



STAFF REPORT

CONDITIONAL USE PERMIT NO. 25-02

TO: Planning Commission

FROM: Economic Development and Planning

DATE: May 21, 2025 (continued from April 16, 2025)

CASE NO.: Conditional Use Permit (CUP) No. 25-02
(CEQA Exemption Section 15301 - Class 1, Existing Facilities)

APPLICANT REQUEST:

A CUP is requested to allow a hotel use in the City's Unlimited Commercial ("C-2") zoning district. Pursuant to Chapter 19.09, Table 19.09.010A of the Commerce Municipal Code (CMC), a hotel use requires the review and approval of a CUP upon the required findings of CMC 19.39.420.

LOCATION: APN's: 6336-019-031, -033, -034 and -035
500 Citadel Drive
Commerce, CA 90040

APPLICANT: Scott Van Boxtel
4100 MacArthur Blvd. Suite 100
Newport Beach, CA 92660

STAFF RECOMMENDATION:

Planning Commission of the City of Commerce ("Planning Commission" or "PC") approve CUP No. 25-02 with the specific findings, conditions of approval, and adopt an exemption from the California Environmental Quality Act (CEQA) finding that the proposed project complies with Administrative Code, Title 14, Chapter 3, §15301, Class 1, Existing Facilities.

PUBLIC HEARING NOTICE:

The public hearing notice was published in the Los Cerritos News on April 4, 2025, and mailed to property owners within 500 feet of the project site. No additional noticing was required since the Planning Commission continued the public hearing to May 21, 2025.

- ATTACHMENTS:**
- A) Specific Findings for Conditional Use Permit
 - B) Conditions of Approval
 - C) Architectural Plans
 - D) Memorandum from Allen Matkins Leck Gamble Mallory and Natsis L.L.P (“Allen Matkins”) to Planning Commission, dated May 14, 2025
 - E) Trip Generation and Vehicles Miles Traveled Assessment from Gibson Transportation Consulting, Inc. (“Gibson”), dated May 13, 2025
 - F) Resolution PC No. 25-03

LAND USE, ZONING AND APPLICABLE REGULATIONS:

Project Site - Land Use & Applicable Regulations	
General Plan Designation:	Commercial
Zoning:	C-2 (Unlimited Commercial)
Applicable Zoning Regulations:	CMC Chapter 19.09, Commercial Zone; CMC Chapter 19.21 Off-Street Parking and Loading; CMC Chapter 19.31 Division 16 – Motels and Hotels; CMC Chapter 19.39 Administration of the Zoning Ordinance.

SURROUNDING ZONING AND LAND USES:

Direction	Zoning	Land Use
North	M-2	Industrial
South	I-5 Freeway/R-1	I-5 Freeway / Single Family Residential
East	C-2	Commercial
West	M-2	Industrial

ENVIRONMENTAL ASSESSMENT:

This project has been determined to be exempt from the environmental review under the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9)); Administrative Code, Title 14, Chapter 3 §15301, Class 1, Existing Facilities. Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of “existing facilities” itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to: (a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical

conveyances; and (b) Additions to existing structures provided that the addition will not result in an increase of more than 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less. In this case, the Project is to convert an existing four-story office building into a hotel with a proposed addition of 1,803 square feet. The addition will extend the proposed lobby to align with the outer wall of the existing building and continue to the other floors.

As requested by the Planning Commission, the Applicant provided supporting documentation as to why the project is exempt from environmental review under a Class 1 categorical exemption. In memorandum dated May 14, 2025 from Allen Matkins, the Applicant's representative rebuttals an opposition letter received on a law firm representing a union organization, Unite Here Local 11. In Allen Matkins memorandum, they assert that the project qualifies under the Class 1 categorical exemption because the existing office building is being converted into a hotel with a proposed addition of 1,803 square feet and this is considered negligible or no expansion of the existing use. Additionally, the memorandum states that the change from office to hotel use is not considered a "major change in focus" since hotels have less impacts as they relate to traffic, noise, and air quality compared to an office use.

In a memorandum prepared by Gibson dated May 13, 2025, results from a trip generation and vehicle miles traveled ("VMT") assessment were outlined. The assessment concluded that the conversion of the office building into a hotel use will result in a net reduction of 25 daily trips and will generate less VMT. The memorandum concludes that this project will have a less-than-significant impact and no further analysis nor mitigation measures are required.

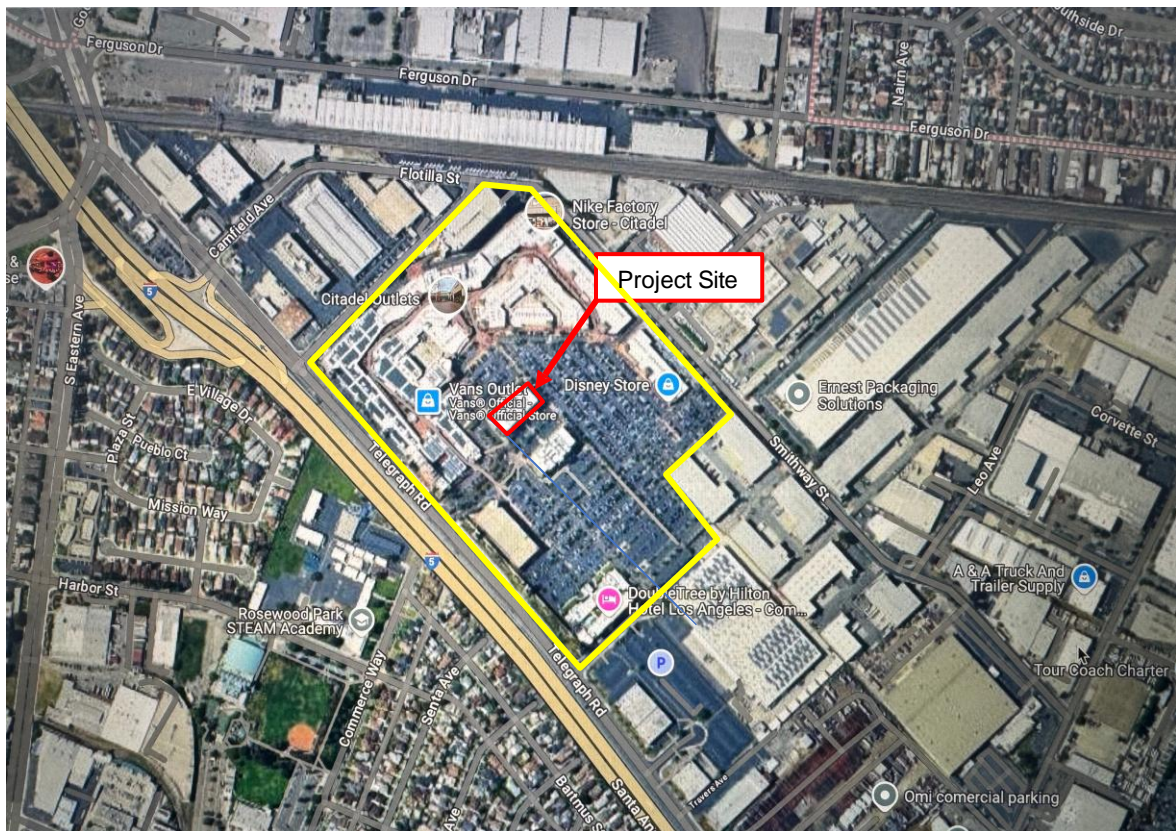
Pursuant to the CEQA and the regulations promulgated thereunder and supporting documents provided by the Applicant, this project will not have a significant effect on the environment and is not subject to further review.

BACKGROUND:

On April 16, 2025, the Planning Commission held a public hearing and heard public testimony regarding CUP No. 25-02 to convert an existing office into a hotel and construct a 1,803 square foot addition. Prior to that meeting, the City received an opposition letter from a law firm representing a union organization, Unite Here Local 11. At the meeting, the Planning Commission received public testimony from two (2) members of the public, opposing the project based on inadequate CEQA analysis. At that meeting the Planning Commission voted 5-0-0 to continue the public hearing for this project to the May 21, 2025 meeting and asked the Applicant to provide justification that the project qualifies under the Class 1 categorical exemption and further evaluation of traffic impacts.

DESCRIPTION OF PROPERTY:

The proposed hotel will be situated within the existing Citadel Outlets property. The existing site consists of an open-air shopping center with surface parking, two parking structures, two office buildings, and an existing hotel (Double Tree). The subject property has a land area of approximately 35,543 acres (outlined in yellow), and it's in the City's C-2 zoning district. The project location on the property is shown in the image below, outlined in red:



ANALYSIS:

The applicant is requesting a CUP to allow a “hotel” within the City’s C-2 zoning district. Under the CMC, Chapter 19.09 (Commercial Zone), Table 19.09.010A, Permitted Uses-Commercial Zone, a “hotel” requires the consideration of a CUP within the zoning district.

Conditional Use Permit

A CUP allows a city to ensure that hotels do not result in adverse impacts on adjacent properties and residents or on surrounding neighborhoods. The purpose of the CUP process is to analyze uses that, due to their operating characteristics, may have the potential to impact surrounding properties. The project site is an area where there are different types of uses, including commercial and industrial. The

proposed hotel is similar to and compatible with other uses in the immediate vicinity, as well as the City's vision for the area. The CUP process also allows staff to tailor conditions of approval to ensure the land use will not negatively impact the general vicinity of such use.

Project Description

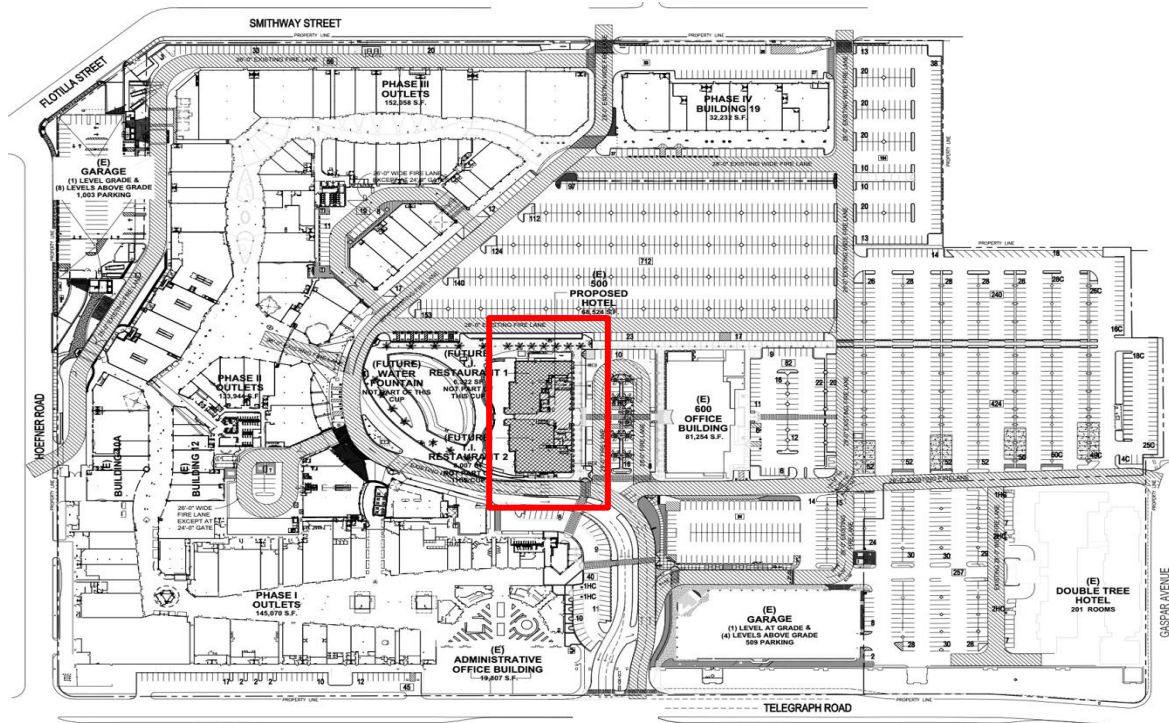
The project is located within the existing Citadel Outlets property. The project will involve the conversion of an existing four-story office building into a hotel. The existing building has a square footage of 81,050. The entire four-story building will involve renovation, which will include a building addition of 1,803 square feet. The addition will take place on the east side of the building, where the proposed hotel entrance will be located. The addition will extend the hotel lobby, which consists of extending an existing inner wall to align with the outer wall of the existing building and continue to the other floors, and a new canopy over the new lobby entry. The building with the addition will have a square footage of 82,853.

The hotel will have a total area of 68,524 square feet. This includes a portion of the ground floor that will be renovated to serve as the hotel lobby, featuring a small kitchen for preparing hot meals for breakfast and lunch. Additionally, there will be a breakfast seating area, staff offices, and two separate future tenant spaces measuring 6,322 square feet and 8,007 square feet, which are not included in this CUP. The second, third, and fourth floors will be converted into 132 hotel rooms, along with guest laundry facilities and necessary storage rooms for housekeeping.

The hotel will have 132 guest rooms with surface parking shared with the Citadel Outlets. The hotel will cater to visitors and tourists seeking a location close to shopping and dining options that are readily available at the Citadel Outlets.

The hotel will employ between 16 and 24 employees depending on the time of day. There will be occasional delivery of hotel supplies by small supply trucks and delivery vehicles or vans.

The site plan below identifies the location of the proposed hotel (an existing building) outlined in red and provides an overview of the entire Citadel Outlets property.



Development Standards, Parking and Maneuvering

The proposed 68,524-square-foot four-story hotel will comply with all the City's development standards. The hotel will be situated within an existing four-story office building. As a result, the setbacks and building height will stay the same, while both the lot coverage and floor area ratio will remain below the allowable percentage and will continue to comply with the zoning code.

As part of its review, staff must determine that the use will conform to the permissible parking requirements identified in Chapter 19.21 (Off-Street Parking and Loading) of the Zoning Ordinance. The purpose of the parking requirements is to ensure all land uses in the City provide adequate off-street parking facilities, loading areas, and vehicle movement areas associated with the use. These regulations intend to ensure that the use of land does not interfere adversely with the circulation of public rights-of-way, that private on-site circulation does not pose a potential safety issue, and that surrounding uses are protected from the noise and traffic impacts associated with off-street parking and loading activities.

The proposed hotel would measure approximately 68,524 square feet with 132 rooms. Under the Commerce Municipal Code, one parking space is required per guest room, plus other spaces as required for auxiliary uses. The square footage and parking breakdown for the hotel and the entire property are shown below in Table 2:

Table 2

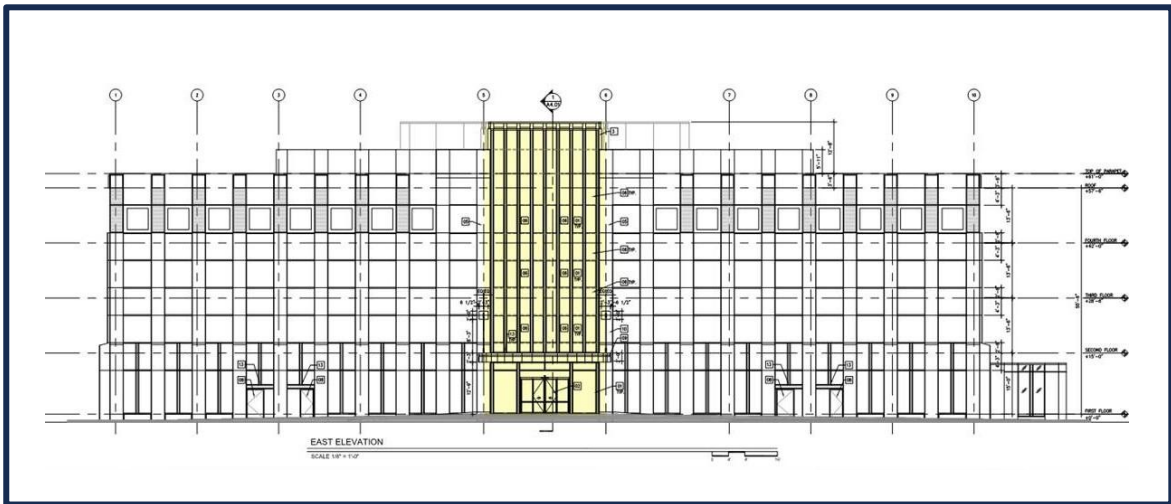
SUMMARY COMPLETED CONDITIONS				
TABLE 13 MUNICIPAL CODE PARKING ANALYSIS				
Land Use	Size (sf) / Employees		Required Spaces	
Retail Shopping Center ¹	463,304	sf	1,853	
Retail Shopping Center ¹	495	employees	248	
500 Hotel ³	68,524	sf	132	
Tenant 1 ⁵ not part of CUP	6,322	sf	32	
Tenant 2 ⁵ not part of CUP	8,007	sf	40	
500 Hotel - Lobby/Reception/office area	4,079	sf	14	
Food Prep/Breakfast & eating area.	2,305	sf	12	
600 Office Building ²	81,254	sf	271	
Admin Office Building ²	19,807	sf	67	
Double Hotel ⁴	201	sf	240	
Total Required Spaces			2,877	
Provided Spaces			3,813	
Surplus			936	
Notes:				
¹ Based on retail rated of 1 space/250 sf				
² Based on office rate of 1 space/300 sf				
³ Based on Hotel rated of 1 space per guest room				
⁴ Based on agreement between Citadel and Hotel				
⁵ Based on assembly rate of 1 spaces/200 sf				

As shown above, when calculating the required parking for the new hotel and the existing structures including outlet stores, office building #600, Double Tree Hotel, and the two future tenants on the ground floor of the new hotel, there will be a surplus of 936 parking spaces beyond the minimum number of parking spaces required by the CMC.

Design and Compatibility

Chapter 19.19 (Site planning and general development standards) of the CMC includes general development standards and design guidelines. The purpose of these standards is to protect and improve the environment and the appearance of the community, and to deter blighting and nuisance conditions. These guidelines address items such as, but not limited to, contextual design, landscaping, architectural treatments, and circulation. The proposed hotel will meet the City's site planning criteria and design guidelines outlined in the CMC.

The architectural design of the existing building will remain unchanged. However, the proposed addition on the east elevation will be designed to match the existing structure, featuring spandrel glass and aluminum mullions. Additionally, a new canopy will be installed above the hotel entrance. The east elevation with the new addition is shown below, highlighted in yellow:



General Plan and Zoning Ordinance

The Commerce General Plan and Zoning Ordinance establishes the permitted land uses and the corresponding development standards within the City. The project area is currently designated as Commercial in the Commerce General Plan and is within the C-2 zoning district. This zone was established to provide for a wide variety of commercial uses. The zone intends to concentrate these uses along major arterials and in other areas that provide easy access. Commercial uses that might create an offensive level of noise, air pollution, glare, radioactivity, or other nuisances are prohibited from this zone. The project site is an area that is home to different types of uses including commercial and industrial. The proposed hotel is similar to and compatible with other uses in the immediate vicinity, as well as the City's vision for the area. Therefore, the proposed hotel use is consistent with the General Plan and zoning district in which it is proposed to be located.

CONCLUSION:

The proposal to convert an existing office building into a hotel and construct a 1,803 square foot addition is consistent with the intent of the zoning code. Staff recommends that the Planning Commission make the necessary findings to approve the requested Conditional Use Permit to allow the proposed hotel within the C-2 zoning district. The site is surrounded by a mixture of commercial and industrial uses and will be operated in harmony with these uses.

As such, the Commercial Land Use in this area of the City is consistent with other permissible activities within the C-2 zone.

Therefore, staff recommends that the Planning Commission approve CUP No. 25-02 with the Specific Findings in Attachment A and the Conditions of Approval in Attachment B.

