

**SUBJECT: ZONE TEXT AMENDMENT TO ENCOURAGE AND FACILITATE
THE CONVERSION OF EXISTING COMMERCIAL
DEVELOPMENTS TO RESIDENTIAL USES**

PREPARED BY: COMMUNITY DEVELOPMENT DEPARTMENT

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STATEMENT ON THE SUBJECT:

The City Council will consider a Zone Text Amendment (ZTA) to encourage and facilitate the conversion of existing commercial buildings to multi-family residential uses by establishing a ministerial approval process for qualifying projects. In response to Planning Commission discussion and community feedback, staff is presenting two options of the proposed ordinance for City Council consideration. The primary difference between the two ordinances is the treatment of hotels and motels, reflecting the policy considerations and community feedback regarding potential economic and employment impacts discussed by the Planning Commission and subsequently received by staff. Both versions otherwise maintain the same proposed standards intended to streamline conversion projects, support Housing Element implementation, and advance City climate and land use goals. The proposed Ordinances are not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162 and are additionally categorically exempt from the provisions of CEQA, pursuant to Section 15183 and Section 15061(b)(3) of the State CEQA Guidelines.

RECOMMENDATION:

Staff recommends that the City Council review the two ordinance options presented for consideration and, after selecting its preferred approach, introduce on first reading the chosen ordinance:

- 1) Option 1 (Attachment A) – Ordinance No. 25-____ entitled: “AN ORDINANCE OF THE CITY OF WEST HOLLYWOOD ADOPTING AN AMENDMENT TO TITLE 19 OF THE WEST HOLLYWOOD MUNICIPAL CODE TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES THROUGH A MINISTERIAL APPROVAL PROCESS, AND FINDING THE ACTION EXEMPT FROM CEQA”

(This is the ordinance as recommended by the Planning Commission on September 4, 2025, which allows qualifying hotel and motel conversions to proceed ministerially when all other eligibility criteria are met.)

- 2) Option 2 (Attachment B) – Alternative Ordinance No. 25-____ entitled: “AN ORDINANCE OF THE CITY OF WEST HOLLYWOOD ADOPTING AN AMENDMENT TO TITLE 19 OF THE WEST HOLLYWOOD MUNICIPAL CODE TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES THROUGH A MINISTERIAL APPROVAL PROCESS, EXCLUDING HOTELS AND MOTELS FROM MINISTERIAL ELIGIBILITY, AND FINDING THE ACTION EXEMPT FROM CEQA”

(This alternative ordinance is identical to Option 1 except that it excludes hotels and motels from eligibility for the ministerial approval pathway, unless otherwise required by state law.)

BACKGROUND / ANALYSIS:

According to the most recent 6th Cycle Regional Housing Needs Assessment and Allocation (RHNA), the City is required to accommodate 3,933 new housing units across various income levels. One strategy to support this goal is to streamline the policy framework for commercial-to-residential conversion (“conversion”) projects, which are development projects that convert existing buildings with non-residential uses, such as offices or other commercial uses, into housing. Residential conversions are a form of

adaptive reuse, which is the process of repurposing existing buildings for a new use other than the one for which the structure was initially designed.

Conversion projects expand the City's housing supply while also preserving existing buildings, lowering carbon impacts, and keeping pace with changing real estate demand. Conversion projects also enable the City to respond to shifting market demand between non-residential and residential uses. Conversion projects can also help mitigate the risk of outdated buildings falling into disuse and deterioration by adapting them to changing conditions.

Challenges to Conversion Projects

However, significant policy challenges exist to making conversion projects feasible, including unclear policy frameworks that contribute to uncertainty, design standards that add complications to projects without proportional benefits to the community, and design standards unsuited to conversion projects. The proposed Ordinances help to resolve these barriers by enabling ministerial approval for conversion projects that fulfill specific requirements, with clear standards, targeted concessions, and a predictable permitting process. These reforms will improve the feasibility of conversion projects throughout the City. If adopted, either Ordinance will directly expand the range of feasible housing projects and help the City meet its housing goals. Without action, vacant or outdated commercial buildings may sit unused, missing an opportunity to address housing needs and strengthen community vitality.

City of West Hollywood's Housing Element

The adopted and certified 6th Cycle Housing Element ("Housing Element") for the City of West Hollywood establishes goals and policies that provide a framework and strategies to promote housing availability, affordability, and adequacy within the City. The Housing Element addresses housing needs across the City's economic and social spectrum through a series of equitable housing programs, one of which is to ensure adequate sites for the RHNA and to prevent any project from resulting in a net loss of housing for the City (Housing Program #11). Housing Program #11 also includes objectives related to conversion projects, calling for the development of regulations to streamline conversion

of office space into housing, to incentivize conversion of office space to residential units, and to reevaluate the proportion of commercial to residential in mixed-use buildings, followed by drafting of a zone text amendment to address the issue. These policies were the catalyst for this draft Ordinance.

Adaptive Reuse Allowed as Potential Rehab Incentive for Cultural Resources

The Municipal Code provides specific rehabilitation incentives for properties that have been formally designated by the City Council as Cultural Resources, offering the possibility of adaptive reuse. These incentives, outlined in Chapter 19.58 (Cultural Heritage Preservation), apply only to designated Cultural Resource properties. All designated Cultural Resources are subject to the requirements and review procedures established in Chapter 19.58 of the Municipal Code. However, these provisions do not apply to properties that are not designated as Cultural Resources.

Overview of Conversion and Adaptive Reuse Research

Staff reviewed conversion and adaptive reuse codes of Santa Monica, Los Angeles, and Beverly Hills, as well as post-pandemic adaptive reuse best practices as discussed in urban planning literature and market assessments. Staff also met with conversion project developers who provided additional insights.

Based on the research, Staff recommends the following actions:

- Implement a flexible design framework to fully accommodate conversion projects, recognizing that older building forms and layouts often require creative, flexible solutions to meet modern housing standards.
- Building age eligibility periods for conversion projects should not be overly restrictive. The City of Los Angeles' initial adaptive reuse ordinance had a single set date as the threshold for building age eligibility to qualify for by-right adaptive reuse provisions, which posed a significant constraint on potential projects. Its newly updated adaptive reuse ordinance has a rolling 15-year timeline, making any building older than 15 years eligible for adaptive reuse. Other cities, such as Santa Monica, have no age requirements for buildings.

- Eligibility for conversion projects should not be restricted to specialized overlays or Specific Plan areas. Feedback from the Central City Association of Los Angeles suggested that LA's updated adaptive reuse ordinance would be improved if it extended to the entire city rather than a limited geographic area. Creating special overlays would add significant administrative burdens to conversion projects and needlessly constrain where property owners may efficiently adapt to the city's evolving needs.

Stakeholder Outreach

City staff met with developers who had experience in conversion projects in the Los Angeles area. These industry experts provided the following recommendations:

- Provide exemptions from the City's open space requirements for buildings set on lots that may not be able to accommodate them. Solutions can include allowing 100 percent of rooftop open space to be counted towards the City's requirements, or providing limited exemptions for buildings on small lots or near existing parks.
- Provide exemptions for non-conforming uses and design standards, such as setbacks on existing buildings. This can prevent costly remodels.
- Remove requirements for ground-floor retail, if they are currently required. Instead, allow flexibility so ground-floor areas can be utilized as needed.
- Do not implement minimum unit sizes, which limit flexibility in how floor areas can be configured. Developers of affordable housing prefer higher unit counts, as this can increase the likelihood of obtaining special financing.
- Provide exemptions from density limits for conversion projects. Projects will still be constrained by total gross floor area, height, and existing lot standards, which will provide adequate limits for how parcels are utilized.

Long Range Planning Subcommittee Feedback

City Staff presented its initial research to the Long Range Planning Subcommittee (LRPSC) at its meeting on October 17, 2024. The LRPSC expressed support for a flexible policy framework to enable conversion projects. Members favored allowing partial and

floor-by-floor conversions and cautioned against requiring ground-floor commercial uses, instead recommending maximum adaptability based on site conditions.

The Subcommittee also discussed affordability considerations, emphasizing the importance of facilitating project feasibility as appropriate. While supportive of moderate-income housing, members noted that blanket inclusionary requirements could reduce project viability. Suggestions included conducting a feasibility study if required, exploring incentives, and preventing oversized units through maximum unit size or tailored FAR limits if necessary.

In response to this feedback, Staff implemented the following elements into the proposed Ordinances:

- The draft Ordinances allow waivers for specific design standards, provided they do not pose health or safety risks.
- The Ordinances include no restrictions on partial conversions and do not require ground-floor retail.

However, Staff recommends not waiving affordable housing requirements for conversion projects, as this would conflict with the goals of the Housing Element and General Plan. To help offset the impact of affordable housing requirements on feasibility, the draft Ordinances implement generous height and FAR waivers, allowing projects in CN zones to add up to two stories, and up to four stories in all other zones. Additionally, conversion projects may exceed height limits in CN zones by up to one story or 12 feet, and up to two stories or 24 feet in all other zones. These waivers enhance the feasibility of conversion projects while maintaining the City's goals of increasing the affordable housing supply.

Staff considered implementing maximum unit size and FAR limits to disincentivize large unit conversion projects. However, Staff advises that these solutions could pose constraints on multi-bedroom units, which are necessary for families. Instead, Staff recommends that flexible unit sizes would be more effective, opening up the possibility for low-income housing financing and increasing overall unit counts. Additionally, the

previously discussed recommendation not to waive affordability requirements helps ensure that all conversion projects have an affordable housing component.

ZONE TEXT AMENDMENT OVERVIEW

New Municipal Code Section 19.36.400 (Commercial to Residential Conversions)

These Ordinances establish a new code section to introduce criteria for ministerial approval for conversion projects that meet specific requirements. They regulate conversion projects and include additional amendments to add new definitions and grant exemptions. Conversion projects that do not fulfill the criteria for ministerial approval may be considered through the City's existing approval processes.

The modified sections are summarized in the table below.

Summary of New Code Chapters/Sections

Type	Section	Title	Change
New code section	19.36.400	Residential Conversions	New code section
Addition to existing code section	19.90.020	Definitions of Specialized Terms and Phrases	New definitions for Residential Conversion, Existing Building Envelope
Addition to existing code section	19.72.030	Non-conforming Structures	Added an exception for Residential Conversions regulating retention of non-conforming structures
Addition to existing code section	19.64.030	Exceptions (Development Fees)	Added residential conversions
Addition to existing code section	19.45.020	Ministerial Housing Permit	Added residential conversions

Recommendation of the Planning Commission

The item was unanimously approved by the Planning Commission on September 4, 2025 (noting Commissioner Lombardi's absence). Commissioners explored how the ordinance applied to different property types and clarified details such as structural retention, incentives, and ministerial eligibility. The Commission supported creating a streamlined,

ministerial process for adaptive reuse projects that convert existing commercial buildings to housing. The Ordinance, as approved by the Planning Commission, is included as ATTACHMENT A (Option 1).

Hotel-to-Residential Conversions Discussion

The most substantive discussion by the Planning Commission focused on whether hotels should remain eligible for conversion under the ordinance. As part of the public hearing, public comments were received expressing concerns that hotel-to-residential conversions could reduce employment opportunities for hospitality workers. During its discussion, the Commission considered whether to include hotels as eligible properties. Some commissioners supported excluding hotels from ministerial approval eligibility due to potential employment and economic impacts, while others favored retaining them to maximize housing opportunities. The Commission ultimately voted 6–0 to recommend approval of the Ordinance as drafted (Option 1), but requested that Staff note for the City Council that the Commission was divided on the inclusion of hotels and that further policy discussion at the Council may be appropriate.

