

FINDINGS

Vesting Zone Change Ordinance and “Q” Classification

1. The action substantially conforms to the purposes, intent and provisions of the General Plan.

The Project proposes the demolition of approximately 6,844 square feet of existing buildings and two open sheds for the construction of a two-tower, mixed-use development with 474 new live-work units, including 24 units for Extremely Low Income Households and 53 units for Very Low Income Households, and 2,034 square feet of retail and restaurant space. Building 1 would be 30 stories (344 feet) in height and Building 2 would be 20 stories (226 feet) in height. Five existing buildings totaling 56,686 square feet and including six live-work units would be retained, resulting in a combined total of 480 live-work units and 34,831 square feet of commercial uses. In total, the Project would include 569,676 square feet of floor area on a 2.18-acre site, for an FAR of 6.0:1.

The Los Angeles General Plan sets forth goals, objectives and programs that guide both Citywide and community-specific land use policies. The General Plan is comprised of a range of State-mandated elements, including, but not limited to Housing and Conservation, Land Use, Noise, Safety, and Transportation. The City's Land Use Element is divided into 35 Community Plans that establish parameters for land use decisions within those sub-areas of the City. The Project is consistent with the following Elements of the General Plan: Framework Element, Housing Element, Mobility Element, Health and Wellness Element, Air Quality Element, and the Land Use Element (Central City North Community Plan).

Although the Project Site is now located within the boundaries of the Downtown Community Plan, which became effective on February 6, 2025, the Project retains vested rights based on the Successional Rights provisions of Chapter 1A of the LAMC Section 1.4.4 and based on the previously approved vested applications under VTT-74890-CN and CPC-2017-437-GPAJ-ZVC-HD-VCU-MCUP-SPR, which approved a General Plan Amendment to change the land use designation of the Project Site to Regional Center Commercial, and a Vesting Zone Change and Height District Change to change the zoning on the Project Site to the [T][Q]C2-2-RIO Zone. Therefore, the Project is vested under the provisions of the former Central City North Community Plan, the Regional Center Commercial land use designation, and the [T][Q]C2-2-RIO Zone and accompanying Qualified “Q” Conditions under Ordinance No. 187,209, effective November 5, 2021.

Framework Element.

The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the Project Site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following provisions, objectives and policies relevant to the proposed project:

Chapter 3: Land Use

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

Objective 3.1: *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*

Objective 3.4: *Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.*

Policy 3.4.1: *Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located:*

- a. *in a network of neighborhood districts, community, regional, and downtown centers,*
- b. *in proximity to rail and bus transit stations and corridors, and*
- c. *along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.*

The Project would provide a complementary mix of uses on site, including two residential towers with ground floor commercial uses, with up to 474 new live-work units, and 2,034 square feet of commercial space. In compliance with Measure JJJ, five percent of rental units (up to 24) would be set aside for Extremely Low-Income Households and 11 percent (up to 53) for Very Low-Income Households; if units are for-sale, 11 percent (up to 53) would be reserved for Very Low-Income households. Further, in accordance with LAMC 11.5.11(a).4, the Project would comply with applicable provisions if both rental and for-sale units are provided. The Project would retain five of seven existing buildings, including six vacant live-work units, for a total of 480 live-work units, and focus new development on underutilized surface parking areas.

The Project would provide 73,599 square feet of open space throughout the Project Site comprised of common outdoor spaces, indoor communal spaces, and private open space. The primary publicly accessible open space amenity would be a ground-level, 17,400-square-foot landscaped pedestrian paseo between Building 1 and Building 2 that would connect Violet St, 7th Place, and the alley to the west. Tenant open space would include indoor and outdoor common amenity areas including a sports court, pools, fitness centers, indoor lounge and outdoor landscaped seating areas, as well as private balconies.

The new residential and commercial uses would be located near multiple local and regional bus lines, including a Metro Local Line 60 stop approximately 200 feet west of the site, providing direct connections to Pershing Square and 7th Street/Metro Center. The Project would concentrate development on an infill site within the evolving Arts District neighborhood, adjacent to existing activity centers and well-served by transit,

accommodating future residents, employees, and visitors while promoting a more livable, transit-oriented neighborhood.

Chapter 4: Housing

The Project will be consistent with the relevant goals and objectives of the Framework Element (Chapter 4), including the following:

Goal 4A: *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1: *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.*

The Project would provide 474 new live-work units (480 total on-site, including six existing units to remain in retained buildings), thereby expanding the City's housing supply in an infill location consistent with the Community Plan. In connection with the requested Vesting Zone Change Ordinance, the Applicant has requested Developer Incentives pursuant to LAMC Chapter 1A 13.B.1.4 to allow a zero-foot side yard along the eastern property line and a 17-foot 10-inch building separation in lieu of the otherwise required 57 feet, which enables the Project to maximize housing production. In compliance with Measure JJJ, five percent of the total rental units would be set aside for Extremely Low-Income Households and 11 percent for Very Low-Income Households (or, for for-sale units, 11 percent for Very Low-Income Households). Thus, the Project would provide both market-rate and affordable housing opportunities in proximity to employment centers, transit, and amenities in the Arts District, furthering the City's housing goals while avoiding encroachment into low-density residential neighborhoods.

The Project is located within an infill site in the Arts District, and would provide new housing opportunities near employment centers, transit, entertainment, and amenities, thereby reducing reliance on the automobile and enhancing neighborhood livability. Rather than encroaching into low-density residential neighborhoods, the Project would add housing in a heavily urbanized and centrally located area already transitioning with mixed-use and live-work developments. Accordingly, the Project supports the City's housing goals by increasing the overall housing supply, providing affordable housing opportunities, and strengthening the range of housing options available in Downtown Los Angeles.

Chapter 5: Urban Form and Neighborhood Design

Goal 5A: *A liveable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywidescales.*

Objective 5.5: *Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*

Objective 5.8: *Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.*

The Project proposes a number of pedestrian improvements that would enhance walkability and create a more livable public realm. These include new sidewalks, landscaping, lighting, street trees, and a publicly accessible ground floor paseo that would provide a new connection between 7th Place, Violet Street, and the adjacent alley. The paseo would feature seating, shade, and public art to enhance connectivity and comfort, creating a welcoming space for residents and visitors. Both residential towers would include active ground floor commercial uses that contribute to the pedestrian experience, while Building 2 would also provide a community room and café, as well as a large, landscaped courtyard. Additional resident amenities include pet-friendly spaces such as a pet spa and relief area, landscaped rooftop terraces with seating and pools, and outdoor gathering areas. Together, these features would reinforce a strong pedestrian orientation and provide spaces that serve as focal points of activity and investment within the community.