Prepared by: Sonia Griego
Associate Planner

Reviewed by: Jessica Serrano
Director of Economic Development and Planning

Reviewed by: Araceli Almazan
City Attorney

ATTACHMENT A
SPECIFIC FINDINGS FOR CONDITIONAL USE PERMIT NO. 25-02

Commerce Municipal Code Section 19.39.420 requires that before granting a Conditional Use Permit, the Planning Commission make the following findings:

1. The proposed use is conditionally permitted within the subject zone and complies with the intent of all applicable provisions of this Title 19. ***The proposed hotel is conditionally permitted within the C-2 (Unlimited Commercial) Zone pursuant to the Commerce Municipal Code. The subject project will allow for the establishment of a use intended to provide a variety of goods and services necessary to meet the needs of the resident and business populations.***
2. The proposed use would not impair the integrity and character of the zone in which it is to be located. ***The proposed use is consistent with other uses in the immediate vicinity and throughout the C-2 zone. The project site is located within the Citadel Outlets property and will serve to further the City's vision for the area. The project site is currently occupied by outlet stores with surface parking, two parking structures, two office buildings, and an existing hotel (Double Tree) and the subject project will continue serving to enhance the aesthetics of the area. Therefore, the proposed use will not impair the integrity and character of the C-2 zoning district.***
3. The subject site is physically suitable for the type of land use being proposed. ***The subject project will meet the parking requirements and provide all required parking on-site. The proposed hotel is situated towards the middle of the subject property ensuring that adequate and ample parking areas will be available for the hotel use and will not negatively impact existing uses and surrounding adjacent uses. Therefore, the subject site is physically suitable for the proposed hotel.***
4. The proposed use is compatible with the land uses presently on the subject property. ***The project site is surrounded by other commercial and industrial uses. The use is conditionally permitted in the zone and will further enhance the City's vision for the area. The proposed use is compatible with adjacent uses and combined with other uses in the C-2 zone, will serve to help provide a variety of goods and services necessary to meet the needs of the resident and business populations.***
5. The proposed use would be compatible with existing and future land uses within the zone and the general area in which the proposed use is to be

located. ***The use is conditionally permitted in the zone and will serve to further enhance the City's vision for the area. The proposed use is compatible with existing uses and future land uses for the area in the C-2 zone.***

6. There would be adequate provisions for water, sanitation, and public utilities and services to ensure that the proposed use would not be detrimental to the public health and safety. ***The project site is in an urbanized area where similar uses exist. It will be located immediately adjacent to uses that have adequate provision for water, sanitation, and public utilities. Similar access to utilities will be provided to the project applicant and therefore adequate provisions are in place.***
7. There would be adequate provisions for public access to serve the subject proposal. ***Access to the site will be achieved through existing internal access driveways, with a connection to the public right-of-way from both Telegraph Road and Gasper Avenue. The entrances are adequate to serve the subject project. Therefore, adequate provisions for public access will be provided.***
8. The proposed use is consistent with the objectives, policies, general, uses, and programs of the Commerce General Plan. ***The proposed use is consistent with the objectives, policies, general land uses, and programs of the Commerce General Plan. The Commerce General Plan designates the project area as Commercial. This project is consistent with the General Plan in that it contributes to helping establish an orderly pattern of development and a wide range of commercial activities. The project will also continue to promote the improvement of existing commercial areas along Telegraph Road.***
9. The proposed use would not be detrimental to the public interest, health, safety, convenience, or welfare. ***The proposed use will be maintained safely and efficiently while providing services, by the imposed conditions. The conditions imposed will ensure that the public interest, health, safety, and convenience or welfare are served. Therefore, the proposed use would not be detrimental to the public interest, health, safety, convenience, or welfare.***
10. The proposed design and elevations preserve and maximize the image, character, and visual quality of the neighborhood. ***The proposed use will serve to enhance the character and visual quality of the area. The subject project is consistent with those existing uses in the area and the City's vision of continued promotion and improvement of existing commercial areas.***

ATTACHMENT B
CONDITIONS OF APPROVAL FOR CONDITIONAL USE PERMIT NO. 25-02

STAFF RECOMMENDATION:

1. A Conditional Use Permit (CUP) approval is valid and in effect and granted pursuant to the provisions of Title 19 of the Commerce Municipal Code and shall be valid only on the property for which it was granted and only for the improvements for which it is granted and further, shall continue to be valid upon change of ownership of the property or any lawfully existing building or structure on the property.
2. All conditions shall be binding upon the applicants, their successors, and assigns; shall run with the land; shall limit and control the issuance and validity of certificates of occupancy; and shall restrict and limit the construction, location, and use and maintenance of all land and structures within the development.
3. This CUP and all rights hereunder shall terminate within twelve months of the effective date of the permit unless operations are commenced or a written time extension is granted, based on a written request submitted prior to the expiration of the one-year period as provided in Section 19.39.460 of the Commerce Municipal Code.
4. The abandonment or non-use of this approval for a period of one year shall terminate the approval without further action of the Planning Commission or City Council, and any privileges granted thereunder shall become null and void.
5. In the event of a transfer of ownership of the property involved in this application, the new owner shall be fully informed of the use and development of said property as set forth by this permit together with all conditions, which are a part thereof.
6. All parking areas shall be clearly identified. The surface parking area must be striped to clearly indicate the location and extent of vehicle parking, maneuvering areas, and drive aisles.
7. Parking for all patrons must be provided on-site.
8. During construction, all roadways shall be kept open to traffic.
9. Equipment used for construction activities shall be properly tuned to reduce exhaust emissions.

10. Roads adjacent to the project site shall be swept as needed to reduce fugitive dust from the proposed project site.
11. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants.
12. Contractors and subcontractors engaged in the construction activities of the project shall obtain a business license and all required permits from the City of Commerce.
13. The landscaping and irrigation plans shall be prepared by a landscape architect and submitted to the City for review and approval. All designated landscaping areas shall be fully planted prior to the issuance of the building permit final inspection and maintained at all times.
14. The project shall comply with the Low Impact Development (LID) Ordinance that the City of Commerce adopted to comply with requirements of the Clean Water Act and the MS4 Stormwater and Urban Runoff Permit.
15. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants. In the event the City determines the owner has failed to comply with the standards listed herein, the City shall notify the owner in writing identifying the deficiencies, and allow the owner to cure the deficiencies listed in the notice, in a timely manner.
16. If the Director of Economic Development and Planning determines that a situation detrimental to public health, safety, and welfare has arisen due to the subject operation, the Director may require changes to the operation, additional studies to be undertaken, and the implementation of additional measures to protect the public's interest. In the event the City determines that the owner has failed to comply with the standards listed herein, the City shall notify the [owner] in writing identifying the deficiencies, and allow the owner to cure the deficiencies listed in the notice, in a timely manner.
17. The project will be required to comply with all programs adopted by the City for the reduction of solid waste.
18. The Director of Economic Development and Planning shall have the authority to initiate proceedings to suspend or revoke a Conditional Use Permit approval pursuant to provisions outlined in Sections 19.39.240 through 19.39.250, inclusive, of the Commerce Municipal Code, Chapter 19.39 if sufficient cause is given. In the event the City determines the owner has failed

to comply with the standards listed herein, the City shall notify the owner in writing identifying the deficiencies and allow the owner to cure the deficiencies listed in the notice, in a timely manner.

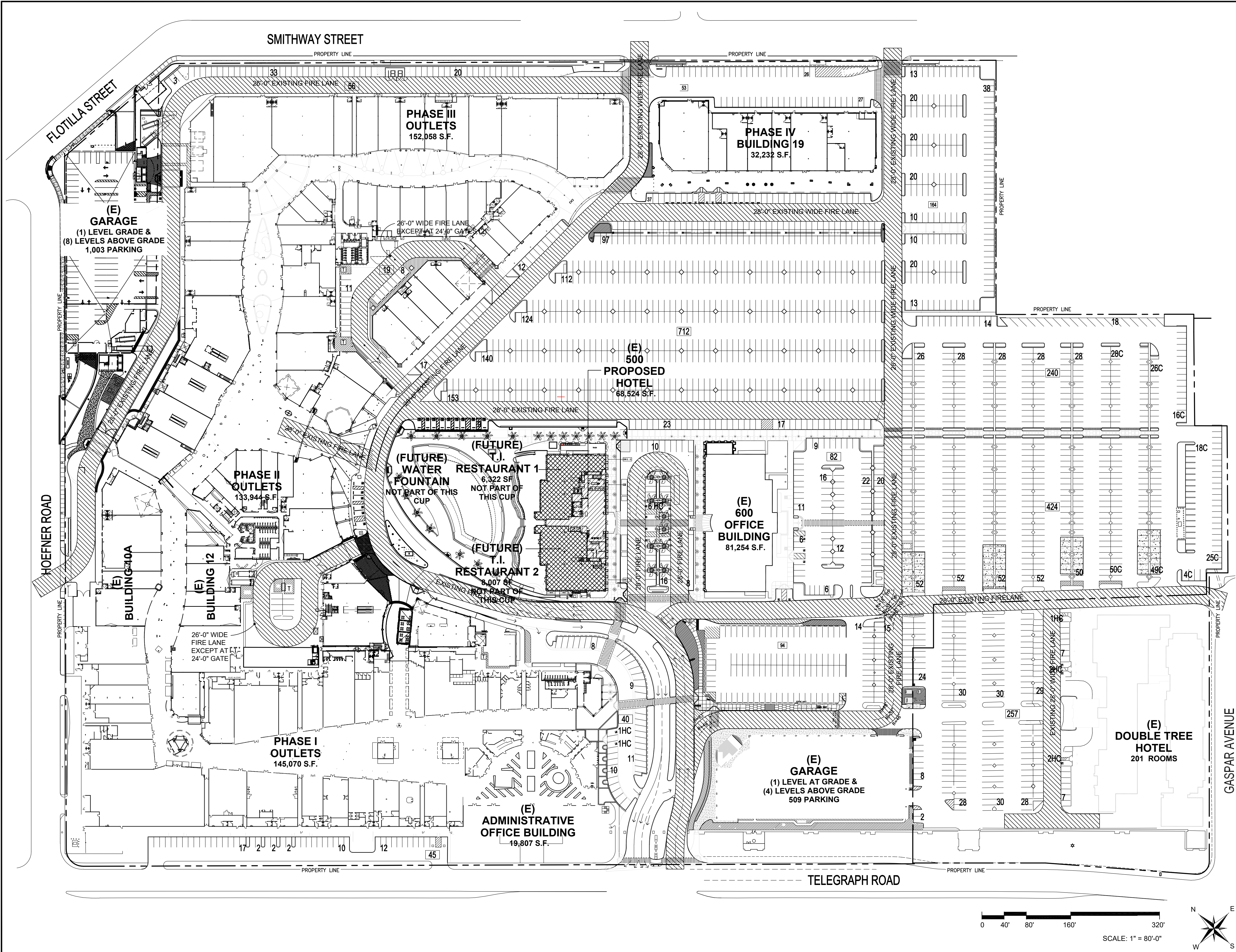
19. The operation must comply with all pertinent South Coast Air Quality Management District (SCAQMD) regulations. The applicant and future tenants shall be required to obtain all pertinent operating permits from the SCAQMD. Proof of permits or proof of exemption shall be provided prior to the issuance of a building permit from the City of Commerce.
20. A City of Commerce Business License shall be obtained and renewed as required by the City of Commerce to reflect the proposed land use.
21. All required permits by all permitting agencies shall be obtained for the operation of said use and any construction associated with the subject request.
22. Construction activities shall be permitted between the hours of 7:00 a.m. to 6:00 p.m.
23. Storage of building materials related to construction activities shall be contained within the project site.
24. The project site shall be cleared of all debris prior to the issuance of a Building & Safety Division final inspection.
25. Southern California Edison (SCE) requires the following conditions for any SCE services:
 - a. The applicant is responsible for contacting SCE and arranging any electrical service at the appropriate stage of construction. The electrical design for the newly installed service shall be designed by SCE and approved by City of Commerce Building and Safety Division (CCBSD).
 - b. All on-site electrical service connections to the proposed improvements shall be designed using an underground (UG) design method. This avoids an overhead service connection.
 - c. All required SCE "equipment" needed to provide service to the proposed improvements (PME Switches, Transformers, and/or Capacitors) shall be installed in a "pad mounted" configuration sitting above the finished grade upon an approved SCE structure.

- d. All required SCE "Cables" needed to provide service to the proposed improvements shall be installed utilizing UG conduits or cable trenches as designed by SCE.
 - e. There shall be no newly installed overhead (OH) facilities across private property without approval from the CCBSD.
- 26. If applicable, the contractor under the observation of the soil engineer shall conduct all clearing, site preparation, or earthwork performed on the project.
- 27. If applicable, the soil engineer shall provide an inspection for site clearing and grading in order to certify that the grading was done in accordance with approved plans and grading specifications.
- 28. Soil binders shall be utilized on construction sites for unpaved roads and/or parking areas.
- 29. The project will be required to comply with all programs adopted by the City for the reduction of solid waste.
- 30. The project applicant shall install energy-efficient electrical appliances and equipment in accordance with the State of California's Energy Efficiency Standards (Title 24).
- 31. On-site management shall be available twenty-four hours a day, seven days a week.
- 32. Not less than weekly maid and housekeeping service shall be provided for each guest room. "Maid and housekeeping service" means basic cleaning, including but not limited to vacuuming, sweeping and/or mopping, dusting, and changing of bed linens and towels.
- 33. No hotel/motel room shall be rented more than once in a twenty-four-hour period.
- 34. All hotels/motels shall maintain daily records reflecting the names and permanent addresses of hotel/motel guests, as verified by valid driver's license or other valid identification along with the license number, state of license, make, model, and year of any guest's vehicle parked on-site or the corporate account information and guest names, the dates of occupancy, length of stay, and room rate. This registration information shall be maintained for at least one year past the last day of stay for each guest and shall be made available for review by any duly sworn peace officer of the City, state, or federal government or any authorized official of the City's code enforcement or Finance Department during normal business hours. Any

person who knowingly or intentionally misrepresents any material facts required in this subsection shall be deemed guilty of a misdemeanor.

35. The applicant is required to install artwork or pay an in-lieu fee subject to the City's Art in Public Places Ordinance. The cost of the artwork or in-lieu fee shall be equal to 1% of the project's valuation.
36. Violation of any of the conditions of the approval shall be cause for revocation and termination of all rights thereunder.
37. The Director of Economic Development and Planning or his/her designee is authorized to make minor modifications to the approved preliminary plans or any of the conditions if such modifications shall achieve substantially the same results as would strict compliance with said plans and conditions.
38. The applicant shall sign, notarize, and return to the Economic Development and Planning Department an affidavit accepting all Conditions of Approval within 10 days from the date of the approval, unless appealed. The Applicant acknowledges and understands that all conditions set forth in this Resolution are conditions precedent to the grant of approval and failure to comply with any condition contained herein shall render this Condition Use Permit non-binding as against the City and shall confer Applicant no legal rights under the law.
39. The applicant shall defend, indemnify, and hold harmless the City, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding brought against the city, its elected and appointed officials, agents, officers, or employees arising out of, or which are related to the applicant's project or application (collectively referred to as "proceedings"). The indemnification shall include, but not be limited to, damages, fees and/or costs, liabilities, and expenses incurred or awarded in connection with the proceedings whether incurred by the applicant, the city, and/or the parties initiating or bringing such proceedings. This indemnity provision shall include the applicant's obligation to indemnify the city for all the city's costs, fees, and damages that the city incurs in enforcing the indemnification provisions set forth herein. The city shall have the right to choose its own legal counsel to represent the city's interest in the proceedings.

ATTACHMENT C
ARCHITECTURAL PLANS



SUMMARY COMPLETED CONDITIONS

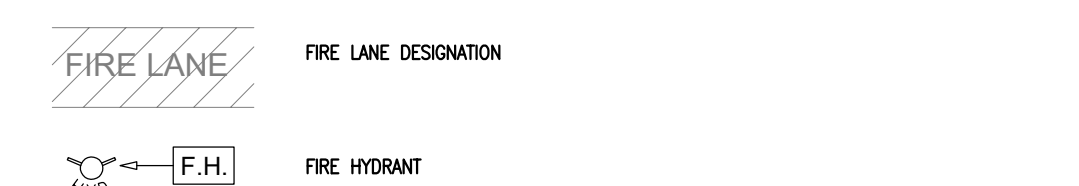
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Admin Office Building ²	19,807	sf	67
Double Hotel ⁴	201	sf	240
			Total Required Spaces
			2,851
			Provided Spaces
			3,813
			Surplus
			962

Notes:
¹Based on retail rated of 1 space/250 sf
²Based on office rate of 1 space/300 sf
³Based on Hotel rated of 1 space per guest room
⁴Based on agreement between Citadel and Hotel
⁵Based on assembly rate of 1 spaces/200 sf

FIRE DEPARTMENT NOTES

- ALL REQUIRED WATER MAINS, FIRE HYDRANTS AND APPURTENANCES SHALL BE OPERATIONAL BEFORE COMBUSTIBLE BUILDING MATERIALS ARE LOCATED ON THE CONSTRUCTION SITE.
- STORAGE IN CLOSELY PACKED PILES SHALL NOT EXCEED 15' IN HEIGHT, 12' ON PALLETS OR IN RACKS AND 6' FOR TIRES, PLASTICS AND SOME FLAMMABLE LIQUIDS. IF HIGH PILED STOCK PILING IS TO BE DONE, SUBMIT A COMPLETE STORAGE PLAN AND DESCRIPTION OF THE COMMODITIES TO BE STORED. SHOW COMPLIANCE WITH ARTICLE 81 OF THE CALIFORNIA FIRE CODE.
- THE CONSTRUCTION, REMODEL, OR DEMOLITION OF A BLDG. SHALL COMPLY WITH U.F.C. ARTICLE 87.
- FIRE HYDRANTS SHALL COMPLY WITH FIRE AND LIFE SAFETY FPB POLICY F-96-01 FOR ON-SITE HYDRANTS.
- THE INSPECTION, HYDROSTATIC TEST & FLUSHING OF THE HYDRANT AND/OR SPRINKLER SYSTEM SHALL BE WITNESSED BY THE PROPER FIRE DEPARTMENT REPRESENTATIVE AND NO UNDERGROUND PIPING SHALL BE COVERED WITH EARTH OR HIDDEN FROM VIEW UNTIL THE FIRE DEPARTMENT REPRESENTATIVE HAS BEEN NOTIFIED AND BEEN GIVEN NO LESS THAN 48 HOURS IN WHICH TO INSPECT SUCH INSTALLATION.
- FIRE RESISTIVE ASSEMBLIES FOR PROTECTION OF OPENINGS TO COMPLY WITH TITLE 24, 713, IN C.B.C. SECTIONS 709 & 710.
- FIRE ACCESS LINES - PRIOR TO START OF CONSTRUCTION W/ COMBUSTIBLE MATERIALS, INSTALL A FIRE APPARATUS ACCESS ROADS AND WATER SUPPLIES FOR FIRE PROTECTION SUITABLE FOR USE BY A 20-TON FIRE DEPT. VEHICLE. COORDINATE ACCESS THRU LOCKED GATES WITH FIRE DEPT. OFFICIALS. THE ACCESS ROADWAY SHALL EXTEND TO WITHIN A MAXIMUM OF 150 FEET OF ALL PORTIONS OF THE EXTERIOR WALLS OF THE FIRST STORY OF ALL BUILDINGS. IN ORDER TO PROVIDE FOR REASONABLE FIRE PROTECTION DURING THE CONSTRUCTION PERIOD, CONTRACTOR SHALL MAINTAIN PASSABLE VEHICULAR ACCESS TO ALL BLDGS. AT ALL TIMES. INSTALL ADEQUATE FIRE HYDRANTS WITH REQUIRED FIRE FLOW PRIOR TO COMMENCEMENT OF STRUCTURAL WOOD FRAMING, AS REQUIRED BY THE FIRE DEPT. & WATER DISTRICT. (C.F.C. 901.3, 8704.2, 8704.3)
- FIRE HYDRANT LOCATIONS SHALL BE IDENTIFIED BY THE INSTALLATION OF REFLECTIVE MARKERS. (C.F.C. 901.4.3)
- PROVIDE APPROVED SIGNS OR OTHER APPROVED NOTICES OR MARKINGS THAT INCLUDE THE WORDS "NO PARKING - FIRE LANE". SIGNS SHALL BE PROVIDED FOR FIRE APPARATUS ACCESS ROADS, TO CLEARLY INDICATE THE ENTRANCE TO SUCH ROAD, OR PROHIBIT THE OBSTRUCTION THEREOF, AS REQUIRED BY THE FIRE INSPECTOR. (FIRE CODE 503.3)
- FIRE DEPARTMENT VEHICULAR ACCESS ROADS SHALL BE HARDSCAPE ALL WEATHER ACCESS IN ACCORDANCE WITH THE DEPARTMENT'S ALL WEATHER ACCESS REQUIREMENTS. (FIRE CODE 503.2.2)
- FIRE DEPARTMENT VEHICULAR ACCESS ROADS MUST BE INSTALLED AND MAINTAINED IN A SERVICEABLE MANNER PRIOR TO AND DURING THE TIME OF CONSTRUCTION (FIRE CODE 501.4).
- APPROVED BUILDING ADDRESS NUMBERS, BUILDING NUMBERS OR APPROVED BUILDING IDENTIFICATION SHALL BE PROVIDED AND MAINTAINED SO AS TO BE PLAINLY VISIBLE AND LEGIBLE FROM THE STREET FRONTING THE PROPERTY. THE NUMBERS SHALL CONTRAST WITH THEIR BACKGROUND, BE ARABIC NUMERALS OR ALPHABET LETTERS, AND BE A MINIMUM OF 4 INCHES HIGH WITH A MINIMUM STROKE OF 0.5 INCH (FIRE CODE 505.1)
- FIRE APPARATUS ACCESS ROADS SHALL BE IDENTIFIED WITH APPROVED SIGNS. TEMPORARY SIGNS SHALL BE INSTALLED AT EACH STREET INTERSECTION WHEN CONSTRUCTION OF NEW ROADWAYS ALLOWS PASSAGE BY VEHICLES. SIGNS SHALL BE OF AN APPROVED SIZE, WEATHER RESISTANT AND BE MAINTAINED UNTIL REPLACED BY PERMANENT SIGNS (FIRE CODE 505.2)

