



APPLICATIONS:

APPEAL APPLICATION

Instructions and Checklist

Related Code Section: Refer to the City Planning case determination to identify the Zone Code section for the entitlement and the appeal procedure.

Purpose: This application is for the appeal of Department of City Planning determinations authorized by the Los Angeles Municipal Code (LAMC).

A. APPELLATE BODY/CASE INFORMATION

1. APPELLATE BODY

- Area Planning Commission City Planning Commission City Council Director of Planning
- Zoning Administrator

Regarding Case Number: _____

Project Address: _____

Final Date to Appeal: _____

2. APPELLANT

Appellant Identity:
(check all that apply)

- Representative Property Owner
- Applicant Operator of the Use/Site

Person, other than the Applicant, Owner or Operator claiming to be aggrieved

Person affected by the determination made by the **Department of Building and Safety**

- Representative Owner Aggrieved Party
- Applicant Operator

3. APPELLANT INFORMATION

Appellant's Name: _____

Company/Organization: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ E-mail: _____

a. Is the appeal being filed on your behalf or on behalf of another party, organization or company?

Self Other: _____

b. Is the appeal being filed to support the original applicant's position? Yes No

4. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): _____

Company: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ E-mail: _____

5. JUSTIFICATION/REASON FOR APPEAL

a. Is the entire decision, or only parts of it being appealed? Entire Part

b. Are specific conditions of approval being appealed? Yes No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

6. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____  Date: 9/19/22

GENERAL APPEAL FILING REQUIREMENTS

B. ALL CASES REQUIRE THE FOLLOWING ITEMS - SEE THE ADDITIONAL INSTRUCTIONS FOR SPECIFIC CASE TYPES

1. Appeal Documents

a. **Three (3) sets** - The following documents are required for each appeal filed (1 original and 2 duplicates) Each case being appealed is required to provide three (3) sets of the listed documents.

- Appeal Application (form CP-7769)
- Justification/Reason for Appeal
- Copies of Original Determination Letter

b. Electronic Copy

Provide an electronic copy of your appeal documents on a flash drive (planning staff will upload materials during filing and return the flash drive to you) or a CD (which will remain in the file). The following items must be saved as individual PDFs and labeled accordingly (e.g. "Appeal Form.pdf", "Justification/Reason Statement.pdf", or "Original Determination Letter.pdf" etc.). No file should exceed 9.8 MB in size.

c. Appeal Fee

- Original Applicant - A fee equal to 85% of the original application fee, provide a copy of the original application receipt(s) to calculate the fee per LAMC Section 19.01B 1.
- Aggrieved Party - The fee charged shall be in accordance with the LAMC Section 19.01B 1.

d. Notice Requirement

- Mailing List: All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC
- Mailing Fee - The appeal notice mailing fee is paid by the project applicant, payment is made to the City Planning's mailing contractor (BTC), a copy of the receipt must be submitted as proof of payment.

SPECIFIC CASE TYPES - APPEAL FILING INFORMATION

C. DENSITY BONUS / TRANSIT ORIENTED COMMUNITES (TOC)

1. Density Bonus/TOC

Appeal procedures for Density Bonus/TOC per LAMC Section 12.22.A 25 (g) f.

NOTE:

- Density Bonus/TOC cases, only the *on menu or additional incentives* items can be appealed.
- Appeals of Density Bonus/TOC cases can only be filed by adjacent owners or tenants (must have documentation), and always only appealable to the Citywide Planning Commission.

- Provide documentation to confirm adjacent owner or tenant status, i.e., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, drivers license, bill statement etc.

D. WAIVER OF DEDICATION AND OR IMPROVEMENT

Appeal procedure for Waiver of Dedication or Improvement per LAMC Section 12.37 I.

NOTE:

- Waivers for By-Right Projects, can only be appealed by the owner.
- When a Waiver is on appeal and is part of a master land use application request or subdivider's statement for a project, the applicant may appeal pursuant to the procedures that governs the entitlement.

E. TENTATIVE TRACT/VESTING

1. Tentative Tract/Vesting - Appeal procedure for Tentative Tract / Vesting application per LAMC Section 17.54 A.

NOTE: Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.

- Provide a copy of the written determination letter from Commission.