The Project is also carefully designed to ensure safety and functionality for both residents and visitors. All residential lobbies and commercial entries would front Violet Street and be clearly defined and separated from vehicular access points. Vehicular access would be limited to two driveways: the garage entrance for Building 1 located in the alley, and the driveway for Building 2 positioned at the eastern end of Violet Street, both intentionally sited away from the most active pedestrian areas. Active ground floor uses and lighting would enhance visibility and promote passive surveillance, while pedestrian paths would be clearly marked and building access secured and well-lit. By combining these design elements, the Project would improve the quality of development and contribute to a safer, more inviting pedestrian environment in the Arts District.

Chapter 7: Economic Development

The Project's consistency with the relevant goals, objectives, and policies in the of the Framework Element (Chapter 7), is provided below:

Goal 7B: *A City with land appropriately and sufficiently designed to sustain a robust commercial and industrial base.*

Objective 7.2: *Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.*

Policy 7.2.2: *Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.*

Policy 7.2.8: *Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.*

The Project would redevelop a portion of the Project Site with a mixed-use development comprised of 474 new live-work units and approximately 2,034 square feet of new commercial space to be used for retail and restaurants. Additionally, the Project would retain five existing buildings located on the northern portion of the Project Site that comprise approximately 56,686 square feet. The existing buildings would be retained with six live-work units, along with office, retail, restaurant, and warehouse uses. As a result, the Project

balances the introduction of new residential uses with the continuation of existing homes and job-producing uses.

The Project would provide for a mix of productive commercial uses along with new live-work housing, consistent with the vested Central City North Community Plan, which encourages continued and expanded live-work uses along with commercial and light industrial uses in Regional Center areas. By combining new retail and restaurant uses with the retention of existing office, retail, and warehouse spaces, the Project would help sustain a robust commercial base. It is anticipated that the Project would generate approximately 14 net new on-site jobs and would contribute ongoing revenue to the City in the form of sales and property taxes.

The proposed uses are compatible with and complement the existing mix of live-work, office, restaurant, and retail uses on-site and within the surrounding Arts District neighborhood. The development is located within an infill area in proximity to employment centers, entertainment, and amenities. The Project would not encroach on low-density residential neighborhoods. Access to public transit is provided throughout Downtown, including several local and regional bus lines with connections to Pershing Square and 7th Street/Metro light rail stations. Specifically, a bus stop for the Metro Local Line 60 is located at the corner of Santa Fe Avenue and Violet Street, approximately 200 feet west of the Project Site.

The Project sustains economic growth and a robust commercial base by retaining and enhancing job-producing uses, redeveloping an underutilized surface parking area, and introducing new live-work housing and commercial uses in an area already transitioning toward mixed-use development. In doing so, the Project aligns with broader City policies that emphasize infill growth near activity centers and transit.

Goal 7C: A City with thriving and expanding businesses.

Objective 7.3: Maintain and enhance the existing businesses in the City.

Policy 7.3.2: Retain existing neighborhood commercial activities within walking distance of residential areas.

Policy 7.3.3: Prioritize the retention and renewal of existing industrial businesses.

The Project would be consistent with the above goal, objective, and policies because it would provide 474 new live-work units, 2,034 square feet of new commercial space for retail and restaurants, and retain existing office, retail, restaurant, and warehouse uses on-site, thereby supporting a City with thriving and expanding businesses. These new and retained uses would be located in proximity to existing residential and employment centers in the surrounding neighborhoods, as well as the proposed residential uses on-site, helping to sustain economic growth while complementing the existing mix of uses in the immediately surrounding area. By retaining existing commercial and industrial uses within walking distance of residential areas and introducing new productive uses, the Project advances the retention and renewal of businesses, maintains neighborhood commercial activity, and enhances the overall economic vitality of the Arts District and the urban core of the City.

Goal 7G: A range of housing opportunities in the City.

Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services

and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.

Policy 7.9.1: Promote the provision of affordable housing through means which require minimal subsidy levels and which, therefore, are less detrimental.

The Project would be consistent with the above goal, objective, and policy because it would provide 474 live-work units, including one-, two-, and three-bedroom units, along with 2,034 square feet of new commercial space for retail and restaurants. Of the 474 new live-work units, in compliance with Measure JJJ, five percent of the total proposed rental units (up to 24 units) would be set aside for Extremely Low-Income Households and 11 percent of the total proposed rental units (up to 53 units) would be set aside for Very Low-Income Households. If the residential units are provided for-sale, then instead, 11 percent of the total proposed for-sale units (up to 53 units) would be set aside for Very Low-Income Households. Further, in accordance with LAMC Section 11.5.11(b) of Chapter 1, if both rental and for-sale units are provided, the Project shall comply with the applicable rental and for-sale provisions. The Project would increase residential density and develop a greater number of housing units on this site, consistent with City objectives to provide a range of housing types and costs and encouraging production of new housing.

By enabling the construction of both market-rate and covenanted affordable housing in proximity to jobs, services, and transit, and by retaining existing commercial and residential uses on-site, the Project would provide a diverse range of housing opportunities and help ensure that future population growth is accommodated within a mixed-use, walkable infill area of the Arts District.

Housing Element

The City's Housing Element for 2021-2029 (Housing Element) was adopted by the Los Angeles City Council on November 24, 2021. While the Project would provide new residential uses, that the Project Site is not identified as a candidate site in the Housing Element. Nonetheless, the Project would be in conformance with Senate Bill (SB) 166, which was adopted on September 29, 2017 and amended Government Code Section 65863, also known as the No Net Loss Law. SB 166 requires that jurisdictions maintain sufficient adequate sites throughout the Housing Element planning period to meet remaining unmet Regional Housing Needs Assessment (RHNA) goals for each income category. As jurisdictions make land use or zoning decisions, or as development occurs, they must assess their ability to accommodate new housing in each income category on remaining sites in their Housing Element inventories, and identify additional sites if necessary.

SB 166 also requires that any reduction in allocated density on an individual project site be consistent with the City's General Plan and that remaining sites in the Housing Element be adequate to meet the City's RHNA allocation. The Project would develop 474 net new residential units, and therefore would not conflict with any No Net Loss requirements.

The Project is consistent with the following Goal, Objectives, and Policies of the Housing Element:

Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.