LEGEND



BUILDING AREA

RETAIL	
PHASE I (EXISTING) AREA:	145,070 S.F.
PHASE II (EXISTING) AREA:	133,944 S.F.
PHASE III (EXISTING) AREA:	152,058 S.F.
PHASE IV (EXISTING) AREA:	32,232 S.F.
TOTAL AREA:	463,304 S.F.
OFFICE (EXISTING)	
ADMIN. OFFICE AREA:	19,807 S.F.
BUILDING 600 AREA:	81,254 S.F.
TOTAL AREA:	101,061 S.F.

BLDG 500 HOTEL (EXISTING)	
BUILDING 500 AREA:	81,050 S.F.
HOTEL ADDITION	8,478 S.F.
TOTAL AREA:	82,853 S.F.

FUTURE T.I. IN BLDG 500 (EXISTING)	
FUTURE T.I. 1:	6,322 S.F.
FUTURE T.I. 2:	8,007 S.F.

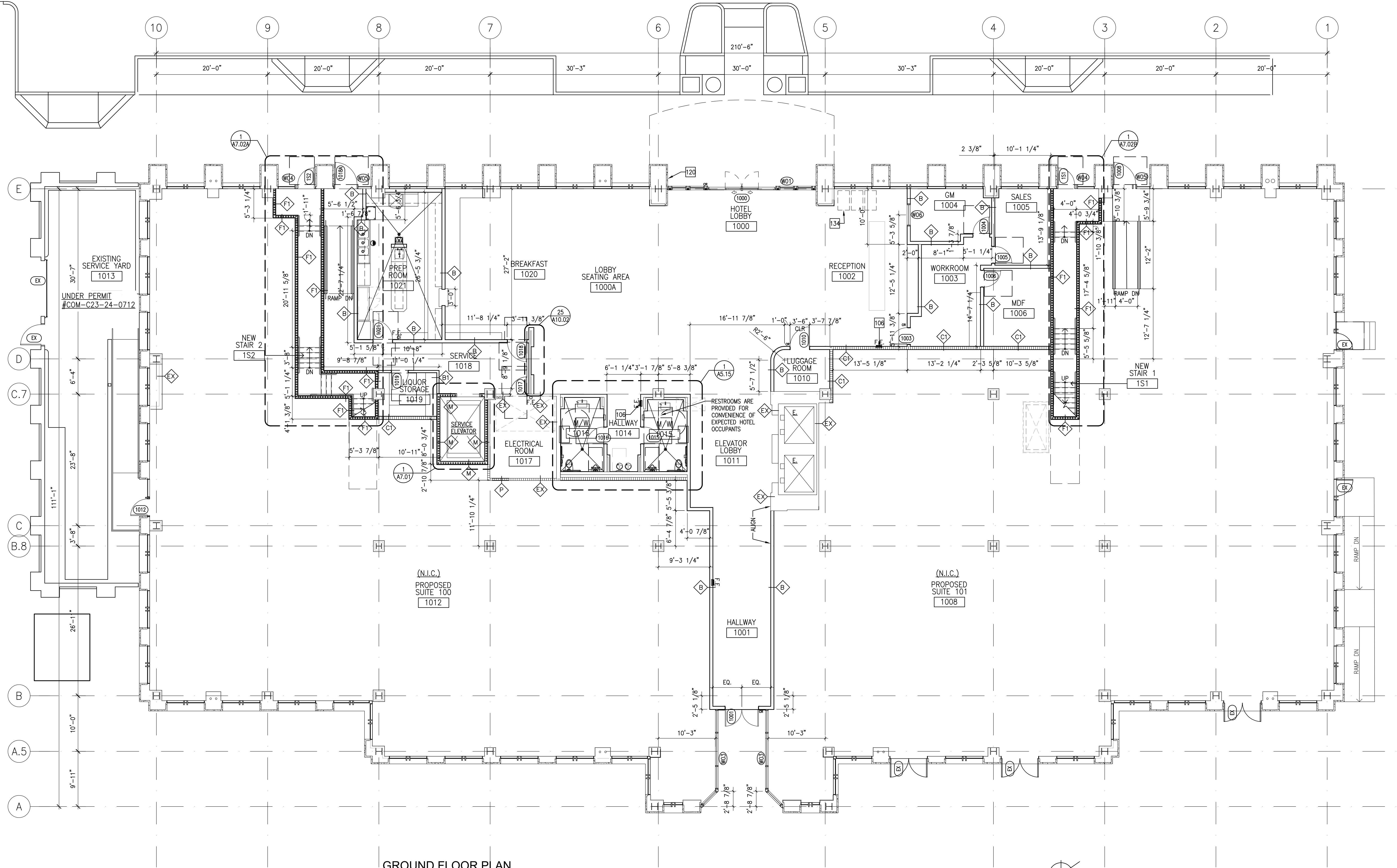
Project: 24-0109
Date: 22 NOV 2024
Sheet no:
A-1

AWBREY
COOK
MCGILL
ARCHITECTS
10401 Wilshire Blvd, Suite 1000
Beverly Hills, CA 90210-3001
Phone: (310) 276-3900

This plan is diagrammatic and intended only for the purpose of depicting the leased premises. The square footage areas of Tenant lease spaces as shown on the plans have been calculated to the exterior face of exterior walls and to the centerline of demising walls between Tenant spaces.

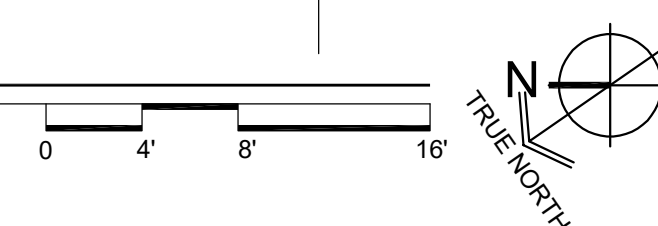
A DEVELOPMENT OF
CRAIG REALTY GROUP
craigrealtygroup.com
SITE PLAN

CITADEL OUTLETS
CITY OF COMMERCE, CA



GROUND FLOOR PLAN

SCALE 1/8" = 1'-0"



Project: 24-0109
Date: 22 NOV 2024
Sheet no.

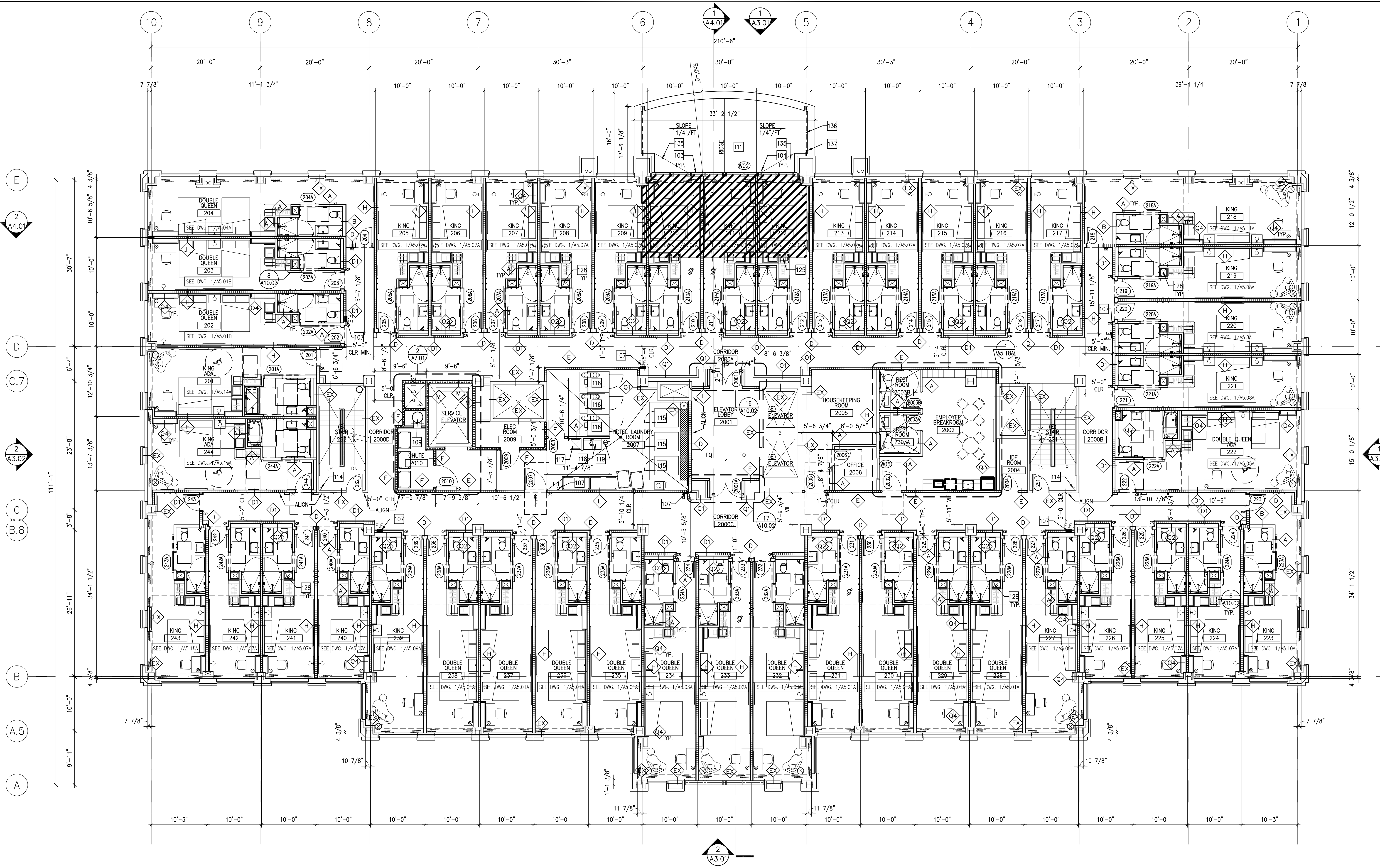
A-2



This plan is diagrammatic and intended only for the purpose of depicting the leased premises. The square footage areas of Tenant lease spaces as shown on the plans have been calculated to the exterior face of exterior walls and to the centerline of demising walls between Tenant spaces.

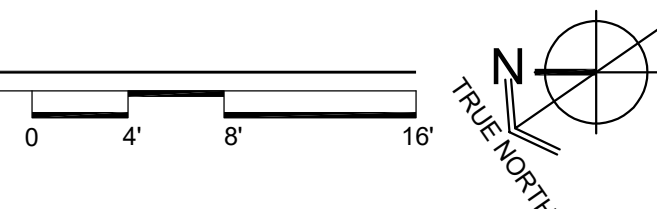
A DEVELOPMENT OF
CRAIG REALTY GROUP
craigrealtygroup.com
FLOOR PLAN - FIRST FLOOR

CITADEL OUTLETS
CITY OF COMMERCE, CA



SECOND FLOOR PLAN

SCALE 1/8" = 1'-0"



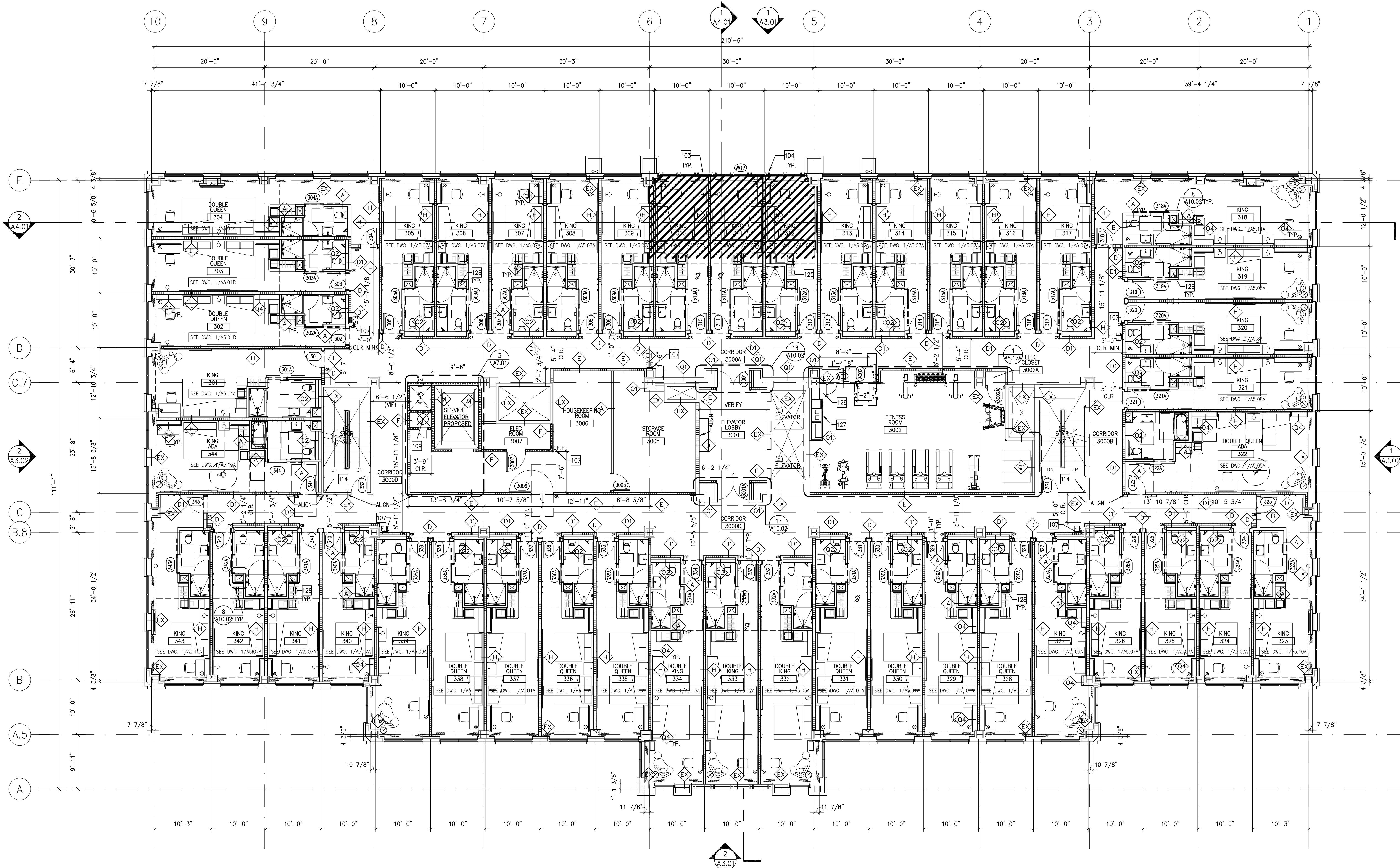
Project: 24-0109
Date: 22 NOV 2024
Sheet no.

AWBREY
COOK
MC GILL
ARCHITECTS
10401 14th Street, Suite 100
San Diego, CA 92121-3501
Phone: (619) 594-3400

This plan is diagrammatic and intended only for the purpose of depicting the leased premises. The square footage areas of Tenant lease spaces as shown on the plans have been calculated to the exterior face of exterior walls and to the centerline of demising walls between Tenant spaces.

