

FINDINGS
ZA-2018-331-CUB-CUX-ZAD-1A

Following (highlighted) is a delineation of the findings and the application of the relevant facts to same:

1. **The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.**

The subject property is a level, rectangular parcel comprised of two lots measuring approximately 12,014 square-feet. The property is zoned M2-2D with a land use designation of Light Manufacturing in the Central City Community Plan Area, the Adaptive Reuse Incentive Areas, the Greater Downtown Housing Incentive Area, the Los Angeles State Enterprise Zone, and the Transit Priority Area in the City of Los Angeles.

The subject property is improved with an existing six-story commercial building with one level of subterranean parking that was built in 1957 and is currently vacant. The applicant proposes to convert the existing building into a 149-room hotel with restaurants, lounges, and a coffee bar on the ground floor and a terrace and pool deck on the rooftop. The project proposes converting mechanical rooms on the rooftop to guest rooms, changing the building from six stories to seven stories. The applicant is proposing tenant improvements to ensure that the site is suitable for the proposed use. The surrounding area of the Downtown Los Angeles in Central City including the location of the subject site entails a variety of uses that are beneficial to residents, tourists, employees, and persons who frequent the area.

The surrounding land uses consists of commercial and light industrial uses. The abutting property to the north, is zoned [Q]C5-2D-O and is developed with a six-story parking structure with commercial uses on the ground floor. The property to the east across Olympic Boulevard is zoned M2-2D and is improved with the California Market Center, a high rise commercial building. The properties to the south across Los Angeles Street are zoned M2-2D and are developed with commercial uses. The properties to the west are zoned M2-2D and are developed with commercial uses.

At the public hearing, the applicant's representative and two stakeholders of the area stated the area was in need of revitalization and improvement of safety. The building is currently underutilized, and does not provide any vibrant activity on the site. With the project, the underutilized building will be reused as a hotel through tenant improvements and minor construction of the subject building. Not only will the project bring more hotel rooms to the downtown area, but the project will promote vibrancy to this part of South Park and revitalize the area with an active hotel use that will put eyes on the street and a presence in the evening time. The conditional uses for alcohol sales and dancing are an ancillary use to the hotel that will enhance the dining and entertainment options to hotel guests, nearby residents, visitors and even employees of the area. Conditions pertaining to dancing and alcohol sales will ensure the project will serve as a benefit to the area by promoting the compatibility of this use with surrounding uses to ensure the operation does not have significant impacts to surrounding uses.

The proposed use in conjunction with the conditions that are imposed such as the requirement that at least one on-duty manager with authority over the activities within the

facility be on the premises at all times that the restaurants, lounges, coffee bar, and rooftop deck is open for business will address the operational and alcohol-related conduct to assure that patron dancing and the service of alcoholic beverages consumed on-site and the availability of alcohol within the hotel rooms will not be detrimental to the community. Therefore, the availability of alcoholic beverages for on-site consumption in conjunction with the proposed hotel will provide a service to the local community, employees, tourists, patrons and residents in the neighborhood.

2. The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.

The project is consistent with the uses envisioned in the Central City Community Plan. The project will involve the adaptive reuse of an existing office building located south (southeast) corner of Main Street and Olympic Boulevard. The subject building was building was constructed in 1957 and is a six-story commercial building. The project involves improvements to the existing building for a 149-room hotel with a ground floor coffee lounge (36 indoor seats with in the 615 square feet of seating area and a 181 square-foot coffee bar area), two ground floor restaurants, where one restaurant will be 2,602 square feet with 124 indoor seats, and the other restaurant will be 2,195 square feet with 137 indoor seats), and a rooftop terrace and pool deck with two fixed bars having a total of 183 seats. Live entertainment in the form of a DJ or other musical performances and public dancing will at the rooftop deck with up to a 1,133 square-foot dance floor at the rooftop. The hotel will operate 24 hours a day, daily, and the establishments serving alcohol will operate from 6 a.m. to 2 a.m., daily.