Alternative Ordinance (Option 2) – Excluding Hotels and Motels from Ministerial Eligibility

To address the concerns of the Commission and community feedback, Staff has drafted an Alternative Ordinance that excludes the conversion of hotels and motels to residential uses from eligibility for the ministerial approval pathway, unless otherwise required by state law. This option responds to public and Commissioner comments and aligns with the City's interest in balancing housing production with preservation of local employment opportunities. It also ensures that any potential hotel conversion is reviewed for consistency with the City's economic development and land use goals.

Staff has prepared this option as a complete Alternative Ordinance (ATTACHMENT B).

Staff does not recommend adopting one version over the other at this time. Both ordinances advance the City's goals of facilitating commercial-to-residential conversions to preserve existing building stock and support housing production. The primary difference between the two is the treatment of hotels and motels, reflecting the policy considerations and community feedback regarding potential economic and employment

impacts discussed by the Planning Commission and subsequently received by staff. Staff requests that the City Council consider the merits of each approach during the public hearing and then proceed with the first reading of the ordinance that best reflects the City Council's policy direction.

Minor Clerical Changes to Ordinance Recommendation by Planning Commission

The attached draft Ordinances contain four minor clerical corrections from the version recommended for approval by the Planning Commission (see ATTACHMENT C). These changes are summarized in the table below.

Reason for change	Change
Removing typo	2. Structure Retention ~~(one of the following)~~ : a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in this Section. b. Residential Conversion of non-historic structures is allowed if it complies with state eligibility criteria.
Numbering correction	4. Unit Thresholds. a. Both Residential Conversion Projects (No Mixed-Use) and Mixed-Use Residential Conversion Projects shall create a minimum of three (3) dwelling units. ~~5-~~ b. Mixed-Use Residential Conversion Projects shall dedicate a minimum of fifty percent (50%) of the gross floor area to residential use.
Terminology correction	L. Cultural Heritage Preservation. Residential Conversion Projects involving City-Designated ~~Historic Cultural~~ Resources must comply with Chapter 19.58 (Cultural Heritage Preservation).
Including residential conversions in the allowed commercial and residential use tables	• Add "Conversion of commercial to residential uses" in Table 2-2 (Allowed Uses and Permit Requirements for Residential Zoning Districts) • Add "Conversion of commercial to residential uses" in Table 2-5 (Allowed Uses and Permit Requirements for Commercial and Public Zoning Districts)

CONFORMANCE WITH VISION 2020 AND THE GOALS OF THE WEST HOLLYWOOD

GENERAL PLAN:

This item is consistent with the Primary Strategic Goal(s) (PSG) and/or Ongoing Strategic Program(s) (OSP) of:

- PSG-1: Maintain the City's Unique Urban Balance with Emphasis on Residential Neighborhood Livability.
- PSG-2: Affordable Housing.
- OSP-9: Upgrade Existing Buildings & Infrastructure.

The draft Ordinances support PSG-1 by streamlining the City's ability to adapt to the evolving balance between commercial and residential uses. Underutilized and vacant commercial spaces can be detrimental to the livability of residential neighborhoods. Efficient adaptation enables the City to adjust to changing environments while maintaining an appropriate balance of uses.

The draft Ordinances also support PSG-2 by creating more affordable housing construction opportunities. The language preserves the City's affordable housing requirements for conversion projects and State incentives while including additional incentives such as height increases to support a greater housing supply.

Finally, the draft Ordinances support OSP-9 by facilitating continual upgrades to existing buildings. The Ordinance helps encourage preservation of existing buildings by requiring retention of at least 50 percent of the building's structure, resulting in reduced carbon emissions compared to entirely new constructions. This enables the City to incrementally increase density and adapt to evolving land-use needs while preserving West Hollywood's core identity.

In addition, this item is compliant with the following goal(s) of the West Hollywood General Plan:

- HP-4: Increase the public's awareness of the City's history and cultural resources.
- HP-5: Promote the preservation of cultural resources through maintenance and rehabilitation incentives and technical assistance.

The draft Ordinances support Goal H-4 by fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives. These Ordinances are a direct outgrowth of this goal, as previously discussed. Additionally, the draft Ordinances support the City's Housing Element Program #11, which calls for the City to streamline development standards for converting office space into housing.

The draft Ordinances also support Goal H-5 by providing a strong policy framework to support housing development and preservation. Creating clear standards for ministerial approval of conversion projects helps reduce uncertainty and increase project feasibility. It implements incentives for redevelopment, such as strategically reducing or eliminating design barriers, and preserves the City's affordable housing requirements.

EVALUATION PROCESSES:

Progress on this Ordinance is expected to be monitored through development activity, utilization of this ministerial approval process, and changes in rates of commercial to residential conversion development.

CLIMATE ACTION AND ENVIRONMENTAL SUSTAINABILITY:

This item continues the implementation of West Hollywood's 2021 Climate Action and Adaptation Plan (WeHo Climate Action), which promotes the City's environmental and sustainability actions on the built environment and municipal operations as well as the quality of life of residents, businesses, and visitors. Reducing emissions from existing buildings is a critical step toward achieving carbon neutrality by 2035.

This item is consistent with the CAAP Climate Measures of:

- EN-1: Improve energy performance, decarbonize and improve energy resilience of the existing building stock
- EN-3: Decarbonize the future building stock and implement best practices in sustainable and resilient new construction

Conversion projects directly advance the City's CAAP objectives by reducing embodied carbon emissions from demolition, preserving existing structures, and enabling retrofits such as electrification and heat pump installations. These actions accelerate

decarbonization while expanding housing opportunities. Conversion projects have reduced environmental impacts compared to all-new construction projects. Residential buildings are also less energy-intensive than most commercial uses, resulting in reduced carbon footprints. This leads to environmental benefits that support the goals of the CAAP.

California Environmental Quality Act (CEQA)

The proposed Ordinances are not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162. No substantial changes are proposed by the Ordinances and there are no substantial changes in the circumstances under which the Project will be undertaken that will require major revisions to the previously certified Housing Element Environmental Impact Report (EIR) due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified Housing Element EIR adequately discusses the potential impacts of the proposed Ordinances. The proposed Ordinances are needed to facilitate the production of housing in the City. The Housing Element EIR thoroughly analyzed the potential environmental impacts that could result from implementing the 2021-2029 Housing Element, including Goal H-4.

Alternatively, the Ordinances are also exempt from further environmental review under CEQA Guidelines Section 15183, which applies to projects that are consistent with the development density and use characteristics analyzed in a previously certified EIR for a General Plan or community-level plan. The proposed Ordinances implement Goal H-4 of the City's certified 6th Cycle Housing Element (2021–2029), which calls for fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives, and Program 11, which calls for the City to streamline development standards for the conversion of office space into housing. The proposed amendments do not introduce new or peculiar environmental impacts beyond what were already considered in the prior EIR, nor increase the severity of previously identified impacts. Instead, they implement previously analyzed policies intended to accommodate the City's

housing needs by enabling residential reuse of non-residential buildings. Accordingly, no potentially significant off-site or cumulative impacts would occur beyond what was studied in the certified EIR for the City's 6th Cycle Housing element. The proposed Ordinances do not authorize specific construction projects but provide a regulatory pathway for conversion projects consistent with existing planning and environmental documents. Therefore, no further environmental review is required under CEQA Guidelines Section 15183.

Finally, the proposed Ordinances are exempt pursuant to CEQA Guidelines Section 15061(b)(3) because it can be shown with certainty that this regulatory pathway will not result in significant effects on the environment. The proposed Ordinances would authorize the adaptive reuse of existing buildings with little new construction, consistent with the City's Housing Element.

COMMUNITY ENGAGEMENT:

Community engagement for the proposed Ordinance was conducted through the City's Engage WeHo platform. Between June 2024 and November 2025, the project page received 82 views from 53 unique visitors. On October 17, 2024, Staff presented the considerations of the proposed ZTA to the Long Range Planning Projects Subcommittee. On September 4, 2025, Staff presented this item at a Planning Commission public hearing. A letter was received from Unite Here Local 11 expressing opposition to the item, citing concerns about how incentivizing the conversion of hotels to residences could negatively impact hotel employees. Additional public comments were received at the Planning Commission hearing as reflected in the meeting minutes (ATTACHMENT E). City staff also met with local developers who had experience in conversion projects in the Los Angeles area.

OFFICE OF PRIMARY RESPONSIBILITY:

COMMUNITY DEVELOPMENT DEPARTMENT / LONG RANGE PLANNING DIVISION

FISCAL IMPACT:

No fiscal impact.

ATTACHMENTS:

- A. Draft Ordinance No. 25-_____ (As approved by the Planning Commission – Option 1)
- B. Draft Alternative Ordinance No. 25-_____ (Excluding Hotels and Motels – Option 2)
- C. Planning Commission Resolution No. PC 25-1599
- D. Planning Commission Staff Report for September 4, 2025
- E. Planning Commission Meeting Minutes for September 4, 2025

ORDINANCE NO. 25-_____

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES AND FINDING THE ACTION EXEMPT FROM CEQA.

THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. Findings.

- A. Under the City of West Hollywood's ("City") 6th Cycle RHNA, the City must accommodate 3,933 new housing units across various income levels. One strategy to support this goal is to streamline the policy framework for commercial-to-residential conversion (conversion) projects, which are development projects to convert existing buildings with nonresidential uses, such as offices or other commercial uses, into housing. This Ordinance advances the City's housing and sustainability goals by enabling underutilized commercial properties to be efficiently converted into new housing opportunities.
- B. Conversion projects make use of existing building stock, reduce demolition waste, and deliver housing faster than new construction. Yet unclear policy requirements have limited their feasibility. The proposed Ordinance establishes clear standards, targeted concessions, and a predictable permitting process, making conversion projects more feasible across the City. Without this action, many outdated commercial buildings may remain vacant, missing an opportunity to meet housing needs and reinvigorate commercial corridors.
- C. Pursuant to the authority granted to the City of West Hollywood (the "City") by Article XI, Section 7 of the California Constitution, the City has the police power to regulate the use of land and property within the City in a manner designed to promote public convenience and general prosperity, as well as public health, welfare, and safety.
- D. A public hearing was duly noticed for the Planning Commission meeting of September 4, 2025, by publication in the Beverly Press newspaper, the City

ATTACHMENT A

website and by announcement on City Channel 6 starting August 14, 2025. Following the public hearing on September 4, 2025, the Planning Commission recommended approval of the proposed zone text amendment to the City Council.

- E. On December 1, 2025, the City Council held a duly-noticed public hearing to consider the Ordinance, including: (1) the public testimony and agenda reports prepared in connection with the Ordinance, (2) the policy considerations discussed therein, and (3) the consideration and recommendation by the City's Planning Commission.

SECTION 2. Environmental Review. The City Council hereby finds that the proposed Ordinance is not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162. No substantial changes are proposed by the Ordinance and there are no substantial changes in the circumstances under which the Project will be undertaken that will require major revisions to the previously certified Housing Element Environmental Impact Report (EIR) due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified Housing Element EIR adequately discusses the potential impacts of the proposed Ordinance. The proposed Ordinance is needed to facilitate the production of housing in the City. The Housing Element EIR fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element, including Goal H-4. Alternatively, the Ordinance is also exempt from further environmental review under CEQA Guidelines Section 15183, which applies to projects that are consistent with the development density and use characteristics analyzed in a previously certified EIR for a General Plan or community-level plan. The proposed Ordinance implements Goal H-4 of the City's certified 6th Cycle Housing Element (2021–2029), which calls for fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives, and Program 11, which calls for the City to streamline development standards for the conversion of office space into housing. The proposed amendments do not introduce new or peculiar environmental impacts beyond what were already considered in the prior EIR, nor increase the severity of previously identified impacts. Instead, they implement previously analyzed policies intended to accommodate the City's housing needs by enabling residential reuse of non-residential buildings. Accordingly, no potentially significant off-site or cumulative impacts would occur beyond what was studied in the certified EIR for the City's 6th Cycle Housing element. The proposed Ordinance does not authorize specific construction projects but provides a regulatory pathway for conversion projects consistent with existing planning and environmental documents. Therefore, no further environmental review is required under

CEQA Guidelines Section 15183. Finally, the proposed Ordinance is exempt pursuant to CEQA Guidelines Section 15061(b)(3) because it can be shown with certainty that this regulatory pathway will not result in significant effects on the environment. The proposed Ordinance would authorize the adaptive reuse of existing buildings with little new construction, consistent with the City's Housing Element.