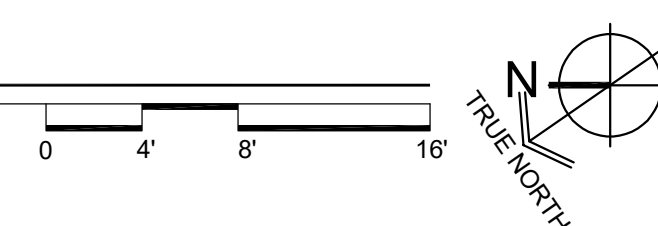
A DEVELOPMENT OF
CRAIG REALTY GROUP
craigrealtygroup.com
SECOND FLOOR PLAN

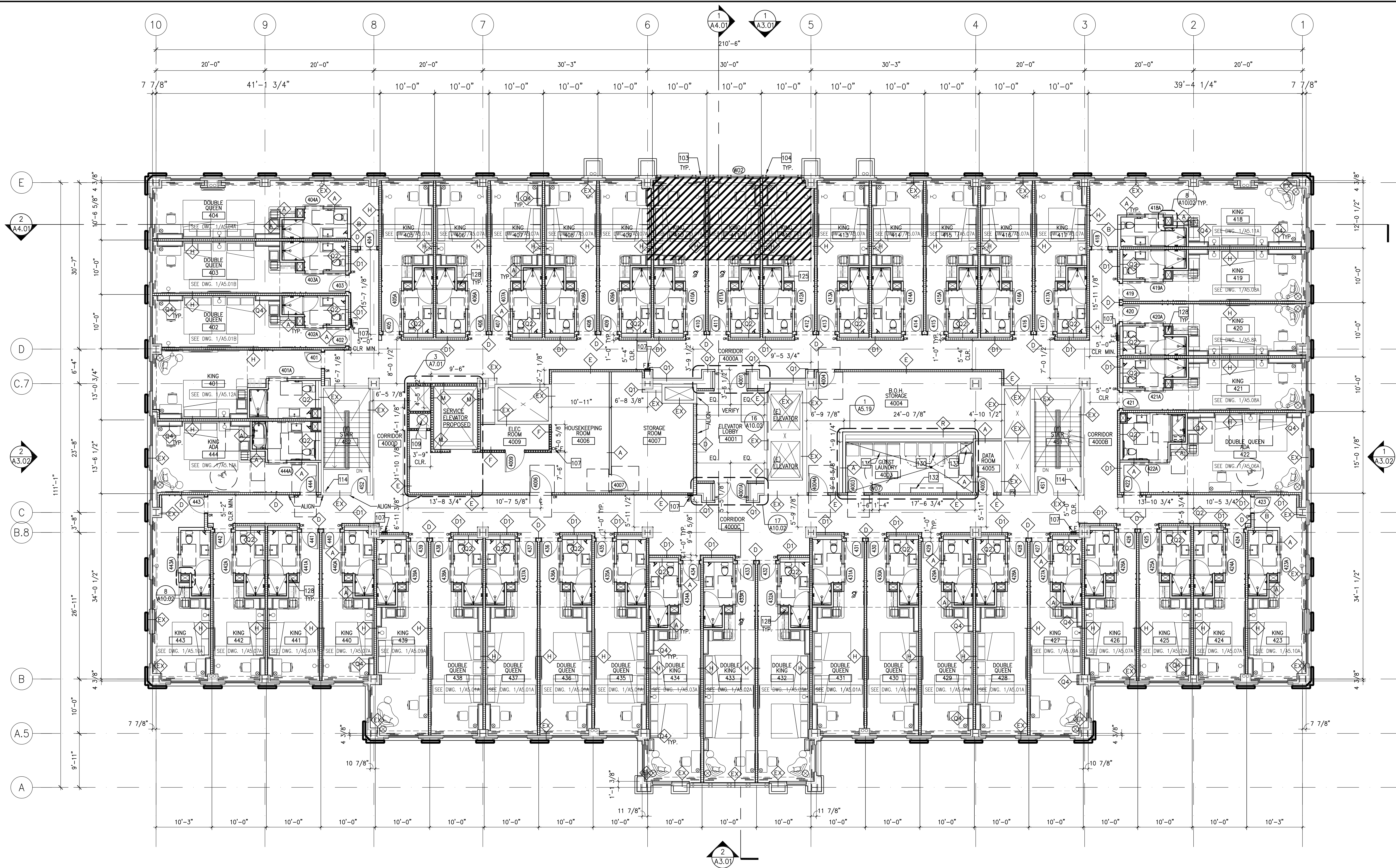
CITADEL OUTLETS
CITY OF COMMERCE, CA



THIRD FLOOR PLAN

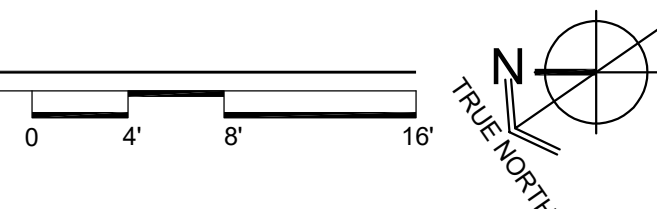
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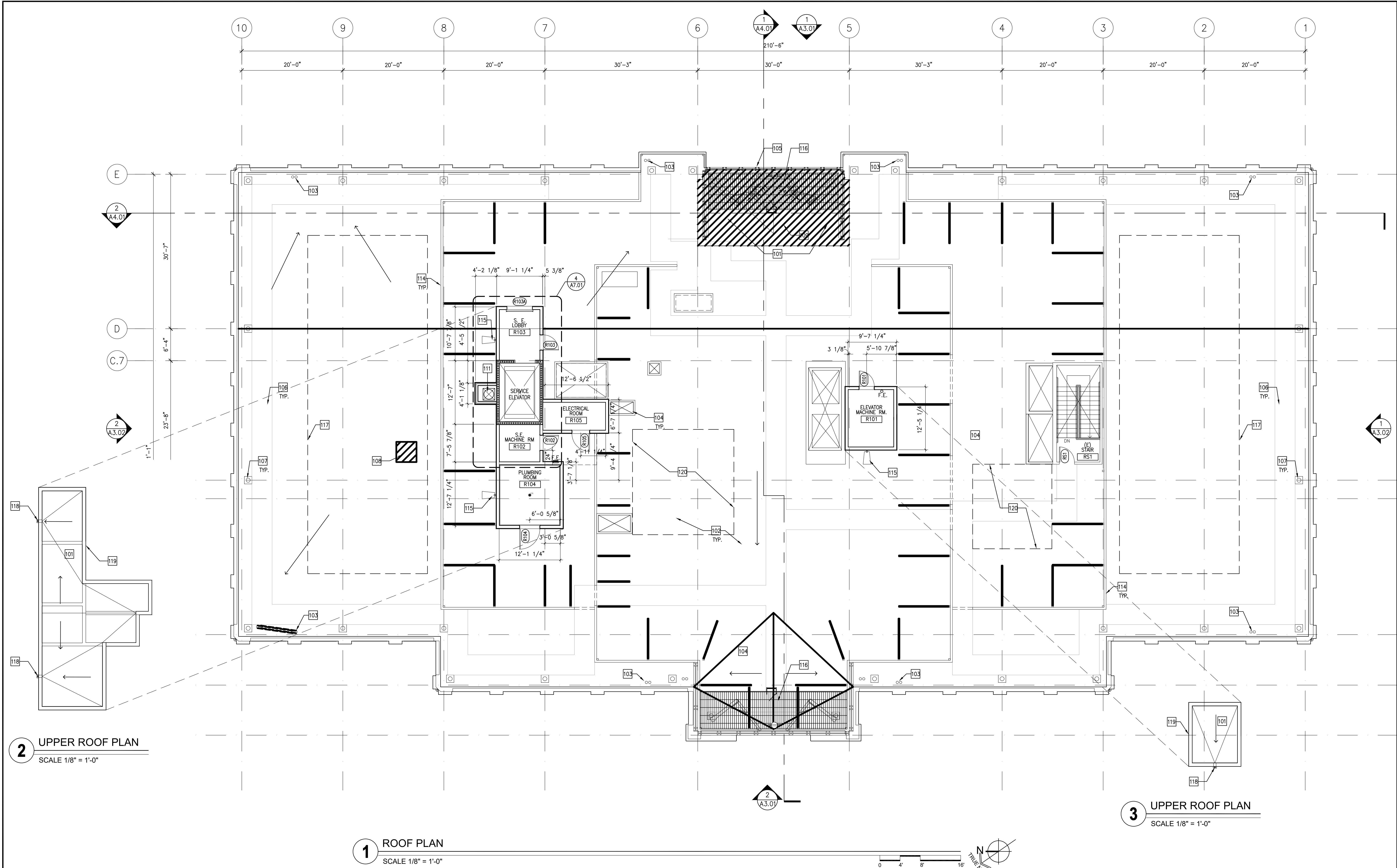




FOURTH FLOOR PLAN

SCALE 1/8" = 1'-0"

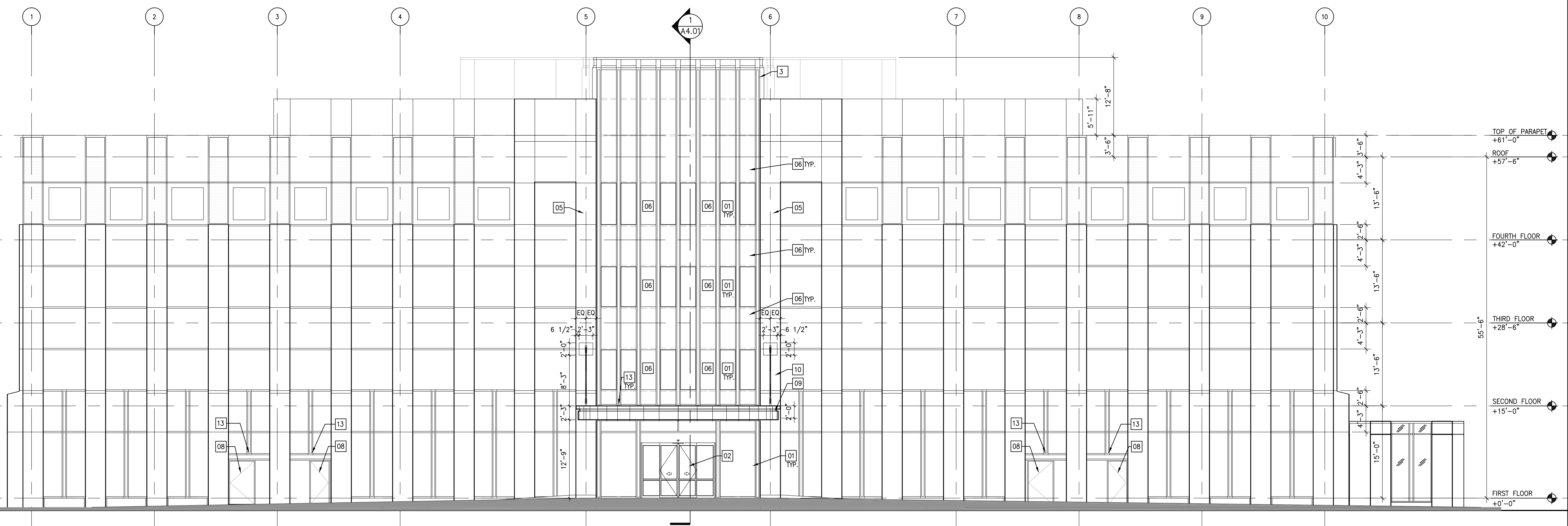




2 UPPER ROOF PLAN
SCALE 1/8" = 1'-0"

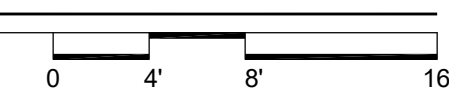
1 ROOF PLAN
SCALE 1/8" = 1'-0"

3 UPPER ROOF PLAN
SCALE 1/8" = 1'-0"



EAST ELEVATION

SCALE 1/8" = 1'-0"



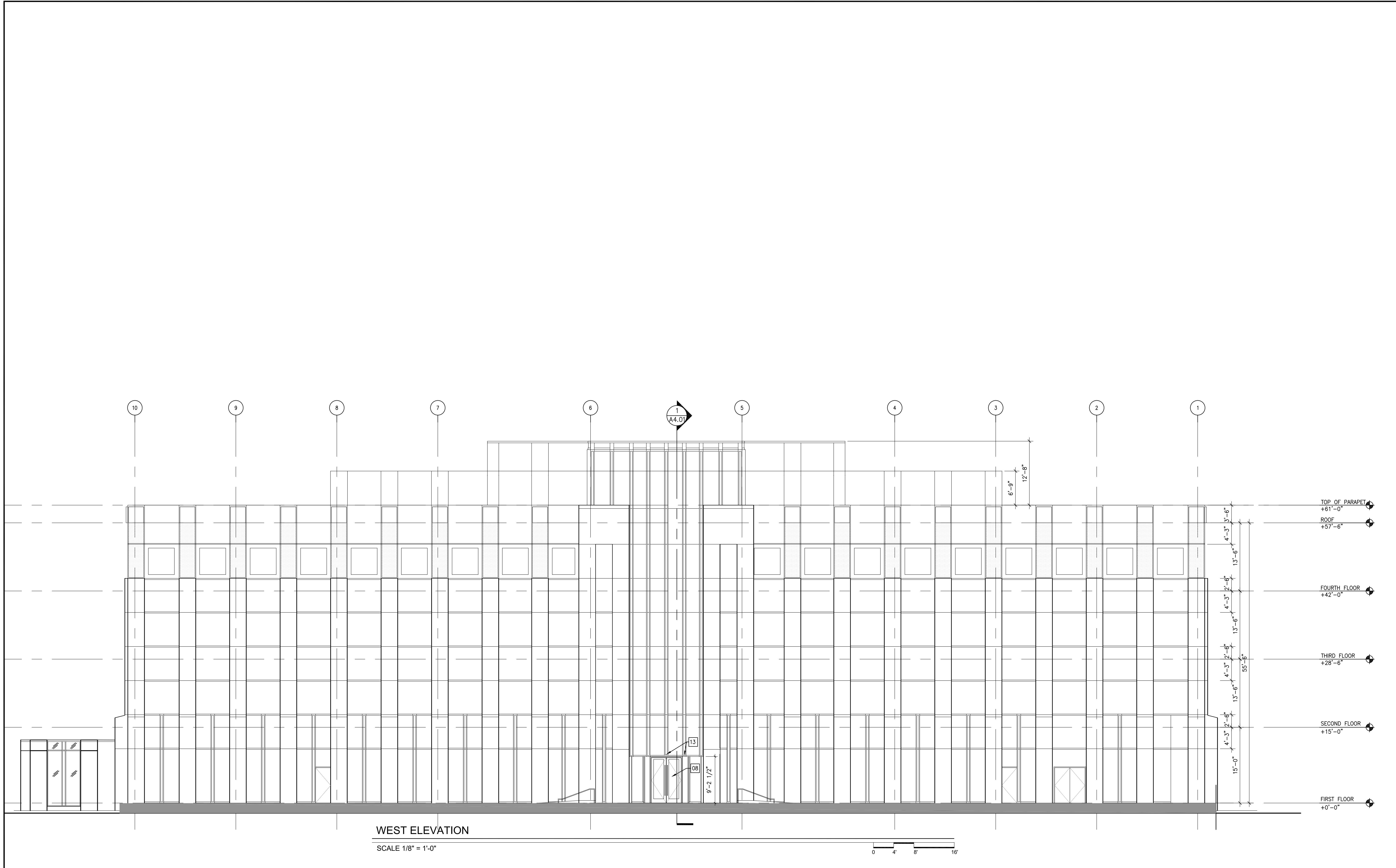
Project:	24-0109
Date :	22 NOV 2024
Sheet no.	



This plan is diagrammatic and intended only for the purpose of depicting the leased premises. The square footage areas of Tenant lease spaces as shown on the plans have been calculated to the exterior face of exterior walls and to the centerline of demising walls between Tenant spaces.

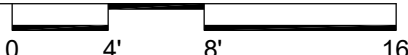
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EAST ELEVATION

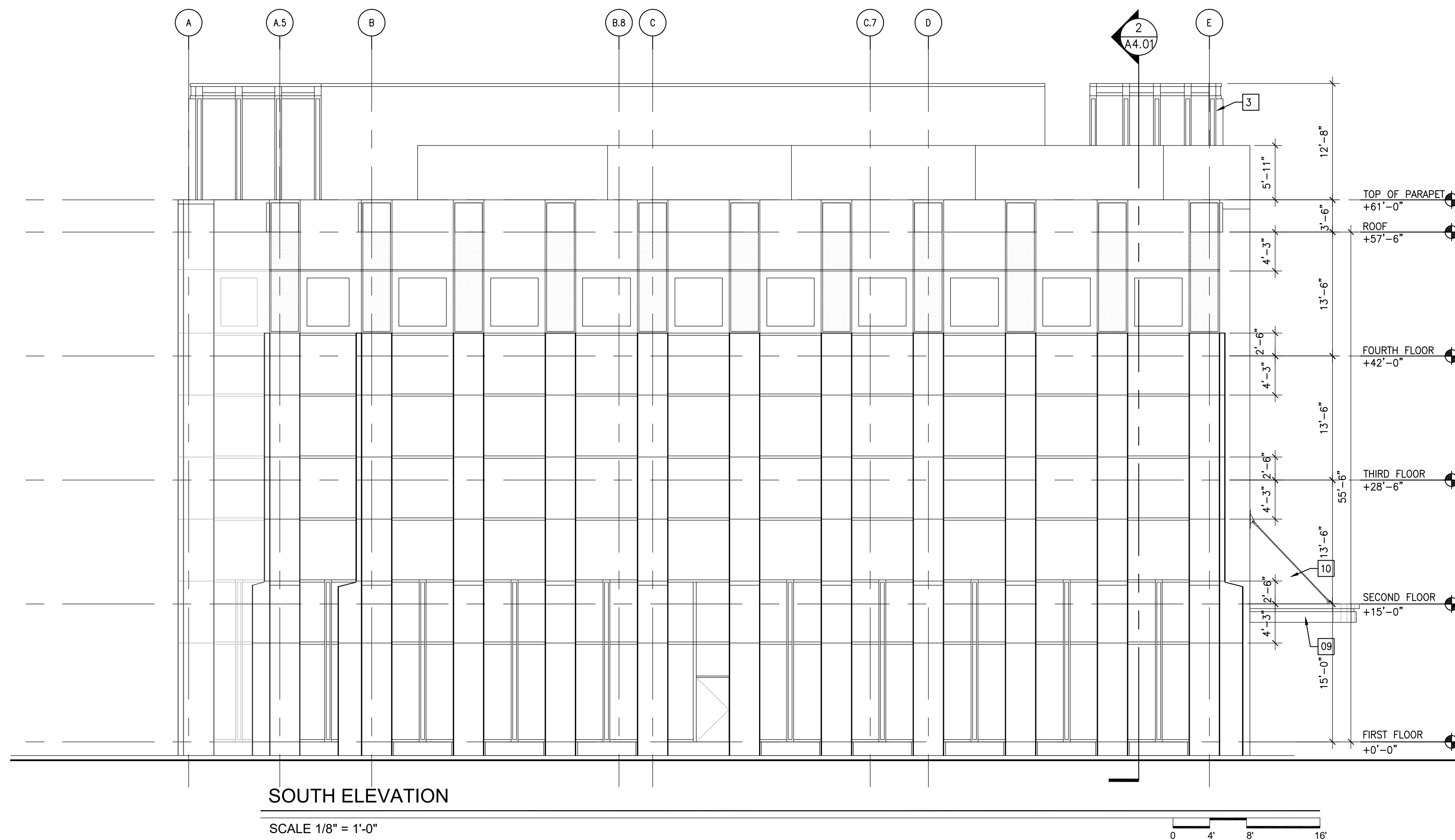
CITADEL OUTLETS
CITY OF COMMERCE, CA



WEST ELEVATION

SCALE 1/8" = 1'-0"

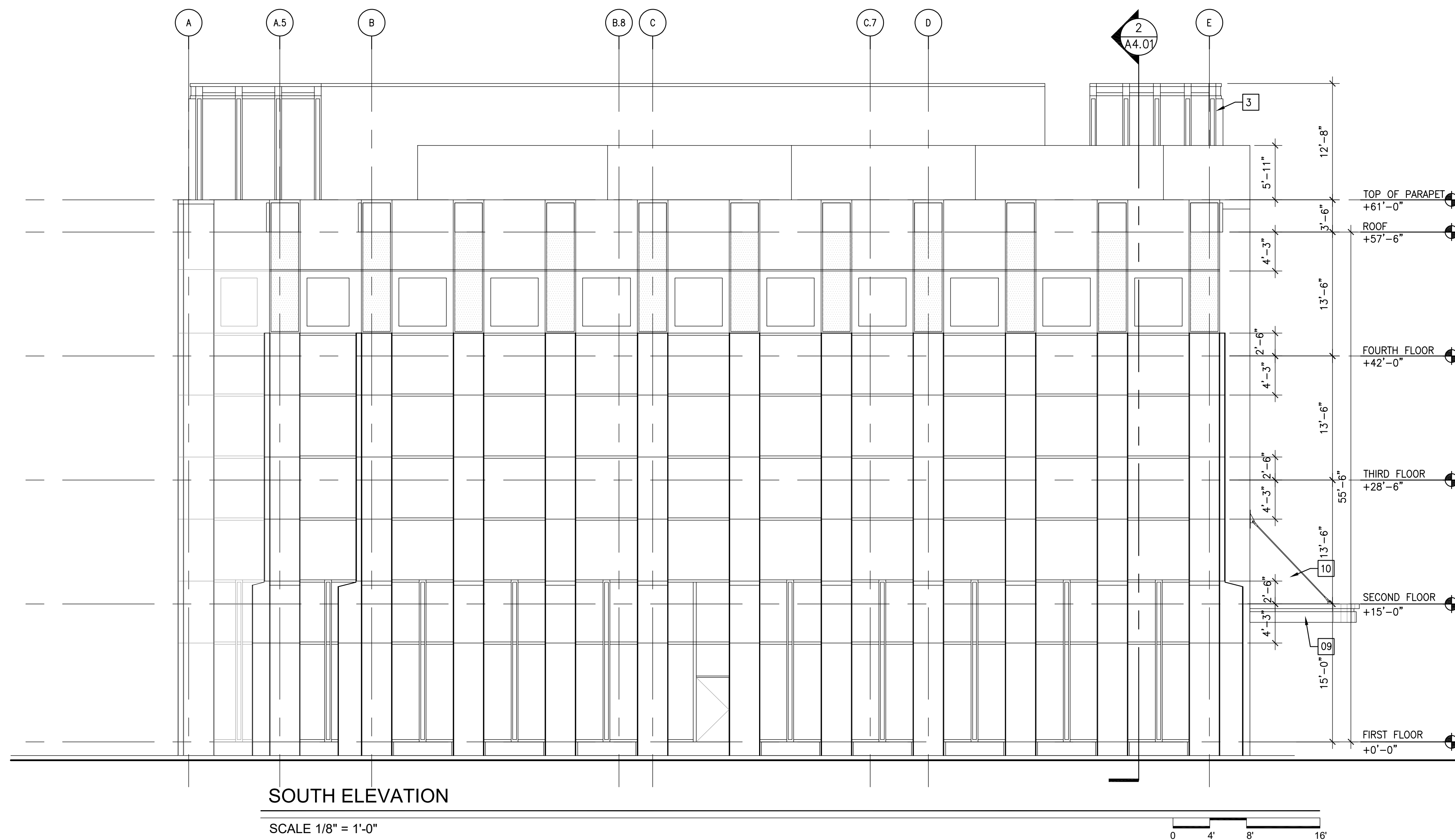




SOUTH ELEVATION

SCALE 1/8" = 1'-0"