As stated in the previous finding, the surrounding land uses consists of commercial and light industrial uses, and zoned for either commercial or industrial uses. The abutting property to the north is developed with a six-story parking structure with commercial uses on the ground floor. The property to the east across Olympic Boulevard is improved with the California Market Center, a high rise commercial building. The properties to the south across Los Angeles Street are developed with commercial uses. The properties to the west are developed with commercial uses. There project site is not located in or within 500 feet of any residentially-zoned property. The nearest residential zones to the site are [Q]R5-4D-O zoned parcels located along Hill Street, nearly 700 feet west of the Project site.

The granting of the conditional uses will lead to an adaptive reuse project that will be compatible with, and not detrimental to, surrounding uses. Since the site is not within 500 feet of any residential-zoned land, the project is not subject to the noise limits set forth by LAMC Section 112.05. The project would be subject to LAMC Section 112.02, which regulates noise from mechanical sources such as heating, air conditioning, and ventilation systems. Section 112.01 would regulate any noise from amplified sources, such as ambient music played on the pool deck or other music played on the possible rooftop dance floor. Ground-borne vibrations from vehicle travel on local roadways would not expose sensitive receptors to vibration levels associated with human annoyance or land use disruption.

Other sources of noise from the operation include the restaurant and bar/lounge areas, the dance floor at the rooftop, and auto-related activities.

Noise from the ground level restaurants would be confined to the restaurant since there are no outdoor eating areas. The rooftop bars and lounge area could generate noise from ambient music, as well as patron noises such as conversations. However, the rooftop deck would contain tall perimeter glass railing which would reduce the off-site transmission of these noises by obstructing their direct line of site to nearby receptors. Noise from these sources is not expected to have more than a marginal effect on noise levels in the project's vicinity, especially given the absence of sensitive receptors in the site's vicinity.

The dance floor located at the rooftop with DJs or other musical performances could periodically generate amplified noises. Though the project is not necessarily located in an area with similar types of uses that generate amplified noise from music, it is located in an area with elevated noise levels and no nearby sensitive receptors. Most uses in the vicinity are office or commercial in nature and would not be sensitive to any noises from the rooftop activities. Nearby office and commercial uses would be largely not be operational during late evening hours during which amplified musical performances would mostly take place.

The project provides 24 on-site parking spaces, and 13 off-site spaces off-site at an adjacent existing parking garage. On-site parking would be subterranean and noise would be mostly confined to within the underground parking area of the site. The 13 off-site spaces would have negligible impact on noise levels, as they are within an existing garage.

The project will be subject to the City of Los Angeles' Green Building Code, which emphasizes energy conservation and efficient uses, increase use in renewable energy, and promotes alternative modes of transportation and reduction in vehicle dependency. Incorporating sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures of this project (i.e., planning and design –reduced parking, access to transportation lines; energy demand, water use, solid waste generation, environmental quality and cumulative impacts) will reduce vehicle miles travelled and the project's potential impact with respect to greenhouse gas emissions. By complying with State, regional and City of Los Angeles greenhouse Gas emission reduction goals and objectives, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded the project's cumulative impacts would not be significant.

The conditional approval of this grant provides alleviation for any potential effects from the sale and on-site consumption of alcohol. These conditions include, but is not limited to, the implementation of a camera surveillance system, the utilization of an electronic age verification device to deter underage drinking and purchases, and the requirement that the operator monitor the area under control their in an effort to prevent the loitering of persons on the premises. Moreover, the applicant is required to provide adequate installed lighting that will render all objects and persons clearly visible within the establishment. These operating conditions in conjunction with the Monitoring, Verification and Inspection Program (MViP) will allow the City the opportunity to continue to monitor and verify compliance of the imposed conditions. Therefore as conditioned, the sale and dispensing of alcoholic beverages for on-site consumption with the restaurants, lounges, coffee bar rooftop terrace and deck and within the 149 rooms of the proposed adaptive reuse hotel will not adversely affect or further degrade the adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety of the community.

3. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any specific plan.

The City of Los Angeles' General Plan consists of elements that dictates policies that advances development and manages the City and address environmental issues. The subject site is located in the Central City Community Plan Area, the Adaptive Reuse Incentive Areas, the Greater Downtown Housing Incentive Area, the Los Angeles State Enterprise Zone, and the Transit Priority Area in the City of Los Angeles.