SECTION 3. General Plan Consistency. The City Council of the City of West Hollywood hereby finds that the Zone Text Amendment (ZTA25-0003) is consistent with the Goals and Policies of the General Plan, specifically Goal H-4: Provide for adequate opportunities for new construction of housing and Goal H-5: Provide for a government environment that facilitates housing development and preservation. The draft Ordinance supports Goal H-4 by fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives. This Ordinance is a direct outgrowth of this goal as previously discussed. Additionally, the draft Ordinance also supports Program 11, which calls for the City to streamline development standards for converting office space into housing. The draft Ordinance also supports Goal H-5 by providing a strong policy framework to support housing development and preservation. Creating clear standards for ministerial approval of conversion projects helps reduce uncertainty and increase project feasibility. It implements incentives for redevelopment, such as strategically reducing or eliminating design barriers, and preserves the City's affordable housing requirements.

SECTION 4. Addition to the Municipal Code. A new Section 19.36.400 Residential Conversions is added to the West Hollywood Municipal Code Chapter 19.36 Standards for Specific Land Uses of Title 19 Zoning Ordinance to read as follows:

§ 19.36.400 Residential Conversions.

- A. Purpose and Intent. The purpose of this Section is to establish objective development standards that encourage and facilitate the conversion of existing buildings and structures to new residential or mixed-use developments in a manner consistent with applicable state housing laws, including but not limited to Government Code Sections 65913.4, 65863, 66300, 65913.12, AB 2011 (2022), SB 6 (2022) and subsequent amendments or related legislation. This Section establishes objective standards, ministerial (nondiscretionary) approvals, and incentives to promote adaptive reuse, increase housing supply, and qualify the City as a prohousing jurisdiction.
- B. Applicability. This Section applies to conversions (i.e., physical alteration or reuse) of existing nonresidential uses (e.g., including, but not limited to office, retail, hotels, motels, parking structures) to residential uses, including, but not limited to multifamily residential or mixed-use projects, in all nonresidential zones.
- C. Project Eligibility. Qualifying Residential Conversion projects must meet the following requirements:
 - 1. Conversion Types (one of the following):

- a. Conversion of nonresidential land uses, including, but not limited to, office, retail, hotels, motels, and parking, to Multifamily Dwelling use.
 - b. Conversion of nonresidential land uses, including, but not limited to, office, retail, hotels, motels, and parking, to Live/Work Facilities in all nonresidential Districts only.
 - c. Conversion of nonresidential land uses, including, but not limited to, office, retail, hotels, motels, and parking, to Mixed-Use developments, provided that at least fifty percent (50%) of the gross floor area is dedicated to residential use.
 - d. Any Residential Conversion Project qualifying as an Extremely Affordable Adaptive Reuse Project pursuant to California Government Code Section 65913.12 (100% affordable for very low-income households, less than or equal to 50% AMI).
 - e. Any project meeting the eligibility criteria of Assembly Bill 2011, Affordable Housing and High Road Jobs Act of 2022 (as amended, including by AB 2243 in 2025) and Senate Bill 6, the Middle Class Housing Act of 2022, or other applicable state laws.
2. Structure Retention.
- a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in this Section.
 - b. Residential Conversion of non-historic structures is allowed if it complies with state eligibility criteria.
3. Existing Building Envelope. Projects shall retain the Existing Building Envelope, unless otherwise required or allowed by state law, except as permitted in this Section.
4. Unit Thresholds.
- a. Both Residential Conversion Projects (No Mixed-Use) and Mixed-Use Residential Conversion Projects shall create a minimum of three (3) dwelling units.
 - b. Mixed-Use Residential Conversion Projects shall dedicate a minimum of fifty percent (50%) of the gross floor area to residential use.
- D. Allowed Incentives. Qualifying projects are allowed the following modifications by right, in addition to incentives allowed under the State Density Bonus Law:
1. Additional Stories.
- a. Projects may add up to two (2) additional stories and not more than 24 feet in height above the existing building for residential uses in CN

zones, and up to four (4) additional stories and not more than 48 feet in height above the existing building in all other zones.

- b. The total resulting building height shall not exceed the height limit of the applicable zone by more than one story or 12 feet in CN zones, or two stories or 24 feet in all other zones, unless otherwise allowed by state law.
- c. Rooftop amenities may be included, provided they comply with the requirements of Subsection 19.20.080(C).

2. Additional Floor Area.

- a. Limitations to Additional Floor Area. The total combined additional gross floor area allowed pursuant to this subsection may not exceed 100 percent of the existing gross floor area.
- b. Enclosure of Existing Covered Spaces at the Ground Level. Projects may add additional gross floor area by enclosing covered arcades, atria, paseos, walkways, and corridors located at the ground level.
- c. Additions. Projects may include new gross floor area located on the parcel, provided the new floor area conforms to the height limitations of Subsection D(1) of this Section.
- d. Reallocation of Existing Floor Area. Existing gross floor area may be relocated from one part of the existing building to another part, or to another location on the project parcel(s), provided the new gross floor area conforms to the height limitations of Subsection (D)(1) of this Section.
- e. Mezzanines. For Residential Conversion Projects within existing building envelopes, mezzanines shall be exempt from Floor Area Ratio (FAR) calculations and shall not be considered an additional story, regardless of their size, provided they remain open to the space below, are entirely within the existing structure, and comply with applicable building code requirements.

E. Modification of Development Standards. Qualifying projects may modify the following development standards, provided they otherwise comply with the height restrictions of Subsection (D)(1) and the floor area limitations of (D)(2) of this Section, and the design standards found in the West Hollywood Building and Fire Codes, as applicable:

- 1. Bicycle Parking and Support Facilities. Bicycle Parking and Support Facilities requirements pursuant to Section 19.28.150 shall not apply.
- 2. Density Limits. The addition of units shall not be counted toward the maximum density limits applicable to the parcel(s).
- 3. Existing Nonconforming Setbacks. Existing nonconforming building setbacks may remain, and additions to the existing building to accommodate bonus

new gross floor area may continue nonconforming setbacks, provided they comply with applicable building codes.

4. Floor Area Ratio (FAR). Additional floor area added pursuant to subsection (D)(2) of this Section shall not be counted toward the maximum FAR limits applicable for the parcel(s).
 5. Legal Nonconforming Structures. Legal nonconforming structures on-site may be maintained as set forth in Section 19.72.030.
 6. Loading Spaces. No additional loading spaces are required.
 7. Open Space. The following Open Space standards shall supersede the requirements in Section 19.36.280, if applicable:
 - a. Minimum open space requirements may be waived for projects with zero setbacks that are within 1,000 linear feet of a public park of at least 0.5 acres in size.
 - b. Private open space and up to 100 percent of the common open space may be located on a rooftop, provided that the open space otherwise complies with the requirements of Section 19.36.280.
 8. Stepbacks. Where applicable, stepback requirements shall not apply.
- F. Additional Design Standards. The following design standards apply to Residential Conversion Projects:
1. Entries with street frontage. Ground floor residential units with entries directly facing street frontage or alleyways shall be subject to the following requirements:
 - a. Each entry shall be set back a minimum of three (3) feet from the property line to allow for privacy, safety, and compliance with door clearance requirements, and to delineate between public and private space.
 - b. Each entry shall include screening elements, such as lattices, walls, recessed or elevated entryways, privacy screens, or landscaping, that obscure direct views into interior living spaces from the street.
 - c. A minimum of one physical feature, such as an awning, landscaped buffer, stoop, or planter, shall be required at the street frontage to delineate between public and private space.
 2. Transparency. Ground floor facades shall maintain 30 to 50 percent transparent glazing.
- G. Other Codes. Residential conversion projects shall fully comply with the design standards found in the West Hollywood Building and Fire Codes.
- H. Labor Standards. Projects must comply with applicable labor standards under state law, including prevailing wages, skilled and trained workforce requirements, apprenticeship programs, and healthcare expenditure contributions, as required by state law.

- I. Tenant Protections. Projects must comply with applicable tenant protection requirements under state law, including notification, relocation assistance, right of first refusal, and Subdivision Map Act provisions as required by state law.
- J. Procedures. A Residential Conversion Project that fulfills the requirements of this chapter shall be processed through a Ministerial Housing Permit pursuant to Chapter 19.45 (Ministerial Housing Permit).
- K. Development Fees. Residential Conversion Projects shall be exempt from impact fees established pursuant to Section 19.64.030 (Exemptions).
- L. Cultural Heritage Preservation. Residential Conversion Projects involving City-Designated Cultural Resources must comply with Chapter 19.58 (Cultural Heritage Preservation).
- M. Affordable Housing Requirements and Incentives. The requirements and provisions of Chapter 19.22 (Affordable Housing Requirements and Incentives) shall apply to Residential Conversion Projects.

SECTION 5. Amendment to Municipal Code. Section 19.90.020 Definitions of Specialized Terms and Phrases of Chapter 19.90 Definitions/Glossary of Title 19 Zoning Ordinance of the West Hollywood Municipal Code is amended to include the following definitions for “Existing Building Envelope” and “Residential Conversion” in alphabetical order as follows:

§ 19.90.020 Definitions of Specialized Terms and Phrases.

E. Definitions “E.”

Existing Building Envelope. The aggregate of building mass and building bulk, measured by the outermost extents of the building’s exterior walls and roofline, that exists as of the date the project application is deemed complete by the City.

R. Definitions “R.”

Residential Conversion. A process to convert existing nonresidential buildings into residential or mixed-use buildings, as regulated by Section 19.36.400 Residential Conversions and in compliance with applicable state housing laws.

SECTION 6. Addition to the Municipal Code. Subsection E. is added to Section 19.72.030 Nonconforming Structures of Chapter 19.72 Nonconforming Uses, Structures, Signs, and Parcels Definitions/Glossary of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.72.030 Nonconforming Structures

- E. *Residential Conversion Projects.* Residential Conversion Projects may retain, continue, or expand the use of nonconforming structures only as permitted by Section 19.36.400 and subject to applicable California Building and Fire Code compliance.

SECTION 7. Addition to the Municipal Code. Subsection H. is added to Section 19.45.020 Applicability of Chapter 19.45 Ministerial Housing Permit of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.45.020 Applicability.

H. Residential Conversion Projects, in accordance with Section 19.36.400.

SECTION 8. Addition to the Municipal Code. Subsection H. is added to Section 19.64.030 Exemptions of Chapter 19.64 Development Fees of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.64.030 Exemptions.

H. Residential Conversion Projects, in accordance with Section 19.36.400.

SECTION 10. Addition to the Municipal Code. “Conversion of commercial to residential uses” is added to Table 2-2 (Allowed Uses and Permit Requirements for Residential Zoning Districts) in Section 19.06.030 Residential Zoning District Land Uses and Permit Requirements, as follows:

PERMIT REQUIRED BY ZONE					
LAND USE ²	R1	R2	R3	R4	Specific Use Regulations
Conversion of commercial to residential uses	P ¹	P ¹	P ¹	P ¹	19.36.400

SECTION 11. Addition to the Municipal Code. “Conversion of commercial to residential uses” is added to Table 2-5 (Allowed Uses and Permit Requirements for Commercial And Public Zoning Districts) in Section 19.10.030 Commercial and Public District Land Uses and Permit Requirements, as follows:

PERMIT REQUIRED BY ZONE							
LAND USES ²	CN	CC/SSP	CA	CR	PDCSP	PF ³	Specific Use Regulations
Conversion of commercial to residential uses	P ¹	P ¹	P ¹	P ¹	P ¹	P ¹	19.36.400

SECTION 12. Certification. The City Clerk is directed to certify the passage and adoption of this Ordinance; make a note of the passage and adoption in the records of this meeting; and cause it to be published or posted in accordance with California law.