0 4' 8' 16'



ATTACHMENT D
MEMORANDUM FROM ALLEN MATKINS TO PLANNING COMMISSION,
DATED MAY 14, 2025

Allen Matkins

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law
2010 Main Street, 8th Floor | Irvine, CA 92614-7214
Telephone: 949.553.1313 | Facsimile: 949.553.8354
www.allenmatkins.com

Paige H. Gosney
E-mail: pgosney@allenmatkins.com
Direct Dial: 949.851.5444 | File Number: 390807.00005/4922-5572-0507.1

Via Email/U.S. Mail

May 14, 2025

Honorable Chairman and Members of the
Planning Commission
Attn: City Clerk
City of Commerce
2535 Commerce Way
Commerce, CA 90040

Re: Conditional Use Permit No. 25-02 – 500 Citadel Drive Hotel Conversion Project

Honorable Chairman and Members of the Planning Commission:

This firm is land use counsel for the applicant for the above-referenced project located at 500 Citadel Drive in the City of Commerce (“City”) which involves the renovation and conversion of an existing 81,050 square-foot four-story office building into a state of the art, 132-room boutique hotel with associated kitchen, breakfast seating and office areas (the “Project”). The Project will cater to visitors and tourists seeking a location close to shopping and dining options that are readily available at the adjacent Citadel Outlets.

Pursuant to City’s Municipal Code, the Project requires approval of a discretionary conditional use permit (“CUP”) and associated compliance with the California Environmental Quality Act (Pub. Resources Code, §§ 21000, et seq.) (“CEQA”). As reflected in the Planning Commission Staff Report and proposed Resolution No. PC 25-03 prepared for the Project, City Planning Staff have determined that all required findings for issuance of the CUP can be made in accordance with Municipal Code section 19.39.420 and that the Project is categorically exempt from environmental CEQA review under the Class 1 Existing Facilities exemption (CEQA Guidelines, § 15301). The Project was originally scheduled for consideration by the City Planning Commission at its meeting on April 16, 2025, with a recommendation of approval; however, the Planning Commission voted to continue the hearing to May 21, 2025, after receiving a last minute opposition letter from UNITE HERE Local 11 (“UNITE”), a union organization representing local hospitality workers. The opposition letter questioned the City’s determination that the Project qualified for the Class 1 CEQA exemption and asserted that further environmental analysis was required to evaluate potential impacts related to traffic and greenhouse gases (GHG).

Honorable Chairman and Members of the Planning Commission

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The purpose of this letter is to respond to and rebut the claims and allegations made in the UNITE opposition letter regarding the Project's qualification for the Class 1 CEQA exemption and its alleged potential traffic and GHG impacts. As outlined more fully below, the Project unquestionably meets the criteria required for application for the Class 1 Existing Facilities Exemption and there is no evidence, much less the requisite substantial evidence, supporting UNITE's claims that the Project (i) will result in unmitigated vehicle-miles-traveled ("VMT") or GHG impacts, (ii) is being impermissibly piecemealed or (iii) is particularly susceptible to cumulative impacts. As such, the Planning Commission can – and should – accept Staff's recommendation and adopt Resolution No. PC 25-03 authorizing issuance of the Project CUP.

We respectfully request that this letter be included as part of the administrative record for this matter.

1. **The City Properly Determined That the Project Qualifies for the Class 1 "Existing Facilities" CEQA Exemption With No Substantial Evidence of VMT or GHG Impacts.**

As set forth in CEQA Guidelines section 15301, the Class 1 Exemption applies as follows:

"Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. ... The key consideration is whether the project involves negligible or no expansion of use." (CEQA Guidelines, § 15301 [emphasis added].)

The non-exclusive list of examples of structures subject to the Class 1 CEQA Exemption identified in CEQA Guidelines section 15301 include, among others: "(a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;... [and] ... (e) Additions to existing structures provided that the addition will not result in an increase of more than: (1) 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less...."

Here, the Project involves the Planning Commission's approval of a CUP ("permitting") to convert an existing four-story office building into a hotel ("minor alteration of existing private structure ... involving negligible or no expansion of existing or former use") with a proposed addition of 1,803 square feet to extend the proposed lobby to align with the outer wall of the existing building (an addition of less than 2,500 square-feet). UNITE asserts that the change in use of the existing structure from an office building to a hotel automatically removes it from the Class 1 CEQA exemption; however, there is nothing in CEQA Guidelines section 15301 or in any caselaw

Honorable Chairman and Members of the Planning Commission
May 14, 2025
Page 3

or other authority that precludes a change in use of the subject structure. Rather, the applicability of the Class 1 Exemption is contingent upon negligible or no *expansion* of the existing use.

In this case, the Project's existing office building is simply being repurposed for a new hospitality use consisting of a 132 room hotel with associated kitchen, eating and office areas. Although different from the existing office use, it does not in any sense of the word expand or intensify the existing office use. UNITE does not disagree with or dispute this fact. Instead, UNITE's opposition letter asserts that the Class 1 Exemption does not apply because the Project is "an entirely new use" and cites to cases involving facts that are easily distinguishable and projects that were clearly outside the scope of the Class 1 Exemption.

For example, in *Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, the Court of Appeal affirmed the decision of the trial court finding that the Regional Water Quality Control Board's determination that the reopening of an existing, outdated landfill qualified for the Class 1 exemption was an error noting that a landfill was not a "facility" under the Class 1 Exemption and the proposed dumping of 3,200,000 tons of municipal solid waste was not a "minor alteration" of an existing structure, as it created a very real and reasonable possibility of causing a significant environmental effect. Moreover, the Regional Water Board's finding that the existing landfill was actually polluting the underground water supply, and that the applicant waste company's proposed mitigation measures could not and would not prevent the continued pollution of the water basin further supported the potential for a significant environmental effect which negated use of the Class 1 Exemption. (*Id.*, at pp. 1191-1196.)

Similarly, in *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, the Court of Appeal held that the Class 1 CEQA Exemption did not apply to the proposed transfer of ownership and change in operation from a nonconsumptive hydroelectric facility to a consumptive use. In support of its decision, the Court stated: "Here, ownership was transferred and the focus of the project's operation was modified to permit consumptive use of an additional 17,000 acre feet of water. A project that shifts from nonconsumptive to consumptive use is not a negligible expansion of current use. It is a major change in focus, and thus does not fall within the 'existing facilities' categorical exemption." (*Id.*, at p. 967.)

Here, the change from office to hotel use is not a "major change in focus" that would give rise to the "reasonable possibility of causing a significant environmental effect." In fact, hotel uses are generally considered less impactful than office uses from an environmental standpoint because they typically involve less intense and concentrated traffic, noise, and air quality impacts as compared to an office use, which often involves more frequent vehicle trips and longer operating hours. For example, hotel traffic is most often concentrated during check-in and check-out times and regularly involves guests arriving via rideshare, bus or public transportation. In comparison, office buildings, with their longer operating hours and more frequent employee and customer trips, can experience more continuous traffic and parking demands, oftentimes leading to more

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May 14, 2025

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congestion and emissions. In addition, hotel operations, including guest activity and mechanical systems, tend to have lower noise levels and less air pollution compared to office buildings, which may include machinery, printing equipment, and higher staff activity.

Moreover, the Project is anticipated to serve clientele that arrive in large tour groups via tour buses and who will generally remain within the greater Citadel commercial shopping and restaurant/retail hospitality complex for the duration of their stay. The effect of this internal capture will be to reduce traffic, VMT and other relevant environmental impacts.

Finally, UNITE's assertion that the Project should be required to evaluate all feasible mitigation measures to minimize vehicle miles traveled and greenhouse gas emissions is baseless and nonsensical. Mitigation measures are required where it has been determined that a project will have a significant environmental impact. There is no evidence whatsoever that the Project will result in such impacts – only unfounded speculation and supposition by UNITE that is patently insufficient to justify further environmental review under CEQA or to negate the City's well-founded determination that the Project meets the criteria for the Class 1 Exemption.

2. The Project is Not Being Piecemealed or Otherwise Susceptible to Cumulative Impacts.

UNITE further argues that the Project's environmental analysis is being impermissibly piecemealed in violation of CEQA because two commercial spaces measuring 6,322 square-feet and 8,007 square-feet, respectively, and a future water fountain are not included as part of the CUP for the Project. (UNITE letter, p. 4.) It is anticipated that the two commercial spaces will ultimately be occupied by restaurant users; however, as of the date of this letter and the Planning Commission's consideration of the Project, the future tenants of these spaces have yet to be determined.

The term "piecemealing" refers to artificially dividing a project into components for the purpose of evading CEQA review. (*Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266, 280.) Courts have found that agencies improperly piecemealed environmental review of projects in various situations. "First, there may be improper piecemealing when the purpose of the reviewed project is to be the first step toward future development." (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223.) Additionally, "there may be improper piecemealing when the reviewed project legally compels or practically presumes completion of another action." (*Id.*) There is no piecemealing, however, when "projects have different proponents, serve different purposes, or can be implemented independently." (*Id.*)

The Project involves the adaptive reuse of the existing office building as a hotel. The City's Zoning Code requires that "hotel" uses within the underlying C-2 zoning designation obtain a CUP. (Mun. Code, § 19.09.020.) The Zoning Code further provides that restaurant uses that do not serve alcohol are permitted by right (P) in the C-2 zone whereas restaurants that serve liquor and those

Honorable Chairman and Members of the Planning Commission
May 14, 2025
Page 5

involving dancing and entertainment require a CUP. (*Id.*) The multitude of other commercial/retail uses allowed in the C-2 zone are also subject to separate and independent permitting requirements.

The future tenants of the two “restaurant” spaces will ultimately be required to obtain their own independent entitlements for whatever use(s) are ultimately proposed for the spaces and, as part of that process, conduct the requisite level of environmental review under CEQA. The Project and future commercial spaces will have different proponents, serve different purposes and are not tied together or contingent upon each other’s development in any relevant respect. (*Banning Ranch Conservancy, supra*, 211 Cal.App.4th at p. 1226.) The development of the two commercial areas for their ultimate uses/purposes can – and will – be implemented independently of the entitlement and development of the Project in a manner completely consistent with CEQA.

The fact that the Citadel Outlets site may have been previously considered for a larger, more comprehensive expansion/redevelopment project years ago (UNITE letter, pp. 4-5) has absolutely no relevance to the adequacy of the environmental review for the proposed Project. First, any prior comprehensive expansion plan was, as UNITE acknowledges in its letter, ultimately scrapped. Second, as individual development plans are prepared for different areas of the larger Citadel Outlets site the relevant permit applications will be submitted to the City who will then determine the appropriate level of environmental review under CEQA. As there is no current grand redevelopment plan for the Citadel Outlets site, there is no greater “project” that need be considered as part of the Project’s separate and independent CEQA review. Third, as noted previously, the Project is exempt from CEQA under the Class 1 “Existing Facilities” Exemption and therefore, as a matter of statutory law, no further CEQA review is required for the Project.

Finally, UNITE’s questioning of the Project’s CEQA exempt status based upon the cumulative impacts exception set forth in CEQA Guidelines section 15300.2(b) is baseless and not supported by any shred of fact or evidence. The assertion of potential cumulative impacts based upon the historical development (both planned and actually executed) of the greater Citadel Outlets site is pure speculation and does not constitute grounds upon which the Project’s approvals can be further delayed or denied by the Planning Commission.

In sum, there is no basis for UNITE’s assertion that the Project’s environmental review is being piecemealed or that it is susceptible to cumulative impacts related to development of the surrounding Citadel Outlets complex. The Planning Commission can – and should – reject these claims and allegations outright and consider the Project for the standalone hotel conversion development that it is.

3. Conclusion.

Based upon the foregoing, the Project unquestionably falls under the Class 1 Existing Facilities CEQA Exemption. UNITE’s contentions otherwise are baseless and unsupported by either

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

Honorable Chairman and Members of the Planning Commission

May 14, 2025

Page 6

fact or law. In addition, there is no evidence to support UNITE's assertions that the Project will result in unmitigated VMT or GHG impacts or that the Project violates CEQA's prohibition on piecemealing or is susceptible to cumulative impacts. These assertions by UNITE have no factual or legal foundation and are asserted for the sole purpose of forcing the Project Applicant to enter into a Project Labor Agreement to hire union employees at the future hotel.

For the foregoing reasons, the Planning Commission should accept Staff's recommendation and adopt Resolution No. PC 25-03 authorizing issuance of the Project CUP.

Very truly yours,



Paige H. Gosney

PHG

cc: Sonia Griego, Associate Planner (soniag@commerceca.gov)
Jessica Serrano, Director of Econ. Dev. and Planning (jessicas@commerceca.gov)
Araceli Almazan, City Attorney (aalmazan@agclawfirm.com)

ATTACHMENT E
TRIP GENERATION AND VEHICLES MILES TRAVELED ASSESSMENT
FROM GIBSON, DATED MAY 13, 2025



MEMORANDUM

TO: Steven Craig, Craig Realty Group

FROM: Jonathan Chambers, P.E.

DATE: May 13, 2025

RE: Trip Generation and Vehicle Miles Traveled Assessment for the
500 Citadel Drive Adaptive Reuse Project
Commerce, California

Ref: J1130e

Gibson Transportation Consulting, Inc. (GTC) was asked by Craig Realty Group (Applicant) to conduct a trip generation and vehicle miles traveled (VMT) assessment for the proposed 500 Citadel Drive Adaptive Reuse Project (Project) within Citadel Outlets in the City of Commerce (City).

PROJECT DESCRIPTION

The Project consists of the adaptive reuse of a four-story, 81,050 square foot (sf) office building as a 132-room hotel (including lobby and basic hotel service and guest amenity space) and two tenant spaces totaling approximately 14,330 sf, which are assumed to be leased to restaurant tenants. The Project would include the addition of 1,803 sf to provide for a larger hotel lobby. The hotel would cater to visitors and tourists seeking a location close to the shopping and dining options at Citadel Outlets.

In addition to the Project office building, Citadel Outlets include an open-air shopping center with approximately 463,300 sf of existing retail space, an additional 81,254 sf office building, and a 201-room DoubleTree by Hilton hotel. An overview of the Citadel Outlets and Project location is shown in Figure 1.

PROJECT BACKGROUND

The Project requested a Conditional Use Permit (CUP) for the hotel use¹ along with a finding for a Class 1 exemption from environmental review under the California Environmental Quality Act (CEQA). City Economic Development and Planning staff prepared *Staff Report: Conditional Use Permit No 25-02* (April 16, 2025) (Staff Report), which found that the proposed hotel is similar to and compatible with other uses in the immediate vicinity, as well as the City's vision for the area, and that the proposed change of use and small addition of square footage to the existing structure is consistent with the "existing facilities" definitions of a Class 1 CEQA exemption. Therefore, the Staff Report recommended that the City Planning Commission approve the CUP and adopt the CEQA exemption.

¹ The two tenant spaces, while part of the Project, are permitted uses and thus are not part of the CUP application.

Prior to the City Planning Commission Hearing (CPC Hearing) on April 16, 2025, a letter was submitted by Jordan R. Sisson, attorney for UNITE HERE Local 11 (a union representing hotel and restaurant workers) challenging the use of a Class 1 exemption and suggesting that the Project may generate VMT impacts requiring mitigation. In response, the Applicant requested the preparation of this analysis.

PROJECT TRIP GENERATION

Estimates of the Project's net new trip generation were prepared to support the VMT analysis. These estimates used industry-standard trip generation rates from *Trip Generation Manual, 11th Edition* (Institute of Transportation Engineers, 2021) (ITE Manual) with applicable trip reductions applied to the existing and future use of the site. These reductions include pass-by trip credits for the tenant spaces, internal capture credits for all uses, and a travel mode reduction for travel by tour bus to and from the hotel. The details of the estimates for each land use are described below.

The existing office building is currently vacant as the Applicant, to prepare for the Project, has not refilled space as lease terms have ended. However, should the Project not go forward, the office space could be re-leased. Therefore, the trip generation and VMT estimates treated the office building as fully operational for the purpose of analyzing the net effect of the Project.

Hotel Trip Generation

Trips for the hotel use were estimated using standard hotel rates from the ITE Manual. While much of the data underlying the hotel trip rates from the ITE Manual include support facilities such as full-service restaurants, for this analysis, trips for the tenant spaces were separately estimated as described below. The ITE Manual's full description of the hotel land use, noting the frequent presence of amenities such as restaurants, is provided in the Attachment.

Two trip reductions were applied to the hotel trip generation estimates. A 20% internal capture credit was applied to account for the vehicular trips that hotel patrons would typically make for meals or tourist activities that would instead be made to either the tenant spaces or the surrounding Citadel Outlets. A 10% tour bus credit was applied to account for those patrons who travel by private shuttle bus rather than individual automobile. Since a single 40-passenger tour bus can replace 20 or more passenger vehicles, and tour groups are expected to be common tenants at the hotel, this credit is conservatively low.

Tenant Space Trip Generation

For trip estimation purposes, the tenant spaces were treated as part of the larger shopping center, which as described in the ITE Manual "typically contains more than retail merchandising facilities. Office space, a movie theater, restaurants, a post office, banks, a health club, and recreational facilities are common tenants." Therefore, tenant spaces occupied by restaurant uses are inherent in the shopping center trip generation rate. The ITE Manual's full description of the shopping center land use is provided in the Attachment.

The ITE Manual shows that a regional shopping center (such as Citadel Outlets) generates fewer trips per sf as the overall size of the center increases, so the estimates for the tenant spaces are calculated as the difference between estimates for the total shopping center before and after the addition of the tenant spaces. Additionally, a 5% pass-by trip reduction was applied to the tenant spaces to account for those customers who were already driving in the vicinity for other purposes, generating minimal additional VMT relating to their visits to the Project.

Prior Office Trip Generation

The trip generation for the existing office building was estimated using both general office and medical / dental office trip rates from the ITE Manual, since approximately 13,840 sf of the building was leased to medical and dental office in the building's most recent tenancy. These types of office tenants generate more trips than general office, because they generate patient trips throughout the day in addition to employee trips. Internal capture reductions of 5% for the general office use and 10% for the medical / dental office were applied to account for trips between the Citadel Outlets shopping and dining uses and the office building.

