

FINDINGS

The Violet Street Creative Office Campus Project includes the following requests for Legislative Actions: 1) a General Plan Amendment to amend the General Plan land use designation for Lot 1 from the Heavy Industrial to Regional Commercial land use designation; 2) a General Plan Amendment to the Transportation Element of the General Plan (Mobility Plan 2035) to reclassify 7th Place along the Project Site frontage from a Collector Street to a Standard Local Street; and 3) Vesting Zone Change and Height District Change for Lot 1 of the Project Site from the M3-1-RIO Zone to the (T)(Q)C2-2-RIO Zone. These actions will be referred to herein as the “Legislative Actions” and where not expressly enumerated, are intended to include all of the requested actions and the development of the Project.

GENERAL PLAN/CHARTER FINDINGS

- 1. The Project and Legislative Actions comply with the Charter Section 555 finding. The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity (Charter Section 555).**

Amendment in Whole or in Part. The requested General Plan Amendment is an Amendment in Part of the Central City North Community Plan, as it is for a portion of the Project Site and for a portion of an adjacent street, and not the entire Community Plan.

The Project Site is located at the intersections of 7th Street, Santa Fe Avenue, and Violet Street, within the Arts District, a heavily urbanized neighborhood east of Downtown Los Angeles that has historically been characterized by industrial, warehousing, and distribution uses and has been experiencing significant redevelopment with mid- and high-rise commercial and residential developments in recent decades. Comprised of approximately six acres, the Project Site is currently improved with an existing five-story parking structure, the historic 222,915 square-foot Ford Factory building (currently occupied by Warner Music Group), a 9,940 square-foot office building, a 25,798 square-foot warehouse, an 21,880 square-foot office building, and various surface parking areas, and is generally surrounded by low- and medium-rise industrial and commercial buildings as well as a few residential buildings. The Project would demolish the office and warehouse buildings for the construction of a new 13-story office building comprised of 435,100 square feet of office space and 15,499 square feet of ground floor retail and restaurant space. An additional 211,201 square feet of office and restaurant space could be developed as a part of the Future Campus Expansion Phase, replacing the office building. The Project would maintain the existing 222,915 square-foot Warner Music Group building and associated five-story parking structure.

The Project Site is organized into areas known as Lots 1, 2, 3, and 4 (as proposed in the Vesting Tentative Tract Map [VTTM] under related Case No. VTT-83382). The requested General Plan Amendment to change the underlying land use designation from Heavy Industrial to Regional Commercial would allow the Project Site to provide a mix of commercial uses in appropriate infill locations near existing activity centers to strengthen the economic identity of the surrounding area, which currently includes these uses. The Project would result in an active streetscape and would continue to provide and introduce new office and related commercial uses, thereby contributing to the conservation and enhancement of the economic identity of the district.

Although the Project Site and properties in the surrounding area are generally designated

for heavy industrial uses, the Arts District neighborhood continues to experience significant redevelopment with a mix of office, retail, restaurant, and residential uses replacing many formerly industrial properties. Proposed new developments nearby include the proposed 670 Mesquit Project, 4th and Central Project, and the Palmetto Project at Palmetto Street and Seaton Street. Nearby recently developed multi-family residential buildings include the Amp Lofts (695 South Santa Fe Avenue), Walnut Building (691 Mill Street), the Brick Lofts (562 Mateo street), the Toy Factory Lofts (1855 Industrial Street) and the Biscuit Company Lofts (1850 Industrial Street). As with these properties, the Project Site is no longer being utilized for industrial-related purposes, and the proposed office campus development would both reflect and support the continued evolution of the Arts District neighborhood.

The Project also involves a General Plan Amendment to reclassify 7th Place adjacent to the Project Site as a Standard Local Street in lieu of the current Collector designation. This request is in support of the proposed vacation and merger of 7th Place into the Project Site, as proposed in the VTTM. Bureau of Engineering policy states that only Standard Local Streets may be vacated, as all other classifications of streets are designed for traffic collection and heavier flow; as such, this General Plan Amendment is necessary to permit the requested vacation and merger in the VTTM. 7th Place currently terminates halfway in the Project Site and does not serve for through-traffic, although it does connect to a north-south public alley; as a result, this request will both better reflect existing traffic conditions and enable the provision of valuable open space and amenity space, in support of the evolution of a formerly industrial neighborhood with little open space to a mixed-use neighborhood with residents, employees, visitors, and amenities.

In addition, the proposed land use change reinforces an area that has its own economic and physical identity by furthering the General Plan Land Use Element's policies to focus development in areas that are accessible to existing activity centers and transit, providing compatible and complementary economically productive uses, which supports the provisions of the Central City North Community Plan. The Project Site is located within a Transit Priority Area and is served by several public transit lines currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT Downtown Area Short Hop (DASH) and Montebello Bus Lines along 7th Street, Santa Fe Avenue, and 4th Street. Notable public transit service in the Project vicinity include Metro Local Lines 18, 60, 62, the LADOT DASH A bus, the LADOT Commuter Express 439, and Montebello bus line M40. Additionally, the Project Site is located approximately one mile south of the L Line Pico/Aliso Station and 1.8 miles east of the 7th Street/Metro Center Station serving the A, B, D, and E subway and light rail lines. The Project appropriately locates office, retail and restaurant uses near transit, jobs, entertainment and services within Downtown, creates new commercial uses for the neighborhood, and promotes pedestrian activity in the general vicinity.

Re-designating the land use of the Project Site reinforces an area that has its own economic and physical identity by furthering the General Plan Land Use Element's policies to focus development in areas that are accessible to existing activity centers and transit, providing compatible and complementary economically productive uses, which supports the provisions of the Central City North Community Plan

Therefore, the General Plan should be amended in part through the Central City North Community Plan as the Project would contribute to and strengthen an area which has significant social, economic or physical identity.

- 2. The action is in substantial conformance with the purposes, intent and provisions of the General Plan (Charter Section 556).**

General Plan Land Use Designation

The Project Site is located within the Central City North Community Plan, which is one of the 35 community plans that comprise the Land Use Element of the General Plan, and which designates the entirety of the Project Site for Heavy Industrial land uses corresponding to the M3 Zone. The Project Site is presently zoned M3-1-RIO, and is therefore consistent with the range of zones permitted under the land use designation.

The subject property totals approximately six-acres in size. The Project Site is organized into areas known as Lots 1, 2, 3, and 4 (as proposed in the VTTM). As proposed, the General Plan Amendment would change the land use designation on Lot 1 of the Project Site from Heavy Industrial to Regional Commercial as well as reclassify 7th Place adjacent to the Project Site as a Standard Local Street in lieu of a Collector Street. In addition, the Project includes a Vesting Zone Change and Height District Change to modify the existing zoning on Lot 1 from M3-1-RIO to (T)(Q)C2-2-RIO. Per the Community Plan, the proposed Regional Commercial land use designation corresponds to the CR, C1.5, C2, C4, RAS3, RAS4, R3, R4, and R5 Zones; as such, the recommended (T)(Q)C2-2-RIO Zone would be consistent with the adoption of the proposed land use designation and in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Central City North Community Plan.

General Plan Text

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, Land Use, Transportation, Noise, Safety, Housing and Conservation. 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 in compliance with the following Elements of the General Plan: Framework Element, Noise Element, Mobility Element, Housing Element, Health and Wellness and Air Quality Elements and the Land Use Element – Central City North Community Plan.

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 Project is consistent with the objectives and policies of the Framework Element as described below:

Chapter 3: Land Use

The Land Use Chapter of the Framework Element identifies objectives and supporting policies relevant to the Project Site. Those objectives and policies seek, in part, to encourage the development of commercial uses and structures that integrate a mix of commercial uses. The Project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it accommodates development of office and restaurant uses in accordance with the applicable policies of the Central City North

Community Plan. Specifically, the Project would be consistent with the following goals, objective and policies, as set forth in the General Plan Framework Land Use Chapter:

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 3.2: *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

Policy 3.2.3: *Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.*

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.*

The Project would support the above goal, objectives and policy of the Framework Element through the provision of a complementary mix of commercial uses on site, including both the development of new and the retention of existing office space, and commercial uses. The Project would also include approximately 75,000 square feet of open space consisting of open space within the new office building and a 43,938square-foot publicly accessible paseo leading from Violet Street to 7th Place.

The Project Site is served by several public transit lines currently provided by Metro, LADOT DASH, and Montebello Bus Lines along 7th Street, Santa Fe Avenue, and 4th Street. Notable public transit service in the Project vicinity includes Metro Local Lines 18, 60, 62, the LADOT DASH A bus, the LADOT Commuter Express 439, and Montebello bus line M40. Additionally, the Project Site is located approximately one mile away from the L Line Pico/Aliso Station and 1.8 miles away from the 7th Street/Metro Center Station serving the A, B, D, and E subway and light-rail lines. The availability and proximity of various transit lines would provide employees/visitors opportunities to use public transit to access the Project Site, thereby reducing vehicle miles traveled.

The Project would provide bicycle parking spaces as required by the LAMC for employees and visitor use. The short-term bicycle parking would be located at the ground floor of the Site adjacent to the office building; and long-term bicycle parking spaces along with a bicycle repair station adjacent to restrooms on the ground floor inside the office building, accessible from the Violet Street or 7th Place entrance. The closest existing bikeways are along 6th Street (from Alameda street to Mateo Street), Mateo Street (from 6th Street to Union Station) and Mission Road to the east (from Jesse Street to 1st Street). Further north of the Project Site, there are Class II bike lanes on portions of East 3rd Street and East 1st Street and existing Class III bike routes on portions of East 2nd Street, East 1st Street, State Street and East 8th Street.