SECTION 13. Record of Proceedings. The documents and materials associated with this Ordinance that constitute the record of proceedings on which these findings are based on located at West Hollywood City Hall, 8300 Santa Monica Boulevard, West Hollywood, California 90069. The City Clerk is the custodian of the record of proceedings.

SECTION 14. Effective Date. This Ordinance (i.e., Zone Text Amendment) shall take effect thirty (30) days after its adoption pursuant to California Government Code Section 36937.

PASSED, APPROVED AND ADOPTED this ____ day of _____, 2025.

CHELSEA LEE BYERS, MAYOR

ATTEST:

MELISSA CROWDER, CITY CLERK

ORDINANCE NO. 25-_____

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES THROUGH A MINISTERIAL APPROVAL PROCESS, EXCLUDING HOTELS AND MOTELS FROM MINISTERIAL ELIGIBILITY AND FINDING THE ACTION EXEMPT FROM CEQA.

THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. Findings.

- A. Under the City of West Hollywood's ("City") 6th Cycle RHNA, the City must accommodate 3,933 new housing units across various income levels. One strategy to support this goal is to streamline the policy framework for commercial-to-residential conversion (conversion) projects, which are development projects to convert existing buildings with nonresidential uses, such as offices or other commercial uses, into housing. This Ordinance advances the City's housing and sustainability goals by enabling underutilized commercial properties to be efficiently converted into new housing opportunities.
- B. Conversion projects make use of existing building stock, reduce demolition waste, and deliver housing faster than new construction. Yet unclear policy requirements have limited their feasibility. The proposed Ordinance establishes clear standards, targeted concessions, and a predictable permitting process, making conversion projects more feasible across the City. Without this action, many outdated commercial buildings may remain vacant, missing an opportunity to meet housing needs and reinvigorate commercial corridors.
- C. Pursuant to the authority granted to the City of West Hollywood (the "City") by Article XI, Section 7 of the California Constitution, the City has the police power to regulate the use of land and property within the City in a manner designed to promote public convenience and general prosperity, as well as public health, welfare, and safety.

- D. A public hearing was duly noticed for the Planning Commission meeting of September 4, 2025, by publication in the Beverly Press newspaper, the City website and by announcement on City Channel 6 starting August 14, 2025. Following the public hearing on September 4, 2025, the Planning Commission recommended approval of the proposed zone text amendment to the City Council.
- E. On December 1, 2025, the City Council held a duly-noticed public hearing to consider the Ordinance, including: (1) the public testimony and agenda reports prepared in connection with the Ordinance, (2) the policy considerations discussed therein, and (3) the consideration and recommendation by the City's Planning Commission.

SECTION 2. Environmental Review. The City Council hereby finds that the proposed Ordinance is not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162. No substantial changes are proposed by the Ordinance and there are no substantial changes in the circumstances under which the Project will be undertaken that will require major revisions to the previously certified Housing Element Environmental Impact Report (EIR) due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified Housing Element EIR adequately discusses the potential impacts of the proposed Ordinance. The proposed Ordinance is needed to facilitate the production of housing in the City. The Housing Element EIR fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element, including Goal H-4. Alternatively, the Ordinance is also exempt from further environmental review under CEQA Guidelines Section 15183, which applies to projects that are consistent with the development density and use characteristics analyzed in a previously certified EIR for a General Plan or community-level plan. The proposed Ordinance implements Goal H-4 of the City's certified 6th Cycle Housing Element (2021–2029), which calls for fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives, and Program 11, which calls for the City to streamline development standards for the conversion of office space into housing. The proposed amendments do not introduce new or peculiar environmental impacts beyond what were already considered in the prior EIR, nor increase the severity of previously identified impacts. Instead, they implement previously analyzed policies intended to accommodate the City's housing needs by enabling residential reuse of non-residential buildings. Accordingly, no potentially significant off-site or cumulative impacts would occur beyond what was studied in the certified EIR for the City's 6th Cycle Housing element. The proposed Ordinance does not authorize specific construction projects but

provides a regulatory pathway for conversion projects consistent with existing planning and environmental documents. Therefore, no further environmental review is required under CEQA Guidelines Section 15183. Finally, the proposed Ordinance is exempt pursuant to CEQA Guidelines Section 15061(b)(3) because it can be shown with certainty that this regulatory pathway will not result in significant effects on the environment. The proposed Ordinance would authorize the adaptive reuse of existing buildings with little new construction, consistent with the City's Housing Element.

SECTION 3. General Plan Consistency. The City Council of the City of West Hollywood hereby finds that the Zone Text Amendment (ZTA25-0003) is consistent with the Goals and Policies of the General Plan, specifically Goal H-4: Provide for adequate opportunities for new construction of housing and Goal H-5: Provide for a government environment that facilitates housing development and preservation. The draft Ordinance supports Goal H-4 by fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives. This Ordinance is a direct outgrowth of this goal as previously discussed. Additionally, the draft Ordinance also supports Program 11, which calls for the City to streamline development standards for converting office space into housing. The draft Ordinance also supports Goal H-5 by providing a strong policy framework to support housing development and preservation. Creating clear standards for ministerial approval of conversion projects helps reduce uncertainty and increase project feasibility. It implements incentives for redevelopment, such as strategically reducing or eliminating design barriers, and preserves the City's affordable housing requirements.

SECTION 4. Addition to the Municipal Code. A new Section 19.36.400 Residential Conversions is added to the West Hollywood Municipal Code Chapter 19.36 Standards for Specific Land Uses of Title 19 Zoning Ordinance to read as follows:

§ 19.36.400 Residential Conversions.

- A. Purpose and Intent. The purpose of this Section is to establish objective development standards that encourage and facilitate the conversion of existing buildings and structures to new residential or mixed-use developments in a manner consistent with applicable state housing laws, including but not limited to Government Code Sections 65913.4, 65863, 66300, 65913.12, AB 2011 (2022), SB 6 (2022) and subsequent amendments or related legislation. This Section establishes objective standards, ministerial (nondiscretionary) approvals, and incentives to promote adaptive reuse, increase housing supply, and qualify the City as a prohousing jurisdiction.
- B. Applicability. This Section applies to conversions (i.e., physical alteration or reuse) of existing nonresidential uses (e.g., including, but not limited to office, retail, and parking structures), excluding hotels and motels, to residential uses, including, but not limited to multifamily residential or mixed-use projects, in all nonresidential zones.

C. Project Eligibility. Qualifying Residential Conversion projects must meet the following requirements:

1. Conversion Types (one of the following):

- a. Conversion of nonresidential land uses, including, but not limited to, office, retail, and parking, excluding hotels and motels, to Multifamily Dwelling use.
- b. Conversion of nonresidential land uses, including, but not limited to, office, retail, and parking, excluding hotels and motels, to Live/Work Facilities in all nonresidential Districts only.
- c. Conversion of nonresidential land uses, including, but not limited to, office, retail, and parking, excluding hotels and motels, to Mixed-Use developments, provided that at least fifty percent (50%) of the gross floor area is dedicated to residential use.
- d. Any Residential Conversion Project qualifying as an Extremely Affordable Adaptive Reuse Project pursuant to California Government Code Section 65913.12 (100% affordable for very low-income households, less than or equal to 50% AMI).
- e. Any project meeting the eligibility criteria of Assembly Bill 2011, Affordable Housing and High Road Jobs Act of 2022 (as amended, including by AB 2243 in 2025) and Senate Bill 6, the Middle Class Housing Act of 2022, or other applicable state laws.

2. Structure Retention.

- a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in this Section.
- b. Residential Conversion of non-historic structures is allowed if it complies with state eligibility criteria.

3. Existing Building Envelope. Projects shall retain the Existing Building Envelope, unless otherwise required or allowed by state law, except as permitted in this Section.

4. Unit Thresholds.

- a. Both Residential Conversion Projects (No Mixed-Use) and Mixed-Use Residential Conversion Projects shall create a minimum of three (3) dwelling units.
- b. Mixed-Use Residential Conversion Projects shall dedicate a minimum of fifty percent (50%) of the gross floor area to residential use.

D. Allowed Incentives. Qualifying projects are allowed the following modifications by right, in addition to incentives allowed under the State Density Bonus Law:

1. Additional Stories.

- a. Projects may add up to two (2) additional stories and not more than 24 feet in height above the existing building for residential uses in CN zones, and up to four (4) additional stories and not more than 48 feet in height above the existing building in all other zones.
- b. The total resulting building height shall not exceed the height limit of the applicable zone by more than one story or 12 feet in CN zones, or two stories or 24 feet in all other zones, unless otherwise allowed by state law.
- c. Rooftop amenities may be included, provided they comply with the requirements of Subsection 19.20.080(C).

2. Additional Floor Area.

- a. Limitations to Additional Floor Area. The total combined additional gross floor area allowed pursuant to this subsection may not exceed 100 percent of the existing gross floor area.
- b. Enclosure of Existing Covered Spaces at the Ground Level. Projects may add additional gross floor area by enclosing covered arcades, atria, paseos, walkways, and corridors located at the ground level.
- c. Additions. Projects may include new gross floor area located on the parcel, provided the new floor area conforms to the height limitations of Subsection D(1) of this Section.
- d. Reallocation of Existing Floor Area. Existing gross floor area may be relocated from one part of the existing building to another part, or to another location on the project parcel(s), provided the new gross floor area conforms to the height limitations of Subsection (D)(1) of this Section.
- e. Mezzanines. For Residential Conversion Projects within existing building envelopes, mezzanines shall be exempt from Floor Area Ratio (FAR) calculations and shall not be considered an additional story, regardless of their size, provided they remain open to the space below, are entirely within the existing structure, and comply with applicable building code requirements.

E. Modification of Development Standards. Qualifying projects may modify the following development standards, provided they otherwise comply with the height restrictions of Subsection (D)(1) and the floor area limitations of (D)(2) of this Section, and the design standards found in the West Hollywood Building and Fire Codes, as applicable:

- 1. Bicycle Parking and Support Facilities. Bicycle Parking and Support Facilities requirements pursuant to Section 19.28.150 shall not apply.
- 2. Density Limits. The addition of units shall not be counted toward the maximum density limits applicable to the parcel(s).

3. Existing Nonconforming Setbacks. Existing nonconforming building setbacks may remain, and additions to the existing building to accommodate bonus new gross floor area may continue nonconforming setbacks, provided they comply with applicable building codes.
 4. Floor Area Ratio (FAR). Additional floor area added pursuant to subsection (D)(2) of this Section shall not be counted toward the maximum FAR limits applicable for the parcel(s).
 5. Legal Nonconforming Structures. Legal nonconforming structures on-site may be maintained as set forth in Section 19.72.030.
 6. Loading Spaces. No additional loading spaces are required.
 7. Open Space. The following Open Space standards shall supersede the requirements in Section 19.36.280, if applicable:
 - a. Minimum open space requirements may be waived for projects with zero setbacks that are within 1,000 linear feet of a public park of at least 0.5 acres in size.
 - b. Private open space and up to 100 percent of the common open space may be located on a rooftop, provided that the open space otherwise complies with the requirements of Section 19.36.280.
 8. Stepbacks. Where applicable, stepback requirements shall not apply.
- F. Additional Design Standards. The following design standards apply to Residential Conversion Projects:
1. Entries with street frontage. Ground floor residential units with entries directly facing street frontage or alleyways shall be subject to the following requirements:
 - a. Each entry shall be set back a minimum of three (3) feet from the property line to allow for privacy, safety, and compliance with door clearance requirements, and to delineate between public and private space.
 - b. Each entry shall include screening elements, such as lattices, walls, recessed or elevated entryways, privacy screens, or landscaping, that obscure direct views into interior living spaces from the street.
 - c. A minimum of one physical feature, such as an awning, landscaped buffer, stoop, or planter, shall be required at the street frontage to delineate between public and private space.
 2. Transparency. Ground floor facades shall maintain 30 to 50 percent transparent glazing.
- G. Other Codes. Residential conversion projects shall fully comply with the design standards found in the West Hollywood Building and Fire Codes.
- H. Labor Standards. Projects must comply with applicable labor standards under state law, including prevailing wages, skilled and trained workforce requirements,

apprenticeship programs, and healthcare expenditure contributions, as required by state law.