Project Trip Generation

Table 1 provides the trip generation estimates for the Project based on the assumptions summarized above. As shown, the Project would generate a net total of approximately 1,116 daily trips, including 52 during the morning peak hour and 92 during the afternoon peak hour. The existing office building, which is currently empty but could be re-leased at any time in lieu of the Project, generated approximately 1,141 daily trips, including 136 during the morning peak hour and 141 during the afternoon peak hour. Thus, the Project would result in a net reduction of 25 daily trips, including a reduction of 84 trips during the morning peak hour and 49 trips during the afternoon peak hour.²

As noted above, the trip rates for hotel inherently account for supporting amenities including full-service restaurants such as that proposed in the tenant spaces. The fact that trips for the tenant spaces were separately estimated and added to the total Project trip generation estimate means that the trips are likely overestimated. Additionally, though many hotel guests are expected to arrive and depart on private tour buses and shuttles, the hotel estimates were reduced by only 10% to account for these buses. The Project trip generation estimates, therefore, represent a conservatively high estimate.

VMT METHODOLOGY AND SIGNIFICANCE THRESHOLDS

CEQA requires that a transportation analysis be conducted based on a project's VMT rather than measures of congestion. Measuring transportation impacts by VMT incentivizes development that minimizes the amount of overall vehicular travel, whether because the land use serves a local need, or the development is located in an area with complementary land uses, or because Project features or programs reduce dependence on automobiles.

² The peak hour reductions exceed the daily reductions because the existing office use generates many more of its daily trips during the peak hours, while the trips generated by the hotel and tenant spaces are more evenly distributed throughout the day.

The California Governor's Office of Planning & Research published *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) (OPR Technical Advisory) to provide detailed guidance on VMT methodology and thresholds of significance. There are two primary guidelines applicable to the Project:

1. A development project expected to generate fewer than 110 net new daily trips is generally assumed to have a less-than-significant impact. (page 12)
2. Where a project replaces an existing VMT-generating land use, if the replacement leads to a net overall decrease in VMT, the project would have a less-than-significant impact. (page 17)

The City has not developed and adopted its own VMT impact thresholds; it uses the thresholds developed by Los Angeles County (County) Public Works in *Transportation Impact Analysis Guidelines* (July 23, 2020) (County TIA Guidelines). The County TIA Guidelines are consistent with the OPR Technical Advisory and include the two guidelines enumerated above.

PROJECT VMT ANALYSIS

The Project would generate fewer daily trips than the existing office space, resulting in a net reduction of daily trips, as shown in Table 1. **Therefore, based on the 110-trip threshold identified above, the Project would have a less-than-significant impact and no further analysis is required.**

While not required, GTC did conduct additional review and analysis to confirm that the Project would generate less VMT than the existing office use, thus reducing overall VMT. The analysis was conducted qualitatively by discussing the relative trip lengths of different types of drivers.

Employee VMT

Trips between work and home tend to be the longest trips the typical employee makes in a given day. According to Table 3.1.3-1 of the County TIA Guidelines, VMT per employee is an average of 18.4 miles in the southern portion of the County, where Citadel Outlets is located. Office employees tend to have certain skillsets or specializations, resulting in them being drawn from a larger geographic area. Therefore, the average employee at the existing office building would have a longer commute and generate more VMT than the average Project employee.

Further, the office employs substantially more people than the Project, as shown in Table 2. According to *City of Los Angeles VMT Calculator Documentation Version 1.3* (Los Angeles Department of Transportation, May 2020), there are an average of four employees per 1,000 sf of general office space and three per 1,000 sf of medical / dental office space, suggesting that, at capacity, approximately 315 employees would work in the building. Hotels have an average of 0.5 employees per room³ and restaurants an average of four employees per 1,000 sf, suggesting that the Project would have a total of 123 employees. Therefore, the Project would decrease

³ The resulting estimate of 66 hotel employees is generally consistent with information in the Staff Report estimating the hotel would have 16 to 24 employees on-site at a time. Assuming three shifts throughout the day, this would result in approximately 50 to 70 employees.

employment by approximately 192 people (approximately 60%). Combining the reduction in employees with the fact that hotel and restaurant employees would typically have lower VMT per employee than office employees, overall employee VMT would be substantially reduced (over 60%) with the Project.

Medical / Dental Patient VMT

Patient trips to and from the medical / dental uses at the existing office building would typically be local trips, as the location would be chosen for proximity to home, work, or Citadel Outlets itself. Many such medical / dental visits would be expected to be made in conjunction with visits to Citadel Outlets. Therefore, these types of trips generate only a small amount of VMT.

Hotel Guest VMT

Citadel Outlets is a destination for many tourists, especially international tour groups. It is common for international tour groups to be bused directly to Citadel Outlets from the airport or from other hotels in the area. In addition to third-party charter services, Citadel Outlets provides its own transportation services, including shuttles directly to and from Los Angeles International Airport (LAX) and downtown Los Angeles. It also provides amenities and services catering to tourists, including an on-site VIP lounge, gift wrapping and package shipping services, bag checks, and foreign currency exchange.

When choosing a hotel, the first factor most travelers consider is the hotel's proximity to the purpose of their visit. A convenient location saves time and reduces transportation costs for travelers. Currently, tour groups are primarily bused to Citadel Outlets from off-site hotels. While some may stay at the DoubleTree by Hilton hotel located in the southeast corner of the Citadel Outlets property, it is offset from the shopping areas by a five-minute walk across a surface parking lot.

The Project, on the other hand, proposes a new hotel specifically intended to cater to international travelers directly adjacent to, and effectively integrated with, the shopping center. Many of the hotel's guests are visitors who would be coming to Citadel Outlets regardless of the Project and, therefore, the Project would generally reduce VMT for those tourists. For hotel guests who would not have visited Citadel Outlets but for the Project, there may be a slight increase in overall VMT depending on what alternative lodging those guests may have found. On average, any additional VMT associated with hotel guests would be expected to be minimal, especially in comparison to the reduction in VMT associated with employees described above.

Tenant Spaces Guest VMT

The two ground-floor tenant spaces are anticipated to be restaurant uses according to the Project architectural plans provided at the CPC Hearing. Citadel Outlets currently includes approximately 463,300 sf of retail space, but dining options include only a single sit-down restaurant, Ruby's Diner, and a small food court with quick-service options. A shopping center typically includes as much as 20% of its leasable area for dining, whereas Citadel Outlets today leases only

approximately 4% of its space to dining uses.⁴ The tenant spaces, totaling 14,330 sf, would increase this to approximately 7%,⁵ which is still a fraction of the typical amount of dining space in a shopping center. As such, new restaurants at the tenant spaces would serve a demand for additional dining options for shopping center customers as well as for hotel guests.

Further supporting the determination that most restaurant customers would be those who are already shopping at Citadel Outlets or staying at the proposed hotel are the geographic characteristics of Citadel Outlets. It is relatively isolated from the surrounding community due to I-5 to the southwest, the passenger and freight rail lines to the north, and large industrial areas to the east and north.

Based on these factors, the tenant spaces would operate as local-serving uses and would complement existing uses at Citadel Outlets and, therefore, that component of the Project is expected to reduce VMT overall.

VMT Summary

Based on the information above, the Project would result in a net decrease in VMT and, thus, would result in a less-than-significant impact and no mitigation would be required.

PUBLIC TRANSIT

Public transit available to Citadel Outlets is not accounted for in the analysis above but has the potential to further reduce VMT.

Currently, there are several ways employees and visitors can access the Project vicinity via public transit, which reduces VMT. Los Angeles County Metropolitan Transportation Authority (Metro) operates bus route 62 along Telegraph Road adjacent to the shopping center. Route 62 travels between downtown Los Angeles and Hawaiian Gardens with peak period service frequency varying from approximately 25 minutes to approximately 60 minutes. City of Commerce Transit operates route 600 between the Civic Center and Citadel Outlets, with variable frequencies of approximately 45 to 60 minutes throughout the day. Metro also operates the Metro E Line light rail between Santa Monica and its eastern terminus at Atlantic Boulevard & Pomona Boulevard, approximately two miles north of Citadel Outlets. The Montebello/Commerce station of the Metrolink train system is approximately 1.5 miles east of Citadel Outlets. These existing transit routes, particularly the bus routes, provide options for employees and customers to get to and from Citadel Outlets without using a car.

In the future, Metro plans to construct the Eastside Transit Corridor Phase 2, which would extend the Metro E Line east to the City of Whittier, with a stop along the north side of Citadel Outlets on Smithway Street. This project, which has undergone environmental review and is expected to be

⁴ According to the Applicant, the existing dining uses comprise approximately 19,185 sf of the 463,300 sf shopping center.

⁵ Based on adding 14,330 sf of tenant spaces to both the existing dining total of 19,185 sf and the overall total of 463,300 sf.

completed between 2035 and 2037,⁶ would provide a high-capacity link between Citadel Outlets and the entire Metro rail network, including connections to downtown Los Angeles, LAX, Beverly Hills, downtown Long Beach, and the San Gabriel Valley. While the Project would be completed before the Metro extension, the eventual transit connection will help to further reduce Project VMT.

CONCLUSION

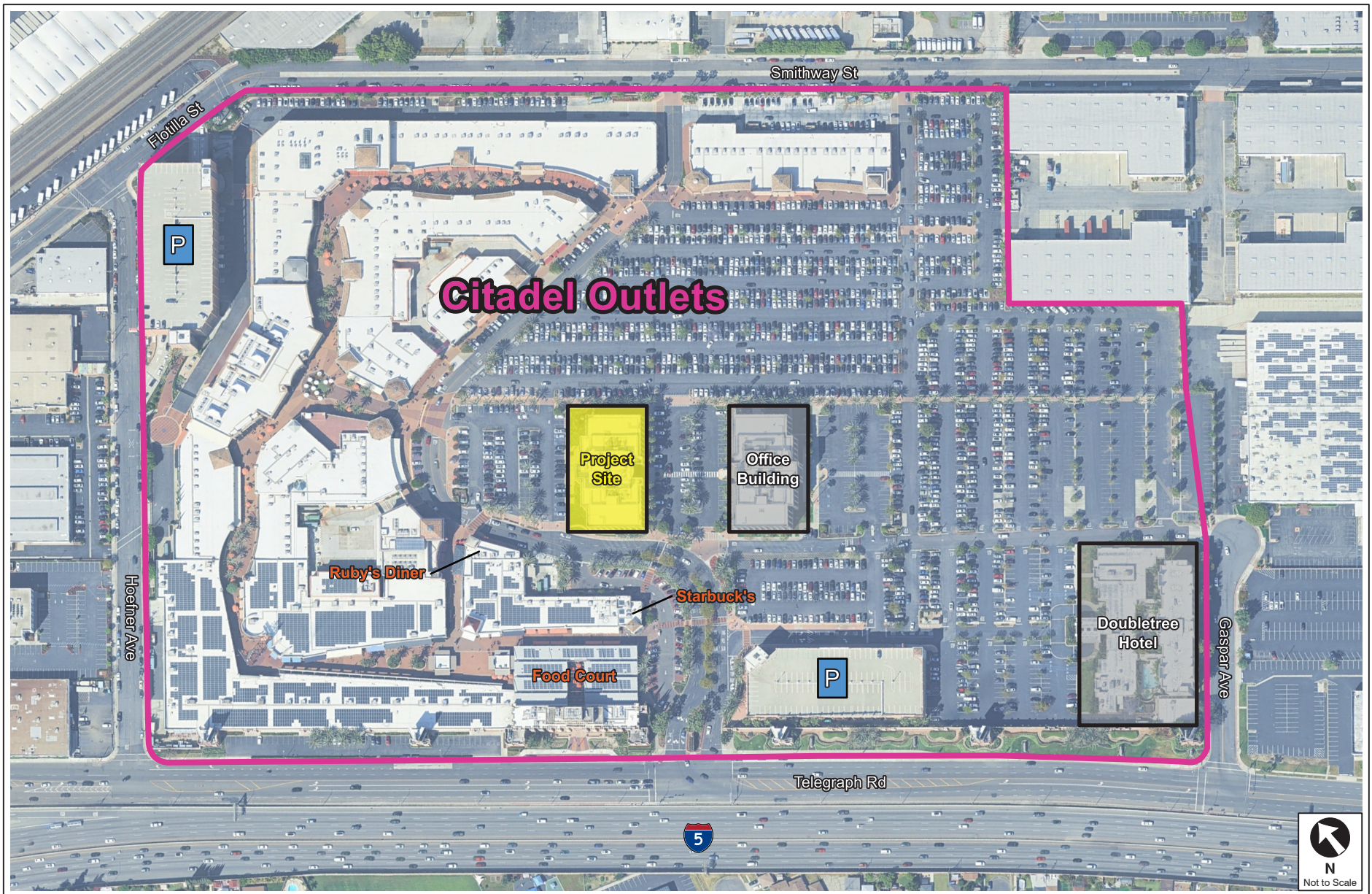
Based on the conservative trip generation estimates shown in Table 1, the Project would generate a net reduction of 25 daily trips with the conversion from an office (including medical / dental office space) to a hotel with ground-level tenant spaces. According to both the OPR Technical Advisory and the County TIA Guidelines, a development generating fewer than 110 net daily trips would have a less-than-significant impact with respect to VMT with no further analysis required.

However, additional VMT evaluation was conducted that conclusively demonstrated that the Project would generate less VMT than the prior office use of the building. It showed that employment-related VMT would be reduced by over 60%, that the hotel guest VMT may generate some additional VMT but far less than that reduced by employees, and that restaurant and patient trips are generally local in nature and would minimally affect VMT.

Overall, the Project would generate substantially less VMT than the office building it would replace and, therefore, would have a less-than-significant impact under CEQA. No mitigation is required.

Over time, VMT to and from the Project should decrease further due to the planned construction of the Eastside Transit Corridor Phase 2, which would provide Metro light rail access from Citadel Outlets to the entire Metro rail network.

⁶ https://www.metro.net/projects/eastside_phase2.



CITADEL OUTLETS SITE PLAN

FIGURE
1

**TABLE 1
TRIP GENERATION ESTIMATES**

Land Use	ITE Land Use	Rate or Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates [a]									
Hotel	310	per room	7.99	56%	44%	0.46	51%	49%	0.59
General Office	710	per 1,000 sf	10.84	88%	12%	1.52	17%	83%	1.44
Medical / Dental Office	720	per 1,000 sf	36.00	79%	21%	3.10	30%	70%	3.93
Shopping Center	820	per 1,000 sf	[b]	62%	38%	[b]	48%	52%	[b]
Trip Generation Estimates									
Proposed Project Trip Generation									
Hotel	310	132 rooms	1,055	34	27	61	40	38	78
Internal Capture - 20%			(211)	(7)	(5)	(12)	(8)	(8)	(16)
Tour Bus - 10%			(84)	(3)	(2)	(5)	(3)	(3)	(6)
Tenant Spaces [c]	820	14,330 sf							
Shopping Center (with tenant spaces)			18,335			415			1,740
Shopping Center (without tenant spaces)			(17,960)			(407)			(1,702)
Net Tenant Spaces Trip Generation			375	0	0	8	0	0	38
Pass-by - 5%			(19)	0	0	0	(1)	(1)	(2)
Total			1,116	24	20	52	28	26	92
Office Building Trip Generation									
General Office	710	67,209 sf	729	90	12	102	16	81	97
Internal Capture - 5%			(36)	(4)	(1)	(5)	(1)	(4)	(5)
Medical / Dental Office	720	13,841 sf	498	34	9	43	16	38	54
Internal Capture - 10%			(50)	(3)	(1)	(4)	(2)	(3)	(5)
Total			1,141	117	19	136	29	112	141
NET PROJECT TRIP GENERATION			-25	-93	1	-84	-1	-86	-49

Notes:

sf = square feet.

[a] Rates from *Trip Generation Manual, 11th Edition* (Institute of Transportation Engineers, 2021).

[b] Shopping center rates are based on the following fitted-curve equations:

$$\text{Daily: } T = 26.11 (X) + 5,863.73$$

T = Average Vehicle Trips

$$\text{Morning Peak Hour: } T = 0.59 (X) + 133.55$$

X = size of shopping center, in 1,000s of sf

$$\text{Afternoon Peak Hour: } \ln(T) = 0.72 \ln(X) + 3.02$$

[c] Calculated as the difference between trips generated by the shopping center with and without the tenant spaces.

**TABLE 2
EMPLOYEE ESTIMATES**

Land Use	Employee Ratio [a]	Size	Employees
Hotel	0.5 per room	132 rooms	66
Tenant Spaces	4 per 1,000 sf	14,330 sf	57
Gross Project Employees			123
General Office	4 per 1,000 sf	67,209 sf	269
Medical / Dental Office	3 per 1,000 sf	13,841 sf	46
Office Building Employees			315
Net Change in Employment			(192)

Notes:

sf = square feet.

[a] Employee ratios from *City of Los Angeles VMT Calculator Documentation Version 1.3* (Los Angeles Department of Transportation, May 2020).

Attachment

ITE Land Use Descriptions

Land Use: 310

Hotel

Description

A hotel is a place of lodging that provides sleeping accommodations and supporting facilities such as a full-service restaurant, cocktail lounge, meeting rooms, banquet room, and convention facilities. A hotel typically provides a swimming pool or another recreational facility such as a fitness room. All suites hotel (Land Use 311), business hotel (Land Use 312), motel (Land Use 320), and resort hotel (Land Use 330) are related uses.

Additional Data

Twenty-five studies provided information on occupancy rates at the time the studies were conducted. The average occupancy rate for these studies was approximately 82 percent.

Some properties in this land use provide guest transportation services (e.g., airport shuttle, limousine service, golf course shuttle service) which may have an impact on the overall trip generation rates.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in California, District of Columbia, Florida, Georgia, Indiana, Minnesota, New York, Ontario (CAN), Pennsylvania, South Dakota, Texas, Vermont, Virginia, and Washington.

For all lodging uses, it is important to collect data on occupied rooms as well as total rooms in order to accurately predict trip generation characteristics for the site.

Trip generation at a hotel may be related to the presence of supporting facilities such as convention facilities, restaurants, meeting/banquet space, and retail facilities. Future data submissions should specify the presence of these amenities. Reporting the level of activity at the supporting facilities such as full, empty, partially active, number of people attending a meeting/banquet during observation may also be useful in further analysis of this land use.