F. BUILDING AND SAFETY DETERMINATION

- 1.** Appeal of the Department of Building and Safety determination, per LAMC 12.26 K 1, an appellant is considered the **Original Applicant** and must provide noticing and pay mailing fees.

a. Appeal Fee

- Original Applicant - The fee charged shall be in accordance with LAMC Section 19.01B 2, as stated in the Building and Safety determination letter, plus all surcharges. (the fee specified in Table 4-A, Section 98.0403.2 of the City of Los Angeles Building Code)

b. Notice Requirement

- Mailing Fee - The applicant must pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt as proof of payment.

- 2.** Appeal of the Director of City Planning determination per LAMC Section 12.26 K 6, an applicant or any other aggrieved person may file an appeal, and is appealable to the Area Planning Commission or Citywide Planning Commission as noted in the determination.

a. Appeal Fee

- Original Applicant - The fee charged shall be in accordance with the LAMC Section 19.01 B 1 a.

b. Notice Requirement

- Mailing List - The appeal notification requirements per LAMC Section 12.26 K 7 apply.
- Mailing Fees - The appeal notice mailing fee is made to City Planning's mailing contractor (BTC), a copy of receipt must be submitted as proof of payment.

G. NUISANCE ABATEMENT

1. Nuisance Abatement - Appeal procedure for Nuisance Abatement per LAMC Section 12.27.1 C 4

NOTE:

- Nuisance Abatement is only appealable to the City Council.

a. Appeal Fee

- Aggrieved Party the fee charged shall be in accordance with the LAMC Section 19.01 B 1.

2. Plan Approval/Compliance Review

Appeal procedure for Nuisance Abatement Plan Approval/Compliance Review per LAMC Section 12.27.1 C 4.

a. Appeal Fee

- Compliance Review - The fee charged shall be in accordance with the LAMC Section 19.01 B.
- Modification - The fee shall be in accordance with the LAMC Section 19.01 B.

NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

Please note that the appellate body must act on your appeal within a time period specified in the Section(s) of the Los Angeles Municipal Code (LAMC) pertaining to the type of appeal being filed. The Department of City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
<input type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

Building & Safety Copy
 Office: Downtown
 Application Invoice No: 83233

City of Los Angeles
 Department of City Planning



Scan this QR Code® with a barcode reading app on your Smartphone. Bookmark page for future reference.



6800183233



City Planning Request

NOTICE: The staff of the Planning Department will analyze your request and accord the same full and impartial consideration to your application, regardless of whether or not you obtain the services of anyone to represent you.

This filing fee is required by Chapter 1, Article 9, L.A.M.C.

If you have questions about this invoice, please contact the planner assigned to this case. To identify the assigned planner, please visit <https://planning.lacity.org/pdiscaseinfo/> and enter the Case Number.

Receipt Number:230922O2D-A4632021-998B-47E9-A144-E6B084D3025B, Amount:\$194.34, Paid Date:09/23/2022

Applicant: HERE LOCAL 11, UNITE (818-6353034)
Representative:
Project Address: 721 E 5TH ST, 90013

NOTES:

ZA-2021-9890-ZV-2A			
Item	Fee	%	Charged Fee
Appeal by Person Other Than The Applicant *	\$158.00	100%	\$158.00
Case Total			\$158.00

Item	Charged Fee
*Fees Subject to Surcharges	\$158.00
Fees Not Subject to Surcharges	\$0.00
Plan & Land Use Fees Total	\$158.00
Expediting Fee	\$0.00
Development Services Center Surcharge (3%)	\$4.74
City Planning Systems Development Surcharge (6%)	\$9.48
Operating Surcharge (7%)	\$11.06
General Plan Maintenance Surcharge (7%)	\$11.06
Grand Total	\$194.34
Total Invoice	\$194.34
Total Overpayment Amount	\$0.00
Total Paid (this amount must equal the sum of all checks)	\$194.34

Council District: 9
 Plan Area: Central City
 Processed by CHAN, JASON on 09/23/2022

Signature: _____

September 15, 2022

**RE: Appeal Justification for Two Interrelated Projects;
El Sol Project (719-725 E. 5th St.) DCP Case Nos. ZA-2021-9890, ENV-2017-4735;
Rendon Hotel Project (2053 E. 7th St.) DCP Case Nos. ZA-2017-4734, ENV-2017-4735**

On behalf of UNITE HERE Local 11 (“**Local 11**” or “**Appellant**”), this office concurrently submits two appeals (“**Appeals**”) to the City of Los Angeles (“**City**”) Department of City Planning (“**DCP**”) involving two interrelated developments:

- (1) **RENDON HOTEL**: the proposed 103-room hotel development located at 2053 East 7th Street consisting of a new 15-story hotel structure and alterations of an existing three-story building that would convert 41 single-room occupancy units (“**SRO(s)**”), which includes granting of various land use entitlements including a general plan amendment, zone change, height district change, conditional uses permits, zone variance, zoning administrator adjustment, and site plan review (“**Rendon Entitlements**”) under Department of City Planning (“**DCP**”) case No. CPC-2017-4734-GPA-ZC-HD-CUB-CUX-ZV-ZAA-SPR (collectively “**Rendon Project**”). The Rendon Entitlements were approved and/or recommended for approval by the City Planning Commission (“**CPC**”) via a Letter of Determination (“**LOD**”) mailed on August 30, 2022, which LOD states September 19, 2022 is the final date to appeal.¹
- (2) **EL SOL HOTEL**: reestablish 42 SRO units at the existing three-story building located at 719 E. 5th Street that historically provided 58 units, which includes granting a zone variance (“**El Sol ZV**”) under DCP case no. ZA-2021-9890-ZV (collectively “**El Sol Project**”). The El Sol ZV was initially approved by the City’s Zoning Administrator (“**ZA**”),² which was subsequently appealed and upheld by CPC via a Corrected LOD mailed September 8, 2022, which states September 23, 2022 is the final date to appeal.³

The Rendon Project and El Sol Project (collectively “**Projects**”) are *interrelated because they both rely on the same Mitigated Negative Declaration* initially circulated in February 2021 (“**MND**”),⁴ subsequently revised via a March 2022 Erratum, and processed under DCP Case No. ENV-2017-4735-MND. The El Sol Project (i.e., reestablishing 42 SRO units) is intended to serve as the Rendon Project’s (i.e., conversion of 42 SRO units) compliance with the City’s Residential Hotel Unit Conversion and Demolition Ordinance 179,868) (“**RHO**”), the Wiggins Settlement Agreement

¹ CPC LOD (8/30/22) DCP Case No. CPC-2017-4734, <https://planning.lacity.org/pdiscaseinfo/document/MjczMTA0/1823a02c-5d95-4003-95c4-258347c32f18/pdd>.

² ZA LOD (3/17/22 DCP Case No. ZA-2021-9890, <https://planning.lacity.org/pdiscaseinfo/document/MTk00TI0/1823a02c-5d95-4003-95c4-258347c32f18/pdd>.

³ CPC LOD (9/8/22) DCP Case No. ZA-2021-9890, <https://planning.lacity.org/pdiscaseinfo/document/MjgwMDE0/1823a02c-5d95-4003-95c4-258347c32f18/pdd>.

⁴ Inclusive of appendices (“**APP-##**”) retrieved from City website <https://planning.lacity.org/development-services/negative-declaration-public-notice> and Erratum (<https://www.dropbox.com/s/eoht7h7now0fj1/ENV-2017-4735-MND%20-%20Erratum.pdf?dl=0>).

(“**Settlement**”), and other guidelines and controls on residential hotel development within the redevelopment area (“**Development Guidelines**”). (See MND Erratum, cover & pp. 3, 20.⁵)

REASON FOR THE APPEALS: The Appellant hereby appeals all the Rendon Entitlements, the El Sol ZV, as well as the MND for both the Rendon and El Sol Projects. Based on the review of relevant documents, approval of the Projects in reliance of the MND violates the Los Angeles Municipal Code (“**LAMC**” or “**Code**”), the California Environmental Quality Act (“**CEQA**”),⁶ as well as the one-for-one replacement requirement under the RHO, Settlement, and Development Guidelines. Appellant respectfully requests the City Council grant the Appeals and withhold all approvals for the Projects—which are stayed under the Code by the timely filing of the Appeals (see e.g., LAMC §§ 11.5.13.D, 11.5.14 5.D(g)(5), 12.27.M, 12.24.I.2)—until the issues raised herein and elsewhere in the Projects’ administrative record are adequately addressed.