The retention of the existing Warner Music Group building and introduction of new office and retail and/or restaurant uses, as well as the provision of a publicly accessible paseo, courtyard, and bicycle facilities within close proximity to public transit would provide residents and visitors in the area a variety of uses and services in a convenient and accessible location that emphasizes pedestrian and bicycle access and reduces reliance on private vehicles and vehicle miles traveled.

Policy 3.14.6: Consider the potential re-designation of marginal industrial land for alternative uses by amending the community plans based on the following criteria:

- a. *Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified Site that will support viable industrial development;*
- b. *Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development;*
- c. *Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;*
- d. *Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas;*
- e. *Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts;*

The Project includes a request to amend the General Plan land use designation for a portion of the Project Site from Heavy Industrial to Regional Commercial. The Regional Commercial land use designation would allow for the development of an 13-story office building with ground floor restaurant/retail space, and a publicly accessible paseo. As indicated in the Economic Development Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. The Environmental Impact Report assessed the surrounding land uses, as well as an analysis of the proposed land use in relation to the General Plan and the CEQA Guidelines threshold for land use compatibility. As demonstrated therein, while the majority of properties in the surrounding area are designated and zoned for heavy industrial and manufacturing uses, the implementation of the Adaptive Reuse Ordinance has allowed for residential uses as live/work components, with neighborhood commercial uses to complement the residential population. The entitlement process further analyzes in detail the Goals, Objectives, and Policies of the General Plan and demonstrates that the Project meets the overall intent of the General Plan. As demonstrated herein, the land use pattern in the immediate neighborhood of the Project Site has evolved from its heavy industrial and manufacturing uses to light industrial and manufacturing uses and new technologies along with compatible and complementary with non-industrial uses including residential, creative office, and retail and entertainment uses, reflecting larger employment and economic trends. As discussed previously, many formerly industrial properties in the immediate vicinity of the Project Site are now developed with various commercial office and residential developments, reflecting larger development trends and the evolution of the Arts District neighborhood.

The Project Site is primarily developed with the existing Warner Music Group building and associated five-story parking structure; these uses occupy the majority of the Project Site and will be maintained. The Warner Music Group building was formerly used for automobile

manufacturing but is currently occupied for creative office space; as such, the remainder of the Project Site is not conducive to any heavy industrial operations, which are both too large and incompatible with the existing uses on the property. In addition, as discussed previously, many formerly industrial properties in the immediate vicinity of the Project Site are now developed with various commercial office and residential developments; new heavy industrial uses on the Project Site would also not be compatible with existing development in the surrounding area, which includes a seven-story multi-family complex directly across the street to the north.

The City also began an update in 2014 of the Central City and Central City North Community Plans, known as the new Downtown Community Plan (also known as DTLA 2040), which includes studying land use and zoning in those plans, as well as the supporting policies and objectives. The Project Site is proposed to be designated “Hybrid Industrial (HI)” under the Downtown Community Plan. According to the Draft Plan, Hybrid Industrial areas preserve existing structures that characterize the existing unique form and development patterns, promote productive, creative, manufacturing, fabrication, and light industrial uses, encourage the development of live/work units, and support walkable neighborhoods with active and livable pedestrian realm. As such, the Downtown Community Plan has already incorporated redesignation of industrial land in and around the Project Site, which reflects the transitional nature of the area by preserving existing structures including the Warner Music Group building (a designated historic resource formerly occupied by automotive manufacturing uses) and newly constructing office and retail/restaurant space to encourage active uses.

In addition, according to the Central City North Community Plan, there are 914 acres planned for industrial use (approximately 45.5 percent of the 2,010-acre total) in the Community Plan area. The Project Site comprises approximately six acres or less than one percent of the industrially-zoned land in the Community Plan area. The requested change in land use designation is only for the portion of the subject property designated as Lot 1 in the related VTTM; accordingly, less than two acres or 0.1 percent of the industrially zoned land in the Community Plan area would be changed to a non-industrial land use designation under the Project. Furthermore, the Project Site is not presently utilized for industrial uses; as such, the Project would not result in the loss of a substantial number of industrial jobs. The Project would result in the provision of new office and commercial space which would create an estimated increase of 2,634 new jobs, which would present far more value to the City and economy than by maintaining the existing industrial land use designation.

In sum, the Project is consistent with the directions relative to industrial land set forth in the Framework Element in that it will provide for a mix of job-producing uses that are allowed for in industrial zones, as is recognized in the adopted Central City North Community Plan and the Downtown Community Plan Update. The proposed uses would not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or cause the City to incur adverse fiscal impacts, and the proposed uses would be compatible with and complement the existing mix of industrial, live/work, arts production, and retail uses within the immediately surrounding area.

Chapter 5: Urban Form and Neighborhood Design

Goal 5A: *A livable 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 citywide scales.*

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

Objective 5.9: *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*

The Project incorporates design elements such as wood and brick accents at the ground level in recognition of the Arts District's industrial past while reflecting a modern office building. The ground floor would be constructed with a rough concrete finish and tall glass windows along Violet Street. Activation of the mezzanine level with a fitness center, rooftop outdoor eating space, and an office terrace add to the internal 360-design features. Additionally, the three above-grade parking levels would be clad in concrete, while upper office levels would be clad in aluminum and non-reflective glass and screened with vertical metal panels that are spaced to create tall, narrow openings. The proposed office building is stepped back above the fifth level from Violet Street, to improve the appearance of the building from the street and adjacent properties. Multilevel balcony cutouts are irregularly located at four locations within the south elevation of the building and help to break up the otherwise flat massing of the south elevation. The roof above Levels 3 and 12 are designed in an irregular sawtooth shape when viewed from the east and west elevations; this design feature helps to further distinguish the building from surrounding structures, which are predominantly rectilinear in form. Mechanical equipment will be located on the roof level above Level 12 and will be screened from the public view.

The Project includes various features that would improve the quality of the development and enhance the public realm. These include publicly accessible open spaces, internal open spaces and amenity spaces, and the provision of bike parking and other amenities. In addition, the Project would introduce new commercial uses to the Project Site that would provide for continuous activity during commercial business hours through the development of retail and/or restaurant uses. The Project has been designed such that the ground floor paseo is visible from the vacated internal public alley from Violet Street and accessible by Project employees and visitors. Appropriate lighting and other security measures would be incorporated into the design of the building as well as the proposed open space features, which would aid in increasing safety.

Chapter 7: Economic Development

Goal 7A: *A vibrant economically revitalized City.*

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.*

The proposed Project would improve an existing underutilized site which is primarily developed with warehouse and office uses by including ground floor retail, restaurant use, office use, and publicly accessible open space. In addition, proposed improvements in the public right-of-way such as wider sidewalks, street trees, and street lighting would further revitalize and enhance the physical environment in this part of the City.

The Project is retaining existing job-producing uses on-site as well as including new commercial uses that would support the economic growth of the community. The provision of 15,499 square feet of ground floor retail and restaurant space and 435,100 square feet of office, as well as approximately 75,000 square feet of outdoor areas and a 43,938-square-foot ground floor publicly accessible paseo from Violet Street and 7th Place, would complement the employment base of the Community Plan area, providing services and amenities for local residents and visitors alike, and fostering continued economic investment. Specifically, the Project would provide for a balanced mix of job-producing uses that are permitted in commercial zones that provides for productive commercial development including office, retail and restaurant uses that would result in an estimated increase of 2,634 net new on-site jobs, generating ongoing revenue to the City in the form of sales and property taxes, sustains economic growth, and assures maximum feasible environmental quality. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality, while integrating sustainable and green building techniques by incorporating various standards and guidelines to reduce resources and energy consumption.

In addition, the proposed uses are compatible with and complement the existing mix of commercial, residential, and manufacturing uses within the immediate surrounding area. The development is located within an infill site in proximity to employment, entertainment, and various amenities within the Arts District neighborhood. Access to public transit is provided throughout Downtown, including several public transit lines currently operated by Metro, DASH, and Montebello Bus Lines along 7th Street, Santa Fe Avenue, and 4th Street. Notable public transit service in the Project vicinity includes Metro Local Lines 18, 60, 62, the LADOT DASH A bus, the LADOT Commuter Express 439, and Montebello bus line M40. Additionally, the Project Site is located approximately one mile south of the L Line Pico/Aliso Station and 1.8 miles east of the 7th Street/Metro Center Station serving the A, B, D, and E subway and light rail lines.

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.

The Project would retain the existing 244,795 square-foot Warner Music Group building while developing a new 13-story office building comprised of 15,499 square feet of ground floor retail and restaurant space and 435,100 square feet of office space, resulting in space for new employers and commercial services in support of the existing businesses in the area. These commercial activities would be sited in proximity to employment centers in the surrounding neighborhood, as well as to residential uses within walking distance of the Project Site.

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 does not propose any residential uses, it would be in conformance with Senate Bill (SB) 166, which was adopted on September 29, 2017 and amended Government Code Section 65863, and also known as the No Net Loss Law, to require sufficient adequate sites to be available at all times through the Housing Element Planning period to meet a jurisdiction's remaining unmet Regional Housing Needs Assessment (RHNA) goals for each income category. Pursuant to

SB 166, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites if a jurisdiction rezones a site or approves a project at a different income level or lower density than showing in the site's inventory.