- I. Tenant Protections. Projects must comply with applicable tenant protection requirements under state law, including notification, relocation assistance, right of first refusal, and Subdivision Map Act provisions as required by state law.
- J. Procedures. A Residential Conversion Project that fulfills the requirements of this chapter shall be processed through a Ministerial Housing Permit pursuant to Chapter 19.45 (Ministerial Housing Permit).
- K. Development Fees. Residential Conversion Projects shall be exempt from impact fees established pursuant to Section 19.64.030 (Exemptions).
- L. Cultural Heritage Preservation. Residential Conversion Projects involving City-Designated Cultural Resources must comply with Chapter 19.58 (Cultural Heritage Preservation).
- M. Affordable Housing Requirements and Incentives. The requirements and provisions of Chapter 19.22 (Affordable Housing Requirements and Incentives) shall apply to Residential Conversion Projects.

SECTION 5. Amendment to Municipal Code. Section 19.90.020 Definitions of Specialized Terms and Phrases of Chapter 19.90 Definitions/Glossary of Title 19 Zoning Ordinance of the West Hollywood Municipal Code is amended to include the following definitions for “Existing Building Envelope” and “Residential Conversion” in alphabetical order as follows:

§ 19.90.020 Definitions of Specialized Terms and Phrases.

E. Definitions “E.”

Existing Building Envelope. The aggregate of building mass and building bulk, measured by the outermost extents of the building’s exterior walls and roofline, that exists as of the date the project application is deemed complete by the City.

R. Definitions “R.”

Residential Conversion. A process to convert existing nonresidential buildings into residential or mixed-use buildings, as regulated by Section 19.36.400 Residential Conversions and in compliance with applicable state housing laws.

SECTION 6. Addition to the Municipal Code. Subsection E. is added to Section 19.72.030 Nonconforming Structures of Chapter 19.72 Nonconforming Uses, Structures, Signs, and Parcels Definitions/Glossary of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.72.030 Nonconforming Structures

- E. *Residential Conversion Projects.* Residential Conversion Projects may retain, continue, or expand the use of nonconforming structures only as permitted by Section 19.36.400 and subject to applicable California Building and Fire Code compliance.

SECTION 7. Addition to the Municipal Code. Subsection H. is added to Section 19.45.020 Applicability of Chapter 19.45 Ministerial Housing Permit of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.45.020 Applicability.

H. Residential Conversion Projects, in accordance with Section 19.36.400.

SECTION 8. Addition to the Municipal Code. Subsection H. is added to Section 19.64.030 Exemptions of Chapter 19.64 Development Fees of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.64.030 Exemptions.

H. Residential Conversion Projects, in accordance with Section 19.36.400.

SECTION 9. Addition to the Municipal Code. “Conversion of commercial to residential uses (excluding hotels and motels)” is added to Table 2-2 (Allowed Uses and Permit Requirements for Residential Zoning Districts) in Section 19.06.030 Residential Zoning District Land Uses and Permit Requirements, as follows:

PERMIT REQUIRED BY ZONE					
LAND USE ²	R1	R2	R3	R4	Specific Use Regulations
Conversion of commercial to residential uses (excluding hotels and motels)	P ¹	P ¹	P ¹	P ¹	19.36.400

SECTION 10. Addition to the Municipal Code. “Conversion of commercial to residential uses (excluding hotels and motels)” is added to Table 2-5 (Allowed Uses and Permit Requirements for Commercial And Public Zoning Districts) in Section 19.10.030 Commercial and Public District Land Uses and Permit Requirements, as follows:

LAND USES ²	PERMIT REQUIRED BY ZONE						Specific Use Regulations
	CN	CC/SSP	CA	CR	PDCSP	PF ³	
Conversion of commercial to residential uses (excluding hotels and motels)	P ¹	P ¹	P ¹	P ¹	P ¹	P ¹	19.36.400

SECTION 11. Certification. The City Clerk is directed to certify the passage and adoption of this Ordinance; make a note of the passage and adoption in the records of this meeting; and cause it to be published or posted in accordance with California law.

SECTION 12. Record of Proceedings. The documents and materials associated with this Ordinance that constitute the record of proceedings on which these findings are based on located at West Hollywood City Hall, 8300 Santa Monica Boulevard, West Hollywood, California 90069. The City Clerk is the custodian of the record of proceedings.

SECTION 13. Effective Date. This Ordinance (i.e., Zone Text Amendment) shall take effect thirty (30) days after its adoption pursuant to California Government Code Section 36937.

PASSED, APPROVED AND ADOPTED this ____ day of _____, 2025.

CHELSEA LEE BYERS, MAYOR

ATTEST:

MELISSA CROWDER, CITY CLERK

RESOLUTION NO. PC 25-1616

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING TO THE CITY COUNCIL APPROVAL OF AN ORDINANCE ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES, AND FINDING THE ACTION EXEMPT FROM CEQA.

The Planning Commission of the City of West Hollywood hereby finds, resolves, determines, and orders as follows:

SECTION 1. Findings.

A. Under the City of West Hollywood's ("City") 6th Cycle Regional Housing Needs Allocation (RHNA), the City must accommodate 3,933 new housing units across various income levels. One implementation strategy is to streamline the policy framework for residential conversion ("RC") projects, which involve adaptive reuse of existing nonresidential buildings, such as offices or retail spaces, into housing. This Ordinance advances the City's housing and sustainability goals by enabling underutilized commercial properties to be efficiently converted into new housing opportunities.

B. RC projects make use of existing building stock, reduce demolition waste, and deliver housing faster than new construction. Yet unclear policy requirements have limited their feasibility. The proposed Ordinance establishes clear standards, targeted concessions, and a predictable permitting process, making RC projects more feasible across the City. Without this action, many outdated commercial buildings may remain vacant, missing an opportunity to meet housing needs and reinvigorate commercial corridors.

C. Pursuant to the authority granted to the City by Article XI, Section 7 of the California Constitution, the City can regulate the use of land and property within the City in a manner designed to promote public convenience and general prosperity, as well as public health, welfare, and safety.

D. A public hearing was duly noticed for the Planning Commission meeting of September 4, 2025, by publication in the Beverly Press newspaper, the City website, and by announcement on City Channel 6 starting August 14, 2025

SECTION 2. Environmental Review.

The Planning Commission hereby finds that the proposed Ordinance is not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162. No substantial changes are proposed by the Ordinance and there are no substantial changes in the circumstances under which the Project will be undertaken that will require major revisions to the previously certified Housing Element Environmental Impact Report (EIR) due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified Housing Element EIR adequately discusses the potential impacts of the proposed Ordinance. The proposed Ordinance is needed to facilitate the production of housing in the City. The Housing Element EIR fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element, including Goal H-4. Alternatively, the Ordinance is also exempt from further environmental review under CEQA Guidelines Section 15183, which applies to projects that are consistent with the development density and use characteristics analyzed in a previously certified EIR for a General Plan or community-level plan. The proposed Ordinance implements Goal H-4 of the City's certified 6th Cycle Housing Element (2021–2029), which calls for fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives, and Program 11, which calls for the City to streamline development standards for the conversion of office space into housing. The proposed amendments do not introduce new or peculiar environmental impacts beyond what were already considered in the prior EIR, nor increase the severity of previously identified impacts. Instead, they implement previously analyzed policies intended to accommodate the City's housing needs by enabling residential reuse of non-residential buildings. Accordingly, no potentially significant off-site or cumulative impacts would occur beyond what was studied in the certified EIR for the City's 6th Cycle Housing element. The proposed Ordinance does not authorize specific construction projects but provides a regulatory pathway for RC projects consistent with existing planning and environmental documents. Therefore, no further environmental review is required under CEQA Guidelines Section 15183. Finally, the proposed Ordinance is exempt pursuant to CEQA Guidelines Section 15061(b)(3) because it can be shown with certainty that this regulatory pathway will not result in significant effects on the environment. The proposed Ordinance would authorize the adaptive reuse of existing buildings with little new construction, consistent with the City's Housing Element..

SECTION 3. General Plan Consistency. The Planning Commission of the City of West Hollywood hereby finds that the Zone Text Amendment (ZTA25-0003 is consistent with the Goals and Policies of the General Plan, specifically Goal H-4: Provide for adequate opportunities for new construction of housing and Goal H-5: Provide for a government environment that facilitates housing development and preservation. The proposed Ordinance supports Goal H-4 by fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives. This Ordinance is a direct outgrowth of this goal as previously discussed. Additionally, the proposed Ordinance also supports Program 11, which calls for the City to streamline development standards for converting office space into housing. The draft Ordinance also supports Goal H-5 by providing a clear policy framework to support housing development and preservation. Creating clear standards for ministerial approval of RC projects helps reduce uncertainty

and increase project feasibility. The proposed Ordinance implements incentives for redevelopment, such as strategically reducing or eliminating design barriers, and preserves the City's affordable housing requirements.

SECTION 4. Recommendation. Based on the entire record before the Planning Commission, all written and oral evidence presented to the Planning Commission, and the findings made in the staff report and this Resolution, the Planning Commission hereby recommends that the City Council adopt an Ordinance entitled: "AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES AND FINDING THE ACTION EXEMPT FROM CEQA" which is attached hereto as "Attachment A" and incorporated by reference herein.

SECTION 5. Certification. The Secretary of the Planning Commission shall certify to the adoption of this resolution.

SECTION 6. Effective Date. This resolution shall take effect immediately after adoption.

PASSED, APPROVED AND ADOPTED by the Planning Commission of the City of West Hollywood at a regular meeting held this 4th day of September, 2025 by the following vote:

AYES: Commissioner: Carvalheiro, Harris, Hoopingarner, Solomon,
Vice Chair Jones, Chair Gregoire.

NOES: Commissioner: None.

ABSENT: Commissioner: Lombardi.

ABSTAIN: Commissioner: None.

RECUSED: Commissioner: None.



DAVID S. GREGOIRE, CHAIRPERSON
PLANNING COMMISSION

ATTEST:



FRANCISCO J. CONTRERAS, AICP
LONG RANGE PLANNING MANAGER

Decisions of the Planning Commission are subject to appeal in accordance with the procedures set forth in West Hollywood Municipal Code Chapter 19.76. Any action to challenge the final decision of the City of West Hollywood made as a result of the public hearing on this application must be filed within the time limits set forth in Code of Civil Procedure Section §1094.5

ATTACHMENT A

ORDINANCE NO. 25-_____

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES AND FINDING THE ACTION EXEMPT FROM CEQA.

THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. Findings.

