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JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. ENV-2019-7193-CE

The Zoning Administrator has determined that based on the whole of the administrative record, the project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, Class 32, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

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 Applicant is proposing the conversion of and a 3,672-square-foot addition to an existing 20,200 square-foot warehouse building for 18 Joint Living and Work Quarters (JLWQ) units for artists and artisans within the M3-1-RIO Zone within the Central City North Community Plan Area. The building would result in 18 Joint Living and Work Quarters, 2,267 square feet of open space, an improved surface parking lot for 24 vehicle spaces, 20 bicycle stalls, and improved landscaping throughout the site. The Applicant is providing parking at-grade and the Project is not located within a Bureau of Engineering (BOE) Special Grading Area. No trees are being proposed to be removed. Regarding the project scope, much of the work involves exterior with some updated windows, new service doors, loading door openings and loading doors; removal of the loading ramps; addition of the raised concrete decks and skylights to the building; and improvement of the surface parking lot. Regarding the Project's design, the building will maintain much of the industrial aesthetic of the building and is introducing a similar design respective of the other four buildings already converted to JLWQ's onsite. The building's plan, massing, brick masonry construction, wood and metal roof frame and support columns, most of the existing window openings, two loading dock openings, existing canopies, and stepped parapets at the roofline would be retained.

The Applicant is seeking a Zoning Administrator's Determination to permit the conversion and of this warehouse building for additional JLWQ units for artists and artisans within this site in the

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M3-1-RIO Zone. As an existing building and a project which is categorized as an in-fill development, the project qualifies for the Class 32 Categorical Exemption.

Located at 2345 – 2421 S. Santa Fe Avenue, the site is zoned M3-1-RIO and has a General Plan Land Use Designation of Heavy Manufacturing. The Municipal Code allows for the conversion of existing manufacturing buildings into JLWQ units and as shown in the case file, the project substantially conforms and meets the goals and plans identified within the General Plan, Central City North Community Plan, and River Implementation Overlay District. The subject site is wholly within the City of Los Angeles, on a site that is approximately 3.39 acres. All properties surrounding the site are zoned M3-1-RIO, designated for heavy manufacturing land uses and are all improved with one- and two-story warehouse and industrial buildings, except for the abutting site to the west, which is a security paving concrete and recycling facility. The site has been previously disturbed and is surrounded by development and therefore is not, and has no value as, a habitat for endangered, rare or threatened species. As mentioned, there are no trees proposed to be removed for the Project.

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance, pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will ensure that the project will not have significant impacts on noise and water. Furthermore, the project does not exceed the threshold criteria established by LADOT for preparing a traffic study. Per the VMT estimate and Transportation Study Assessment Form reviewed and signed by Planning Staff on May 07, 2021, the project is not required to prepare a traffic study. Therefore, the project will not have any significant impacts to traffic. Interim thresholds were developed by DCP staff based on CalEEMod models runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. The project site will be adequately served by all public utilities and services given that the conversion of a warehouse building for 18 JLWQ units, will be on a site which has been previously developed and is consistent with the General Plan. Therefore, the projects meet all of the Criteria for the Class 32.

There are five (5) Exceptions which the City is required to consider before finding a project exempt under Class 32: (a) Cumulative Impacts; (b) Significant Effect; (d) Scenic Highways; (d) Hazardous Waste Sites; and (e) Historical Resources.

Regarding Cumulative Impacts, there are no known recently proposed and approved projects requesting a Zoning Administrator's Determination for an 18 JLWQ unit building and will not result in significant cumulative impacts from successive projects of the same type in the same place.

For Significant Effect, as mentioned, the project proposes the conversion of an existing warehouse building in an area zoned and designated for heavy manufacturing. The site has previously received approvals for the conversion of four of the five buildings for JLWQ's, first in 1986 and then again in 2011. In addition, the project will provide on-site parking for 24 vehicles and two short-term and 18 long-term bicycle parking spaces. All adjacent lots surrounding the project site are developed in the M3-1-RIO Zone with a series of one- and two-story industrial and warehouse buildings. Additionally, the subject site's proposal of converting the one-story development is of a similar size and slope to the existing three one-story and one two-story buildings within the site, including the one- and two-story buildings surrounding the property, and the project's scope of work does not include adding any building height to the warehouse. The project proposes a Floor Area Ratio (FAR) of 0.96:1 on a site that is permitted to have a maximum FAR of 1.5:1. The building design is compatible with the surrounding neighborhood and will receive alterations to the windows, new entryways, a central courtyard, a raised concrete deck, and attractive landscaping. The area is characterized best as an industrial area and the site has been characterized as a colony, a magnet for artists, artisans, and designers existing on the site with a longstanding history. The conversion of this remaining underutilized industrial building will

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fully convert this site for live-work housing. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

Regarding Scenic Highways, the only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. The site is approximately 27 miles from the state park and would not have any potential impacts to this resource that would result from the Project. Therefore, the subject site will not create any impacts within a designated State Scenic Highway.

With respect to Hazardous Waste Sites, according to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site within 1,000 feet of the vicinity, is identified as a hazardous waste site.

Finally, for Historical Resources, the site consists of four buildings built between 1916 and 1924, and one building – the subject property at 2345 S. Santa Fe Avenue – built in 1953. The four buildings have been identified as eligible for listing in the National Register of Historic Places and the California Register of Historical Resources, and the site was designated a Historic-Cultural Monument (HCM #LA 5000) on February 04, 2020 as the C.B. Van Vorst Co. Manufacturing Plant/Santa Fe Art Colony. As such, a Historic Resources Assessment report dated December 15, 2020 was submitted for the project. The report, prepared by Historic Resources Group, evaluated the proposed rehabilitation of the 2345 S. Santa Fe Avenue warehouse building and its potential impacts to the historic significance of the site, and provided an analysis using the Secretary of the Interior's Standards for Rehabilitation. The report summarized that much of the scope of work involves exterior alterations and concluded that the building's plan, massing, brick masonry construction, wood and metal roof frame and support columns, most of the existing window openings, two loading dock openings, existing canopies, and stepped parapets at the roofline would be retained. It further noted that the subject warehouse building is the least important building in terms of contributing to the historic significance of the subject property because it was built several years after the period of significance established by SurveyLA for the daylight factory property type and because it lacks much of the character-defining features found on the other four buildings. On February 9, 2021, the Office of Historic Resources (OHR) approved the report and plans, stating that the warehouse conversion is a compatible alteration to the property.

Based on this, the project will not result in a substantial adverse change to the significance of a historic resource and this exception does not apply.