SPECIFIC POINTS IN ISSUE: First, CPC’s approvals on the Projects fail to adequately address CEQA compliance concerns, including the MND’s failure to properly analyze and mitigate the Projects’ environmental impacts (e.g., vehicle miles traveled, greenhouse gas emissions, noise, housing, land use inconsistency, etc.) that were raised by Appellant and others, including multiple experts (e.g., SWAPE, Menlo Scientific Acoustics, Smith Engineering),⁷ which are reiterated and fully incorporated into the Appeals.

Second, CPC’s LODs for both Projects fail to address Local 11’s concern with the City’s refusal to apply the one-for-one replacement requirement to the El Sol Hotel units, as raised in Local 11’s comment letter dated April 28, 2022 (attached hereto as *Exhibit A*). As fully explained therein, the SRO rules do in fact apply to the El Sol Hotel, which DCP staff claimed was not a residential hotel leading up to and during the CPC hearing.⁸ The CPC LODs now admit the El Sol Hotel was a *residential apartment hotel use*⁹ but fail to explain why it is not subject to the one-for-one SRO replacement requirement.

Appellant reserves the right to supplement these comments and specific appeal points in the future. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during the EIR comment period].)

⁵ See also Ordinance (https://clkrep.lacity.org/onlinedocs/2008/08-0644_ord_179868.pdf); Settlement (<https://www.dropbox.com/s/rm6tds3okl4m8m8/Wiggins%20Settlement%20Agreement%20executed%20-%20Full.pdf?dl=0>); SRO Hotel Guidelines (https://www.dropbox.com/s/80pock2g5bywkzt/D4D_CI_CT_%20RESIDENTIAL_HOTELS.pdf?dl=0).

⁶ Pub. Res. Code § 21000 et seq. and 14 Cal. Code Regs. (“**CEQA Guidelines**”) § 15000 et seq.

⁷ See e.g., DCP (4/28/22) CPC Appeal Report, PDF pp. 59-232, https://planning.lacity.org/plndoc/Staff_Reports/2022/04-19-2022/ZA_2021_9890.pdf.

⁸ See e.g., DCP (4/25/22) Technical Modifications, PDF p. 1, https://drive.google.com/drive/folders/1mGccHzSz6T_cqzzRI-A8m-i33rFHnSvC; DCP (4/28/22) Presentation, Slide 5 (“Not a Residential Hotel”), Slide 22 (“Not subject to the RHO No Guest Rooms or Efficiency Units”), <https://drive.google.com/drive/folders/1LAy9lnOfsbCSvWbzLzxxZAsc4WYZNY-i>; CPC (4/28/22) Item 12/13 minutes, hh:mm:ss 00:07:00 – 00:08:15, 00:16:00 – 00:17:45, https://planning.lacity.org/plndoc/Audio/CPC/2022/04-28-2022/12_ZA_2021_9890.mp3.

⁹ See CPC LOD, supra fn. 2, pp. F-23 (“The historic building permit record shows that the [El Sol Hotel] property and building were used as a residential hotel use until approximately 2018.”); see also CPC LOD, supra fn. 3, pp. F-1 – F-3 (passim).

HOW ARE YOU AGGRIEVED BY THE DECISION: Local 11's members live and/or work in the vicinity of the Project sites, breathe the air, suffer traffic congestion, and suffer other environmental impacts of the Projects unless they are properly analyzed and mitigated. Additionally, Local 11 is committed to ensuring responsible development in Los Angeles, that local land-use rules/regulations are followed, and informed decision-making by public officials regarding projects that may significantly impact the environment and affordable housing in the City of Los Angeles. Hence, granting this Appeal will confer a substantial benefit to Local 11 and the public, including citizens, residents, businesses, and taxpayers affected by the Projects, and result in enforcing important public rights.

HOW DID THE DECISION-MAKER ERRED OR ABUSED THEIR DISCRETION: CPC abused its discretion because it improperly granted the two Projects' entitlements and approved the MND in violation of the RSO and Code, and relied on an inadequate CEQA review – as explained above, Exhibit A attached hereto, and in prior comments already in the administrative record,¹⁰ which by this reference are incorporated in their entirety into the Appeals.

Finally, on behalf of the Appellant, this office requests, to the extent not already on the notice list, for all notices of CEQA actions, hearings on the Appeals and any approvals for the Projects, CEQA determinations, or public hearings to be held on the Projects under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§ 21092.2, 21167(f) and Gov. Code § 65092 and LAMC § 197.01.F.) Please send notice by electronic and regular mail at the address provided on page one of this letter.