SB 166 requires that the reduction on an individual project site in allocated density is consistent with the City's General Plan and that the remaining sites identified in the Housing Element are adequate to meet the City's RHNA's allocation. The Housing Element identified the Project Site as a "candidate site" to which 34.09 Very Low Income Units, 34.9 Low Income Units, and 646.9 Above-Moderate Income Units have been allocated.

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 of April 1, 2023, the City's remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low Income Units, 67,086 Low Income Units, 74,964 Moderate Income Units, and 168,892 Above-Moderate Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low Income Units, 332,096 Low Income Units, 63,107 Moderate Income Units, and 907,466 Above-Moderate Income Units. The excess Above-Moderate Income Unit capacity may accommodate both Moderate and Above-Moderate Unit RHNA Allocations. Therefore, the City's remaining RHNA Allocation for the 2021-2029 Planning period for Very Low Income Units represents 34 percent of the City's total remaining capacity of Very low Income Units, 20.2 percent of the total remaining capacity for Low Income Units, 7.7 percent of the total remaining capacity for Moderate Income Units, and 18.6 percent of the total remaining capacity for Above-Moderate Income Units; less than half of the City's total capacity for each affordable housing type. While the Housing Element identified the Project Site as being able to accommodate 34.09 Very Low Income Units, 34.9 Low Income Units, and 646.9 Above-Moderate Income Units and the Project would reduce the number of City parcels that allow for residential uses, the City's share of the RHNA Allocation for the 2021-2029 Planning period can be located on other parcels throughout the City. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the 2021-2029 Planning period. Thus, consistent with Goal 1, Objective 1.1, and Policy 1.1.2, the City has forecasted for existing and projected housing needs and developed a buffer above household projections that would meet existing and projected needs.

Mobility Plan 2035

The Mobility Element 2035 (Mobility Element), adopted in September 2016, 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 involves a General Plan Amendment to reclassify 7th Place adjacent to the Project Site as a Standard Local Street in lieu of the current Collector designation. This request is in support of the proposed vacation and merger of 7th Place into the Project Site, as proposed in the VTTM. Bureau of Engineering policy states that only Standard Local Streets may be vacated, as all other classifications of streets are designed for traffic collection and heavier flow; as such, this General Plan Amendment is necessary to permit the requested vacation and merger in the VTTM. 7th Place currently terminates halfway in the Project Site and does not serve through-traffic, but does connect to an existing north-south alley. The area to be vacated would instead be utilized as an approximately one-acre publicly-accessible pedestrian paseo. As a result, this request will both better reflect existing traffic conditions and enable the provision of valuable open space and amenity space, in support of the evolution of a formerly industrial neighborhood with little open space to a mixed-use neighborhood with residents, employees, visitors, and amenities. Therefore, the request is substantially consistent with and will not conflict with the Mobility Plan 2035.

The Project would further 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 vehicular, pedestrian, and bicycles, and introduce new commercial uses such as new office space, retail and restaurants to the area, which would reduce the vehicle miles travel to the site as on-site employees, nearby residents, and visitors would be able to walk to the retail and restaurant uses. The Project Site is located in a Transit Priority Area and is served by several public

transit lines including Metro Local Lines 18, 60, 62, the LADOT DASH A bus, the LADOT Commuter Express 439, and Montebello bus line M40 increasing accessibility to and from the Site via walking and transit. Additionally, the Project Site is located approximately one mile south of the L Line Pico/Aliso Station and 1.8 miles east of the 7th Street/Metro Center Station serving the A, B, D, and E subway and light rail lines.

The site design provides safe and convenient access to nearby neighborhood uses and various nearby transit options, while creating an active environment by supporting bicycle and pedestrian activities. Specifically, pedestrian entrances would continue to be located along Santa Fe Avenue (to access the existing Warner Music Group building), and new entrances would be added along Violet Street and 7th Place to access the new office building ground floor lobby and the ground floor retail and restaurant uses. Short-term bicycle parking would be dispersed throughout the Project Site, while the long-term bicycle parking, repair station and restrooms would be provided on the ground floor next to the lobby of the office building. The Project would provide 1,276 vehicle parking spaces in four levels of subterranean parking and three levels of above-grade parking (accessible from 7th Place).

The Project would also improve the streetscape surrounding the Project Site with improved sidewalks, street lighting, and street trees; and would activate the street with a 43,938-square-foot publicly accessible paseo adjacent to the existing Warner Music Group building, running from Violet Street through to 7th Place to provide connectivity through the Project Site and the surrounding area, with entrances to the commercial uses accessible from adjacent public streets and open spaces, further contributing to a walkable environment. These Project features and improvements would lend themselves to create a safe and engaging pedestrian environment, and would enrich the quality of the public realm, consistent with the objectives of the Mobility Element.

The Project's (T) Conditions and related VTTM also includes BOE Conditions of Approval that would require improvements in the adjacent public right-of-way along Violet Street, 7th Place, the alley westerly of Santa Fe Avenue, 7th Street, the Westerly Public Alley, and Santa Fe Avenue. Therefore, the Project would be consistent with the street standards and improvements outlined in the Mobility Plan 2035.

Health and Wellness 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. Furthermore, in compliance with Code requirements, a minimum of 30 percent of the total code-required parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of the total code-required parking spaces would be equipped with EV chargers.

Additionally, the Project would add office space and commercial uses to a neighborhood that is rapidly adding residential uses and is well-served by several public transit lines. By locating employment opportunities and neighborhood serving uses in proximity to transit and existing residential uses, the Project would reduce vehicle miles traveled and reduce reliance on single-occupancy vehicle trips. The Project would also include a 43,938-square-foot publicly accessible paseo adjacent to the existing Warner Music Group building running from Violet Street through to 7th Place, which would provide open space for employees, visitors, and nearby residents, aid in providing a healthy work and urban environment, and reduce pollution. Additionally, the Project would provide short- and long-term bicycle parking throughout the ground floor of the Site. Bicycle amenities include a repair station and restrooms adjacent to the long-term bicycle parking next to the lobby of the office building; such facilities would promote alternative modes of transportation and the associated improvements in health.

In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of sustainable building features and comply with construction protocols required by the Los Angeles Green Building Code and CALGreen, which would reduce energy and water usage and would include but not limited to high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; water-efficient landscape design; and a solar ready rooftop.

The Project's energy efficiency features and location near major transit facilities, which designates it in a Transit Priority Area, would help reduce the energy and emission footprint of the Project and the per capita GHG emissions of the employees and visitors from private automobile travel. With existing code-requirements and as conditioned, the Project would be consistent with the aforementioned policies, as well as Policy 5.1.2 of the Air Quality Element mentioned above, by ensuring that future developments are energy efficient and shift to efficient and non-polluting sources of energy. The EV parking mentioned earlier also

provides a convenient service amenity to the employees and visitors who utilize electricity on site for other functions. As such, the Project would provide service amenities to improve habitability for on-site employees of the Project and to minimize impacts on neighboring properties. Therefore, the Project would promote a healthy built environment, encourage healthy working conditions, reduce air pollution, and promote land use policies that reduce per capita greenhouse gas emissions.

Sewerage Facilities Element

The Sewerage Facilities Element of the General Plan will not be affected by the recommended action. The sewer system will be able to accommodate the total flows for the Project, further detailed gauging and evaluation may be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the Applicant would be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Project.

Land Use Element – Central City North Community Plan

The development of the Project would support the overarching goals of the Central City North Community Plan. The proposed development furthers the following Community Plan objectives and policies:

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

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

The Project's development of a new 13-story office building comprised of 435,100 square feet of office space and 15,499 square feet of ground floor retail and restaurant space would complement existing nearby commercial development, provide opportunities for new

commercial development and services, and strengthen the economic base by expanding 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 core of the City, as well as to existing nearby residential uses located throughout the Arts District neighborhood.

The ground floor street frontages along the east, north, and south elevations of the Project would be wrapped with office, restaurant, and retail uses. The existing Warner Music Group building would continue to occupy the entirety of the street frontage along Santa Fe Avenue. The site layout and design of the new office building would wrap aboveground parking levels with active uses along the primary street frontages, thereby minimizing potential impacts and improving the pedestrian environment. The retail and restaurant uses as well as the proposed paseo would both draw interest from pedestrians walking along Santa Fe Avenue, Violet Street and 7th Place, especially as the ground floor uses would be visible and open under a tall ceiling or mezzanine level creating the industrial warehouse feel of the Arts District. The Project would create an inviting pedestrian environment through the provision of ground floor open space activated with a variety of commercial uses, seating, planters, and mural art.

In sum, the Project is consistent with the above commercial policies in that it would provide for a commercial development with job-producing uses that are allowed for in commercial zones, as is recognized in the adopted Central City North Community Plan.

River Improvement Overlay District

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 approximately 800 feet west of the Los Angeles River. Nevertheless, the Project would further the relevant objectives of the Los Angeles River Design Guidelines, including employing high quality, attractive and distinguishable architecture.

Central Industrial Redevelopment Plan

The Project Site is located within the Central Industrial Redevelopment Project Area and is thus subject to the requirements of the Central Industrial Redevelopment Plan (Redevelopment Plan). The Project is generally consistent with the Redevelopment Plan, as follows:

Section 502 - Redevelopment Plan Map

This section defers to the General Plan, Community Plan, and any applicable zoning ordinance regarding allowable land uses. The Project Site is designated for Heavy Industrial land uses in the Central City North Community Plan and is located in the M3-1-RIO Zone. The Project includes a General Plan Amendment, Vesting Zone Change, and Height District Change that would change the land use designation on Lot 1 of the Project Site from Heavy Industrial to Regional Commercial and the zoning from M3-1-RIO to (T)(Q)C2-2-RIO. Pursuant to Section 502 of the Redevelopment Plan, and pending City Council approval, changes to the General Plan, Community Plan, and any applicable Ordinances are automatically incorporated into the Redevelopment Plan. Therefore, the requested General Plan Amendment, Zone Change, and Height District Change would be incorporated into the

Redevelopment Plan would supersede any other regulations in the Redevelopment Plan.