The Central City Community Plan Map designates the property for Light Manufacturing land uses with corresponding zones of MR2 and M2 and is developed with primarily commercial, retail, entertainment and residential uses. The land use designation and surrounding zoning permits for a variety of uses including the proposed adapted reuse of the commercial building into a hotel with 149 hotel rooms. Alcohol sales is not directly addressed in the Community Plan, however the approval of such a request is allowed through the approval of the Zoning Administrator, subject to certain findings. Furthermore, the Community Plan encourages adaptive reuse of existing commercial uses such as the proposed project.

The purpose of the Central City Community Plan is to promote “an arrangement of land uses, streets and services which will encourage and contribute to the health, safety, welfare and convenience of the people who live and work in the Community.” Moreover, the Community Plan aims to improve the function, design and economic vitality of the commercial districts while preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.

The proposed use of the subject site is consistent with, and aids to advance the goals and objectives identified in the Central City Community Plan by;

- Objective 1-2 To increase the range of housing choices available to Downtown employees and residents.
- Policies 1-2.1 Promote the development of neighborhood work/live housing.
- Objective 1-4 To facilitate the conversion of historic buildings in the Historic Core to housing, office, art, and cultural uses in order to attract new residents.
- Policies 1-4.1 Encourage the rehabilitation and adaptive reuse of historic buildings for housing, artist lofts and live-work units.
- Objective 2-1 To improve Central City’s competitiveness as a location for offices, business, retail, and industry.
- Objective 2-3 To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.

- Objective 2-4 To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.
- Policies 2-4.1 Promote night life activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.

The viability of Downtown Los Angeles depends on the continued economic growth and development of the city as a whole. The proposed use conforms to the intent, purpose, and provisions of the General Plan and the Central City Community Plan and advances the objectives and intent of the plan by offering a service that will address the needs of the visitors and residents in the community. The project will reuse an existing commercial building that has been vacant for several years, and bring in a use that adds more hotel rooms to the downtown area, while conforming to the Adaptive Reuse Ordinance. The hotel use is a by-right, permitted use in the M2 zone, and is thus, consistent with the zone. Ground floor restaurants and a coffee bar are proposed to bring in a neighborhood serving use that will bring in more pedestrian activity on both Olympic Boulevard and Main Street. With rooftop activity including live entertainment and a dance floor, will not be detrimental to surrounding uses and will promote the night life activity envisioned by the Community Plan.

At the public hearing, one person submitted a letter stating an excerpt from the Central City Community Plan:

“Downtown Los Angeles has the least amount of public open space of any major U.S. urban center. Although a number of private-building related parks and plazas have been built in recent decades, deficiencies at every scale of public open space from large recreational areas to neighborhood parks and pedestrian friendly streets weaken the opportunity for social interaction and the strengthening of community identity and focus” and encourages that “streets improved with planting, paving, lighting, signage, and furnishings act as pedestrian friendly, open space corridors”.

The project site is already built out and will not involve the demolition of the entire building for the construction of a new building. The project is subject to the Adaptive Reuse Ordinance and will be subject to all the applicable regulations of the ordinance to conform to the Central City Community Plan. Also, the project will be required to comply with all applicable regulations and policies regarding for the removal and replacement of street trees to the satisfaction of the Urban Forestry Division, Bureau of Street Services.

As such, the project will conform to all of the applicable regulations of the General Plan, Central City Community Plan, Adaptive Reuse Ordinance and subject to all other regulations of the Code.

ADDITIONAL REQUIRED FINDINGS FOR THE SALE OF ALCOHOLIC BEVERAGES

4. The proposed use will not adversely affect the welfare of the pertinent community.

The location of the site is convenient to a large population because it is located along a major street, Olympic Boulevard is a heavily traveled commercial corridor within Downtown Los Angeles. Furthermore, the proposed hotel is connected with other major

thoroughfares which are connected by convenient public transportation and the regional freeway system.