Objective 1.1: *Forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.*

Policy 1.1.2: *Account for existing housing needs when planning for future development by conducting analysis to develop and incorporate a buffer above household projections.*

As proposed, the Project would provide 474 new live-work units, including one-, two-, and three-bedroom units. Of these units, in compliance with Measure JJJ, five percent of the rental units (up to 24 units) would be set aside for Extremely Low-Income Households and 11 percent of the rental units (up to 53 units) would be set aside for Very Low-Income Households. If the units are provided for-sale, 11 percent (up to 53 units) would be set aside for Very Low-Income Households. Further, in accordance with LAMC Sec. 11.5.11(b) of Chapter 1, if both rental and for-sale units are provided, the Project shall comply with the applicable rental and for-sale provisions.

As of August 26, 2025, the City's remaining RHNA allocation for the 2021-2029 planning period is 110,694 Very Low-Income Units, 62,625 Low-Income Units, 74,249 Moderate-Income Units, and 168,892 Above-Moderate-Income Units, with a remaining capacity of 330,056 Very Low-Income Units, 332,096 Low-Income Units, 63,107 Moderate-Income Units, and 139,842 Above-Moderate-Income Units. The Project Site is not identified as a candidate site, and while it would introduce new residential uses, the City's remaining RHNA capacity is sufficient to accommodate the Project's 474 live-work units. Accordingly, the Project's residential units would be accommodated within the City's overall housing capacity, ensuring consistency with City housing goals.

The Project is consistent with the vested Central City North Community Plan, which envisions Regional Center Commercial sites as locations for the introduction of live-work housing in proximity to creative office, retail, and light industrial uses. Located within an infill site in the Arts District, the Project would provide new housing opportunities near employment centers, transit, entertainment, and amenities, reducing reliance on the automobile and enhancing neighborhood livability. The Project would not encroach on low-density residential neighborhoods but would contribute to an area already transitioning with mixed-use and live-work developments. Accordingly, the Project supports the City's housing goals by increasing overall supply, providing affordable housing opportunities, and strengthening the range of housing options available in Downtown Los Angeles.

Transportation Element – Mobility Plan 2035

The City's Transportation Element, known as Mobility Plan 2035, was adopted in September 2016 and guides development of a citywide transportation system with the goal of ensuring the efficient movement of people and goods and recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, reduction of vehicle trips, and focused growth in proximity to public transit. The Mobility Plan 2035 includes goals that define the City's high-level mobility priorities and sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles.

The Project would be in conformance with following objectives and policies of the Mobility Element as described below.

Chapter 2: World Class Infrastructure

Policy 2.3: Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Chapter 3: Access for All Angelenos

Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.

Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Policy 3.5: Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.

Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities

The Project would provide access for all modes of travel, including vehicles, pedestrians, and bicycles, while introducing a complementary mix of new commercial and live-work uses. The Project would reduce vehicle miles traveled as on-site residents, employees, and visitors could utilize on-site or walk to nearby services, as well as live and recreate on-site. Public transit service in the vicinity includes multiple bus lines, with connections to Downtown subway stations such as Pershing Square and 7th Street/Metro Center. The closest stops include Metro Local Line 60, 200 feet west at South Santa Fe Avenue and Violet Street; Metro Local Line 62, 700 feet northwest at 7th Street and Santa Fe Avenue; Metro Line 18 at 6th Street and Mateo Street, 0.4 miles northwest; and Metro Local Line 66 at South Santa Fe Avenue and Olympic, approximately 0.5 miles south.

The Project would provide safe and convenient access to nearby neighborhood uses and transit options while supporting an active pedestrian and bicycle environment. Pedestrian access would be provided from adjacent sidewalks and public right-of-way on Violet Street and 7th Place, as well as the alley to the west. Internally, pedestrian circulation to both the residential and retail/restaurant uses would be accommodated via the paseo connecting existing buildings with the proposed buildings. Bicycle parking would be provided on-site for both short-term and long-term needs, with short-term parking conveniently located near building entrances throughout the Site and long-term bike parking located near the lobby on the ground level of Building 2.

All vehicular parking for residential and commercial uses is provided across six subterranean levels, minimizing surface-level traffic to maintain a safe and comfortable pedestrian environment. Vehicle access would be provided from the alley and the eastern end of the Violet Street frontage.

Additionally, the Project's (T) Conditions and related Vesting Tentative Tract Map include Bureau of Engineering requirements for improvements along Violet Street, 7th Place, and the alley located easterly of South Santa Fe Avenue. These improvements ensure consistency with Mobility Plan 2035 standards and support safe, convenient multimodal access throughout the Project Site.

Health and Wellness Element and Air Quality Element

Adopted in March 2015, the Plan for a Healthy Los Angeles lays the foundation to create healthier communities for all Angelenos. As the Health and Wellness Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City of Los Angeles will strive to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The Project is consistent with the following:

Chapter 2: A City Built for Health

Policy 2.2: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.

Chapter 5: An Environment Where Life Thrives

Policy 5.1: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.

Policy 5.7: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.

Air Quality Element

Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.

The Project would comply with applicable provisions of the CALGreen Code and the Los Angeles Green Building Code, which would serve to reduce the Project's energy usage

The Project would provide 474 live-work units, including one-, two-, and three-bedroom units, and would add 2,034 square feet of new commercial uses (retail/restaurant) to a neighborhood that is rapidly transitioning with mixed-use development and is well-served by public transit. By locating residential and neighborhood-serving uses in close proximity, the Project would reduce vehicle miles traveled and reliance on single-occupancy vehicle trips. The Project would also include a publicly accessible paseo, providing open space for employees, visitors, and residents, contributing to a healthy urban environment.

The Project would provide short- and long-term bicycle parking throughout the Project Site, with long-term bicycle parking conveniently located near building entrances. Restrooms would be provided on the ground level of both buildings and P1 level of the subterranean garage. These amenities would encourage alternative modes of transportation and the associated improvements in public health.

In addition to adhering to smart growth principles of infill development near employment centers and public transportation, the Project would incorporate sustainable building features to reduce energy and water use, including high-efficiency plumbing fixtures, weather-based irrigation controllers, water-efficient landscaping, and Energy Star appliances. The Project's energy efficiency features, combined with its location near transit, would reduce the energy and emissions footprint of the Project and per capita greenhouse gas emissions from private automobile travel.

As conditioned, the Project would be consistent with the relevant policies of the Health and Wellness and Air Quality Elements, promoting a healthy built environment, supporting healthy working conditions, reducing air pollution, and encouraging land use patterns that reduce per capita greenhouse gas emissions.