- A. Under the City of West Hollywood's ("City") 6th Cycle RHNA, the City must accommodate 3,933 new housing units across various income levels. One strategy to support this goal is to streamline the policy framework for residential conversion (RC) projects, which are development projects to convert existing buildings with nonresidential uses, such as offices or other commercial uses, into housing. This Ordinance advances the City's housing and sustainability goals by enabling underutilized commercial properties to be efficiently converted into new housing opportunities.
- B. RC projects make use of existing building stock, reduce demolition waste, and deliver housing faster than new construction. Yet unclear policy requirements have limited their feasibility. The proposed Ordinance establishes clear standards, targeted concessions, and a predictable permitting process, making RC projects more feasible across the City. Without this action, many outdated commercial buildings may remain vacant, missing an opportunity to meet housing needs and reinvigorate commercial corridors.
- C. Pursuant to the authority granted to the City of West Hollywood (the "City") by Article XI, Section 7 of the California Constitution, the City has the police power to regulate the use of land and property within the City in a manner designed to promote public convenience and general prosperity, as well as public health, welfare, and safety.
- D. A public hearing was duly noticed for the Planning Commission meeting of September 4, 2025, by publication in the Beverly Press newspaper, the City website and by announcement on City Channel 6 starting August 14, 2025. Following the public hearing on September 4, 2025, the Planning Commission

recommended approval of the proposed zone text amendment to the City Council.

- E. On XXXX, the City Council held a duly-noticed public hearing to consider the Ordinance, including: (1) the public testimony and agenda reports prepared in connection with the Ordinance, (2) the policy considerations discussed therein, and (3) the consideration and recommendation by the City's Planning Commission.

SECTION 2. Environmental Review. The Planning Commission hereby finds that the proposed Ordinance is not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162. No substantial changes are proposed by the Ordinance and there are no substantial changes in the circumstances under which the Project will be undertaken that will require major revisions to the previously certified Housing Element Environmental Impact Report (EIR) due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified Housing Element EIR adequately discusses the potential impacts of the proposed Ordinance. The proposed Ordinance is needed to facilitate the production of housing in the City. The Housing Element EIR fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element, including Goal H-4. Alternatively, the Ordinance is also exempt from further environmental review under CEQA Guidelines Section 15183, which applies to projects that are consistent with the development density and use characteristics analyzed in a previously certified EIR for a General Plan or community-level plan. The proposed Ordinance implements Goal H-4 of the City's certified 6th Cycle Housing Element (2021–2029), which calls for fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives, and Program 11, which calls for the City to streamline development standards for the conversion of office space into housing. The proposed amendments do not introduce new or peculiar environmental impacts beyond what were already considered in the prior EIR, nor increase the severity of previously identified impacts. Instead, they implement previously analyzed policies intended to accommodate the City's housing needs by enabling residential reuse of non-residential buildings. Accordingly, no potentially significant off-site or cumulative impacts would occur beyond what was studied in the certified EIR for the City's 6th Cycle Housing element. The proposed Ordinance does not authorize specific construction projects but provides a regulatory pathway for RC projects consistent with existing planning and environmental documents. Therefore, no further environmental review is required under CEQA Guidelines Section 15183. Finally, the proposed Ordinance is exempt pursuant to CEQA Guidelines Section 15061(b)(3) because it can be shown with certainty that this regulatory pathway will not result in significant effects on the environment. The proposed

Ordinance would authorize the adaptive reuse of existing buildings with little new construction, consistent with the City's Housing Element. .

SECTION 3. General Plan Consistency. The City Council of the City of West Hollywood hereby finds that the Zone Text Amendment (ZTA25-0003) is consistent with the Goals and Policies of the General Plan, specifically Goal H-4: Provide for adequate opportunities for new construction of housing and Goal H-5: Provide for a government environment that facilitates housing development and preservation. The draft Ordinance supports Goal H-4 by fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives. This Ordinance is a direct outgrowth of this goal as previously discussed. Additionally, the draft Ordinance also supports Program 11, which calls for the City to streamline development standards for converting office space into housing. The draft Ordinance also supports Goal H-5 by providing a strong policy framework to support housing development and preservation. Creating clear standards for ministerial approval of RC projects helps reduce uncertainty and increase project feasibility. It implements incentives for redevelopment, such as strategically reducing or eliminating design barriers, and preserves the City's affordable housing requirements.

SECTION 4. Addition to the Municipal Code. A new Section 19.36.400 Residential Conversions is added to the West Hollywood Municipal Code Chapter 19.36 Standards for Specific Land Uses of Title 19 Zoning Ordinance to read as follows:

§ 19.36.400 Residential Conversions.

- A. Purpose and Intent. The purpose of this Section is to establish objective development standards that encourage and facilitate the conversion of existing buildings and structures to new residential or mixed-use developments in a manner consistent with applicable state housing laws, including but not limited to Government Code Sections 65913.4, 65863, 66300, 65913.12, AB 2011 (2022), SB 6 (2022) and subsequent amendments or related legislation. This Section establishes objective standards, ministerial (nondiscretionary) approvals, and incentives to promote adaptive reuse, increase housing supply, and qualify the City as a prohousing jurisdiction.
- B. Applicability. This Section applies to conversions (i.e., physical alteration or reuse) of existing nonresidential uses (e.g., including, but not limited to office, retail, hotels, motels, parking structures) to residential uses, including, but not limited to multifamily residential or mixed-use projects, in all nonresidential zones.
- C. Project Eligibility. Qualifying Residential Conversion projects must meet the following requirements:
 - 1. Conversion Types (one of the following):
 - a. Conversion of nonresidential land uses, including, but not limited to, office, retail, hotels, motels, and parking, to Multifamily Dwelling use.
 - b. Conversion of nonresidential land uses, including, but not limited to, office, retail, hotels, motels, and parking, to Live/Work Facilities in all nonresidential Districts only.

- c. Conversion of nonresidential land uses, including, but not limited to, office, retail, hotels, motels, and parking, to Mixed-Use developments, provided that at least fifty percent (50%) of the gross floor area is dedicated to residential use.
 - d. Any Residential Conversion Project qualifying as an Extremely Affordable Adaptive Reuse Project pursuant to California Government Code Section 65913.12 (100% affordable for very low-income households, less than or equal to 50% AMI).
 - e. Any project meeting the eligibility criteria of Assembly Bill 2011, Affordable Housing and High Road Jobs Act of 2022 (as amended, including by AB 2243 in 2025) and Senate Bill 6, the Middle Class Housing Act of 2022, or other applicable state laws.
- 2. Structure Retention (one of the following):
 - a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in this Section.
 - b. Residential Conversion of non-historic structures is allowed if it complies with state eligibility criteria.
- 3. Existing Building Envelope. Projects shall retain the Existing Building Envelope, unless otherwise required or allowed by state law, except as permitted in this Section.
- 4. Unit Thresholds.
 - a. Both Residential Conversion Projects (No Mixed-Use) and Mixed-Use Residential Conversion Projects shall create a minimum of three (3) dwelling units.
- 5. Mixed-Use Residential Conversion Projects shall dedicate a minimum of fifty percent (50%) of the gross floor area to residential use.
- D. Allowed Incentives. Qualifying projects are allowed the following modifications by right, in addition to incentives allowed under the State Density Bonus Law:
 - 1. Additional Stories.
 - a. Projects may add up to two (2) additional stories and not more than 24 feet in height above the existing building for residential uses in CN zones, and up to four (4) additional stories and not more than 48 feet in height above the existing building in all other zones.
 - b. The total resulting building height shall not exceed the height limit of the applicable zone by more than one story or 12 feet in CN zones, or two stories or 24 feet in all other zones, unless otherwise allowed by state law.
 - c. Rooftop amenities may be included, provided they comply with the requirements of Subsection 19.20.080(C).

2. Additional Floor Area.

- a. Limitations to Additional Floor Area. The total combined additional gross floor area allowed pursuant to this subsection may not exceed 100 percent of the existing gross floor area.
 - b. Enclosure of Existing Covered Spaces at the Ground Level. Projects may add additional gross floor area by enclosing covered arcades, atria, paseos, walkways, and corridors located at the ground level.
 - c. Additions. Projects may include new gross floor area located on the parcel, provided the new floor area conforms to the height limitations of Subsection D(1) of this Section.
 - d. Reallocation of Existing Floor Area. Existing gross floor area may be relocated from one part of the existing building to another part, or to another location on the project parcel(s), provided the new gross floor area conforms to the height limitations of Subsection (D)(1) of this Section.
 - e. Mezzanines. For Residential Conversion Projects within existing building envelopes, mezzanines shall be exempt from Floor Area Ratio (FAR) calculations and shall not be considered an additional story, regardless of their size, provided they remain open to the space below, are entirely within the existing structure, and comply with applicable building code requirements.
- E. Modification of Development Standards. Qualifying projects may modify the following development standards, provided they otherwise comply with the height restrictions of Subsection (D)(1) and the floor area limitations of (D)(2) of this Section, and the design standards found in the West Hollywood Building and Fire Codes, as applicable:
1. Bicycle Parking and Support Facilities. Bicycle Parking and Support Facilities requirements pursuant to Section 19.28.150 shall not apply.
 2. Density Limits. The addition of units shall not be counted toward the maximum density limits applicable to the parcel(s).
 3. Existing Nonconforming Setbacks. Existing nonconforming building setbacks may remain, and additions to the existing building to accommodate bonus new gross floor area may continue nonconforming setbacks, provided they comply with applicable building codes.
 4. Floor Area Ratio (FAR). Additional floor area added pursuant to subsection (D)(2) of this Section shall not be counted toward the maximum FAR limits applicable for the parcel(s).
 5. Legal Nonconforming Structures. Legal nonconforming structures on-site may be maintained as set forth in Section 19.72.030.
 6. Loading Spaces. No additional loading spaces are required.
 7. Open Space. The following Open Space standards shall supersede the requirements in Section 19.36.280, if applicable:

- a. Minimum open space requirements may be waived for projects with zero setbacks that are within 1,000 linear feet of a public park of at least 0.5 acres in size.
 - b. Private open space and up to 100 percent of the common open space may be located on a rooftop, provided that the open space otherwise complies with the requirements of Section 19.36.280.
- 8. Stepbacks. Where applicable, stepback requirements shall not apply.
- F. Additional Design Standards. The following design standards apply to Residential Conversion Projects:
 - 1. Entries with street frontage. Ground floor residential units with entries directly facing street frontage or alleyways shall be subject to the following requirements:
 - a. Each entry shall be set back a minimum of three (3) feet from the property line to allow for privacy, safety, and compliance with door clearance requirements, and to delineate between public and private space.
 - b. Each entry shall include screening elements, such as lattices, walls, recessed or elevated entryways, privacy screens, or landscaping, that obscure direct views into interior living spaces from the street.
 - c. A minimum of one physical feature, such as an awning, landscaped buffer, stoop, or planter, shall be required at the street frontage to delineate between public and private space.
 - 2. Transparency. Ground floor facades shall maintain 30 to 50 percent transparent glazing.
- G. Other Codes. Residential conversion projects shall fully comply with the design standards found in the West Hollywood Building and Fire Codes.
- H. Labor Standards. Projects must comply with applicable labor standards under state law, including prevailing wages, skilled and trained workforce requirements, apprenticeship programs, and healthcare expenditure contributions, as required by state law.
- I. Tenant Protections. Projects must comply with applicable tenant protection requirements under state law, including notification, relocation assistance, right of first refusal, and Subdivision Map Act provisions as required by state law.
- J. Procedures. A Residential Conversion Project that fulfills the requirements of this chapter shall be processed through a Ministerial Housing Permit pursuant to Chapter 19.45 (Ministerial Housing Permit).
- K. Development Fees. Residential Conversion Projects shall be exempt from impact fees established pursuant to Section 19.64.030 (Exemptions).
- L. Cultural Heritage Preservation. Residential Conversion Projects involving City-Designated Historic Resources must comply with Chapter 19.58 (Cultural Heritage Preservation).

- M. Affordable Housing Requirements and Incentives. The requirements and provisions of Chapter 19.22 (Affordable Housing Requirements and Incentives) shall apply to Residential Conversion Projects.