The request is for a Conditional Use Permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption in conjunction with a proposed 79,257 square-foot 7-story hotel with 149 hotel rooms, a 2,565 square-foot restaurant with 124 indoor seats, a 2,398 square-foot restaurant with 137 indoor seats, a coffee lounge with 36 indoor seats, a rooftop terrace and pool deck with two (2) fixed bars and 183 seats and within access-cabinets in each of the 149 guest rooms; a Conditional Use to Permit to allow patron dancing; and, a Zoning Administrator's Determination to permit the adaptive reuse of an existing commercial office building for the conversion, use, and maintenance of a hotel in the M2-2D Zone. The project does not include a request to allow off-site sale.

Tourism and entertainment play a significant role in the commercial activity of Los Angeles and Central City. Downtown Los Angeles offers a variety of attractions for both residents and visitors alike.

The applicant is responsible for monitoring both patron and employee conduct on the premises and within the parking areas under their control to assure behavior that does not adversely affect or detract from the quality of life for adjoining residents, property owners, and businesses and will ensure that the subject site does not become a nuisance to the community. The grant also imposes conditions that requires security measures to ensure that the use is compatible with the surrounding area and not injurious, this includes the requirement that all employees participate in training provided by the Los Angeles Police Department STAR (Standardized Training for Alcohol Retailers) Program.

In addition, the applicant has prepared a Security Plan with the Los Angeles Police Department to ensure the project would not affect the general welfare in a negative way. The security plan provides guidelines and protocol to deal with many different operational issues that could arise, including nuisances, emergencies, patrolling, conduct, contacting security, noise, etc.

The addition of the sale and dispensing of alcoholic beverages for on-site consumption will serve as an added convenient amenity to the residents, employees, and tourists. Moreover, the Zoning Administrator has imposed conditions to safeguard peaceful enjoyment and quality of life for neighboring properties. Therefore, as conditioned by this grant, the request for the sale and dispensing of a full line of alcoholic beverages for on-site consumption within the hotel rooms, restaurants, lounges, rooftop terrace, and coffee bar along with patron dancing will not adversely affect the welfare of the pertinent community.

5. **The granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages, including beer and wine, in the area of the City involved, giving consideration to applicable State laws and to the California Department of Alcoholic Beverage Control's guidelines for undue concentration; and also giving consideration to the number and proximity of these establishments within a one thousand foot radius of the site, the crime rate in the area (especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace and disorderly conduct), and whether revocation or nuisance proceedings have been initiated for any use in the area.**

According to the California Department of Alcoholic Beverage Control (“ABC”) licensing criteria, four on-sale and two off-sale alcoholic beverage licenses are allocated to subject Census Tract No. 2079. Data provided on the ABC’s License Query System indicates that there are currently 28 existing on-site and seven existing off-site licenses within this Census Tract.

The following alcohol establishments are within 1000-feet of the subject site:

Jason’s Broadway Market, 900 South Broadway	Type 20
Ace Hotel, 921-933 South Broadway	Type 47, 66 & 68
LAX Discount Store, 1065 South Broadway	Type 20
The Mayan Theater & Niteclub, 1038-1044 South Hill Street	Type 48 & 68
Belasco Theater, 1050 South Hill Street	Type 47 & 68
Pattern Bar, 100 West 9 th Street	Type 48 & 58
1810 Restaurant, 105 West 9 th Street	Type 41
Wood Spoon Café, 107 West 9 th Street	Type 41
O & M Imports, 117 West 9 th Street #407	Type 20, 9, & 17
IMPEX Co., 117 West 9 th Street #423	Type 9, 17, 12, & 18
Coure Dell Amante Pizza & Pasta, 121-125 East 9 th Street	Type 41 & 20
Tony’s Mini Market, 224 West 9 th Street	Type 20
Jason’s Wine & Spirit, 110 East 9 th Street #A2	Type 21
Ramen, 952 South Broadway	Type 41
Carl’s Jr, 106 East Olympic Boulevard	Type 41

Concentration can be undue when the addition of a license will negatively impact a community. Concentration is not undue when the approval of a license does not negatively impact an area, but rather such a license will benefit the public welfare and convenience. The subject site is located in an area of the City where a concentration of commercial and entertainment uses exists and therefore an increase in the number of allocated alcoholic beverage license is anticipated. Moreover, the California Department of Alcoholic Beverage Control has the discretion to approve an application if there is evidence that normal operations will not be contrary to public welfare and will not interfere with the quiet enjoyment of property by residents. The approval of the request will allow the applicant to provide an additional amenity for the employees, residents and tourists in the area.