Land Use Element – Central City North Community Plan

The Project Site is vested under the provisions of the Central City North Community Plan, one of the Community Plans that collectively form the Land Use Element of the General Plan, with a land use designation of Regional Center Commercial, which envisions a variety of residential and commercial service and office uses. The Project is consistent with the following relevant objectives and policies:

Residential

Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.

Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.

Policy 1-2.1: Encourage multiple residential development in commercial zones.

Policy 1-3.1: Seek a high degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.

Policy 1-3.2: Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.

Objective 1-4: To promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background.

Policy 1-4.1: Promote greater individual choice in type, quality, price, and location of housing.

Policy 1-4.2: Ensure that new housing opportunities minimize displacement of the existing residents.

The Project would provide 474 live-work units, including one-, two-, and three-bedroom units, with on-site affordable units in compliance with Measure JJJ: five percent of rental units (up to 24 units) for Extremely Low-Income Households and 11 percent of rental units (up to 53 units) for Very Low-Income Households. For-sale units would provide up to 11 percent (53 units) for Very Low-Income Households. By providing a mix of unit types and affordability levels, the Project expands housing supply adjacent to Downtown, facilitates

co-location of housing with commercial and neighborhood services, and increases opportunities for lower-income households. The Project also uses incentives and flexible development standards to support live-work unit production, consistent with policies encouraging housing that is both affordable and responsive to contemporary work/living patterns.

The Project would include the construction of a new mixed-use development, comprised of two residential buildings of different heights. Building 1 located on the western portion of the Site would be 30 stories with a maximum height of approximately 344 feet to the top of the rooftop helipad. Building 2 located on the eastern portion of the Site would be 20 stories and approximately 226 feet tall. Both buildings would include ground floor commercial uses and residential amenities, with landscaped open space areas located between and around the towers. Although notably taller than existing immediately surrounding structures, the design of the Project incorporates elements to reflect the existing neighborhood character and identity and promote architectural compatibility. The towers would be consistent with the Arts District evolving neighborhood, originally comprised of low-scale manufacturing and industrial uses, but which now includes projects such as the approved 1100 East 5th Street Project (8 stories), 670 Mesquit Project (32 stories), 4th and Central Project (30 stories), the 520 Mateo Street Project (13 stories), Arts District Center Project (12 stories), and the ROW Downtown LA Project (8 stories). The two new buildings would be designed with a contemporary architectural style while reflecting the industrial character of the surrounding area by using a repetition of stacked components to resemble the structural rhythm of stacked pallets. The new buildings would be constructed with concrete and glass exterior materials and each floor of the residential building would be staggered, with projecting balconies and recessed windows, to break up the buildings' facades. These proposed distinctive textures, colors, materials, and architectural features add visual interest and complement the neighborhood identity.

Commercial

Objective 2-1: *To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.*

Policy 2-1.1: *New commercial uses shall be located in existing established commercial areas or existing shopping centers.*

Policy 2-1.4: *Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.*

Objective 2-2: *To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses.*

Policy 2-2.2: *New development needs to add to and enhance the existing pedestrian street activity.*

Policy 2-2.3: *Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.*

Policy 2-3.4: *Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented areas incorporate commercial uses.*

Policy 2-4.2: *Preserve community character, scale, and architectural diversity.*

Policy 2-4.3: Improve safety and aesthetics of parking areas in commercial areas.

The Project's new ground floor commercial space would provide opportunities for new commercial development and services, strengthen the economic base, and expand market opportunities for existing and new businesses. These commercial activities would be sited in proximity to existing residential and employment centers in the nearby Downtown, as well as to existing and proposed residential uses located nearby throughout the Arts District neighborhood.

The two new buildings would be designed to reflect the industrial character of the surrounding area and constructed with concrete and glass exterior materials, with staggered, projecting balconies and recessed windows to break up the buildings' facades. Parking would be fully provided in subterranean levels, improving the safety and aesthetics of parking areas in commercial areas. The mixed-use Project's ground floor street frontage would incorporate retail and restaurant uses, with design features such as 20-foot tall transparent storefront glass that would enhance the existing pedestrian street activity. A sports court would be sited adjacent to the existing, three-story live-work building at the northeast end, providing a buffer to the lower-scale development along 7th Place. These proposed distinctive features add architectural diversity, visual interest, and complement the neighborhood identity.

The Project would provide a publicly accessible paseo connecting Violet Street and 7th Place, with landscaped open space, seating, and ground floor retail, enhancing pedestrian circulation and street-level activity. Streetscape improvements including sidewalks, street trees, and lighting further support a safe, connected, and walkable environment.

Based on the above, the Project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

2. The recommended action is deemed consistent with public necessity, convenience, general welfare and good zoning practice.

In 2021, the Los Angeles City Council approved a two-tower mixed-use development featuring 353 residential units and a commercial office tower under a zone change (Ordinance No. 187,209). A subsequent 2025 version of the project (Project) has since been proposed to replace the office tower with an entirely residential building, shifting the focus away from commercial use to deliver a net increase in new live-work and affordable units while keeping the overall floor area ratio and preservation elements similar to the 2021 plans. This change necessitates an ordinance to modify four of the original zone change's Qualified "Q" Conditions: Q Condition No. 1 (Site Development) to update the building design and project scope, Q Condition No. 6 (Housing Requirements) to reflect the increased number of required affordable units, Q Condition No. 7 (Pedestrian Paseo) to account for an expanded 31,001-square-foot public paseo area, and a new developer incentive to authorize a reduce building separation between the two towers.

The Project includes the construction of two new buildings totaling approximately 512,990 square feet and containing 474 new live-work units and ground floor commercial uses. The new buildings would include: Building 1, a 30-story residential tower approximately 344 feet tall to the top of the helipad, with 324 live-work units and 1,066 square feet of ground-floor commercial space; and Building 2, a 20-story tower approximately 226 feet tall, with 150 live-work units and 968 square feet of commercial space. Of the new units, 24 units would

be reserved for Extremely Low Income Households and 53 units for Very Low Income Households, consistent with Measure JJJ affordability requirements. If the residential units are instead offered for sale, a minimum of 11 percent (53 units) would be set aside for Very Low Income Households in compliance with Measure JJJ. Pursuant to LAMC Section 11.5.11(a).4, if both rental and for-sale units are provided, the Project would comply with the applicable provisions for each unit type.