SECTION 5. Amendment to Municipal Code. Section 19.90.020 Definitions of Specialized Terms and Phrases of Chapter 19.90 Definitions/Glossary of Title 19 Zoning Ordinance of the West Hollywood Municipal Code is amended to include the following definitions for “Existing Building Envelope” and “Residential Conversion” in alphabetical order as follows:

§ 19.90.020 Definitions of Specialized Terms and Phrases.

E. Definitions “E.”

Existing Building Envelope. The aggregate of building mass and building bulk, measured by the outermost extents of the building’s exterior walls and roofline, that exists as of the date the project application is deemed complete by the City.

R. Definitions “R.”

Residential Conversion. A process to convert existing nonresidential buildings into residential or mixed-use buildings, as regulated by Section 19.36.400 Residential Conversions and in compliance with applicable state housing laws.

SECTION 6. Addition to the Municipal Code. Subsection E. is added to Section 19.72.030 Nonconforming Structures of Chapter 19.72 Nonconforming Uses, Structures, Signs, and Parcels Definitions/Glossary of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.72.030 Nonconforming Structures

- E. *Residential Conversion Projects.* Residential Conversion Projects may retain, continue, or expand the use of nonconforming structures only as permitted by Section 19.36.400 and subject to applicable California Building and Fire Code compliance.

SECTION 7. Addition to the Municipal Code. Subsection H. is added to Section 19.45.020 Applicability of Chapter 19.45 Ministerial Housing Permit of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.45.020 Applicability.

- H. Residential Conversion Projects, in accordance with Section 19.36.400.

SECTION 8. Addition to the Municipal Code. Subsection H. is added to Section 19.64.030 Exemptions of Chapter 19.64 Development Fees of Title 19 Zoning Ordinance of the West Hollywood Municipal Code to read as follows:

§ 19.64.030 Exemptions.

- H. Residential Conversion Projects, in accordance with Section 19.36.400.

SECTION 9. Certification. The City Clerk is directed to certify the passage and adoption of this Ordinance; make a note of the passage and adoption in the records of this meeting; and cause it to be published or posted in accordance with California law.

SECTION 10. Record of Proceedings. The documents and materials associated with this Ordinance that constitute the record of proceedings on which these findings are based on located at West Hollywood City Hall, 8300 Santa Monica Boulevard, West Hollywood, California 90069. The City Clerk is the custodian of the record of proceedings.

SECTION 11. Effective Date; This Ordinance (i.e., Zone Text Amendment) shall take effect thirty (30) days after its adoption pursuant to California Government Code Section 36937.

PASSED, APPROVED AND ADOPTED this ____ day of _____, 2025.

CHELSEA LEE BYERS, MAYOR

ATTEST:

MELISSA CROWDER, CITY CLERK

SUBJECT: ZONE TEXT AMENDMENT TO ENCOURAGE AND FACILITATE
THE CONVERSION OF EXISTING COMMERCIAL
DEVELOPMENTS TO RESIDENTIAL USES

PREPARED BY: COMMUNITY DEVELOPMENT DEPARTMENT
Jennifer Alkire, AICP, Acting Director of Community Development
Francisco J. Contreras, AICP, Long Range Planning Manager
Tahirah Farris, ACIP, Long Range Planning, Senior Planner
Emily Rotman, Long Range Planning, Assistant Planner
Jordan Parrish, Long Range Planning, Contract Planner

STATEMENT ON THE SUBJECT

The Planning Commission will consider a Zone Text Amendment to encourage and facilitate the conversion of existing commercial buildings to multi-family residential uses. The proposed Zone Text Amendment aligns with state policy, West Hollywood's Housing Element, and climate action goals. The proposed Ordinance is not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162 and is additionally categorically exempt from the provisions of CEQA, pursuant to Section 15183 and Section 15061(b)(3) of the State CEQA Guidelines.

RECOMMENDATION

Staff recommends the Planning Commission hold a public hearing, listen to all pertinent testimony, and adopt the following Resolution:

Draft Resolution No. PC 25-1616: **"A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING TO THE CITY COUNCIL APPROVAL OF AN ORDINANCE ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES, AND FINDING THE ACTION EXEMPT FROM CEQA."**
(EXHIBIT A)

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BACKGROUND / ANALYSIS

Under the most recent 6th Cycle Regional Housing Needs Assessment and Allocation (RHNA), the City must accommodate 3,933 new housing units across various income levels. One strategy to support this goal is to streamline the policy framework for residential conversion (RC) projects, which are development projects to convert existing buildings with non-residential uses, such as offices or other commercial uses, into housing. Residential conversions are a form of adaptive reuse (AR), which is the process of repurposing existing buildings for a new use other than for which the building was originally designed.

RC projects expand the City's housing supply while also preserving existing buildings, lowering carbon impacts, and keeping pace with changing real estate demand. RC projects also allow the City to respond to the market as market demand shifts between non-residential and residential uses. RC projects can also help mitigate the risk of outdated buildings, which are prevented from adapting to changing conditions, falling into underuse and deterioration.

Challenges to Conversion Projects

However, significant challenges exist to making RC projects feasible, including unclear policy frameworks that contribute to uncertainty, design standards that add complications to projects without proportional benefits to the community, and design standards unsuited to RC projects. The proposed Ordinance resolves these barriers by establishing clear standards, targeted concessions, and a predictable permitting process. These reforms will improve the feasibility of RC projects throughout the City. If adopted, this Ordinance will directly expand the range of feasible housing projects, helping the City meet its RHNA allocation of 3,933 units. Without action, vacant or outdated commercial buildings may sit unused, missing an opportunity to address housing needs and community vitality.

City of West Hollywood's Housing Element

The adopted and certified 6th Cycle Housing Element ("Housing Element") for the City of West Hollywood contains goals and policies that establish a framework and strategies to promote housing availability, affordability, and adequacy in the City. The Housing Element addresses housing needs across the City's economic and social spectrum through a series of equitable housing programs, one of which is to ensure adequate sites for the RHNA and to ensure that no project results in a net-loss of housing for the City (Housing Program #11). Housing Program #11 also includes objectives related to RC projects, calling for the development of regulations to streamline conversion of office space into housing, to incentivize conversion of office space to residential units, and to reevaluate the proportion of commercial to residential in mixed use buildings, followed by drafting of a zone text amendment to address the issue. These policies were the catalyst for this draft ordinance.

State legislation underscores the urgency of conversion opportunities, with Assembly Bill (AB) 1490 and AB 529 both directing agencies to facilitate adaptive reuse. AB 1490¹ makes adaptive reuse an allowable use for 100 percent affordable housing projects that designate at least 50 percent of the units as very low-income. Additionally, AB 529² requires the State Department of Housing and Community Development (HCD) to recommend code changes to support adaptive reuse projects by December 2025.

Overview of Adaptive Reuse Research

Staff reviewed adaptive reuse codes of Santa Monica, Los Angeles, and Beverly Hills, as well as post-pandemic adaptive reuse best practices as discussed in urban planning literature and market assessments. Staff also met with RC project developers who provided additional insights.

Based on the research, Staff recommends the following actions:

- Implement a flexible design framework to fully accommodate residential conversion projects, recognizing that older building forms and layouts often require creative, flexible solutions to meet modern housing standards.
- Eligibility periods for residential conversion projects should not be overly restrictive. The City of Los Angeles' initial AR ordinance had a single set date as the threshold for building age eligibility to qualify for by-right AR provisions, which posed a major constraint on potential projects. Its updated Ordinance has a rolling 15-year timeline, making any building older than 15 years eligible for AR. Other cities, such as Santa Monica, have no building age requirements at all.
- Eligibility for RC projects should not be restricted to specialized overlays or Specific Plans areas. Feedback from the Central City Association of Los Angeles suggested that LA's updated AR ordinance would be improved if extended to the entire city rather than a limited geographic area, as previously applied. Creating special overlays would add significant administrative burdens to RC projects and needlessly constrain where property owners may efficiently adapt to the city's evolving needs.

Additional feedback from the City's Current and Historic Preservation Planning (CHPP) division includes the following recommendations:

- Create design standards to address unique design dilemmas in West Hollywood, including implementing a requirement for visual screening for units that open directly into streets or alleyways and limiting glass walls along street fronts to improve privacy.
- Implement a waiver for open space requirements for buildings with no setbacks and within 1,000 feet of a public park of at least half an acre in size.
- Ensure that West Hollywood's design standards facilitate well-precedented solutions for complying with State light and air circulation requirements in buildings

¹ [Bill Text - AB-1490 Affordable housing development projects: adaptive reuse.](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1490)
(https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1490)

² [Bill Text - AB-529 Adaptive reuse projects.](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB529)
(https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB529)

that may adjoin neighboring buildings and have windowless walls. Solutions can include adding light wells, interior courtyards, skylights, or clerestory windows as seen in older row-style buildings.

Stakeholder Outreach

City staff also met with local developers who had experience in RC projects in the Los Angeles area. These industry experts provided the following recommendations:

- Provide exemptions from the City's open space requirements for buildings set on lots that may not accommodate the City's requirements. Solutions can include allowing 100 percent of rooftop open space to be counted towards the City's requirements, or providing limited exemptions to open space requirements for buildings with no setbacks and within 1,000 feet of a public park of at least half an acre in size.
- Provide exemptions for non-conforming uses and design standards, such as non-conforming setbacks on existing buildings. This can prevent costly remodels to accommodate modern setback requirements.
- Remove requirements for ground-floor retail, if they are currently required. Instead, allow flexibility so ground-floor areas can be utilized as management offices and amenity spaces as needed.
- Do not implement minimum unit sizes, which limit flexibility in how floor areas can be configured. Developers of affordable housing prefer higher unit counts, as this can increase the likelihood of obtaining special financing for affordable housing.
- Provide exemptions from density limits for RC projects. Projects will still be constrained by total gross floor area, height, and existing lot dimension standards, which will provide effective limits for how parcels are utilized.

Long Range Planning Subcommittee Feedback

Staff presented its initial research to the Long Range Planning Subcommittee (LRPSC) at its October 17, 2024 meeting. The LRPSC expressed support for a flexible policy framework to enable RC conversions. Members favored allowing partial and floor-by-floor conversions and cautioned against requiring ground-floor commercial uses, instead recommending maximum adaptability based on site conditions.

The Subcommittee also discussed affordability considerations, emphasizing the importance of facilitating project feasibility as appropriate. While supportive of moderate-income housing, members noted that blanket inclusionary requirements could reduce project viability. Suggestions included conducting a feasibility study, exploring incentives, and preventing oversized luxury units through maximum unit size or tailored FAR limits.

In response to this feedback, Staff implemented the following elements of the proposed Ordinance:

- The draft ordinance allows waivers for certain design standards, provided they do not pose health or safety risks.
- The Ordinance includes no restrictions on partial conversions, does not require ground floor retail, and allows hotels to convert to residential uses.

However, Staff determined not to waive affordable housing requirements for RC projects as this would conflict with the goals of the Housing Element and General Plan. To help offset the impact of affordable housing requirements on feasibility, the draft ordinance implements height and FAR waivers, allowing projects in CN zones to add up to two stories, and up to four stories in all other zones. Additionally, RC projects may exceed height limits in CN zones by up to one story or 12 feet, and up to two stories or 24 feet in all other zones. These waivers increase the feasibility of RC projects while retaining the City's goals of increasing affordable housing supply.

Staff considered implementing maximum unit size and FAR limits to disincentivize exclusively luxury RC projects. However, Staff determined that these solutions were not satisfactory for preserving affordability, and could pose constraints on multi-bedroom units necessary for families. Instead, Staff determined that flexible unit sizes would be more effective, opening up the possibility for low-income housing financing and increasing overall unit counts. Additionally, the previously discussed decision not to waive affordability requirements helps ensure that all RC projects have an affordable housing component.