According to statistics provided by the Los Angeles Police Department Central Division, which has jurisdiction over the subject property within Crime Reporting District No. 185, a total of 264 Part I Crimes and 290 Part II arrests were reported in 2017, compared to the citywide average of 191 crimes and arrests and the high crime average of 229 crimes for 2017. In 2017, there were (14) Narcotics, (34) Liquor Law, (29) Public Drunkenness, (0) Disturbing the Peace, (56) Disorderly Conduct, (0) Gambling, and (12) DUI related arrests. These numbers do not reflect the total number of arrests in the subject reporting district over the accountable year. Arrests for this calendar year may reflect crimes reported in previous years.

The statistics presented indicates that the crime rate in the reporting district where the subject site is located is higher than citywide average. However, the proposed hotel is located along a commercial corridor where there is a concentration of retail, entertainment, restaurants, and offices, therefore an establishment such as the subject site is anticipated. Negative impacts commonly associated with the sale of alcoholic beverages, such as

criminal activity, public drunkenness, and loitering are mitigated by the conditions imposed by this grant. Furthermore, the conditions imposed to mitigate the operations and the on-site consumption will ensure that the use will be beneficial to the community and contribute to the continued development of the area. Additionally, there were no revocation or nuisance proceedings initiated for any use within close proximity of the subject site.

6. **The proposed use will not detrimentally affect nearby residentially zoned communities in the area of the City involved, after giving consideration to the distance of the proposed use from residential buildings, churches, schools, hospitals, public playgrounds and other similar uses, and other establishments dispensing, for sale or other consideration, alcoholic beverages, including beer and wine.**

The following sensitive uses were observed within a 1,000-foot radius of the subject property:

- Fashion Careers International Fashion School, 112 West 9th Street #1030
- Michael Vincent Academy, 1138 South Broadway
- YWCA Job Corp Center, 1031 South Hill Street

The Zoning Administrator have given consideration to the distance of the subject establishment from the above-referenced sensitive uses and recognizes that implementing proactive security measures will decrease the potential for the hotel to become a nuisance in the community. There were no correspondence indicating the use would be detrimental to any of the sensitive uses near the project site. The grant has been well conditioned, to protect the health, safety and welfare of the surrounding neighbors. The potential effects of excessive noise or disruptive behavior, criminal activity and underage drinking have been considered and addressed by requiring adequate lighting, and requiring the use of electronic age verification devices. As conditioned, the proposed use will not detrimentally affect nearby residentially zoned community and the sensitive uses located in close proximity to the subject site.

ZONING ADMINISTRATOR'S DETERMINATION FINDINGS

7. **The Adaptive Reuse Project complies with the standards for dwelling units, guest rooms and joint living and work quarters set forth in Section 12.22-A.26(i).**

The project's design and layout conforms to the referenced standards of LAMC Section 12.22-A.26(i). The proposed project is the adaptive reuse of an existing six-story commercial building with one level of subterranean parking that is currently vacant. In conformance with LAMC Section 12.22-A,26(i)(2), the proposed building will contain guest rooms with a toilet and bathing facilities in each room as shown in Exhibit A. The guest rooms range in size from 201 square feet to 742 square feet. The approval of the requested entitlement will allow the adaptive reuse of an existing commercial office building for the conversion, use, and maintenance of a hotel in the M2-2D Zone.