To accommodate the new development, two existing buildings on the southern portion of the Project Site, totaling approximately 6,844 square feet and including one commercial building and one building with four live-work units, along with two open sheds and surface parking, would be demolished. Five other existing buildings, located on the northern portion of the Project Site, would be retained for six live-work units along with 6,983 square feet of office space, 25,739 square feet of retail space, and 2,109 square feet of warehouse space. Combined with the existing development, the Project totals 480 live-work units and 36,805 square feet of commercial, for a total floor area of 569,676 square feet and a Floor Area Ratio (FAR) of 6.0:1.

Public Necessity. The Project would demolish two buildings, including four live-work units and two open sheds, and construct a 20-story building and a 30-story building, collectively containing 474 live-work units, of which five percent (24 units) would be deed-restricted for ELI households and 11 percent (53 units) would be deed-restricted for VLI households, along with 2,034 square feet of commercial uses and a publicly accessible paseo and ground floor courtyard connecting Violet Street and 7th Place. As such, the Project would support balanced growth through new housing, employment-generating uses, and accessible open space, while providing much-needed restricted affordable housing units, in support of planning goals and providing a public benefit.

Additionally, the Project would be an infill development within the Arts District neighborhood which is rapidly transforming from an area with low-rise warehouses with industrial uses and a few residential buildings to an area with a more intense mix of residential, office, retail, and restaurant uses. The proposed amendment to the Vesting Zone Change Ordinance would be consistent with public necessity as it would introduce a greater amount of live-work units and affordable units to an area going through expanded growth; and would provide housing on an underdeveloped site that could otherwise support the economic goals for the City and the Downtown area. As such, the proposed amendment to the Vesting Zone Change Ordinance would be in conformity with public necessity.

Convenience. The Project would introduce new live-work units, employment opportunities, publicly accessible open space, and commercial uses to a centrally located neighborhood near housing, jobs, and transit. Additionally, the Project would activate the Project Site frontages by providing new ground floor retail/restaurant uses while preserving existing office, retail, and restaurant space. In addition, as previously discussed, as the seven existing buildings, sheds and surface parking encompass the entire site, there is currently no on-site outdoor open space. The Project would provide 63,882 square feet of open space, which would include new landscaping, rooftop decks, a ground floor public paseo, private residential balconies, and planting of trees. The paseo and courtyard accessible from Violet Street and 7th Place would enhance the public realm, offering places to eat, shop, and gather for residents and visitors.

In sum, the Project provides needed residential density with affordable housing near existing employment centers, entertainment, services, and transit. It would also create new

retail/restaurant uses and open space for the neighborhood and promote pedestrian activity in the area. Accordingly, the proposed Vesting Zone Change Ordinance would be in conformity with the public convenience.

General Welfare. The proposed Vesting Zone Change Ordinance would promote the general welfare by providing 474 new live-work units, including units set aside for Extremely Low-Income and Very Low-Income Households, in a transit-accessible, centrally-located neighborhood. In compliance with Measure JJJ, five percent of the proposed rental units (up to 24 units) would be set aside for Extremely Low-Income Households, and 11 percent of the proposed rental units (up to 53 units) would be set aside for Very Low-Income Households. For for-sale units, 11 percent (up to 39 units) would be set aside for Very Low-Income Households, and if both rental and for-sale units are provided, the Project would comply with the applicable provisions of LAMC 11.5.11(a). These affordable housing provisions would help address the City's ongoing need for affordable housing.

The Project would retain existing office, retail, restaurant, and warehouse uses while adding new commercial space, thereby supporting local employment and economic activity. Publicly-accessible open space, including a paseo and ground floor courtyard, would enhance the urban environment for residents, employees, and visitors. By concentrating residential and commercial uses in a compact, walkable area, the Project would create a more active, vibrant, and safe neighborhood. Accordingly, the proposed Vesting Zone Change Ordinance is consistent with the public welfare.

Good Zoning Practice. The immediate vicinity is characterized by a mix of retail, restaurant, hotel, and office uses, along with produce wholesale, contained in low- and mid-rise buildings of varying ages. In this context, the proposed amendment represents good zoning practice by introducing a balanced mix of residential and commercial uses that complement the surrounding development pattern.

The proposed Vesting Zone Change Ordinance would allow the development of 474 new live-work units, including 24 reserved for Extremely Low-Income households and 53 for Very Low-Income households, directly supporting the City's affordable housing goals. The Project would also provide 2,034 square feet of commercial space and retain existing office, retail, restaurant, and warehouse uses, sustaining and expanding local employment opportunities. Located near local and regional bus lines, the Project would reduce reliance on single-occupancy vehicles while providing approximately 73,599 square feet of open space, including 17,400 square feet of publicly accessible areas. The Project is consistent with the evolving Arts District, which has transitioned from low-scale industrial uses to a mixed-use neighborhood, including nearby proposed projects such as the 670 Mesquit Project (32 stories), 4th and Central Project (30 stories), and the Palmetto Project (21 stories). By integrating new residential, affordable housing, commercial, and public open space in a compact, transit-accessible area, the Project aligns with surrounding land use patterns and promotes orderly, balanced growth. Accordingly, the proposed Vesting Zone Change Ordinance represents good zoning practice by supporting housing, employment, and neighborhood vitality.

In addition, the Project Site is located within and subject to the River Improvement Overlay (RIO) due to its vested zoning, and would implement the Los Angeles River Design Guidelines by providing high-quality, visually appealing, and distinguishable architecture, locating all 798 vehicle parking spaces underground, and placing loading areas within the building or out of public view, thereby minimizing the visual impact of parking and loading

on the streetscape.

Finally, as discussed in more detail in Finding No. 1, the redevelopment of the Project Site with residential and commercial uses is consistent with the objectives and policies of the Community Plan by providing a project that retains employment-generating uses on site that complement existing uses in the vicinity, while also providing much-needed live-work units with commercial land uses on the ground level, thereby promoting a more walkable lifestyle by locating commercial and residential uses together and within proximity of transit and existing job centers and services. Therefore, the Vesting Zone Change Ordinance would be in conformity with good zoning practices and consistent with development patterns in the immediate vicinity.

3. “Q” Classification Findings.

Per LAMC Section 13B.1.4, the current action, as recommended, has been made contingent upon compliance with updated “Q” conditions of approval imposed herein for the Project. The “Q” Conditions that limit the scale and scope of future development on the site, as well as ensure a publicly accessible paseo, are also necessary to protect the best interests of and to assure a development more compatible with surrounding properties and the overall pattern of development in the community, and to secure an appropriate development in harmony with the General Plan.