PROPOSED ZONE TEXT AMENDMENT FOR COMMERCIAL TO RESIDENTIAL CONVERSIONS

New West Hollywood Municipal Code Section 19.36.400 Commercial to Residential Conversions

Currently, the WHMC does not directly address RC projects. This Ordinance provides a new code section to regulate RC projects and additional amendments to add new definitions, grant exemptions, and allow ministerial approval of qualifying projects. The modified sections are summarized in the table below:

Proposed Zone Text Amendment

Type	Section	Title	Change
New Code Section	19.36.400	Residential Conversions	New code section
Addition	19.90.020	Definitions of Specialized Terms and Phrases	New definitions for Residential Conversion, Existing Building Envelope
Addition	19.72.030	Non-conforming Structures	Added an exception for Residential Conversions regulating retention of non-conforming structures
Addition	19.64.030	Exceptions (Development Fees)	Added residential conversions
Addition	19.45.020	Ministerial Housing Permit	Added residential conversions

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The proposed Ordinance is not subject to subsequent review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15162. No substantial changes are proposed by the Ordinance and there are no substantial changes in the circumstances under which the Project will be undertaken that will require major revisions to the previously certified Housing Element Environmental Impact Report (EIR) due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified Housing Element EIR adequately discusses the potential impacts of the proposed Ordinance. The proposed Ordinance is needed to facilitate the production of housing in the City. The Housing Element EIR fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element, including Goal H-4.

Alternatively, the Ordinance is also exempt from further environmental review under CEQA Guidelines Section 15183, which applies to projects that are consistent with the development density and use characteristics analyzed in a previously certified EIR for a General Plan or community-level plan. The proposed Ordinance implements Goal H-4 of the City's certified 6th Cycle Housing Element (2021–2029), which calls for fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives, and Program 11, which calls for the City to streamline development standards for the conversion of office space into housing. The proposed amendments do not introduce new or peculiar environmental impacts beyond what were already considered in the prior EIR, nor increase the severity of previously identified impacts. Instead, they implement previously analyzed policies intended to accommodate the City's housing needs by enabling residential reuse of non-residential buildings. Accordingly, no potentially significant off-site or cumulative impacts would occur beyond what was studied in the certified EIR for the City's 6th Cycle Housing element. The proposed Ordinance does not authorize specific construction projects but provides a regulatory pathway for RC projects consistent with existing planning and environmental documents. Therefore, no further environmental review is required under CEQA Guidelines Section 15183.

Finally, the proposed Ordinance is exempt pursuant to CEQA Guidelines Section 15061(b)(3) because it can be shown with certainty that this regulatory pathway will not result in significant effects on the environment. The proposed Ordinance would authorize the adaptive reuse of existing buildings with little new construction, consistent with the City's Housing Element.

COMPLIANCE WITH THE WEST HOLLYWOOD PRIMARY STRATEGY GOALS AND GENERAL PLAN 2035

This item is consistent with the Primary Strategic Goal(s) (PSG) and/or Ongoing Strategic Program(s) (OSP) of:

- PSG-1: Maintain the City's Unique Urban Balance with Emphasis on Residential Neighborhood Livability.
- PSG-2: Affordable Housing.
- OSP-9: Upgrade Existing Buildings & Infrastructure.

The draft ordinance supports PSG-1 by streamlining the City's ability to adapt to the evolving balance between commercial and residential uses. Underutilized and vacant commercial spaces can be detrimental to residential neighborhood livability. Efficient adaptation helps the City adjust to changing environments while preserving an appropriate balance of uses.

The draft ordinance also supports PSG-2 by creating more affordable housing construction opportunities. The language preserves the City's affordable housing requirements for RC projects and State incentives while including additional incentives such as height increases to support a greater housing supply.

Finally, the draft ordinance supports OSP-9 by facilitating continual upgrades to existing buildings. The Ordinance helps encourage preservation of existing buildings by requiring retention of at least 50 percent of the building's structure, resulting in reduced carbon emissions compared to completely new constructions. This allows the City to incrementally increase density and adapt to evolving land use needs while preserving West Hollywood's core identity.

In addition, this item is compliant with the following goal(s) of the West Hollywood General Plan:

- H-4: Provide for adequate opportunities for new construction of housing.
- H-5: Provide for a government environment that facilitates housing development and preservation.

The draft ordinance supports Goal H-4 by fostering the adaptive reuse of existing structures for residential purposes using construction and planning incentives. This Ordinance is a direct outgrowth of this goal, as previously discussed. Additionally, the draft ordinance supports the City's Housing Element Program #11, which calls for the City to streamline development standards for converting office space into housing.

The draft ordinance also supports Goal H-5 by providing a strong policy framework to support housing development and preservation. Creating clear standards for ministerial approval of RC projects helps reduce uncertainty and increase project feasibility. It implements incentives for redevelopment, such as strategically reducing or eliminating design barriers, and preserves the City's affordable housing requirements.

CLIMATE ACTION AND ENVIRONMENTAL SUSTAINABILITY

This item is consistent with the Climate Action and Adaptation Plan (CAAP), Climate Action Measures:

- EN-1: Improve energy performance, decarbonize and improve energy resilience of the existing building stock
- EN-3: Decarbonize the future building stock and implement best practices in sustainable and resilient new construction

RC projects directly advance the City's CAAP objectives by reducing embodied carbon emissions from demolition, preserving existing structures, and enabling retrofits such as electrification and heat pumps. These actions accelerate decarbonization while expanding housing opportunities. RC projects have reduced environmental impacts compared to all-new construction projects. Residential buildings are also less energy-intensive than most commercial uses, resulting in reduced carbon footprints. This leads to the environmental benefits that support the goals of the CAAP.

EXHIBITS

- A. Draft Resolution No. PC 25-1616 (With Ordinance Attached)
- B. Text Amendment Markup
- C. Existing Land Use Map

**C. ZONE TEXT AMENDMENT
COMMERCIAL TO RESIDENTIAL CONVERSIONS:**

Jordan Parrish, Contract Planner, provided a verbal presentation and background information, as presented in the staff report dated Thursday, September 4, 2025.

He stated the Planning Commission will consider a zone text amendment to encourage and facilitate the conversion of existing commercial buildings to multi-family residential uses.

State legislation underscores the urgency of conversion opportunities, with Assembly Bill (AB) 1490 and AB 529 both directing agencies to facilitate adaptive reuse. AB 1490 makes adaptive reuse an allowable use for 100 percent affordable housing projects that designate at least 50 percent of the units as very low-income. Additionally, AB 529 requires the State Department of Housing and Community Development (HCD) to recommend code changes to support adaptive reuse projects by December 2025.

Currently, the West Hollywood Municipal Code does not directly address residential conversion (RC) projects. This Ordinance provides a new code section to regulate RC projects and additional amendments to add new definitions, grant exemptions, and allow ministerial approval of qualifying projects. If adopted, this Ordinance will directly expand the range of feasible housing projects, helping the city meet its RHNA allocation of 3,933 units.

He detailed incentives that make conversions work, including height bonuses, floor area flexibility, flexibility for light and air circulation, density limits [waived], and fees [waived].

He spoke regarding design standards, including more rooftop open space, setbacks, screened entries along alleys and street, and ground floor transparency and detailed community benefits.

Vice Chair Jones disclosed for the record she spoke to representatives from Unite Here, Local 11. They discussed items contained in the staff report.

Commissioner Solomon disclosed for the record he spoke to representatives from Unite Here, Local 11. They discussed items contained in the staff report.

Commissioner Harris disclosed for the record she spoke to representatives from Unite Here, Local 11. They discussed items contained in the staff report.

Chair Gregoire opened public comments for Item 10.C.

ANITA GOSWAMI, WEST HOLLYWOOD, has concerns regarding this item. She spoke about insufficient parking requirements, and possible impacts to neighboring communities by developers using additional waivers and incentives.

CHARLES CARNOW, LOS ANGELES, Unite Here, Local 11, has concerns regarding this item. He stated his disapproval of the ordinance allowing hotels to be converted into housing. He proposed excluding conversions to mixed-use hotel and residential uses and excluding conversion from hotels to housing.

The commission questioned the parking ratios if a percentage of a hotel space was converted into housing, and requested staff to disclose for the record which developers were met with prior to preparing this item.

They further questioned why non-conforming hotels in residential neighborhoods were excluded, and requested clarification regarding applicable project eligibility requirements and current language, other applicable state laws, structure retention, and limitations to additional floor area.

The commission questioned what type of outreach was made to the business community, and requested clarification regarding the number of additional eligible modifications, incentives, waivers or concessions that could be allowed, and questioned decarbonation standards.

Staff clarified and amended for the record, Resolution No. PC 25-1616, Page 8 of 12:

2. Structure Retention. a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in Section. b. Residential Conversion of non-historic structures is allowed in this Section.

ACTION: Close public comment portion of the public hearing for Item 10.C.
Motion carried by consensus of the Commission.

Some of the commission stated their concerns with existing hotels being included in this ordinance with further discussion on the topic.

Commissioner Solomon suggested a motion to amend the ordinance to exclude hotels and move the remaining recommendations forward.

After discussion regarding removing hotels from the ordinance, Commissioner Solomon withdrew his suggested motion.

Commissioner Carvalho moved to: 1) approve staff's recommendation of approval.

Seconded by Commissioner Harris.

Isaac Rosen clarified for the record the following amendments to Resolution No. PC 25-1616, page 7 of 12:

§19.36.400 Residential Conversions.

C. Project Eligibility. Qualifying Residential Conversion projects must meet the following requirements:

a. Conversion Types (one of the following):

Page 8 of 12:

2. Structure Retention (one of the following):

a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in this Section.

4. Unit Thresholds.

~~a. Unit Thresholds for Fully Residential Conversion Projects (No Mixed Use). Projects shall create a minimum of three (3) dwelling units.~~

~~b. Unit Thresholds for Mixed Use Residential Conversion Projects. Projects shall create a minimum of three (3) dwelling units and dedicate a minimum of fifty percent (50%) of the gross floor area to residential use.~~

- a. Both Residential Conversion Projects (No Mixed-Use) and Mixed-Use Residential Conversion Projects shall create a minimum of three (3) dwelling units.

ACTION: 1) Adopt Resolution No. PC 25-1616 as amended:

[page 7/12] a) §19.36.400 Residential Conversions. C. Project Eligibility. Qualifying Residential Conversion projects must meet the following requirements: a. Conversion Types (one of the following):

[page 8/12] b) Structure Retention (one of the following): a. Projects shall retain and modify the existing building structure so that at least fifty percent (50%) of the existing foundations (interior portions), beams, columns, slabs, trusses, frames, and load-bearing walls remain, unless otherwise allowed by state law, except as permitted in this Section.

[page 8/12] c) 4. Unit Thresholds. ~~a. Unit Thresholds for Fully Residential Conversion Projects (No Mixed Use). Projects shall create a minimum of three (3) dwelling units.~~

~~b. Unit Thresholds for Mixed-Use Residential Conversion Projects. Projects shall create a minimum of three (3) dwelling units and dedicate a minimum of fifty percent (50%) of the gross floor area to residential use.~~

d) a. Both Residential Conversion Projects (No Mixed-Use) and Mixed-Use Residential Conversion Projects shall create a minimum of three (3) dwelling units.

“A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST HOLLYWOOD, RECOMMENDING TO THE CITY COUNCIL APPROVAL OF AN ORDINANCE ADOPTING AN AMENDMENT TO TITLE 19, THE ZONING ORDINANCE OF THE WEST HOLLYWOOD MUNICIPAL CODE, TO ENCOURAGE AND FACILITATE THE CONVERSION OF EXISTING COMMERCIAL DEVELOPMENTS TO RESIDENTIAL USES, AND FINDING THE ACTION EXEMPT FROM CEQA.” and 2) Close the Public Hearing for Item 10.C. **Moved by Commissioner Carvalho, seconded by Commissioner Harris and passes, noting Commissioner Lombardi absent.**