Section 503.1 – Industrial Uses

This section states that industrial areas shown on the Redevelopment Map Plan shall be maintained, consistent with the Community Plan. While the majority of properties in the surrounding area are designated and zoned heavy industrial and manufacturing, the implementation of the Adaptive Reuse Ordinance has allowed for the conversion of a number of industrial buildings and properties for residential and commercial uses. Notably, the existing Warner Music Group Building on the Project Site was formerly an automobile factory and has been converted into creative office space. In addition, there are a number of other commercially-utilized and commercially-zoned properties near the Project Site. Specifically, the Project vicinity is surrounded by low- and medium-rise industrial, residential, and commercial buildings. To the north are live/work units and commercial and industrial buildings. To the east are multi-family residential, commercial, industrial and warehouse uses. To the south and west are commercial and industrial uses. Additionally, there are various residential uses located less than 0.5 miles from the Project Site, including the Amp Lofts (695 South Santa Fe Avenue), the 915 Mateo Apartments, the Walnut Building (691 Mill Street), the Toy Factory Lofts (1855 Industrial Street) and the Biscuit Company Lofts (1850 Industrial Street). Given this mix of surrounding uses and the fact that the subject property is no longer used for industrial purposes, the conversion of industrial land to residential live/work, office and commercial uses, will be compatible with and complementary to adjacent land uses.

According to the Central City North Community Plan, there are 914 acres planned for industrial use (approximately 45.5 percent of the 2,010-acre total) in the Community Plan area. The Project Site comprises approximately six-acres or approximately 0.66 percent of the industrially-zoned land in the Community Plan. The Project would result in a net increase of 2,634 new employees and would generate ongoing revenue to the City in the form of sales and property taxes. Thus, the Project would not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or cause the City to incur adverse fiscal impacts. Therefore, the Project would comply with Section 503.1 of the Redevelopment Plan.

Section 504.2 – Public Street Layout, Rights-of-Way and Easements

This section requires that roadway dedications as illustrated in Exhibit 1 of the Redevelopment Plan Map shall remain substantially in existing configuration; however, additional public streets, rights-of-way, and easements may be created in the Project as needed for development and circulation.

The Project, like many others in the surrounding area, reflects the changing nature of the Arts District from primarily industrial uses to a mix of commercial and residential uses. The Project incorporates mobility-friendly design elements such as expanded, landscaped sidewalks, street lighting, street trees, a ground floor paseo and courtyard connecting Violet Street and 7th Place, and bicycle parking facilities consistent with the City's Bicycle Parking Ordinance to provide friendly, safe, and convenient access to nearby neighborhood uses and various nearby transit options. In addition, the Project will comply with all right-of-way improvement conditions and dedication requirements as a part of the (T) Conditions of the Zone Change and the related VTTM, and will be consistent with the Mobility Plan 2035 as a result. Therefore, the Project would comply with Section 504.2 of the Redevelopment Plan.

Section 507 – New Construction and Rehabilitation of Properties

This section requires that new construction and rehabilitation of existing structures located in the Project Area shall comply with all existing regulations. The Project is required to comply with all applicable federal, state, and local regulations. Therefore, the Project would comply with Section 507 of the Redevelopment Plan.

Section 509 – Limitation on Type, Size, and Height of Buildings

This section requires that the type, size and height of buildings shall be limited by applicable federal, state, and local statutes, codes, ordinances and regulations and as generally diagrammed in Exhibit No. 4 of the Redevelopment Plan. The Project includes a General Plan Amendment, Vesting Zone Change, and Height District Change to change the land use designation to Regional Commercial uses and the existing zone to (T)(Q)C2-2-RIO for Lot 1; this action would not establish a maximum building height for Lot 1. As such, the Project would be consistent with this section.

Section 512.1 – Maximum Floor Area Ratios

This section requires that the maximum floor area ratios for any parcel in the Redevelopment Plan Area to be no more than three times the parcel area. As stated in Section 502 of the Redevelopment Plan, “in the event that the General Plan, the applicable Community Plan, or any applicable City zoning ordinance is amended or supplemented with regard to any land use in the Project Area, the land use provisions of this Plan, including without limitation, all Exhibits attached hereto, shall be automatically modified accordingly without the need for any formal plan amendment process.” The Project includes a General Plan Amendment, Vesting Zone Change, and Height District Change to change the land use designation to Regional Commercial uses and the existing zone to (T)(Q)C2-2-RIO for Lot 1; this action would permit a maximum FAR of 6:1 and would not establish a maximum building height for Lot 1. The Project would result in the development of 450,599 square feet of building floor area on Lot 1, resulting in a FAR of up to 4.13:1 on Lot 1. As such, the Project would be consistent with this section.

Section 513 - Open Space, Landscaping, Light, Air and Privacy

This section defines the approximate amount of total open space to be provided in the Redevelopment Plan area and also states that sufficient space shall be maintained between buildings to provide adequate light, air, and privacy. While this provision applies to the entire Redevelopment Plan area and is not meant to be directly applied to individual development projects, the Project would provide open space areas to generally support this plan provision. While under LAMC Section 12.21 G, commercial projects are not required to provide open space, the Project will include approximately 75,000 square feet of open space, including a landscaped paseo, ground floor courtyard, roof decks, and terraces that would provide light, air, and privacy to the Project Site. The Project also proposes to add trees on-site and street trees in the public right-of-way. Therefore, the Project complies with Section 513 of the Redevelopment Plan.

Section 514 – Signs and Billboards

This section prohibits billboards and requires that all other signage conform to the City's signage standards. No billboards or any signage are proposed for the Project, and all future commercial tenant signage would be required to comply with the City's sign regulations. Therefore, the Project conforms with Section 514 of the Redevelopment Plan.

Section 515 – Utilities

This section requires that all utilities be placed underground if physically and economically feasible. As conditioned, the Applicant would be required to comply with the requirements of the City of Los Angeles Department of Water and Power in regards to the placement of utility lines. Therefore, the Project conforms to Section 515 of the Redevelopment Plan.

Section 516 – Parking and Loading Facilities

This section requires that all parking be provided consistent with the standards of the LAMC and that parking and loading areas be screened/out of view from the public. Pursuant to the provisions of Assembly Bill (AB) 2097, the Project, as an eligible development located within one-half mile of a Major Transit Stop, is not required to provide any vehicle parking. However, the Applicant has chosen to voluntarily provide 1,276 parking spaces within the new office building within three above-grade and four subterranean levels. The above-grade parking would be wrapped with office and retail uses to the south and east and screened along the westerly public alley thereby reducing visibility from the public right-of-way. In addition, the Project would place loading areas within the office building along 7th Place close to the westerly public alley. Therefore, the Project conforms with Section 516 of the Redevelopment Plan.

Section 517 – Setbacks

This section requires that all setback areas be landscaped, paved for accessibility, and maintained by the owner. Pursuant to LAMC Section 12.14, front yard, side and rear setbacks are not required in the proposed C2 Zone for Lot 1. However, the Project would include a landscaped and paved ground floor paseo to be maintained by the owner. Therefore, the Project conforms with Section 517 of the Redevelopment Plan.

Section 518 – Incompatible Uses

This section prohibits the construction/operation of incompatible uses with the surrounding area and/or the extraction of oil, gas, or other mineral substances. The Project Site is located within the Arts District that has been transitioning from predominantly industrial warehouses to also include creative offices, commercial uses (e.g., retail shops, restaurants, and studios), live/work units and multi-family residential. The surrounding area of the Project Site is characterized by low- and medium-rise industrial, residential, and commercial buildings; as a proposed new commercial development and the continuation of an existing office complex, the Project will not introduce any incompatible uses to the surrounding area. There would also be no oil, gas and other mineral substances extractions as a part of the Project operations. Therefore, the Project conforms with Section 518 of the Redevelopment Plan.

Section 519 – Resubdivision of Parcels

This section states that no parcel shall be re-subdivided without Agency approval. On August 29, 2024, the Deputy Advisory Agency (DAA) approved the associated VTTM Case No. VTT-83382, for the vacation and merger of portions of 7th Place and the Easterly Public Alley into the site; re-subdivision of the site into four ground lots; and a Haul Route for the export of up to 144,000 cubic yards of soil. The Project would conform with Section 519 of the Redevelopment Plan.

Section 522 – Design Guidelines and Development Controls

This section requires that all new improvements to existing and proposed developments be

in accordance with the Redevelopment Plan and any other applicable design guidelines and development controls. Land use regulations under the Redevelopment Plan shall defer to and are superseded by the underlying General Plan, Community Plan, and Zoning Ordinance, including the codified sections of the RIO Overlay. The Project would include a publicly accessible paseo, street trees, and employ high quality and distinguishable architecture while minimizing the appearance of parking areas. The Project conforms to all applicable design guidelines and zoning regulations; therefore, the Project conforms to Section 522 of the Redevelopment Plan.