Project Review Findings

4. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The Project includes the demolition of two of the seven on-site buildings, two open sheds, and surface parking areas located on the southern portion of the Site, and the construction of a new mixed-use development, comprised of two residential towers with up to 474 new live-work units, including 24 units for Extremely Low Income Households and 53 units for Very Low Income Households, and 2,034 square feet of retail and restaurant space. The five existing buildings located on the northern portion of the Project Site would be retained with six live-work units, and office, retail, restaurant, and warehouse uses. Further, in accordance with LAMC 11.5.11(a).4, if both rental and for-sale units are provided, the Project shall comply with the applicable rental and for-sale provisions. The uses would be located in two new buildings: Building 1 would be 30 stories (344 feet) in height and Building 2 would be 20 stories (226 feet) in height. Five existing buildings totaling 56,686 square feet and including six live-work units would be retained, resulting in a combined total of 480 live-work units and 34,831 square feet of commercial uses. In total, the Project would include 569,676 square feet of floor area on a 2.18-acre site, for an FAR of 6.0:1.

The Los Angeles General Plan sets forth goals, objectives and programs that guide both Citywide and community-specific land use policies. The General Plan is comprised of a range of State-mandated elements, including, but not limited to Housing and Conservation, Land Use, Noise, Safety, and Transportation. The City’s Land Use Element is divided into 35 Community Plans that establish parameters for land use decisions within those sub-areas of the City. The Project is consistent with the following Elements of the General Plan: Framework Element, Housing Element, Mobility Element, Health and Wellness Element, Air Quality Element and the Land Use Element- Central City North Community Plan.

As discussed in Finding No. 1 the Project would be consistent with the purposes, intent and provisions of the General Plan and its elements, including the Framework Element, Housing Element, Mobility Element, Health and Wellness Element and the Land Use Element – Central City North Community Plan that relate to housing, economic vitality, and the Citywide Design Guidelines. Approval of the Project would enhance the built environment in the surrounding neighborhood and would provide a function that is fitting and compatible with the character of the surrounding community and commercial viability of the region as a whole.

The Project Site is located within the River Improvement Overlay Zone (RIO) and would be required to comply with the Los Angeles River Design Guidelines, which establishes best practices for designing projects located within the RIO District. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies address river-adjacent development. Although the Project is located within the boundaries of the RIO District, the Project Site is separated from the Los Angeles River by existing railroad tracks and is not immediately adjacent or accessible from the River. Nevertheless, the Project would further the relevant objectives of the Los Angeles River Design Guidelines, including employing high quality, attractive and distinguishable architecture and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view.

Based on the above, the Project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

5. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development in neighboring properties.

The Project is an infill development in the Arts District that would replace two existing buildings (one with four live-work units and one with two open sheds) with a two-tower, mixed-use development that would include 474 new live-work units, including restricted affordable units in compliance with LAMC requirements, along with 2,034 square feet of retail and restaurant space. Building 1 up to 30 stories (344 feet) and Building 2 up to 20 stories (226 feet). Five existing buildings totaling 56,686 square feet would be retained, including six existing live-work units, resulting in a combined total of 480 live-work units and 34,831 square feet of commercial uses at completion. The Project would also feature a publicly accessible paseo and ground floor courtyard connecting the two new buildings and their commercial spaces. In total, the development would provide 569,676 square feet of floor area on a 2.18-acre site, for an FAR of 6.0:1.

Height

The Project Site is located in an urbanized area and generally surrounded by low- and medium-rise industrial, commercial, and residential buildings. To the north across East 7th Place are one- to three-story commercial and manufacturing buildings with restaurant, retail, office, and hotel uses. To the east is a surface parking lot, railroad tracks, and the Los Angeles River. To the south across Violet Street are one- and two-story commercial and manufacturing buildings, including a recycling center and distribution facility, as well as a recently constructed nine-story office building at 2130 Violet Street. To the west across the

alley are additional one- and two-story commercial and manufacturing buildings. While the immediate surroundings are generally low-scale, the Site is within the Arts District, an area undergoing significant transition with the introduction of taller residential, commercial, and mixed-use buildings alongside adaptive reuse of existing industrial structures.

Several proposed and approved projects located within one mile of the Project Site, including their height and number of stories, are shown in the table below. As indicated, these projects range in height from 148 feet to 378 feet. The Project, with a maximum building height of 344 feet for Building 1 and 226 feet for Building 2, falls within the range of nearby approved and proposed projects and is generally consistent with the scale of development in the surrounding area.

<i>Height and Number of Stories of Proposed/Approved Nearby Projects</i>			
Project Location	Number of Stories/Height	Distance from Project Site	Approved/Proposed
2143 Violet Street	31 stories/343 feet	on-site	Approved
2045 Violet Street	13 stories/273 feet	0.2 miles	Approved
1101 East 5 th Street	12 stories/170 feet	0.25 miles	Approved
4 th Street and Central Avenue ¹	30 stories/max height of 364 feet	0.35 miles	Proposed
670 Mesquit Street ²	26-32 stories/max height of 378 feet	0.45 miles	Approved
401 Hewitt Street	18 stories/292 feet	0.25 miles	Approved
¹ This project would include 10 buildings.			
² This project would include five buildings.			

The Project proposes two new high-rise residential buildings designed in a contemporary style that reflects the industrial character of the Arts District, with stacked forms and modular elements reminiscent of shipping containers or pallets, using concrete, metal panels, and glass. Building 1, on the western portion of the Project Site, would be 30 stories and approximately 344 feet tall with a vertical, streamlined appearance. Building 2, on the eastern portion, would be 20 stories and approximately 226 feet tall, with deeper projections creating a more articulated façade. The lower height of Building 2 would serve as a height transition toward the Los Angeles River.

The Project also retains five existing northern buildings with office, retail, restaurant, warehouse uses, and six live-work units, maintaining continuity with the surrounding low- and medium-rise fabric. Together, the design, materials, and landscaped open spaces create a human-scaled, visually articulated development compatible with the evolving Arts District and nearby approved and proposed high-rise projects.

Bulk & Mass

The Project's bulk and massing would be compatible with existing and future development in the surrounding area. The underlying C2 Zone, in conjunction with Height District 2, does not limit maximum building height but limits FAR to a maximum of 6.0:1, which the Project

would not exceed. The design incorporates a mix of scales and uses that reflect the evolving character of the Arts District, while respecting adjacent structures, including the five retained buildings on the northern portion of the Site. Building 2, at 20 stories, is set back behind an open courtyard to provide a transition to the river side and Violet Street, and a sports court adjacent to the three-story, live-work building at the northeast end provides a buffer to the lower-scale development along 7th Place. Both towers feature recessed windows and projecting balconies that break up the massing and visually articulate the buildings.