8. **That the uses of property surrounding the proposed location of the Adaptive Reuse Project will not be detrimental to the safety and welfare of prospective residents.**

The surrounding uses consists of primarily commercial and light industrial uses. The subject property is located in Downtown, Fashion District in well-developed area. The abutting property to the north, is zoned [Q]C5-2D-O and is developed with a six-story parking structure with commercial uses on the ground floor. The property to the east across Olympic Boulevard is zoned M2-2D and is improved with the California Market Center, a high rise commercial building. The properties to the south across Los Angeles Street are zoned M2-2D and are developed with commercial uses. The properties to the west are zoned M2-2D and are developed with commercial uses. Moreover, there are hotel and residential uses within close proximity to the subject site and the location is not known to be detrimental to the safety and welfare of prospective guests.

Finding No. 2 identified the operating characteristics of the hotel in addition to the live entertainment and dancing elements associated with the rooftop deck. The project's impacts were analyzed, and with compliance with all Codes, including the Greenhouse Building Code and Noise Ordinance, the operating characteristics of the uses proposed will not be detrimental to surrounding uses. Also, as stated in Finding No. 4, a security plan was submitted as part of the case file. The security plan was prepared with the efforts of the Los Angeles Police Department to ensure the project would not affect the general welfare in a negative way. The security plan provides guidelines and protocol to deal with many different operational issues that could arise, including nuisances, emergencies, patrolling, conduct, contacting security, noise, etc. The project will have surveillance cameras throughout the building, as required by the conditional use condition for alcohol sales, adequate lighting, and presence of hotel staff because of the 24 hour operation of the hotel, the adaptive reuse project will not be detrimental to the safety of hotel and restaurant guests and visitors.

9. That the Adaptive Reuse Project will not displace viable industrial uses.

The subject site has been vacant for several years. The subject property is improved with an existing six-story commercial building with one level of subterranean parking that was built in 1957. The applicant is proposing improvements to ensure that the site is suitable for the proposed use and convert mechanical rooms on the rooftop to guest rooms, changing the building from six stories to seven stories. The applicant proposes to convert the existing building into a 149-room hotel with restaurants, lounges, and a coffee bar on the ground floor and a terrace and pool deck on the rooftop.

The request is for a Zoning Administrator's Determination to permit the adaptive reuse of an existing commercial office building for the conversion, use, and maintenance of a hotel in the M2-2D Zone, a Conditional Use Permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption in conjunction with a proposed 79,257 square-foot 7-story hotel with 149 hotel rooms, a 2,565 square-foot restaurant with 124 indoor seats, a 2,398 square-foot restaurant with 137 indoor seats, a coffee lounge with 36 indoor seats, a rooftop terrace and pool deck with two (2) fixed bars and 183 seats and within access-cabinets in each of the 149 guest rooms; and a Conditional Use to Permit to allow patron dancing. The Adaptive Reuse of the project site will not displace viable industrial uses.

ADDITIONAL MANDATORY FINDINGS

9. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have

been reviewed and it has been determined that this project is located in Zone X, areas determined to be outside the 0.2% annual floodplain.

10. Pursuant to Section 21084 of the Public Resources Code, the Secretary for the Natural Resources Agency found certain classes of projects not to have a significant effect on the environment and declared them to be categorically exempt from the requirement for the preparation of environmental documents.

The proposed project has been determined not to have a significant effect on the environment and is therefore categorically exempt from the provisions of CEQA pursuant to Article III, Section 1, Class 32 of the City CEQA Guidelines. On June 20, 2017, the proposed project was issued a Notice of Exemption Log Reference No. ENV-2017-332-CE. The proposed project will not require mitigation or monitoring measures and no alternatives to the project were evaluated.

The project qualifies for a Categorical Exemption under CEQA Guidelines Section 15532(b) since the project is an infill development project identified as “development that occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.”

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following criteria:

- (a) *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations;*
- (b) *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses;*
- (c) *The project site has no value as habitat for endangered, rare or threatened species;*
- (d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and*
- (e) *The site can be adequately served by all required utilities and public services.*

The project is an infill development that will involve the adaptive reuse of an existing 6-story, commercial office building that is currently vacant to a 149-room hotel with ground level restaurants and a coffee bar, and a roof terrace with a pool deck in the M2-2D zone and is 0.275 acres within the Los Angeles City limits. The site and surrounding area are urbanized areas, as defined in page 11 of Section 21071 of Chapter 2.5 and Section 15387 Article 20 Definitions of the 2017 California Environmental Quality Act, CEQA Guidelines. The adaptive reuse of the commercial office building to a hotel is permitted in the M2-2D zone through a Zoning Administrator’s Determination, where the findings have been made as required by Code.