Section 523 - Variances, Conditional Use Permits, Building Permits and Other Land Development Entitlements

This section requires that no zoning variance, conditional use permit, building permit, demolition permit or other land development entitlement be issued without approval from the CRA/LA. As stated in Ordinance No. 186,325, the City Planning Department has assumed the roles and authority of the former CRA/LA. As part of the requirement for this Project, Redevelopment Plan compliance findings have been provided herein. Therefore, the Project conforms to Section 523 of the Redevelopment Plan.

Section 524 – Buildings of Architectural and Historical Significance

This section states that prior to redevelopment or rehabilitation of any parcel within the Project Area, the Agency shall determine if any structures located on the applicable parcel(s) are of architectural or historic significance. As determined in the Project's Cultural Resources Section of the Draft EIR, the existing Warner Music Group building (former Ford Factory building) on the Project Site has been designated and is a historical resource for purposes of CEQA. The building was determined eligible for listing as City HCM and in the National Register, and was listed in the California Register for its association with the Ford Motor Company and as a Beaux-Arts style daylight automobile parts factory. The Warner Music Group building will be retained as part of the Project. None of the Project Site's remaining buildings have been designated or determined eligible for listing as a historical resource. Therefore, the Project would comply with Section 524 of the Redevelopment Plan.

Section 525 – Design for Development

This section authorizes the Agency to establish FAR, height, setback, design, access, and other applicable development and design controls as necessary for both private and public parcels located within the Project Area. In conjunction with the approval of the requested entitlements, the Project conforms to Section 525 of the Redevelopment Plan.

3. Adoption of the proposed ordinance, order or resolution will be in conformity with public necessity, convenience, general welfare and good zoning practice (Charter Section 558).

The proposed Amendment to the Central City North Community Plan will be in conformance with public necessity, convenience, general welfare and represents good zoning practice, as it would re-designate the land use from Heavy Industrial to Regional Commercial. In conjunction with the Amendment, the corresponding Vesting Zone and Height District Change from M3-1-RIO to (T)(Q)C2-2-RIO would permit the development of a new 13-story office building comprised of 15,499 square feet of ground floor retail and/or restaurant space, 435,100 square feet of office (with the potential of 211,201 square feet of office and restaurant use in the Future Campus Expansion Phase), and the retention of the 222,915 square-foot Warner Music Group building and associated five-story parking structure.

Public Necessity, Convenience, and General Welfare.

The Project Site is located in an urbanized area in the Arts District neighborhood, which continues to experience significant redevelopment, including the introduction of taller buildings with a variety of new uses such as residential, live/work, restaurant, retail, and office uses being introduced within an area previously concentrated primarily with industrial uses. The Project Site itself is no longer fully being utilized for industrial related purposes, as it is currently primarily utilized as a creative office complex; the Project Site will continue to operate as such with the addition of retail and/or restaurant uses.

The Project would result in a net increase of 2,634 new employees and would generate ongoing revenue to the City in the form of sales and property taxes. The Project would introduce over 435,000 square feet of office space for employment opportunities, as well as over 15,000 square feet of commercial services such as retail and restaurants that would serve the community. Therefore, the Project would support the regional economy provide valuable jobs and services to the community.

The Project promotes a more walkable neighborhood by locating office, retail and restaurant uses within proximity of transit, existing job centers and services, and similar commercial uses. The Project Site is served by several public transit lines currently provided by Metro, LADOT DASH, and Montebello Bus Lines along 7th Street, Santa Fe Avenue, and 4th Street. Notable public transit service in the Project vicinity include Metro Local Lines 18, 60, 62, the LADOT DASH A bus, the LADOT Commuter Express 439, and Montebello bus line M40. Additionally, the Project Site is located approximately one mile away from the L Line Pico/Aliso Station and 1.8 miles away from the 7th Street/Metro Center Station serving the A, B, D, and E subway and light-rail lines. The availability and proximity of various transit lines would provide employees/visitors opportunities to use public transit to access the Project Site, thereby reducing vehicle miles traveled. The retention of the existing Warner Music Group building and introduction of new office and retail and/or restaurant uses, as well as the provision of a publicly accessible paseo, courtyard, and bicycle facilities within close proximity to public transit would provide residents and visitors in the area a variety of uses and services in a convenient and accessible location.

Furthermore, while open space is not required, the Project would provide approximately 75,000 square feet of open space, including a 43,938 square-foot ground floor paseo and various other open spaces throughout the new office building such as balconies and roof decks. The requested General Plan Amendment to reclassify 7th Place would enable the vacation and repurposing of 7th Place into a publicly accessible multi-modal accessway and open space area connecting to other open spaces and buildings throughout the campus. As proposed, the Project would improve the general welfare of the future employees and visitors of the development through the provision of open space, amenities including seating and lighting, and commercial uses. The Project would further promote foot traffic through the development of ground floor restaurant uses, new street trees, and the ground floor paseo through the Project Site that would be open to the public and connect to a pedestrian passageway that would provide pedestrian access between Violet Street and 7th Place.

Approval of the requested General Plan Amendments would allow the Project to make more efficient use of land by providing new employment opportunities in direct proximity to transit and residential uses, while accommodating for projected population growth in the area that is compatible with its evolving surrounding uses. Therefore, the requested General Plan Amendments would be in conformity with public necessity, convenience, and general welfare.

Good Zoning Practice

Although the Site, as well as a number of other properties in the area, are designated for industrial uses, development in the immediate vicinity is currently characterized by a mix of commercial and industrial uses. The Project Site itself is no longer being utilized for industrial-related purposes, occupied by a warehouse and office building with associated surface parking. Nearby residential buildings residential uses within walking distance of the Site include the Amp Lofts (695 South Santa Fe Avenue), Walnut Building (691 Mill Street), the Brick Lofts (562 Mateo street), the Toy Factory Lofts (1855 Industrial Street) and the Biscuit Company Lofts (1850 Industrial Street).

As the Arts District neighborhood is developed with a mixture of residential, commercial, office and light manufacturing uses, the Project would be compatible with the range of uses that exist in the vicinity. In addition, the proposed 13-story office building would be similar in height to other buildings in the immediate surrounding area, including those recently approved and proposed projects included in the table below.

<i>Height and Number of Stories of Proposed/Approved Nearby Projects</i>			
Project Location	Number of Stories/Height	Distance from 2045 Violet Site	Approved/Proposed
2143 Violet Street	31 stories/343 feet	0.2 miles	Approved
1101 East 5 th Street	12 stories/170 feet	1 mile	Approved
527 Colyton Street	12 stories/148 feet	0.4 miles	Proposed
670 Mesquit Street ²	26-32 stories/max height of 378 feet	0.8 miles	Proposed
1100 East 5 th Street	8 stories/110 feet	1 mile	Proposed
4 th Street and Central Avenue ¹	2-44 stories/max height of 500 feet	1.2 miles	Proposed
¹ This project would include 10 buildings.			
² This project would include five buildings.			

The General Plan Amendment to change the land use designation on Lot 1 only would enable the development of the proposed Project and provision of new office and commercial uses, while retaining the existing uses on the remainder of the Project Site, including the historic Warner Music Group building. The General Plan Amendment to reclassify 7th Place would enable the development of the Project Site into a cohesive unified campus by enabling the thoughtful repurposing of 7th Place into a multi-modal accessway and open space area connecting to other open spaces and buildings throughout the campus. Furthermore, the requests would allow for commercial uses that are consistent with the objectives and policies of the Central City North Community Plan, as discussed in Finding No. 2 above. Therefore, the requests would represent good zoning practices reflective of desirable development patterns in this portion of the City.

As such, approval of the Project would allow for the development and use of a commercial building consistent with the scale of existing and proposed developments in the surrounding neighborhood.

ENTITLEMENT FINDINGS

Vesting Zone Change, Height District Change, and “T” and “Q” Classification

- 4. The action is deemed consistent with public necessity, convenience, general welfare and good zoning practice.**

The proposed Zone Change and Height District Change from M3-1-RIO to (T)(Q)C2-2-RIO would be consistent with the requested General Plan Amendment to change the Project Site's land use designation from Heavy Industrial to Regional Commercial as detailed in Finding No. 2 above.

Public Necessity. The subject property is currently designated as Heavy Industrial and zoned M3-1-RIO in the Central City North Community Plan. The Applicant is requesting a General Plan Amendment, Vesting Zone Change and Height District Change to modify the land use designation to Regional Commercial and to change the Zone and Height District to (T)(Q)C2-2-RIO for Lot 1 of the Project Site. The proposed Zone Change and Height District Change would allow for a variety of commercial uses and a maximum FAR of 6:1.

Approval of the Vesting Zone and Height District Change would permit the construction of a new 13-story building encompassing 450,599 square feet of floor area on a portion of the Project Site designated as Lot 1 (as delineated in the related VTTM No. 83382), comprised of 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and four subterranean and three above-grade levels of parking; a Future Campus Expansion Phase could allow for up to 211,201 square feet of additional office and restaurant uses. The Project includes the continued use and maintenance of the 222,915 square-foot Warner Music Group building (originally the Ford Factory building, a designated historic resource) and a five-story parking garage with 604 parking spaces.

The Project would be an infill development within the Arts District, a neighborhood which is rapidly transforming from an area formerly characterized primarily by low-rise warehouses, industrial uses, and few residential buildings to an area with a more intense mix of residential, office, retail, and restaurant uses. Additionally, the existing Warner Music Group building that is being retained as part of the Project had already been previously converted from industrial uses to offices, retail, and restaurant space. The Project would reflect the evolving nature of the surrounding area by bringing a greater variety of jobs to the area and redeveloping an underutilized site that could otherwise support the economic goals for the City and the Community Plan area. As such, the proposed Vesting Zone and Height District Change would be in conformity with public necessity.