The Project also emphasizes pedestrian scale and active frontages. Ground floors include approximately 20-foot-tall glass storefronts and recessed entries that activate the streetscape, along with the 17,400-square-foot publicly accessible landscaped paseo and courtyard connecting Violet Street to 7th Place. Additional terraces and landscaped spaces, including a pool deck at Building 1, further reduce perceived massing. The arrangement of towers, paseo, and landscaped open spaces ensures that the Project's bulk and mass are compatible with surrounding development and supportive of the evolving urban form of the Arts District.

Setbacks

The Project makes use of Developer Incentives pursuant to LAMC Section 11.5.11(e) to adjust certain setback requirements in order to accommodate the proposed design. Specifically, the Project requests: (1) a zero-foot side yard, in lieu of the 16 feet otherwise required for the residential floors along the eastern property line; and (2) a 17-foot 10-inch building separation between the new and existing buildings, in lieu of the 57 feet otherwise required. These deviations are consistent with the dense, urban development pattern of the Arts District, where reduced side yards and narrower building separations are common. The eastern boundary does not abut any buildings or sensitive uses, but rather a series of railroad tracks followed by the concrete channelized portion of the Los Angeles River. The design also incorporates a publicly accessible landscaped paseo and courtyard connecting the two new towers and their commercial spaces, providing meaningful open space and pedestrian permeability to offset reduced yard areas. Together, these features ensure that the Project's setbacks maintain compatibility with surrounding development while reinforcing the pedestrian-oriented, urban character of the neighborhood.

Off-Street Parking and Loading Area

The Project's off-street parking and loading areas would be designed to be compatible with existing and future development in the surrounding area. Vehicular access to the Project Site would be provided via a driveway from the alley on the southwestern side of the Site and a driveway from Violet Street to the east, both designed in accordance with LADOT standards. The driveways and loading areas would be located away from the busiest pedestrian areas, accessed via the alley for Building 1 and at the far east end of Violet Street for Building 2. Both are set away from the widest section of the ground floor paseo. Building lobbies for both Buildings 1 and 2 face Violet Street, further prioritizing pedestrian engagement along the street frontage.

Although the City cannot require the Project to provide vehicle parking for the proposed residential and commercial uses pursuant to Government Code Section 65863.2 (AB 2097), the Project would voluntarily provide 798 parking spaces. Of these, 30 percent of spaces would be EV-ready and 10 percent would include electric vehicle chargers within six subterranean parking levels. These provisions ensure that the Project's parking and loading

facilities would operate safely and efficiently while remaining compatible with the scale, circulation, and functionality of the surrounding urban context.

Landscaping

The Project includes a publicly accessible 17,400-square-foot landscaped paseo connecting Violet Street with 7th Place and the alleyway adjacent to the west, designed with shaded island planters, gardens, and a variety of seating areas. Additional landscaped amenities include a pet relief area near Building 1, and an outdoor amenity space with trees, planters, seating, and lighting next to Building 2. In total, the Project provides approximately 40,822 square feet of outdoor common open space, including 8,169 square feet of landscaped common open space, across the ground floor and rooftop spaces, meeting LAMC open space requirements.

The Project also incorporates extensive tree planting, with a total of 119 on-site trees provided in compliance with the LAMC requirement of one tree per four dwelling units, along with six new street trees along Violet Street in accordance with Bureau of Street Services Urban Forestry Division standards.

Trash Collection

As conditioned, all trash and recycling areas would be enclosed and not visible from the public right-of-way. Trash collection areas are provided on the ground level of both Building 1 and 2 adjacent to the loading docks for easy access and convenient pick-up.

Lighting & Building Signage

The Project would add new live-work and restaurant/retail uses that include accent and security lighting, in compliance with LAMC requirements. Additionally, the Project has been designed and conditioned to incorporate pedestrian lighting that is installed with shielding to ensure the Project's lighting is directed onto the site. All signage would be required to comply with LAMC requirements. In addition, the Project has been conditioned so that there shall be no off-site commercial signage on construction fencing during construction.

The Project, as an infill residential and commercial project, would be compatible with existing and future development on adjacent and neighboring properties with regards to height, bulk, and setbacks, off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements. Therefore, the arrangement of the development would be consistent and compatible with existing and future development in neighboring properties.

6. **That any residential project provides recreational and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties.**

The Project would include 474 new live/work units (for a total of 480 live-work units with the retention of six live-work units). As such, the Project is required to provide 65,350 square feet of open space based on the number and typology/size of proposed live/work units.

The Project would provide 73,599 square feet of open space throughout the Project Site comprised of publicly accessible, landscaped outdoor areas, indoor and outdoor tenant

common open space, and private balconies. The primary, publicly accessible open space amenity would be a ground-level, 17,400-square-foot landscaped pedestrian paseo between Building 1 and Building 2 that would connect Violet St, 7th Place, and the alleyway to the west. The indoor common tenant amenity areas include lounge areas, a fitness center, and dog spas, and the outdoor amenities include a variety of features including pools, a sports court, seating areas, and landscaped open space. In addition, private residential balconies would be provided throughout both residential towers.

As such, the Project would provide recreational and service amenities to improve the habitability for the residents and minimize impacts on neighboring properties.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

INTRODUCTION

The City of Los Angeles (the "City"), as Lead Agency, has evaluated the environmental impacts of the 2143 Violet Street Project by preparing an environmental impact report (EIR) ENV-2017-438-EIR (SCH No. 2018051050). The EIR was prepared in compliance with the California Environmental Quality Act of 1970, Public Resources Code Section 21000 et seq. (CEQA) and the California Code of Regulations Title 14, Division 6, Chapter 3 (the "CEQA Guidelines").

The 2143 Violet Street Project EIR, consisting of the Draft EIR, the Final EIR, Erratum, and Addenda, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of 2143 Violet Street Project, located at 2117–2147 East Violet Street and 2118–2142 East 7th Place within the City of Los Angeles.