Sincerely,



Jordan R. Sisson
Attorney for Appellant

ATTACHMENTS:

Exhibit A: Local 11 Comment Letter (4/28/2022)

¹⁰ Supra fn. 7.

EXHIBIT A

April 28, 2022

VIA EMAIL:

City Planning Commission (cpc@lacity.org)
c/o Oliver Netburn, City Planner (oliver.netburn@lacity.org)
City Planning Department, City of Los Angeles

**RE: Item 12 (El Sol Hotel) & Item 13 (Rendon Hotel), CPC Hearing Scheduled 4/28/2022;
Appeal of El Sol Project (719 E. 5th St.) (DCP Case Nos. ZA-2021-9890, ENV-2017-4734);
Rendon Hotel Project (2053 E 7th St.) (DCP Case Nos. CPC-2017-4734, ENV-2017-4734);**

Dear City Planning Commission (“CPC”) and Department of City Planning (“DCP”):

On behalf of UNITE HERE Local 11 (“**Local 11**” or “**Appellant**”), this office respectfully provides the following comments to the City of Los Angeles (“**City**”) regarding the above-referenced “**Appeal**” of the El Sol Hotel project (i.e., reestablish single-room occupancy (“**SRO**”)) involving the inter-related Rendon Hotel project (i.e., 103-room hotel) (collectively “**Projects**”). In addition to its environmental concerns, Local 11 is seriously concerned with the Projects’ compliance with the City’s SRO rules—namely the one-for-one replacement requirements under: (i) the “**Development Guidelines**” and Controls for Residential Hotels in the Central Industrial “**Redevelopment Plan**” Project Area; (ii) the City’s Residential Hotel Unit Conversion and Demolition “**Ordinance**” 179868 codified under the Los Angeles Municipal “**Code**” or “**LAMC**” § 47.70 *et seq.*; and (iii) the Wiggins “**Settlement Agreement**.”¹ For example, Section VI (B) (3) of the Development Guidelines state:

"Replacement may mean new construction or rehabilitation of existing units. However, rehabilitated units may only qualify as Replacement Units if the units are not included on Attachment A to these Development Guidelines." (Emphasis added.)

The El Sol is included in Attachment A and, thus, the 33 historic SRO units at the El Sol Hotel must be replaced in addition to the Rendon Hotel’s 42 units—totaling 75 units subject to the City’s one-for-one replacement requirement. DCP disagrees, arguing the SRO rules do not apply to the El Sol Hotel because: (i) the site was erroneously included in the Wiggins Settlement Agreement; (ii) the site has no guest rooms or efficiency units and is not a residential hotel; (iii) the prior owner “initiated Ellis proceedings” in September 2018; and (iv) the hotel “lost its non-conforming rights” to operate in the M zone.² Respectfully, the City’s arguments are irrelevant under the plain language/purpose of the City’s SRO rules.

First, not only is it unexplained why the El Sol Hotel was “erroneously” included in the Settlement Agreement, but DCP fails to recognize that the City’s SRO rules under the Development Guidelines and Ordinance are independent of the private Wiggins settlement between the City and Legal Aid Foundation. The El Sol Hotel is listed in the attachment to the City’s Development Guidelines, and compliance is required for consistency with the applicable Redevelopment Plan. Furthermore, the Development Guidelines and Ordinance clearly indicate that compliance with one does not excuse compliance with the other.³ Thus, even if compliant with the Settlement Agreement, the Projects must still comply with the one-for-one replacement requirement independently enforceable both under the Development Guidelines and Ordinance.

¹ See [Development Guidelines](#) (Jun. 2006); [Ordinance](#) (May 2008); [Settlement Agreement](#) (Aug. 2006).

² See [Staff Report](#), pp. A-16 – A-17 (response to appeal point 15); [Staff Presentation](#), slides 4, 5, 22.

³ See LAMC § 47.89; see also Development Guidelines § XI.

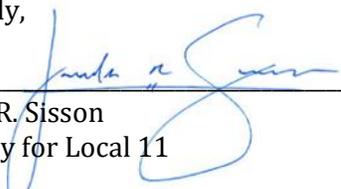
Second, *staff repeatedly acknowledges* the site's recent use as a residential hotel, it is listed on *ZIMAS as subject to the Ordinance and Development Guidelines*,⁴ and this is further *substantiated by the site's previous owner* under DCP case no. ZA-2015-2843 (withdrawn in October 2016).⁵ The site falls squarely within the definition of "Residential Hotel" under the Development Guidelines and the Ordinance, which includes a strong presumption for SROs operating in 2005.⁶ There is no evidence that the site was not used as a primary residence in 2005. On the contrary, the LA Housing Department record seems to show "RSO"/"SCEP" payments were "paid" in 2008,⁷ and that the Salvation Army was providing supportive service in combination with residential housing⁸ which can be a form of relative long-term/primary housing under the Code.⁹ Thus, the evidence and presumptions favor finding the El Sol units subject to the Development Guidelines and Ordinance.

Third, there is *no evidence that the El Sol falls within the narrow exemptions* from the SRO rules,¹⁰ such as submitting a "notice of intent to withdraw all of the building's accommodations from rent or lease" *before October 11, 2005*. (LAMC § 47.74.B.3.) Neither initiating Ellis Act proceedings in 2018 nor losing non-conforming rights qualifies for an exemption from the Development Guidelines or Ordinance, which apply to even vacant units.¹¹ DCP cannot expand these narrow exemptions.

In sum, the El Sol falls within the plain language of the Development Guidelines and Ordinance. There is no evidence that any of the specific exemptions apply. Neither the staff report's three-sentence response nor the presentation's conclusory claims address this issue, which is central to Local 11's Appeal. At stake is preserving 33 additional SRO units, which warrants *CPC continuing this item until DCP confirms strict compliance with the City's SRO zoning rules*.

We appreciate your consideration.

Sincerely,



Jordan R. Sisson
Attorney for Local 11

⁴ See e.g., Staff Presentation, slides 2 & 5 ("reuse of existing *Residential Hotel*" ... "33 Light Housekeeping Rooms (a hotel use from 1906 to *2016*)"); *Staff Report*, PDF pp. 4, 45 (building used "as a *residential hotel* use until approximately *2018* ... continually operated as a *residential hotel*, most recently by Salvation Army, who owned and managed the building until approximately *2010*."); *Supplemental Documents*, PDF p. 7 ("... building has long been used for *residential purposes (Hotel/Rooming House)*."); *ZIMAS* (listing "*ZI-2353 Residential Hotel* Unit Conversion Demolition Ordinance" and "*ZI-2487 City Center/Central Ind. Dev. Guidelines & Controls for Residential Hotels*").

⁵ *Master Land Use Permit Application* (8/3/15) PDF p. 1 ("light housekeeping over retail ... Micro Live/Work units over retail"); *Environmental Assessment Form* (11/10/15) PDF pp. 16, 19 ("...subject to the *CRA Development Guidelines* ... El Sol Hotel, *appears as #27 on Attachment A, a list of affected sites* ... entitled for 33 units of light housekeeping per its CFO ... *Single-bedroom units*").

⁶ See *Development Guidelines*, pp. 5-6 (includes SRO units, guest rooms or efficiency units used as primary residence including those meeting definition "within one year prior to the adoption of the Development Guidelines [i.e., *Jun. 2005*] are considered to a be Residential Hotel/SRO ... inventory of Residential Hotels meeting this definition is attached hereto" [i.e., listing El Sol]); see also *Ordinance*, p. 4-5 (Residential Unit includes units occupied on *October 11, 2005* and article "*presumes that 100 percent* of the units of any building that is a Residential Hotel are *used for residential purposes and constitutes Residential Units*.").

⁷ *Supplemental Documents*, PDF p. 25.

⁸ *Proposed ZAA Findings* (undated) PDF p. 2 (Salvation Army "operated the Harbor Light/Safe Harbor Programs here. When Salvation Army left the site in 2009"); *LA Weekly* (10/5/09) (then media manager of communications "said the Salvation Army was currently preparing to move the *current remaining residents* of Harbor Light to other regional *residential* facilities").

⁹ LAMC § 12.03 ("Supportive Housing" defined as "housing with no limit on length of stay[.]" "Supportive Services" includes inter alia "permanent housing" and other services necessary to obtain/maintain housing, and "Transitional Housing" is linked to supportive services offered "usually for a period of up to 24 months.

¹⁰ See e.g., *Development Guidelines* §§ IX, X; LAMC §§ 47.74, 47.75.C, 47.76.

¹¹ See e.g., *Development Guidelines* §§ IV.B.6, IV.B.8, VI.B.1, VI.C.