Convenience. The Project promotes a more walkable neighborhood by locating office, retail and restaurant uses within proximity of transit, existing job centers and services, and similar commercial uses. The Project would add over 450,000 square feet of office space and commercial services to a centrally located urban neighborhood that is experiencing residential growth and is well-served by transit. Developing the Project in such a location would provide employment opportunities and services for residents, reduce vehicle miles traveled, and reduce reliance on single-occupancy vehicle trips. The Project Site is served by several public transit lines currently provided by Metro, LADOT DASH, and Montebello Bus Lines along 7th Street, Santa Fe Avenue, and 4th Street. Notable public transit service in the Project vicinity includes Metro Local Lines 18, 60, 62, the LADOT DASH A bus, the LADOT Commuter Express 439, and Montebello bus line M40. Additionally, the Project Site is located approximately one mile away from the L Line Pico/Aliso Station and 1.8 miles away from the 7th Street/Metro Center Station serving the A, B, D, and E subway and light-rail lines. The availability and proximity of various transit lines would provide

employees/visitors opportunities to use public transit to access the Project Site, thereby reducing vehicle miles traveled. The retention of the existing Warner Music Group building and introduction of new office and retail and/or restaurant uses, as well as the provision of a publicly accessible paseo, courtyard, and bicycle facilities within close proximity to public transit would provide residents and visitors in the area a variety of uses and services in a convenient and accessible location.

The Project would also provide approximately 75,000 square feet of open space, including a 43,938 square-foot ground floor publicly accessible paseo and various other open spaces throughout the new office building such as balconies and roof decks. The paseo would be open to the public and connect to a pedestrian passageway that would provide pedestrian access between Violet Street and 7th Place, enhancing connectivity and convenience throughout the Project Site and community.

General Welfare. The Project promotes a more walkable neighborhood by locating office, retail and restaurant uses within proximity of transit, existing job centers and services, and similar commercial uses. The Project would add over 450,000 square feet of office space and commercial services to a centrally located urban neighborhood that is experiencing residential growth and is well-served by transit. Developing the Project in such a location would provide employment opportunities and services for residents, reduce vehicle miles traveled, and reduce reliance on single-occupancy vehicle trips. In addition, the Project would also include publicly-accessible open space and commercial services that would serve both employees of the site as well as neighboring residents and visitors. As such, the Project would be consistent with the general welfare of the community.

Good Zoning Practice. The Project Site is located within the boundaries of the Central City North Community Plan, which designates the subject property for Heavy Industrial land uses corresponding to the M3 Zone. The Project Site is currently zoned M3-1-RIO, and is thus consistent with the existing land use designation. Although the Project Site is designated for heavy industrial uses, the immediate vicinity is characterized by a mix of office, residential, restaurant, and retail uses. Additionally, the Project Site is no longer fully utilized for industrial-related purposes, as it currently consists primarily of office uses and associated parking.

The Project involves a General Plan Amendment to change the land use designation on Lot 1 of the Project Site from Heavy Industrial to Regional Commercial. The proposed Regional Commercial land use designation corresponds to the CR, C1.5, C2, C4, RAS3, RAS4, R3, R4, and R5 Zones; as such, the recommended (T)(Q)C2-2-RIO Zone would be consistent with the adoption of the proposed land use designation. The proposed zone and land use designation is also similar to multiple other properties in the vicinity of the Project Site which have been approved for similar requests, reflective of the evolving nature of the Arts District neighborhood. The surrounding area includes several other newer non-industrial developments, including a seven-story residential complex directly across the street to the north. Therefore, the Vesting Zone and Height District Change would be in conformity with good zoning practices and with development patterns in the surrounding area.

5. “T” and “Q” Classification Findings.

Per LAMC Sections 12.32 G.1 and 2, the current action, as recommended, has been made contingent upon compliance with new “T” and “Q” conditions of approval imposed herein for the Project. The “T” Conditions are necessary to ensure the identified dedications, improvements, and actions are undertaken to meet the public’s needs, convenience, and general welfare served by the actions required. These actions and improvements will provide the necessary infrastructure to serve the proposed community at this Site. The “Q”

conditions that limit the scale and scope of future development on the site, as well as requirements to maintain public access through a pedestrian paseo in the location of vacated public rights-of-way is also necessary to assure a development more compatible with surrounding properties and the overall pattern of development in the community, to secure an appropriate development in harmony with the General Plan. Therefore, the imposition of the included “T” and “Q” Conditions herein are in conformance with the public necessity, convenience, general welfare, and good zoning practice.

Vesting Conditional Use

In conjunction with the development of the Project, the Applicant is requesting a Vesting Conditional Use Permit to allow Floor Area Ratio (FAR) Averaging for buildings which comprise a unified commercial development in the C or M Zone. The following are the required findings as required by LAMC 12.24 E and 12.24 W.19.

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

The Project Site is organized into areas known as Lots 1, 2, 3, and 4 (as proposed in the VTTM under related Case No. VTT-83382). The Project proposes the development of a new 450,599 square-foot building on Lot 1; the maintenance of an existing 222,915 square-foot building occupied by Warner Music Group on Lot 3; and a Future Campus Expansion Phase would develop an additional maximum of 211,201 square feet of floor area on Lot 4. Upon completion (including the Future Expansion Phase), the Project would result in a total of 884,715 square feet of floor area across the entirety of the Project Site, resulting in a FAR of 3.4:1. The proposed (T)(Q)C2-2 Zone would permit a maximum FAR of 6:1 on Lot 1, while the underlying M3-1-RIO Zone would permit a maximum FAR of 1.5:1 on Lots 2-4. The following table shows the maximum allowable development per the zone of each lot. The Project would result in a proposed development floor area that is slightly below the maximum allowable total development:

Lot	Lot Area per Tract (sf)	Maximum FAR	Maximum Development (sf)	Proposed Development (sf)	Proposed FAR (rounded up)
1	109,319.1	6:1	655,914	450,599	4.13:1
2	61,251.39	1.5:1	91,877	0	0
3	76,150 sf	1.5:1	114,225	222,915	2.93:1
4	16,527.23	1.5:1	24,790	211,201	12.78:1
TOTAL	263,248		886,807	884,715	3.4:1

The Project proposes the development of 450,599 square feet of floor area on Lot 1, resulting in a FAR of approximately 4.13:1 on Lot 1, less than the allowable 6:1. The existing parking garage on Lot 2 does not count towards floor area, and has an unused development floor area of 91,877 square feet. The Conditional Use Permit would allow the excess unutilized floor area from Lots 1 and 2 to be averaged over the rest of the Project Site on Lots 3 and 4, resulting in an averaged FAR of approximately 2.6:1 across the entirety of the Project Site with completion of the Project’s initial phase with a total of 695,394 square feet of development over the entire site. With completion of the Future Expansion Phase, and

the demolition of the 21,880 square feet office building, the average FAR across the entire Project Site will be approximately 3.4:1.

The Project would enhance the built environment through the development of the site as a cohesive campus that would include essential and beneficial uses through the balance of office, retail and restaurant uses. In addition, the Project would retain the historic Warner Music Group building, which formerly served as a space for assembling cars manufactured by the Ford Motor Company. The proposed project will not only add to the economic activity of the neighborhood, but also assist in ensuring the vitality of a historic resource. Additionally, the proposed vacation of the alley that connects the terminus of 7th Place to Violet Street, associated with the related VTTM, will enable the new development to create a publicly accessible pedestrian thoroughfare and passageway linking the campus as a unified development and introducing a significant new public open space opportunity.

The requested Conditional Use would enable the development of additional floor area on Lot 4 of the Project Site that would provide services and employment opportunities, consistent with the Central City North Community Plan's goal of conserving and strengthening viable commercial development in the community and to provide additional opportunities for new commercial development and services. Additionally, the averaging contributes to the provision of commercial space which further supports the Arts District's evolving neighborhood from a solely industrial and wholesale district, to a community comprised of creative production and light industrial uses and commercial uses, including retail and restaurant uses. Therefore, the conditional use will both enhance the built environment and provide a valuable service and benefit to the region.

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

The Project Site is located in the Arts District neighborhood, adjacent to the Los Angeles River, and is generally bounded by 7th Street to the north, Violet Street to the south, Santa Fe Avenue to the east, and an alley to the west. The Project Site is organized into areas known as Lots 1, 2, 3, and 4 (as proposed in a VTTM under related Case No. VTT-83382). Lot 1 is currently improved with 25,798 square feet of warehouse uses and 9,940 square feet of office uses, along with associated surface parking and truck loading areas; Lot 2 is developed with a five-story parking garage; Lot 3 is improved with the existing 222,915 square-foot Warner Music Group office building, and Lot 4 is improved with a 21,880 square-foot warehouse. The existing parking garage on Lot 2 and building on Lot 3 would be retained while the warehouse and office on Lot 1 would be demolished to accommodate a new 13-story office building; under a Future Campus Expansion Phase, the office building on Lot 4 would be demolished for up to 211,201 square feet of additional floor area.