The project is characterized as an urban in-fill Categorical Exemption, and qualifies for the Class 32 Categorical Exemption. The site is zoned M2-2D and has a General Plan Land Use Designation of Light Manufacturing. The project is consistent with the applicable Central City Community Plan land use designation and policies and all applicable zoning designations and regulations. Specifically, the project is consistent with the following Plan Objectives and Policies:

Objective 1-2	To increase the range of housing choices available to Downtown employees and residents.
Policies 1-2.1	Promote the development of neighborhood work/live housing.
Objective 1-4	To facilitate the conversion of historic buildings in the Historic Core to housing, office, art, and cultural uses in order to attract new residents.
Policies 1-4.1	Encourage the rehabilitation and adaptive reuse of historic buildings for housing, artist lofts and live-work units.
Objective 2-1	To improve Central City's competitiveness as a location for offices, business, retail, and industry.
Objective 2-3	To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.
Objective 2-4	To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.
Policies 2-4.1	Promote night life activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.

The site is designated as Light Manufacturing, and the project is not requesting to change the zone or land use designation of the site. The project will bring in a hotel use through the adaptive reuse ordinance and the findings for a Zoning Administrator's Determination, as required by the Code, to allow the adaptive reuse of an existing commercial office building to a 149-room hotel have been made. The project will comply with all regulations of the Code, including height, floor area, setbacks, parking, etc. Also, the project will be required to comply with all applicable regulations and policies regarding for the removal and replacement of street trees to the satisfaction of the Urban Forestry Division, Bureau of Street Services.

The site is currently developed and surrounded by development and therefore is not, and has no value as, a habitat for endangered, rare or threatened species. In addition, there are no protected trees on the site.

The project would not result in any significant effects related to traffic, noise, air quality, or water quality. The project will be subject to Regulatory Compliance Measures, which require compliance with the City of Los Angeles Noise Ordinance, pollutant discharge, dewatering, stormwater conditions; and Best Management Practices for stormwater runoff. The following environmental issues were analyzed in depth and concluded that impacts would be less than significant.

- Traffic. A Transportation Impact Study prepared by Gibson Transportation Consulting Inc., dated February 2018 and reviewed by Los Angeles Department

of Transportation. The study analyzed intersections that could be impacted, as well as the project's traffic impacts, vehicle miles travelled, parking impacts, circulation and access of the site, construction impacts on traffic, and many other areas related to construction and operation of the project. Based on the analysis conducted, none of the study intersections would be significantly impacted by the project traffic during the morning or afternoon peak hours under Existing with Project Conditions or Future with Project Conditions. The study concluded with the project would not result in significant impacts, and that no traffic study was required. A Department of Transportation Traffic Analysis for the proposed project was signed by LADOT staff and dated March 29, 2018, indicating that the project would not result in a significant impacts.