The Original Project as analyzed in the EIR, involved the construction and operation of a new mixed-use development on a 96,523-square-foot site. The Original Project included up to 347 new live-work units, approximately 187,374 square feet of new office space, 21,858 square feet of new commercial floor area, and a 926 square-foot community room. The uses would have been located in a 36-story residential tower with a maximum height of 425 feet, and an eight-story office building with a maximum height of 131 feet. In addition, five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet would have been retained with office, retail, restaurant, warehouse, and six live-work units. Two existing buildings, one which contains four live-work units and two existing open sheds would have been removed. Upon completion, up to 569,448 square feet of floor area would have been located within the Project Site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1.

The Draft EIR was circulated for a 46-day public comment period beginning on June 18, 2020 and ending on August 3, 2020. A Notice of Completion and Availability (NOC/NOA) was distributed on June 18, 2020 to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The NOA was also filed with the County Clerk on June 18, 2020. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning by appointment only due to the Mayor's Safer at Home Order in response to COVID-19. A copy of the document was also posted online at <https://planning.lacity.org/project-review/environmental-review/published-documents> and was available for purchase on a USB through the Department of City Planning.

The Final EIR was then distributed on December 2020 and an Erratum was published in February 2021. The Erratum included correction of a typographical error and concluded that the Original Project's transportation impacts would remain less than significant and no mitigation measures are required. Notices regarding availability of the Final EIR were distributed to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b).

The Deputy Advisory Agency (DAA) certified the EIR on February 23, 2021 ("Certified EIR") in conjunction with the approval of the Project's Vesting Tentative Tract Map No. VTT-74890-CN. In connection with the certification of the EIR, the Deputy Advisory Agency adopted CEQA findings,

as well as a statement of overriding considerations and a mitigation monitoring program (MMP). The DAA adopted the MMP in the EIR as a Condition of Approval. This decision was appealed and the City Planning Commission denied the appeal and sustained the actions of the DAA. All mitigation measures in the MMP are also imposed on the Original Project through Conditions of Approval, to mitigate or avoid significant effects of the Original Project on the environment and to ensure compliance during implementation of the Original Project.

First Addendum

Subsequent to CPC approval, but prior to final approval by the City Council, the Applicant proposed revisions under the 2021 Modified Project. Accordingly, the City of Los Angeles, acting as lead agency, prepared an Addendum, dated August 2021 (First Addendum), to the Certified EIR, pursuant to Section 15164 of the State CEQA Guidelines, which analyzed the 2021 Modified Project's proposed modifications, and demonstrated that all of the potential environmental impacts associated with the proposed modifications would be within the envelope of impacts as already evaluated in the Certified EIR. The First Addendum concluded that the anticipated environmental impacts of the 2021 Modified Project were consistent with the analysis contained in the Certified EIR, and the 2021 Modified Project would not generate significant impacts not previously analyzed or require additional mitigation measures. On September 14, 2021, the City Council determined that the Certified EIR and First Addendum adequately assessed the environmental impacts of the 2021 Modified Project and approved the First Addendum in connection with the approval of a General Plan Amendment, Vesting Zone Change, and Height District Change for the 2021 Modified Project.

Second Addendum

In April 2025, the Applicant made further revisions, resulting in the 2025 Modified Project. The Modified Project would involve the demolition of approximately 6,844 square feet of existing buildings and two open sheds to allow for the development of 512,990 square feet of new residential and commercial uses within two, new mixed-use buildings. The Project includes 474 live-work units, including 24 units for Extremely Low Income Households and 53 units for Very Low Income Households, along with 2,034 square feet of retail and restaurant space. Building 1 would be 30 to 31 stories in height (approximately 344 feet), and Building 2 would be 20 stories (approximately 226 feet). Five existing buildings totaling approximately 56,686 square feet would be retained, resulting in a combined total of 480 live-work units and 34,831 square feet of commercial uses. Upon completion, the Project would result in a total of 569,676 square feet of floor area on a 2.18-acre site, with an FAR of 6.0:1.

Accordingly, a Second Addendum, dated March 2026, was prepared to analyze the 2025 Modified Project, and similarly concluded that the anticipated environmental impacts of the 2025 Modified Project were consistent with the analysis contained in the Certified EIR, and the 2025 Modified Project would not generate significant impacts not previously analyzed or require additional mitigation measures. The Second Addendum was approved by the DAA on April 24, 2026.

NO SUPPLEMENTAL OR SUBSEQUENT REVIEW IS REQUIRED

CEQA and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387) allow the City to rely on the previously certified EIR unless a Subsequent or Supplemental EIR is required. Specifically, CEQA Guidelines Sections 15162 and 15163 require preparation of a Subsequent or Supplemental EIR when an EIR has been previously

certified or a negative declaration has previously been adopted and one or more of the following circumstances exist:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

None of the above changes or factors have arisen and there are no substantial changes to the Project, and it is substantially the same as the approved project. No substantial changes have been identified to the surrounding circumstances, and no new information of substantial importance has been identified since the approval of the Project. There is no evidence of new or more severe significant impacts, and no new mitigation measures are required for the project.

Accordingly, there is no basis for changing any of the impact conclusions referenced in the certified EIR's CEQA Findings. Similarly, there is no basis for changing any of the mitigation measures referenced in the certified EIR's CEQA Findings, all of which have been implemented as part of the conditions of approval. There is no basis for finding that mitigation measures or alternatives previously rejected as infeasible are instead feasible. There is also no reason to change the determination that the overriding considerations referenced in the certified EIR's CEQA Findings, and each of them considered independently, continue to override the significant and unavoidable impacts of the Project.

Therefore, as the Project was assessed in the previously certified EIR, and pursuant to CEQA Guidelines Section 15162, no supplement or subsequent EIR or subsequent mitigated negative declaration is required, as the whole of the administrative record demonstrates that no major revisions to the EIR are necessary due to the involvement of new significant environmental effects or a substantial increase in the severity of a previously identified significant effect resulting from changes to the project, changes to circumstances, or the existence of new information. In addition,

no addendum is required, as no changes or additions to the EIR are necessary pursuant to CEQA Guidelines Section 15164.

RECORD OF PROCEEDINGS

The record of proceedings for the decision includes the Record of Proceedings for the original CEQA Findings, including all items included in the case files, as well as all written and oral information submitted at the hearings on this matter. The documents and other materials that constitute the record of proceedings on which the City of Los Angeles' CEQA Findings are based are located at the Department of City Planning, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90021. This information is provided in compliance with CEQA Section 21081.6(a)(2).

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at <https://planning.lacity.org/project-review/environmental-review/published-documents> (to locate the documents, select "Environmental Impact Reports (EIRs)" and search for the environmental case number).