The Project Site is bisected by an alley connecting 7th Place and Violet Street which is proposed to be vacated and developed into a pedestrian paseo; in addition, the Project proposes to vacate and redesign 7th Place as a shared vehicle, bicycle, and pedestrian accessway. These areas would be designed with landscaping, mural art, outdoor seating, and paving and improve pedestrian connectivity throughout the Project Site and the community. The Project would also include accent and security lighting, in compliance with LAMC requirements, and similar to that provided for existing adjacent commercial and industrial uses. These proposed improvements, including materials that allow for high visibility at the ground floor, new trees along the street frontages, and usable ground floor outdoor areas throughout the Site would enhance the physical environment and complement existing development in the area.

Additionally, the Project's size, height, and architecture have been designed to integrate with the surrounding Arts District neighborhood, which is characterized by buildings of varied age, scale, height, and intensity. The new 13-story office building would be a maximum height of 217 feet six inches and be located on Lot 1 (encompassing the southwest portion of the Project Site). The height/number of stories of several proposed and approved projects located approximately one mile from the Project Site, is provided in the table and figure below. As shown, the recently approved and proposed projects range in height from 116 feet to a maximum of 378 feet. Thus, the Project's maximum height would be well within the range of Project heights 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	0.2 mile	Approved
1100 East 5 th Street	8 stories/116 feet	1.1 miles	Proposed
1101 East 5 th Street	12 stories/170 feet	1.1 miles	Approved
4 th Street and Central Avenue ¹	2-30 stories/max height of 364 feet	1.3 miles	Proposed
670 Mesquit Street ²	26-32 stories/max height of 378 feet	0.4 mile	Proposed
527 Colyton Street	12 stories/148 feet	0.8 miles	Proposed
401 Hewitt St	18 stories/ 292 feet	1 mile	Approved
¹ This project would include 10 buildings. ² This project would include five buildings.			

The Future Campus Expansion Phase is not currently defined in terms of most development standards; other than a maximum amount of square footage permissible, the exact development envelope, including height, is unknown at this time. As such, any future development that constitutes the Future Campus Expansion Phase, specifically any development on Lot 4 that results in the creation of any amount of new floor area, has been conditioned to be subject to future entitlement review under Section 13B.2.4 (*Project Review*) of Chapter 1A of the LAMC. Additional entitlement review of the Future Campus Expansion Phase will ensure that the proposed development is compatible with the surrounding area.

The proposed office building is further designed with a contemporary architectural style that reflects the industrial character of the surrounding area by utilizing reinforced concrete and various glass systems. The proposed ground floor commercial uses will enhance the streetscape and complement other existing similar uses in the surrounding area.

Therefore, the Project would not adversely affect the surrounding neighborhood, properties, or public health, welfare and safety.

- 8. That the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.**

Pursuant to LAMC Section 12.36, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. As detailed above in Finding No. 2, the Project is in substantial conformance with the purposes, intent and provisions of the General Plan and its elements, including the Framework Element, Transportation Element, Health and Wellness and Air Quality Elements and the Land Use Element (Community Plan), as well as overlays including the Central Industrial Redevelopment Plan and River Implementation Overlay. As proposed, the Project would conserve and strengthen viable commercial development within the Arts District neighborhood, provide new office space and commercial services in a centrally located urbanized area in close proximity to transit, and provide ground floor commercial spaces and publicly accessible open spaces that would activate the pedestrian realm. The Project would include energy efficiency and sustainability in new construction and provide construction and permanent jobs, and would retain an existing historic building. Therefore, the Project is in substantial conformance with the purposes, intent, and provisions of the General Plan and the Community Plan.

9. That the Project is a Unified Development as defined by LAMC Section 12.24 W.19 (c).

The Project is a commercial development consisting of a new 13-story, 450,599 square-foot building comprised of 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and four subterranean and three above-grade levels of parking. The Project would require the demolition of warehouse and office uses and associated surface parking, all located on the southwest portion of the Project Site (designated as Lot 1 in the related VTTM No. 83382). In addition, a Future Campus Expansion Phase could allow for up to 211,201 square feet of additional office and restaurant uses, which would require the demolition of an existing office building, located at the corner of Violet Street and Santa Fe Avenue (designated as Lot 4 in the VTTM). The existing 222,915 square-foot Warner Music Group building (originally the Ford Factory building, a designated historic resource) and a five-story parking garage with 604 parking spaces would be retained as part of the Project.

A Unified Development is defined by LAMC Section 12.24 W.19 as a development which is:

- A. A combination of functional linkages such as pedestrian or vehicular connections;
- B. In conjunction with common architectural and landscape features, which constitute distinctive design elements of the development;
- C. Is composed of two or more contiguous parcels, or lots of record separated only by a street or alley; and
- D. When the development is viewed from adjoining streets appears to be a consolidated whole.

As designed, the Project Site will be developed as a unified creative office campus with shared functions, common amenities, and linked by common open space areas. Specifically, the Project includes a 43,938 square-foot ground floor public paseo which would provide pedestrian ground floor connectivity throughout the Project Site and equally distribute landscaping and passive amenities throughout the ground floor. The paseo would provide common amenity space for the creative office campus as a whole and serve as a unifying design element for the entire Project Site, with the various proposed buildings and buildings to remain all centered around it. The paseo will enhance connectivity throughout the Project Site and provide new connections between the existing and proposed uses on the Project Site.

In addition, the Project Site will be developed and operated as one unified development. 7th Place is proposed to be vacated and repurposed for a multi-modal accessway and open

area and will serve as both vehicle and pedestrian/bike access for the entire site. Loading and delivery functions for the entire site will be provided via 7th Place as well.

An additional 211,201 square feet of floor area may be developed on Lot 4 under the Future Campus Expansion Phase. This future expansion would continue to share common facilities and amenities with the rest of the Project Site, including vehicle access and open space areas.

Finally, the Project involves a related VTTM for the merger and re-subdivision of the Project Site into four designated ground lots. The tract map illustrates a cohesive development site with common access points, passageways, and open space features. Therefore, the Project meets the definition of a Unified Development.

Zone Variance

10. The strict application of the provisions of the zoning ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations.

LAMC Section 12.21 C.6 states that a loading zone shall be maintained on the same lot with every nonresidential building in the C or M Zones where the lot abuts an alley, and that such a loading zone shall be provided at-grade with vehicular ingress and egress from said alley. The Project Site abuts the existing Westerly Public Alley, where loading would otherwise be required to be sited. The Applicant requests a Variance to permit the required commercial loading zone to be located and arranged so that delivery vehicles shall drive into loading areas from 7th Place instead of the Westerly Public Alley.

The purpose of this provision of the zoning ordinance is to separate “back of house” operations, including deliveries, from “front of house” operations, as well as to protect abutting uses and activities, such as pedestrian traffic flow. However, in this case, granting the Variance would further these purposes because 7th Place presently terminates within the Project Site and, therefore, functions more as an alley than a through-street, and does not carry any vehicle through-traffic. The Project proposes to vacate 7th Place in order to redevelop it as a multi-modal pedestrian, bicycle, and vehicle accessway providing primary vehicular access to the Project Site and, in doing so, the Project maintains the primary street frontages of Violet Street, 7th Street, and Santa Fe Avenue without interrupting those blocks with vehicle accessways and loading zones.

Additionally, placing the loading area along 7th Place would allow for future commercial tenants to function more efficiently with their daily loading and unloading needs, and proximity to the proposed retail/restaurant spaces and lobby elevators would allow improved internal circulation; whereas, locating the loading zone along the western alley to remain, e.g. relegating delivery traffic to the most narrow passageway at the most western edge of the Project Site, would result in unnecessary practical inefficiencies. Finally, providing vehicle access and loading off of an alley would be physically impractical for a development of this size, and it would be impractical to force loading to the alley when a more efficient layout can be achieved by maintaining the existing purpose of 7th Place as a “back-of-house” vehicle and loading accessway. Therefore, strict application of the zoning ordinance would result in unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations.

11. There are special circumstances applicable to the subject property such as size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity.

LAMC Section 12.21 C.6 states that a loading zone shall be maintained on the same lot with every nonresidential building in the C or M Zones where the lot abuts an alley, and that such a loading zone shall be provided at-grade with vehicular ingress and egress from said alley. The Applicant requests a Variance to permit the required commercial loading zone to be located and arranged so that delivery vehicles shall drive into loading areas from 7th Place instead of the Westerly Public Alley.

There are special circumstances applicable to the subject property as 7th Place presently terminates within the Project Site and, as a result, 7th Place functions more as an alley than a through-street, and does not carry any vehicle through-traffic. Other properties in the same zone and vicinity do not have public roadways that terminate within the property. As a result, it would be more practical to provide vehicle access and loading off of 7th Place, which is proposed to be vacated along with the connecting Easterly Public Alley in order to redevelop it as a multi-modal pedestrian, bicycle, and vehicle accessway providing primary vehicular access to the Project Site. Doing so further maintains the primary street frontages on Violet Street, 7th Street, and Santa Fe Avenue without interrupting those blocks with vehicle accessways and loading zones.

Therefore, there are special circumstances applicable to the Project Site that do not generally apply to other properties in the same zone and vicinity that justify the requested Variance.

- 12. The variance is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property in the same zone and vicinity but which, because of the special circumstances and practical difficulties or unnecessary hardships, is denied to the property in question.**

LAMC Section 12.21 C.6 states that a loading zone shall be maintained on the same lot with every nonresidential building in the C or M Zones where the lot abuts an alley, and that such a loading zone shall be provided at-grade with vehicular ingress and egress from said alley. The Applicant requests a Variance to permit the required commercial loading zone to be located and arranged so that delivery vehicles shall drive into loading areas from 7th Place instead of the Westerly Public Alley.