Source Numbers

170, 260, 262, 277, 280, 301, 306, 357, 422, 507, 577, 728, 867, 872, 925, 951, 1009, 1021, 1026, 1046

Hotel (310)

Vehicle Trip Ends vs: Rooms On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 7

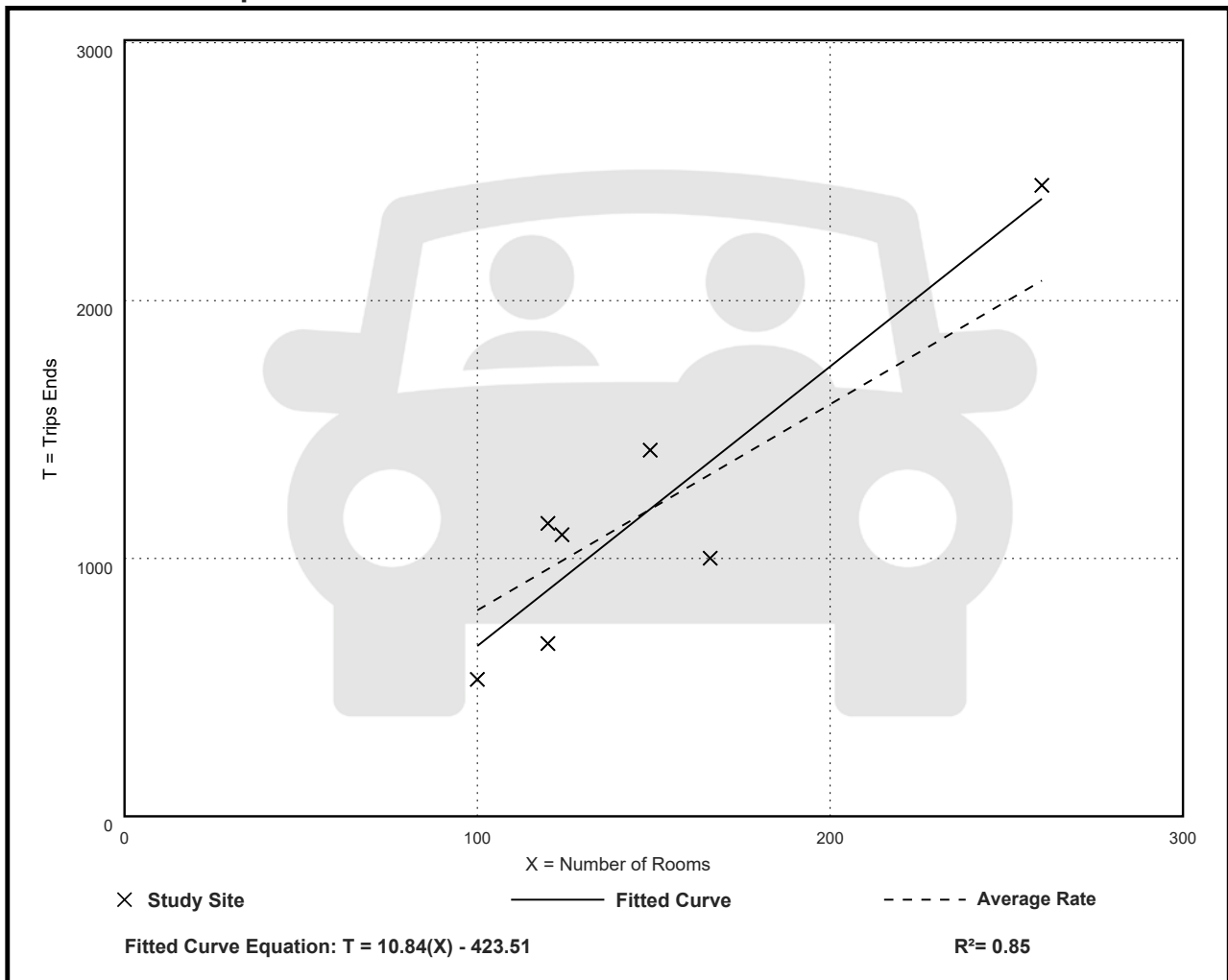
Avg. Num. of Rooms: 148

Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
7.99	5.31 - 9.53	1.92

Data Plot and Equation



Hotel (310)

Vehicle Trip Ends vs: Rooms

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 28

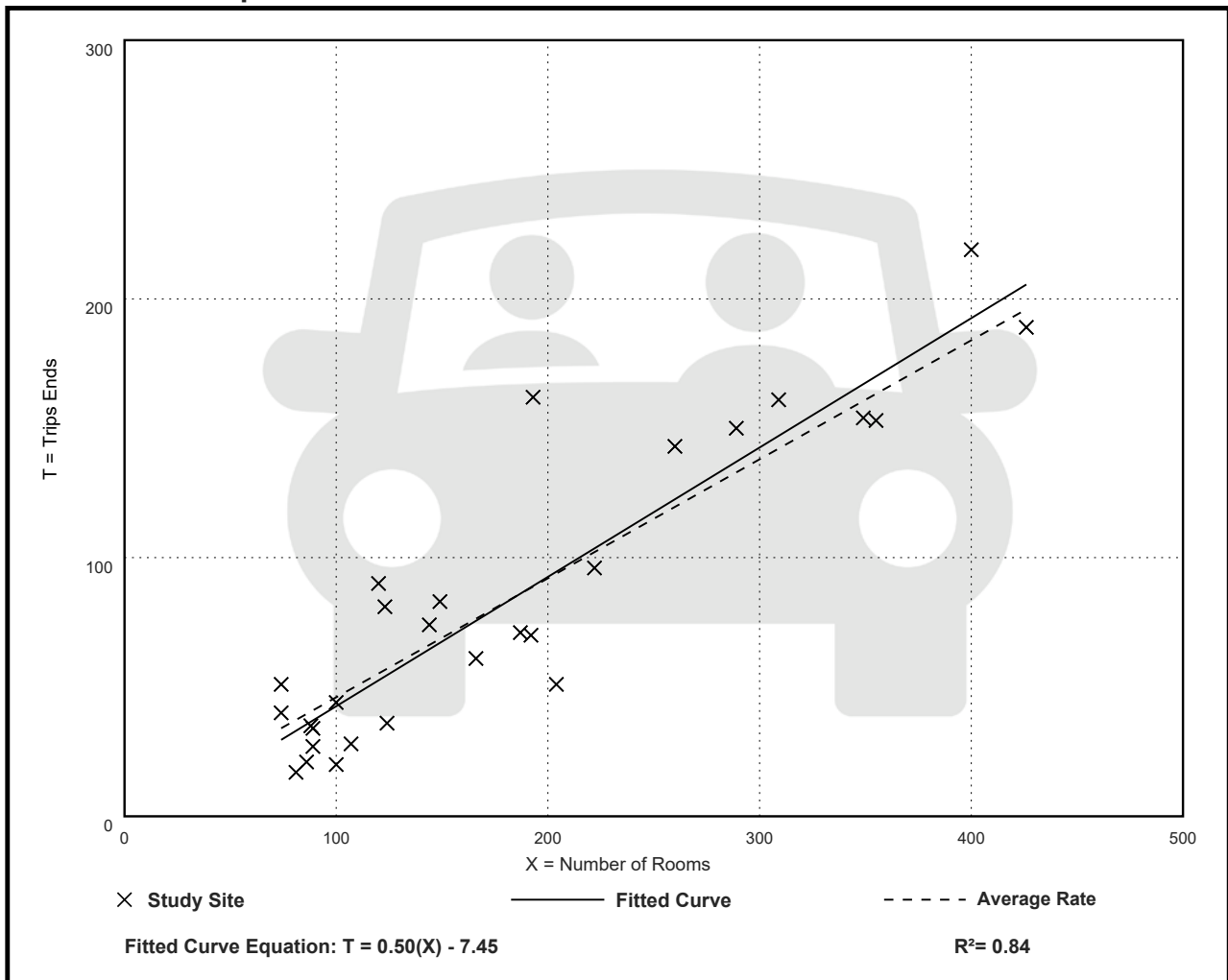
Avg. Num. of Rooms: 182

Directional Distribution: 56% entering, 44% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.46	0.20 - 0.84	0.14

Data Plot and Equation



Hotel (310)

Vehicle Trip Ends vs: Rooms

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 31

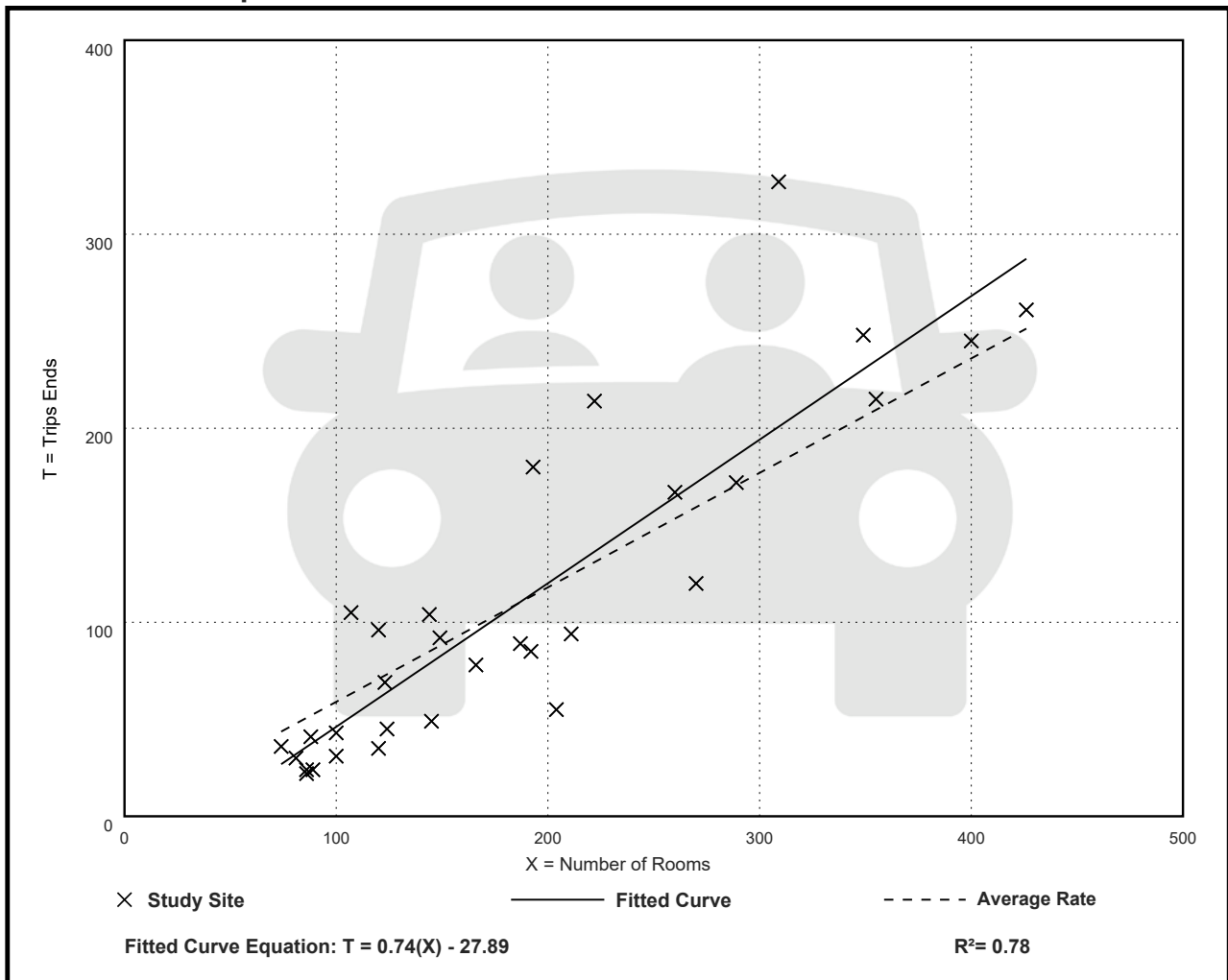
Avg. Num. of Rooms: 186

Directional Distribution: 51% entering, 49% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.59	0.26 - 1.06	0.22

Data Plot and Equation



Land Use: 820

Shopping Center (>150k)

Description

A shopping center is an integrated group of commercial establishments that is planned, developed, owned, and managed as a unit. Each study site in this land use has at least 150,000 square feet of gross leasable area (GLA). It often has more than one anchor store. Various names can be assigned to a shopping center within this size range, depending on its specific size and tenants, such as community center, regional center, superregional center, fashion center, and power center.

A shopping center of this size typically contains more than retail merchandising facilities. Office space, a movie theater, restaurants, a post office, banks, a health club, and recreational facilities are common tenants.

A shopping center of this size can be enclosed or open-air. The vehicle trips generated at a shopping center are based upon the total GLA of the center. In the case of a smaller center without an enclosed mall or peripheral buildings, the GLA is the same as the gross floor area of the building.

The 150,000 square feet GLA threshold value between community/regional shopping center and shopping plaza (Land Use 821) is based on an examination of trip generation data. For a shopping plaza that is smaller than the threshold value, the presence or absence of a supermarket within the plaza has a measurable effect on site trip generation. For a shopping center that is larger than the threshold value, the trips generated by its other major tenants mask any effects of the presence or absence of an on-site supermarket.

Shopping plaza (40-150k) (Land Use 821), strip retail plaza (<40k) (Land Use 822), and factory outlet center (Land Use 823) are related uses.

Additional Data

Many shopping centers—in addition to the integrated unit of shops in one building or enclosed around a mall—include outparcels (peripheral buildings or pads located on the perimeter of the center adjacent to the streets and major access points). These buildings are typically drive-in banks, retail stores, restaurants, or small offices. Although the data herein do not indicate which of the centers studied include peripheral buildings, it can be assumed that some of the data show their effect.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Alberta (CAN), California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky,

Maryland, Massachusetts, Michigan, Minnesota, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, Vermont, Virginia, Washington, West Virginia, and Wisconsin.

Source Numbers

77, 110, 154, 156, 159, 190, 199, 202, 204, 213, 251, 269, 294, 295, 299, 304, 305, 307, 308, 309, 311, 314, 315, 316, 317, 319, 365, 385, 404, 414, 423, 442, 446, 562, 629, 702, 715, 728, 868, 871, 880, 899, 912, 926, 946, 962, 973, 974, 978, 1034, 1040, 1067

Shopping Center (>150k) (820)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA
On a: Weekday

Setting/Location: General Urban/Suburban

Number of Studies: 108

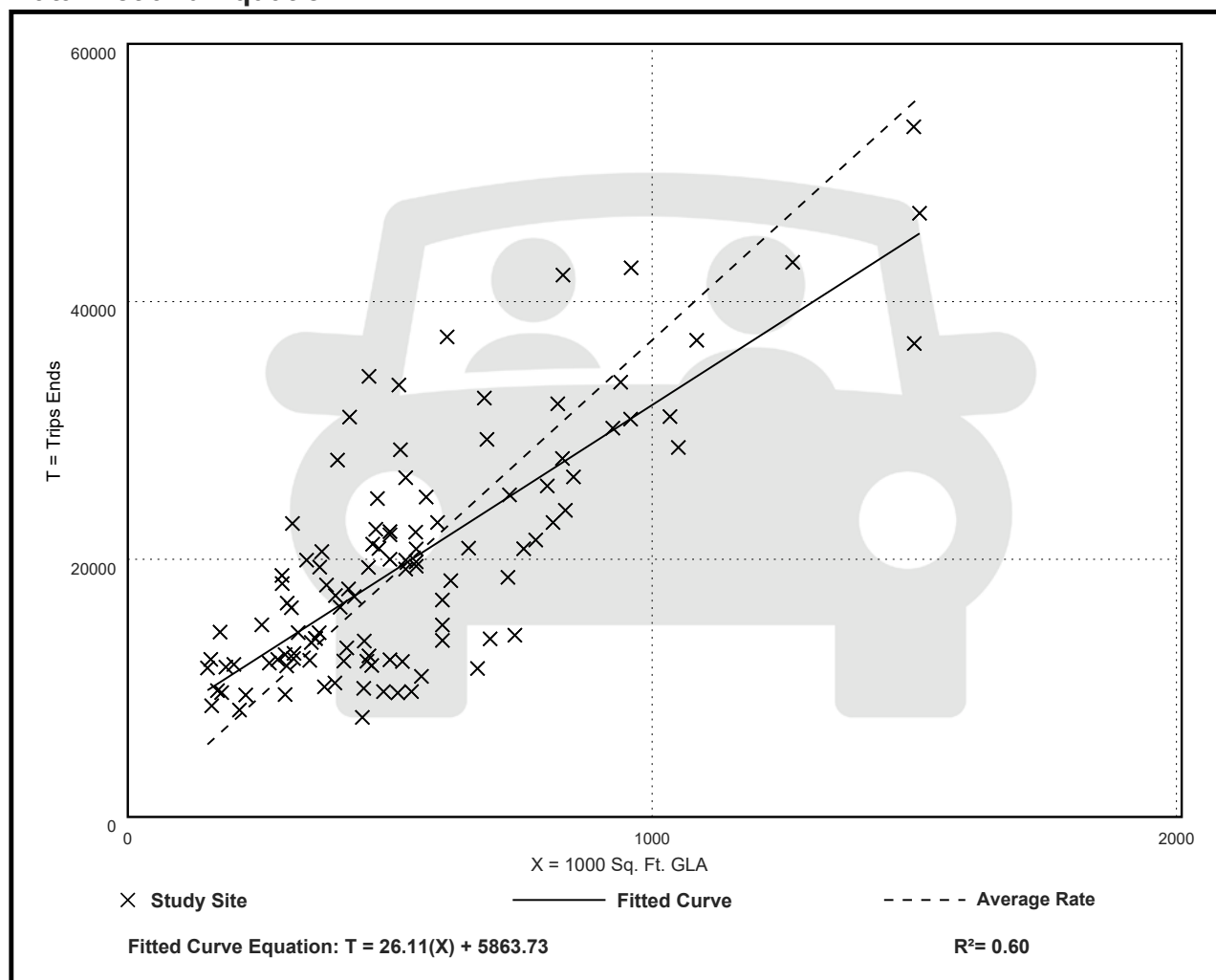
Avg. 1000 Sq. Ft. GLA: 538

Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
37.01	17.27 - 81.53	12.79

Data Plot and Equation



Shopping Center (>150k) (820)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 44

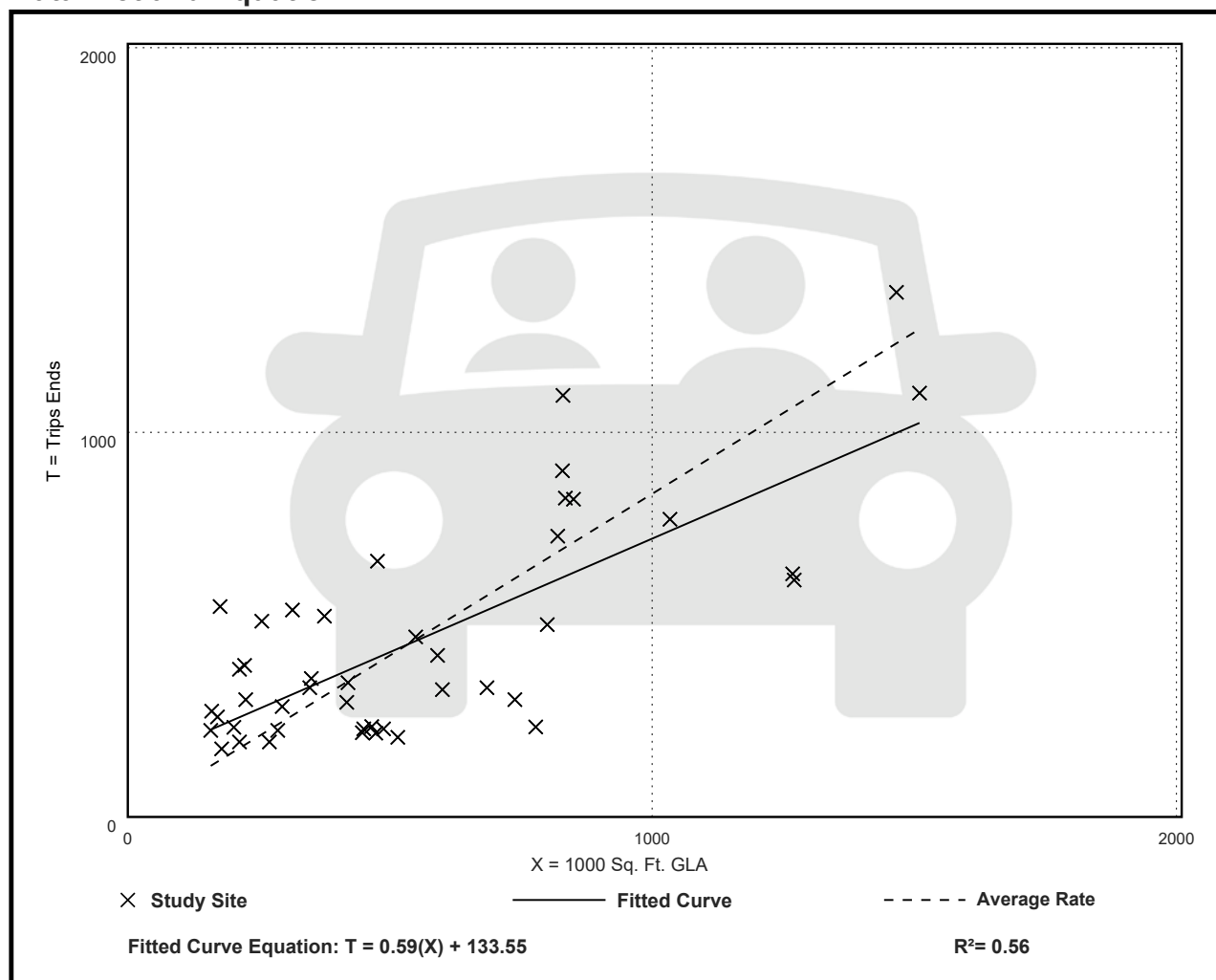
Avg. 1000 Sq. Ft. GLA: 546

Directional Distribution: 62% entering, 38% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
0.84	0.30 - 3.11	0.42