- Noise. Since the site is not within 500 feet of any residential-zoned land, the project is not subject to the noise limits set forth by LAMC Section 112.05. The project would be subject to LAMC Section 112.02, which regulates noise from mechanical sources such as heating, air conditioning, and ventilation systems. Section 112.01 would regulate any noise from amplified sources, such as ambient music played on the pool deck or other music played on the possible rooftop dance floor. Ground-borne vibrations from vehicle travel on local roadways would not expose sensitive receptors to vibration levels associated with human annoyance or land use disruption. Other sources of noise from the operation include the restaurant and bar/lounge areas, the dance floor at the rooftop, and auto-related activities. Noise from the ground level restaurants would be confined to the restaurant since there are no outdoor eating areas. The rooftop bars and lounge area could generate noise from ambient music, as well as patron noises such as conversations. However, the rooftop deck would contain tall perimeter glass railing which would reduce the off-site transmission of these noises by obstructing their direct line of site to nearby receptors. Noise from these sources is not expected to have more than a marginal effect on noise levels in the project's vicinity, especially given the absence of sensitive receptors in the site's vicinity. The dance floor located at the rooftop with DJs or other musical performances could periodically generate amplified noises. Though the project is not necessarily located in an area with similar types of uses that generate amplified noise from music, it is located in an area with elevated noise levels and no nearby sensitive receptors. Most uses in the vicinity are office or commercial in nature and would not be sensitive to any noises from the rooftop activities. Nearby office and commercial uses would be largely not be operational during late evening hours during which amplified musical performances would mostly take place. The project provides 24 on-site parking spaces, and 13 off-site spaces off-site at an adjacent existing parking garage. On-site parking would be subterranean and noise would be mostly confined to within the underground parking area of the site. The 13 off-site spaces would have negligible impact on noise levels, as they are within an existing garage.
- Air Quality. The project will be subject to all Federal, State, and Local regulations regarding air quality and greenhouse gases. The project would be subject to the SCAQMD's 2016 Air Quality Management Plan. The project converts an existing office building into a hotel and restaurant facility in the City of Los Angeles. The proposed project would not add any residents to the Plan area and would not increase population in the South Coast Air Basin. Because the AQMP accommodates growth forecasts from Local General Plans, the emissions associated with this project are accounted for and mitigated in the regionals air quality attainment plans. As such, the project would not obstruct implementation

of the AQMP and its cumulative impacts on regional air quality would be less than significant. The project does not conflict with the growth assumptions in the regional air plan and this impact would be less than significant.

Construction impacts to air quality and greenhouse gases would be less than significant. The project will not exceed SCAQMD mass emission thresholds for ozone precursors during construction, and cumulative emissions of localized nonattainment pollutants PM10 and PM2.5, would not be considerably. Impacts would be less than significant. For operational impacts, the hotel is not include a major source of combustion or fugitive dust. Localized emissions of PM10 and PM2.5 would be minimal. Existing land uses in the area include land uses that do produce substantial emissions of localized nonattainment pollutants.

Construction activities would not expose nearby sensitive receptors to PM10 and PM2.5 levels that exceed SCAQMD Localized Significant thresholds. During long term project operations, the project will not substantial emissions of Toxic Air Contaminants ("TACs") during the construction or operations phase. The project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. The project would not create substantial concentrations of TACs. The project will not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the project would not warrant the need for a health risk assessment associated with on-site activities.

The operation would not create objectionable odors.

- Greenhouse Gases. The City's Green Building Ordinance has several requirements that call for reductions in Greenhouse Gas emissions from reducing in energy use, water use, and solid waste generation from new non-renewable. The project is subject to the regulatory compliance measures and project design features that would reduce the project's greenhouse gas emissions profile and would represent improvement from the No Action Taken scenario. Also, with compliance with regulatory compliance measure, the project would be consistent with a number of relevant plans and policies that govern climate change.

The project will incorporate several design elements that will reduce the carbon footprint of the development. Such include: reduced parking based on compliance with the City's bicycle parking ordinance; access to sever public transportation lines, use of low-emitting materials; Equipment fixtures; a set aside of a minimum 250 square feet for the future installation of photovoltaic or other electrical solar panels; a future electrical solar system; appliances that meet Energy Star designation; plumbing fixtures with low flow rates; automatic irrigation system controllers, etc.

Construction and operational noise levels would not exceed those thresholds established within the L.A. CEQA Thresholds Guide. Based on a review of similar projects, the project would not create significant levels of construction or operational emissions, nor toxic air contaminants. The project would not result in significant impacts to water quality.

In addition, a Transportation Impact Study for the project was prepared by Gibson Consulting.

The project site is currently and will continue to be adequately served by all public utilities and services.

Exceptions to Categorical Exemptions

There are six (6) exceptions to categorical exemptions must be considered in order to find a project exempt from CEQA: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

The project is not located on or near any environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. There is not a succession of known projects of the same type and in same place as the subject project. The project would not reasonably result in a significant effect on the environment due to unusual circumstances. The project is not located near a State Scenic Highway. Furthermore, according to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site in the vicinity is identified as a hazardous waste site. The project site has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register or Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register, and was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles.