request shall require a modification of the school's existing Conditional Use Permit, which is subject to the review and approval by the Planning Commission, consistent with current requirements for a modification to a use permit (Section 17.595.035). The project will be required to meet the required findings for a Conditional Use Permit, pursuant to Section 17.530.020 - Findings and Decision;
2. In order to prevent schools from developing in a "leap frog" type pattern, i.e., acquiring and developing property not directly adjacent to their own, the Amendment requires that the modification and/or expansion may only include property that is already part of the existing private school use or that is directly and physically abutting the existing school property;
3. Any application for a modification and/or expansion of a private school in the IG Zone with an existing Conditional Use Permit shall include:
 - a. The submittal of a master plan document that thoroughly outlines the extent of the proposed modification and/or expansion, including any proposed increase to student enrollment and/or staff. The form and substance of the master plan document shall be determined by the Director.
 - b. The submittal of an economic study which estimates the fiscal impacts of any modification and/or expansion on the City. The study shall include, but not be limited to, a calculation of the economic and tax "opportunity cost" to the City of expanding the nonconforming private school use. The form and substance of the economic study shall be determined by the Director.

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4. After consideration of the economic study and the fiscal impacts on the City from any modification and/or expansion of the existing private school use, the appropriate review authority may impose reasonable conditions to mitigate the fiscal impacts if it determines that such conditions will serve the public interest, health, safety, convenience or welfare.
5. The total area of a private school use, following its proposed expansion, may not exceed 3.5 acres. (The 3.5 acre limit slightly exceeds the total area for the Willows Community School following completion of its proposed expansion.)

Willows Conditional Use Permit Modification

As part of its application for the ZCA, the School concurrently submitted a Conditional Use Permit Modification application. The application included a Master Plan document (Attachment No. 3) and an Economic Study (Attachment No. 4) as required by the proposed ZCA.

Master Plan

The School currently operates with a maximum student enrollment of 425 out of four buildings in the Hayden Tract as described above and identified as Willows I, II, III and IV in the Master Plan. The School currently owns Willows I and II and leases Willows III and IV. The School owns an additional structure, the former Santa Monica Gymnastics Center located at 8476 Warner Drive, abutting the existing school campus to the west and identified as Willows V.

Phase 1

As part of the School's Master Plan, Phase 1, the School will initiate an increase in enrollment of 50 students and an expansion of campus operations to include the Willows V property.

The School is requesting an immediate increase in student enrollment of 25 students (from 425 to 450 students), referred to in the Master Plan document as Phase 1A, following approval of the ZCA and CUP Modification. As part of Phase 1B, the School will proceed to remove the Willows V building and in its place construct a surface parking lot. The lot will consist of 21 dedicated parking spaces, with 18 in a tandem configuration, located on the northern half of the lot. An additional 34 parking spaces, identified as event parking, will be provided on the southern half of the lot. During regular school hours when events are not taking place, the southern half of the lot will be gated and used as a hard-court play area for the School. Phase 1B will also result in the

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addition of the 25 new students, bringing total enrollment at the end of Phase 1 from 425 to 475 students.

In order to ensure that commencement of the School's proposed expansion is pursued in a timely fashion, the conditions of approval require demolition and/or construction work permitted under Phase 1 of the Master Plan to commence within two years of the effective date of the CUP Modification. Commencement of demolition and/or construction work under Phase 1 of the Master Plan shall deem the CUP Modification exercised and will require that Phase 1 be completed within two years of commencement and allow for implementation of Phases 2 and 3 as described below.

Phase 2

The Master Plan document provides a development scenario for Phase 2 of the School's development. Phase 2 will result in the addition of 75 students to the school's enrollment, resulting in a total enrollment at its completion of 550 students. Phase 2 of the Master Plan includes the reconfiguration of the east side of the property, which entails the demolition and removal of the Willows III building and the construction of a new approximately 18,000 square foot building. The existing parking area along the Higuera Street frontage will be removed to accommodate the placement of the new building. To replace the lost parking, a new parking area will be built along the eastern side of the campus, connecting with the Willows V lot, thereby creating a continuous parking lot between the School's Higuera Street and Warner Drive street frontages. The new, combined parking lot will provide 53 dedicated parking spaces and 30 spaces for on-site queuing during morning and afternoon pick-up and drop-off periods.

Pursuant to the conditions of approval, prior to the commencement of demolition and/or construction work under Phase 2 of the Master Plan, the Planning Commission shall conduct a Conformance Review of the Phase 2 plans. The Commission shall approve the plans provided it finds that they are in substantial conformance with the Master Plan and all applicable conditions of approval of the land use permit.

Phase 3

The Master Plan document provides a development scenario for Phase 3 of the School's development. Phase 3 will result in the addition of 25 additional students to the School's enrollment, resulting in a total enrollment at its completion of 575 students. Phase 3 of the Master Plan includes the demolition and removal of the Willows I building, to be replaced by a new approximately

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13,000 square foot building. Phase 3 also includes the proposed acquisition of two properties – the California Stay property (8525 Higuera Street) and the WorldPac property (8510 Warner Drive), and the demolition and removal of both buildings. A new approximately 10,000 square-foot building will be constructed on the California Stay property for new classroom space. The WorldPac property will also be redeveloped with a new 10,000 square-foot building. The conceptual plan for the building, envisions a theater and play yard located on the property.

As outlined in the Master Plan and as described above, the School plans on a phased expansion of school operations over a number of years which includes the potential acquisition of abutting properties. In order to allow the School a reasonable time period to acquire the additional properties and complete the phased expansion, the Conditions of Approval adopted by the Planning Commission for the CUP/M outline specific time frames for acquisition of the additional properties and to begin construction of Phase 3 of the Master Plan. As proposed, the School will have four years from the effective date of the approval of the application to acquire a fee or leasehold interest in the WorldPac Property (8510 Warner Drive; also referred to as “Property B” in the Master Plan document and conditions of approval). Once an interest has been acquired in the WorldPac property, the School will have five years from the date of acquisition to begin demolition and/or construction work, as permitted under Phase 3 of the Master Plan.

The School will have eight years from the effective date of the approval of the application to acquire a fee or leasehold interest in the California Stay (8525 Higuera Street; also referred to as “Property C” in the Master Plan document and conditions of approval). Once an interest has been acquired in the California Stay property, the School has five years from the date of acquisition to commence demolition and/or construction work, as permitted under Phase 3 of the Master Plan.

Pursuant to the conditions of approval, prior to the commencement of demolition and/or construction work under Phase 3 of the Master Plan, the Planning Commission shall conduct a Conformance Review of the Phase 3 plans. The Commission shall approve the plans provided it finds that they are in substantial conformance with the Master Plan and all applicable conditions of approval of the land use permit.

Economic Study

The School recognized the issue of lost tax revenues to the City at the outset of the discretionary approval process and retained HR&A to assess the financial

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impacts to the City. As part of the submittal requirements for the School's CUP/M application HR&A conducted an economic and tax revenue analysis (the "Analysis"), reviewed by staff and the City's financial consultants, Keyser Marston and Associates (KMA). This detailed analysis has been entirely funded by the School and required several months to get agreement on the method of analysis. The Analysis, further explained in a summary letter from HR&A (Attachment No. 4), identified the opportunity cost to the City of implementing the School's proposed Master Plan. The opportunity cost is defined as the annual City tax revenues from The Willows project versus the next best alternative. The annual tax revenue from the alternative use which exceeds revenues from the Willows project represents the opportunity cost to the City. The analysis relied on the following definitions and scenarios:

- Tax revenues to the City include direct property tax, sales tax, utility tax, business tax, and property tax increment.
- The opportunity cost for Phase 1 is the difference between annual tax revenues from existing conditions (the existing Willows campus plus the existing California Stay and WorldPac operations) versus the proposed Phase 1 improvements of the Willows School.
- The opportunity cost of the full build-out (the completion of the Phased development of the school, per the Master Plan document) is the difference between the annual tax revenue for the existing Willows campus, plus an intensified use of the California Stay and WorldPac properties versus the Willows project at full build-out.
- The intensified use of the California Stay and WorldPac properties includes the rehab of the buildings into multi-tenant professional office uses, typical of The Hayden Tract.

The School has agreed to voluntarily contribute the opportunity cost to the City in order to make the City whole. Based on the analysis of HR&A, as reviewed by staff and KMA, the School will contribute \$61,100 annually to the City as part of the Phase 1 development. Subsequent additional annual payments to the City will include \$21,413 as part of Phase 2 and \$21,413 as part of Phase 3. Therefore, at the completion of the phased development of the School's expansion, the School shall contribute \$103,926 annually to the City's General Fund.

KMA has completed a City Revenue Analysis (Attachment No. 5) of the School's Master Plan (Project) and the proposed Opportunity Cost Analysis prepared by HR&A, which proposes the School make a payment to the City of \$103,926 per year upon full build-out of the Project. This fee amount was set in May 2011, and it includes the opportunity costs associated with the property tax increment that could potentially be generated by private use of the properties

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KMA analyzed the proposed Project, as well as two alternate scenarios based on comments from the Planning Commission. In each of the KMA analyses, they have eliminated the property tax increment revenue and replaced it with the property tax revenue that would be received by the City. The following is a summary of their analysis:

Scenario 1 – Willows Project Developed

Scenario 1 represents the full build out of the Willows Project. Under this alternative it is assumed that Willows will purchase both the WorldPac and Cal Stay properties. These buildings will be demolished and will be replaced with school uses. Thus, the annual recurring City revenues generated by the school uses of the Willows Project will be less than the City revenues generated by the existing buildings. KMA estimates the recurring City revenues for Scenario 1 at \$55,615 per year.

Scenario 2 – New Owners & Higher Intensity Use

Scenario 2 represents an alternate development scenario in which the current configuration and uses of Willows remain the same. However, in this Scenario, both the WorldPac and Cal Stay buildings are sold to new owners. Under the assumptions applied in the HR&A analysis, this sale increases the assessed valuation of the two properties from a weighted average of \$37 per square foot of land area to \$200 per square foot of land area. Furthermore, it is assumed that the WorldPac and Cal Stay buildings are converted to uses that generate taxable sales. For this Scenario, the new uses are assumed to generate taxable sales of \$96 per square foot of gross building area (GBA). This represents the average taxable sales currently generated in the Hayden Tract. KMA estimates the recurring City revenues for Scenario 2 at \$106,760 per year.

Scenario 3 – New Owners & Highest Intensity Use

Scenario 3 represents a third alternate development scenario which is similar in scope to Scenario 2. The existing Willows configuration and uses would remain the same. As in Scenario 2, both the WorldPac and Cal Stay buildings are sold to new owners. However, in this Scenario the new uses are assumed to be higher sales tax generating retail uses, with taxable sales assumed at \$400 per square foot of GBA. It should be noted that the development scope used in Scenario 3 is unlikely to be feasible given the configuration of the sites and the lack of parking. Scenario 3 is merely intended to provide a perspective on the loss of public revenue that could occur if the entire character of the

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Hayden Tract development changed at some point in the future. KMA estimates the recurring City revenues for Scenario 3 at \$164,477 per year.

Opportunity Cost Calculation

The Project's opportunity cost is equal to the difference between the recurring City revenues generated by the Project and the two alternative scenarios. The following outlines the opportunity costs for Scenario 2 and Scenario 3.

- Scenario 2: $\$106,750 - \$55,615 = \$51,145$
- Scenario 3: $\$164,477 - \$55,615 = \$108,863$

Conclusions

As shown in the KMA analysis, the opportunity cost incurred by the City is estimated at approximately \$51,000 per year under a development scope for these properties that reflects the current characteristics of the Hayden Tract development. If the entire character of the Hayden Tract changes in the future, the opportunity cost is estimated to total approximately \$109,000 per year.

The conditions of approval require Willows to make a payment to the City of \$103,926 per year if the WorldPac and Cal Stay buildings are purchased by the school. This payment is nearly twice as much as the anticipated opportunity cost, and only slightly less than the opportunity cost that could be possibly incurred in the distant future if development patterns change radically from the current conditions.

In order to address questions from the Planning Commission on the continuing suitability of the School's proposed financial contribution taking into consideration the KMA analysis being different than HR&A's cost calculations because of the changed City fiscal circumstances since the demise of redevelopment agencies and the School's payment exceeding the City's opportunity cost as measured today, HR&A prepared a letter (Attachment No. 6) which addresses the KMA analysis. The letter concludes that the School's proposed contribution of \$103,926 is roughly proportional to the potential opportunity cost to the City if the City were also to include the opportunity cost calculation: (1) the possibility that the Willows V building owned by the School could be converted at some point in the future to an intensified commercial office and retail use if the School's applications were not approved by the City; and (2) the possibility that the California Stay, World Pac, and Willows V building if reused for commercial purposes, might also generate future retail sales tax revenue for the City at a much higher level than HR&A estimated, if the Hayden Tract evolved into a more commercial retail center.

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Required Findings in Support of the Zoning Code Amendment

Zoning Code Section 17.620.030 outlines the required findings for approval of a Zoning Code Amendment as follows:

1. The proposed amendment ensures and maintains internal consistency with the goals, policies, and strategies of all elements of the General Plan and will not create any inconsistencies with this title, in the case of a Zoning Code amendment.
2. The proposed amendment would not be detrimental to the public interest, health, safety, convenience or welfare of the City.
3. The proposed amendment is in compliance with the provisions of the California Environmental Quality Act (CEQA).

The Planning Commission determined that the above-findings could be made and has recommended the City Council approve the ZCA.

Environmental Determination

Pursuant to the California Environmental Quality Act (CEQA) guidelines, an Initial Study and Mitigated Negative Declaration finding has been prepared and circulated for review for the proposed project. The Planning Commission adopted the Mitigated Negative Declaration finding on August 8, 2012 (Attachment No. 7). No further City Council action on the Mitigated Negative Declaration is required.

City Council Review Authority

As discussed above, the City Council's review authority is limited to the ZCA. The Planning Commission's approval of the CUP Modification is final, as no appeal was filed. However, as set forth in the project conditions of approval, the CUP Modification will only become effective on the effective date of the ZCA, if adopted by the City Council.

CONCLUSION:

The proposed ZCA is very specific in its allowance for only schools with existing Conditional Use Permits to apply for a modification, and only with the submittal of a master plan document and economic study. The Amendment is limited in

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scope, applying to only the three existing private schools in the IG Zone – Willows Community School, Park Century and Turning Point. Furthermore, any such application to modify the existing use permit will be subject to the review and approval of the Planning Commission.

FISCAL ANALYSIS:

Introduction, and subsequent adoption of the proposed Ordinance in and of itself will not generate any cost to the City nor will it create any additional revenues. However, should the Ordinance be adopted, the City may potentially garner additional opportunity cost revenue from the reuse of properties acquired by private schools for expansion of their facilities. An economic study prepared as part an applicant's conditional use permit modification will determine the opportunity cost of using properties zoned for Industrial General land uses for a private school use. The Planning Commission, as part of their review of the school's application may impose reasonable conditions to mitigate the fiscal impacts if it determines that such conditions will serve the public interest, health, safety, convenience or welfare. Discretionary application fees will also be collected for the processing of CUP Modifications.

In the case of the Willows School Conditional Use Permit Modification approved by the Planning Commission, the School will voluntarily contribute \$61,100 annually to the City as part of the Phase 1 development. Subsequent annual payments to the City will include \$21,413 as part of Phase 2 and \$21,413 as part of Phase 3. Therefore, at the completion of the phased development of the School's expansion, the School shall contribute \$103,926 annually to the City's General Fund.

ATTACHMENTS:

1. Proposed Ordinance amending Section 17.230.015, Table 2-8 (Allowed Uses and Permit Requirements) and Section 17.610.010 (Nonconforming Uses), to allow for the modification and/or expansion of nonconforming private school uses in the Industrial General zone subject to approval of a modification of an existing Conditional Use Permit.
2. Planning Commission Resolution No. 2012-P006
3. Willows School Master Plan Document date June 27,2012
4. Economic Study – HR&A Letter dated July 3, 2012
5. KMA City Revenue Analysis dated July 27, 2012
6. HR&A Letter dated August 8, 2012
7. Initial Study/Mitigated Negative Declaration dated May 24, 2012.
8. Written Correspondences

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9. Planning Commission Minutes, July 11, 2012

MOTIONS:

That The Council:

1. Determine that no additional environmental information is needed based on the Planning Commission's adoption of a Mitigated Negative Declaration finding that Zoning Code Amendment, Planning Commission ZCA Resolution No. 2012-P005, will not have a significant adverse impact on the environment; and,
2. Introduce the proposed Ordinance amending Section 17.230.015, Table 2-8 (Allowed Uses and Permit Requirements) and Section 17.610.010 (Nonconforming Uses), to allow for the modification and/or expansion of nonconforming private school uses in the Industrial General zone subject to approval of a modification of an existing Conditional Use Permit.