Data Plot and Equation



Shopping Center (>150k) (820)

Vehicle Trip Ends vs: 1000 Sq. Ft. GLA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 126

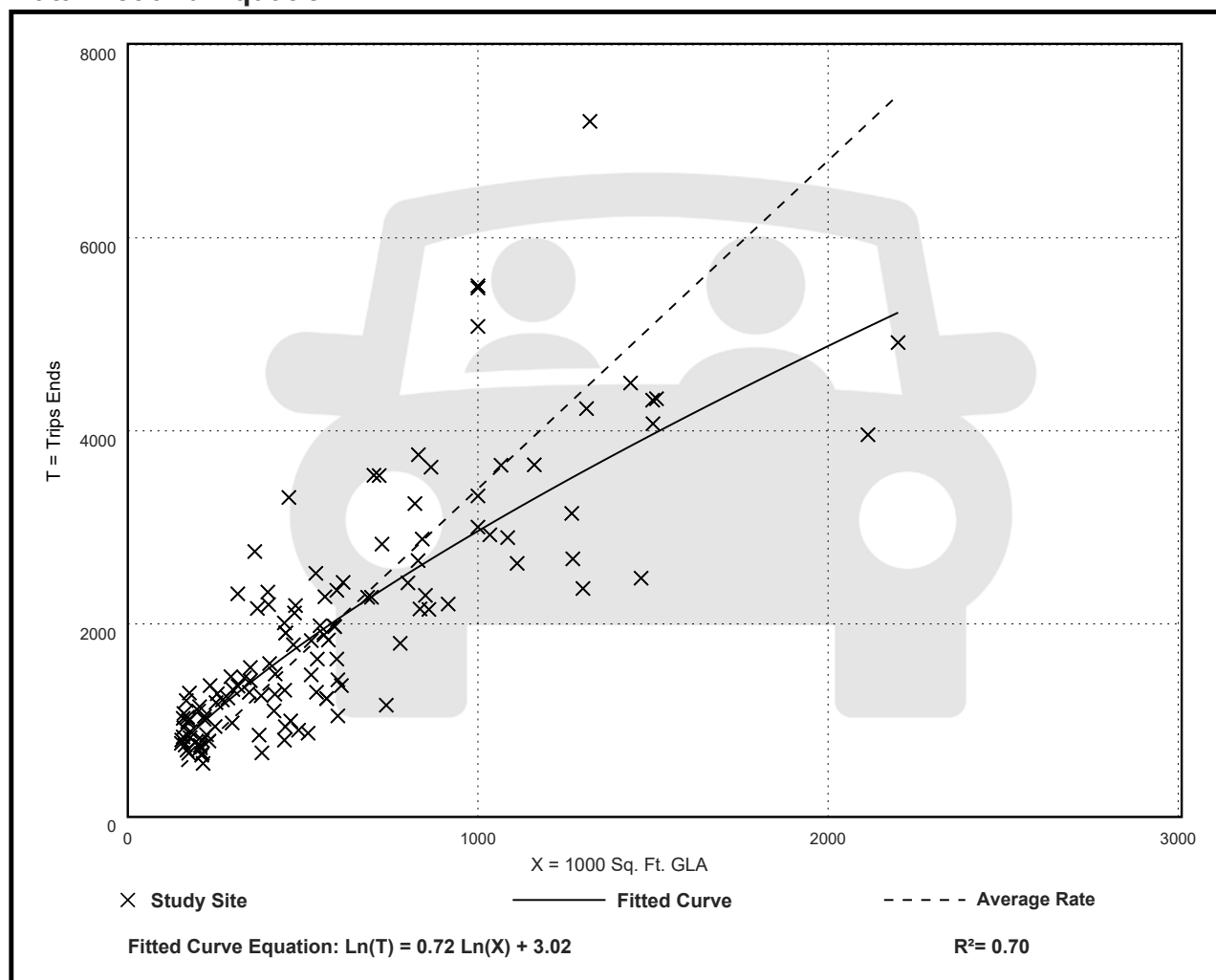
Avg. 1000 Sq. Ft. GLA: 581

Directional Distribution: 48% entering, 52% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
3.40	1.57 - 7.58	1.26

Data Plot and Equation



ATTACHMENT F
RESOLUTION NO. PC 25-03

RESOLUTION NO. PC 25-03

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF COMMERCE APPROVING CONDITIONAL USE PERMIT NO. 25-02

WHEREAS, Scott Van Boxtel filed an application with the City for a Conditional Use Permit (CUP) to allow a hotel use in the City's Unlimited Commercial ("C-2") zoning district. Pursuant to Chapter 19.09, Table 19.09.010A of the Commerce Municipal Code (CMC), a hotel use requires the review and approval of a CUP upon the required findings of CMC 19.39.420. The subject property is located at 500 Citadel Drive in the City of Commerce; and

WHEREAS, a CUP is required to operate a hotel within the City's C-2 zoning district. Staff has reviewed all aspects of the application and, with conditions of approval, believes the necessary findings can be made for the Planning Commission to approve the underlying CUP; and

WHEREAS, staff provided notice of the public hearing for the CUP application in the Los Cerritos Community News on April 4, 2025, and by mail to all property owners within 500 feet of the project site; and

WHEREAS, on April 16, 2025, the Planning Commission reviewed all materials concerning the subject request and held a public hearing, considering all evidence submitted thereat. At that meeting, the Planning Commission voted 5-0-0 to continue the public hearing to the meeting of May 21, 2025, and requested that the Applicant provide justification that the project qualifies under the Class 1 categorical exemption and further evaluation of traffic impacts; and

WHEREAS, the Planning Commission has reviewed all materials concerning the subject request and held a public hearing on May 21 2025, considering all evidence submitted thereat.

NOW, THEREFORE, THE PLANNING COMMISSION DOES HEREBY RESOLVE AND DETERMINE AS FOLLOWS:

Section 1. This project has been determined to be exempt from the environmental review under the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9)); Administrative Code, Title 14, Chapter 3 §15301, Class 1, Existing Facilities. Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to: (a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances; and (b) Additions to existing structures provided that the addition will not result in an increase of more than 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less.

In this case, the Project is to convert an existing four-story office building into a hotel with a proposed addition of 1,803 square feet. The addition will extend the proposed lobby to align with the outer wall of the existing building and continue to the other floors.

Section 2. The Planning Commission finds that the facts of the case are as follows:

1. The proposed use is conditionally permitted within the subject zone and complies with the intent of all applicable provisions of this Title 19. The proposed hotel is conditionally permitted within the C-2 (Unlimited Commercial) Zone pursuant to the Commerce Municipal Code. The subject project will allow for the establishment of a use intended to provide a variety of goods and services necessary to meet the needs of the resident and business populations.
2. The proposed use would not impair the integrity and character of the zone in which it is to be located. The proposed use is consistent with other uses in the immediate vicinity and throughout the C-2 zone. The project site is located within the Citadel Outlets property and will serve to further the City's vision for the area. The project site is currently occupied by outlet stores with surface parking, two parking structures, two office buildings, and an existing hotel (Double Tree) and the subject project will continue serving to enhance the aesthetics of the area. Therefore, the proposed use will not impair the integrity and character of the C-2 zoning district.
3. The subject site is physically suitable for the type of land use being proposed. The subject project will meet the parking requirements and provide all required parking on-site. The proposed hotel is situated towards the middle of the subject property ensuring that adequate and ample parking areas will be available for the hotel use and will not negatively impact existing uses and surrounding adjacent uses. Therefore, the subject site is physically suitable for the proposed hotel.
4. The proposed use is compatible with the land uses presently on the subject property. The project site is surrounded by other commercial and industrial uses. The use is conditionally permitted in the zone and will further enhance the City's vision for the area. The proposed use is compatible with adjacent uses and combined with other uses in the C-2 zone, will serve to help provide a variety of goods and services necessary to meet the needs of the resident and business populations.
5. The proposed use would be compatible with existing and future land uses within the zone and the general area in which the proposed use is to be located. The use is conditionally permitted in the zone and will serve to further enhance the City's vision for the area. The proposed use is compatible with existing uses and future land uses for the area in the C-2 zone.
6. There would be adequate provisions for water, sanitation, and public utilities and services to ensure that the proposed use would not be detrimental to the public health and safety. The project site is in an urbanized area where similar uses exist. It will be located immediately adjacent to uses that have adequate provision for water, sanitation, and public utilities. Similar access to utilities will be provided to the project applicant and therefore adequate provisions are in place.
7. There would be adequate provisions for public access to serve the subject proposal. Access to the site will be achieved through existing internal access driveways, with a connection to the public right-of-way from both Telegraph Road and Gasper Avenue. The entrances are adequate to serve the subject project. Therefore, adequate provisions for public access will be provided.

8. The proposed use is consistent with the objectives, policies, general, uses, and programs of the Commerce General Plan. The proposed use is consistent with the objectives, policies, general land uses, and programs of the Commerce General Plan. The Commerce General Plan designates the project area as Commercial. This project is consistent with the General Plan in that it contributes to helping establish an orderly pattern of development and a wide range of commercial activities. The project will also continue to promote the improvement of existing commercial areas along Telegraph Road.
9. The proposed use would not be detrimental to the public interest, health, safety, convenience, or welfare. The proposed use will be maintained safely and efficiently while providing services, by the imposed conditions. The conditions imposed will ensure that the public interest, health, safety, and convenience or welfare are served. Therefore, the proposed use would not be detrimental to the public interest, health, safety, convenience, or welfare.
10. The proposed design and elevations preserve and maximize the image, character, and visual quality of the neighborhood. The proposed use will serve to enhance the character and visual quality of the area. The subject project is consistent with those existing uses in the area and the City's vision of continued promotion and improvement of existing commercial areas.

Section 3. The Planning Commission does hereby conditionally approve Conditional Use Permit No. 25-02 subject to the following conditions:

1. A Conditional Use Permit (CUP) approval is valid and in effect and granted pursuant to the provisions of Title 19 of the Commerce Municipal Code and shall be valid only on the property for which it was granted and only for the improvements for which it is granted and further, shall continue to be valid upon change of ownership of the property or any lawfully existing building or structure on the property.
2. All conditions shall be binding upon the applicants, their successors, and assigns; shall run with the land; shall limit and control the issuance and validity of certificates of occupancy; and shall restrict and limit the construction, location, and use and maintenance of all land and structures within the development.
3. This CUP and all rights hereunder shall terminate within twelve months of the effective date of the permit unless operations are commenced or a written time extension is granted, based on a written request submitted prior to the expiration of the one-year period as provided in Section 19.39.460 of the Commerce Municipal Code.
4. The abandonment or non-use of this approval for a period of one year shall terminate the approval without further action of the Planning Commission or City Council, and any privileges granted thereunder shall become null and void.

5. In the event of a transfer of ownership of the property involved in this application, the new owner shall be fully informed of the use and development of said property as set forth by this permit together with all conditions, which are a part thereof.
6. All parking areas shall be clearly identified. The surface parking area must be striped to clearly indicate the location and extent of vehicle parking, maneuvering areas, and drive aisles.
7. Parking for all patrons must be provided on-site.
8. During construction, all roadways shall be kept open to traffic.
9. Equipment used for construction activities shall be properly tuned to reduce exhaust emissions.
10. Roads adjacent to the project site shall be swept as needed to reduce fugitive dust from the proposed project site.
11. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants.
12. Contractors and subcontractors engaged in the construction activities of the project shall obtain a business license and all required permits from the City of Commerce.
13. The landscaping and irrigation plans shall be prepared by a landscape architect and submitted to the City for review and approval. All designated landscaping areas shall be fully planted prior to the issuance of the building permit final inspection and maintained at all times.
14. The project shall comply with the Low Impact Development (LID) Ordinance that the City of Commerce adopted to comply with requirements of the Clean Water Act and the MS4 Stormwater and Urban Runoff Permit.
15. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants. In the event the City determines the owner has failed to comply with the standards listed herein, the City shall notify the owner in writing identifying the deficiencies, and allow the owner to cure the deficiencies listed in the notice, in a timely manner.
16. If the Director of Economic Development and Planning determines that a situation detrimental to public health, safety, and welfare has arisen due to the subject operation, the Director may require changes to the operation, additional studies to be undertaken, and the implementation of additional measures to protect the public's interest. In the event the City determines that the owner has failed to comply with the standards listed herein, the City shall notify the [owner] in writing identifying the deficiencies, and allow the owner to cure the deficiencies listed in the notice, in a timely manner.

17. The project will be required to comply with all programs adopted by the City for the reduction of solid waste.
18. The Director of Economic Development and Planning shall have the authority to initiate proceedings to suspend or revoke a Conditional Use Permit approval pursuant to provisions outlined in Sections 19.39.240 through 19.39.250, inclusive, of the Commerce Municipal Code, Chapter 19.39 if sufficient cause is given. In the event the City determines the owner has failed to comply with the standards listed herein, the City shall notify the owner in writing identifying the deficiencies, and allow the owner to cure the deficiencies listed in the notice, in a timely manner.
19. The operation must comply with all pertinent South Coast Air Quality Management District (SCAQMD) regulations. The applicant and future tenants shall be required to obtain all pertinent operating permits from the SCAQMD. Proof of permits or proof of exemption shall be provided prior to the issuance of a building permit from the City of Commerce.
20. A City of Commerce Business License shall be obtained and renewed as required by the City of Commerce to reflect the proposed land use.
21. All required permits by all permitting agencies shall be obtained for the operation of said use and any construction associated with the subject request.
22. Construction activities shall be permitted between the hours of 7:00 a.m. to 6:00 p.m.
23. Storage of building materials related to construction activities shall be contained within the project site.
24. The project site shall be cleared of all debris prior to the issuance of a Building & Safety Division final inspection.
25. Southern California Edison (SCE) requires the following conditions for any SCE services:
 - a. The applicant is responsible for contacting SCE and arranging any electrical service at the appropriate stage of construction. The electrical design for the newly installed service shall be designed by SCE and approved by City of Commerce Building and Safety Division (CCBSD).
 - b. All on-site electrical service connections to the proposed improvements shall be designed using an underground (UG) design method. This avoids an overhead service connection.
 - c. All required SCE "equipment" needed to provide service to the proposed improvements (PME Switches, Transformers, and/or Capacitors) shall be installed in a "pad mounted" configuration sitting above the finished grade upon an approved SCE structure.

- d. All required SCE "Cables" needed to provide service to the proposed improvements shall be installed utilizing UG conduits or cable trenches as designed by SCE.
 - e. There shall be no newly installed overhead (OH) facilities across private property without approval from the CCBSD.
- 26. If applicable, the contractor under the observation of the soil engineer shall conduct all clearing, site preparation, or earthwork performed on the project.
 - 27. If applicable, the soil engineer shall provide an inspection for site clearing and grading in order to certify that the grading was done in accordance with approved plans and grading specifications.
 - 28. Soil binders shall be utilized on construction sites for unpaved roads and/or parking areas.
 - 29. The project will be required to comply with all programs adopted by the City for the reduction of solid waste.
 - 30. The project applicant shall install energy-efficient electrical appliances and equipment in accordance with the State of California's Energy Efficiency Standards (Title 24).
 - 31. On-site management shall be available twenty-four hours a day, seven days a week.
 - 32. Not less than weekly maid and housekeeping service shall be provided for each guest room. "Maid and housekeeping service" means basic cleaning, including but not limited to vacuuming, sweeping and/or mopping, dusting, and changing of bed linens and towels.
 - 33. No hotel/motel room shall be rented more than once in a twenty-four-hour period.
 - 34. All hotels/motels shall maintain daily records reflecting the names and permanent addresses of hotel/motel guests, as verified by valid driver's license or other valid identification along with the license number, state of license, make, model, and year of any guest's vehicle parked on-site or the corporate account information and guest names, the dates of occupancy, length of stay, and room rate. This registration information shall be maintained for at least one year past the last day of stay for each guest and shall be made available for review by any duly sworn peace officer of the City, state, or federal government or any authorized official of the City's code enforcement or Finance Department during normal business hours. Any person who knowingly or intentionally misrepresents any material facts required in this subsection shall be deemed guilty of a misdemeanor.
 - 35. The applicant is required to install artwork or pay an in-lieu fee subject to the City's Art in Public Places Ordinance. The cost of the artwork or in-lieu fee shall be equal to 1% of the project's valuation.

36. Violation of any of the conditions of the approval shall be cause for revocation and termination of all rights thereunder.
37. The Director of Economic Development and Planning or his/her designee is authorized to make minor modifications to the approved preliminary plans or any of the conditions if such modifications shall achieve substantially the same results as would strict compliance with said plans and conditions.
38. The applicant shall sign, notarize, and return to the Economic Development and Planning Department an affidavit accepting all Conditions of Approval within 10 days from the date of the approval, unless appealed. The Applicant acknowledges and understands that all conditions set forth in this Resolution are conditions precedent to the grant of approval and failure to comply with any condition contained herein shall render this Condition Use Permit non-binding as against the City and shall confer Applicant no legal rights under the law.
39. The applicant shall defend, indemnify, and hold harmless the City, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding brought against the city, its elected and appointed officials, agents, officers, or employees arising out of, or which are related to the applicant's project or application (collectively referred to as "proceedings"). The indemnification shall include, but not be limited to, damages, fees and/or costs, liabilities, and expenses incurred or awarded in connection with the proceedings whether incurred by the applicant, the city, and/or the parties initiating or bringing such proceedings. This indemnity provision shall include the applicant's obligation to indemnify the city for all the city's costs, fees, and damages that the city incurs in enforcing the indemnification provisions set forth herein. The city shall have the right to choose its own legal counsel to represent the city's interest in the proceedings.

I hereby certify that the foregoing findings and conditions contained in this resolution were adopted by the Planning Commission at its regular meeting on May 21, 2025.

Salvador Gutierrez, Chairperson
Planning Commission

ATTEST:

Jessica Serrano, Secretary

ACCEPTANCE OF CONDITIONS
CONDITIONAL USE PERMIT NO. 25-02

A F F I D A V I T

I, _____, hereby state that I am the owner, or the authorized agent of the owner, of property involved in Conditional Use Permit No. 25-02 at 500 Citadel Drive in the City of Commerce.

I further state that I have read, understand, and accept, and will comply with all the conditions of approval contained in Planning Commission Resolution No. PC 25-03.

I am also aware that if any of the provisions of this Conditional Use Permit are violated or held to be invalid, or any law, statute, or ordinance is violated, the Conditional Use Permit shall be void and the privileges granted thereunder shall lapse.

Signed: _____ Title: _____

Company: _____

Mailing Address: _____

Phone: _____ Date: _____

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)
CITY OF COMMERCE)

A notary public or other public officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On _____ before me, _____
(Insert name and title of the officer)

Personally appeared _____
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within the instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity (ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____ (Seal)