At present, the orientation and relationship of the existing alley and the Project Site, and existing development pattern presents unique operational difficulties and inconveniences for the Project Site. As previously mentioned, the purpose of this provision of the zoning ordinance is to separate “back of house” operations, including deliveries, from “front of house” operations, as well as to protect abutting uses and activities, such as pedestrian traffic flow. Requiring delivery vehicles to only access the subject property from the alley would place an unnecessary burden for delivery and loading traffic along a single outlying portion (the westernmost edge) of the Project Site. Placing the loading area along 7th Place would allow for future commercial tenants to function more efficiently with their daily loading and unloading needs by collocating loading functions with primary vehicle access to the entire Project Site. The proximity to the proposed retail/restaurant spaces and lobby elevators would allow improved internal circulation. Locating the loading zone along the western alley to remain, e.g. relegating delivery traffic to the narrowest passageway at the most western edge of the Project Site, would result in unnecessary practical inefficiencies.

There are special circumstances applicable to the subject property as 7th Place presently terminates within the Project Site and, as a result, 7th Place functions more as an alley than as a through-street and does not carry any vehicle through-traffic. Other properties in the same zone and vicinity do not have public roadways that terminate within the property. As a

result, it would be more practical to provide vehicle access and loading off of 7th Place, which is proposed to be vacated along with the connecting Easterly Public Alley in order to redevelop it as a multi-modal pedestrian, bicycle, and vehicle accessway providing primary vehicular access to the Project Site. Doing so further maintains the primary street frontages on Violet Street, 7th Street, and Santa Fe Avenue without interrupting those blocks with vehicle accessways and loading zones. If the Variance is denied, the Project Site would be denied the ability to provide loading in the most efficient and practical manner possible. Therefore, given the specific circumstances of the Project Site, the preservation and enjoyment of a substantial use generally possessed by other property in the same zone and vicinity would be denied to the Project Site in question if delivery vehicles were required to access the site from the existing alley.

13. The granting of the variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the same zone or vicinity in which the property is located.

LAMC Section 12.21 C.6 states that a loading zone shall be maintained on the same lot with every nonresidential building in the C or M Zones where the lot abuts an alley, and that such a loading zone shall be provided at-grade with vehicular ingress and egress from said alley. The Applicant requests a Variance to permit the required commercial loading zone to be located and arranged so that delivery vehicles shall drive into loading areas from 7th Place instead of the westerly public alley.

The Project Site is large enough to handle the ingress and egress, and staging of delivery vehicles without interfering with traffic flow within the public right-of-way. Granting of the Variance would substantially benefit the properties west of the Project Site by redirecting delivery vehicles away from their businesses without shifting such burden to any other properties or businesses in the vicinity. As 7th Place presently terminates within the Project Site, connecting only to an alley that bisects the Project Site, it basically functions as an alley and does not carry any vehicle through-traffic. The Project proposes to vacate 7th Place and the connecting alley, in order to redevelop it as a multi-modal pedestrian, bicycle, and vehicle accessway providing primary vehicular access to the Project Site. In doing so, the Project would allow the primary street frontages along Violet Street, 7th Street, and Santa Fe Avenue to remain uninterrupted from with vehicle accessways and loading zones. The Project would maintain the function of 7th Place as it currently exists and will not result in a substantial change in conditions for nearby properties. Therefore, the granting of the Variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the same zone or vicinity in which the property is located.

14. The granting of the variance will not adversely affect any element of the General Plan.

Pursuant to LAMC Section 12.36, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. As detailed above in Finding No. 2, the Project is in substantial conformance with the purposes, intent and provisions of the General Plan and its elements, including the Framework Element, Transportation Element, Health and Wellness and Air Quality Elements and the Land Use Element (Community Plan), as well as overlays including the Central Industrial Redevelopment Plan and River Implementation Overlay.

Specifically, the requested Variance to permit the required commercial loading zone to be located and arranged so that delivery vehicles shall drive into loading areas from 7th Place instead of the westerly public alley would not adversely affect any element of the General Plan. Although 7th Place is a designated Collector roadway, in practice it does not serve the function of a Collector roadway, which collects and distributes vehicle traffic from many local

streets. 7th Place presently terminates within the Project Site, connecting only to an alley that bisects the Project Site; as a result, 7th Place does not carry any vehicle through-traffic, and functions as an alley. As such, 7th Place does not serve regional traffic in the area, and therefore the Variance will have no adverse effect on the City's transportation needs or the Mobility Plan. Therefore, the granting of the Variance for the loading zone access will not adversely affect any element of the General Plan.

Site Plan Review

15. **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 is for the redevelopment and expansion of an existing office campus on an approximately six-acre site, which includes the demolition of warehouse and office uses and associated surface parking, all located on the southwest portion of the Project Site; and the construction of a 13-story, 450,599-square-foot building comprised of 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and four subterranean and three above-grade levels of parking. In addition, a Future Campus Expansion Phase could allow for up to 211,201 square feet of additional office and restaurant uses, replacing an existing office building, located at the corner of Violet Street and Santa Fe Avenue. The existing 222,915 square-foot Warner Music Group building (originally the Ford Factory building, a designated historic resource) and a five-story parking garage would be retained as part of the Project.

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, Mobility Element, Health and Wellness Element, Air Quality Element and the Land Use Element - Central City North Community Plan.

Pursuant to LAMC Section 13.A.2.10 D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. As detailed above in Finding No. 2, the Project is in substantial conformance with the purposes, intent and provisions of the General Plan and its elements, including the Framework Element, Transportation Element, Health and Wellness and Air Quality Elements and the Land Use Element (Community Plan), as well as overlays including the Central Industrial Redevelopment Plan and River Implementation Overlay. As proposed, the Project would conserve and strengthen viable commercial development within the Arts District neighborhood, provide new office space and commercial services in a centrally located urbanized area in close proximity to transit, and provide ground floor commercial spaces and publicly accessible open spaces that would activate the pedestrian realm. The Project would include energy efficiency and sustainability in new construction and provide construction and permanent jobs, and would retain an existing historic building. Therefore, the Project 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. 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.

- 16. 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 Site is located in the Arts District neighborhood just east of the downtown core of the City and is bounded by 7th Street to the north, Santa Fe Avenue to the east, Violet Street to the south, and 7th Place and alleyways to the west. Vehicular access to the Site is currently available at driveways along Violet Street and 7th Place.

The Project Site is currently developed with a mix of commercial and industrial uses and is organized into areas known as Lots 1, 2, 3, and 4 (as proposed in a VVTTM under related Case No. VTT-83382). Lot 1, located at the southwestern corner of the Project Site (2045 East Violet Street and 2020 East 7th Place) is improved with a two-story, 25,798 square-foot warehouse building and a one-story, 9,940 square-foot office building, along with associated surface parking and truck loading areas. Lot 2, located at the northwestern corner of the Project Site (2030 East 7th Street) is developed with a five-story, 208,573-square-foot parking garage. Lot 3, located at the northeastern portion of the Project Site (777 South Santa Fe Avenue) along Santa Fe Avenue between 7th Street and Violet Street is developed with the historic 222,915 square-foot Warner Music Group building (originally the Ford Factory building, a designated historic resource). Lot 4, located at the southeast corner of the Project Site (2051 East Violet Street) is developed with a one-story 21,880 square foot office building. The Project proposes to demolish all existing development on Lot 1 for the new construction of a 13-story, 450,599-square-foot building comprised of 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and four subterranean and three above-grade levels of parking. Existing development on Lot 2 and 3, including the existing Warner Music Group building, would be retained. The Future Campus Expansion Phase would result in the demolition of the existing building on Lot 4 for the construction of up to 211,201 square feet of additional office and restaurant uses.

Bulk, Mass, and Height

The Project Site is located in an urbanized area and generally surrounded by industrial and commercial buildings as well as a few residential buildings. To the north of the Project Site are one-story commercial buildings and multi-story residential lofts. To the east of the Project Site, are one to two-story commercial and residential buildings. To the south of the Project Site is a ground level parking lot, a two-story agricultural product wholesaler and market, and a one-story clothing store. To the west of the Project Site, is a one-story commercial building. While the area immediately around the Site is generally surrounded by low and medium rise industrial, commercial and residential buildings, the Project Site is located in the Arts District neighborhood which continues to undergo changes to the development landscape, including the introduction of taller buildings with a variety of new uses such as residential, live/work, restaurant, retail, and office uses being introduced within an area previously concentrated with commercial and industrial uses.

The new office building would have a building height of 217 feet, and 6 inches, inclusive of rooftop mechanical equipment. Several proposed and approved projects located within approximately one mile of the Site, including the height/number of stories of each project, are provided in the table below. As shown, the recently approved and proposed projects range in height from 110 feet to a maximum of 378 feet. Thus, the Project's maximum height would be within the range of heights for the recently approved or proposed project's heights.

<i>Height and Number of Stories of Proposed/Approved Nearby Projects</i>			
Project Location	Number of Stories/Height	Distance from 2045 Violet Site	Approved/Proposed
2143 Violet Street	31 stories/343 feet	0.2 miles	Approved
1101 East 5 th Street	12 stories/170 feet	1 mile	Approved
527 Colyton Street	12 stories/148 feet	0.4 miles	Proposed
670 Mesquit Street ²	26-32 stories/max height of 378 feet	0.8 miles	Proposed
1100 East 5 th Street	8 stories/110 feet	1 mile	Proposed
4 th Street and Central Avenue ¹	2-44 stories/max height of 500 feet	1.2 miles	Proposed
¹ This project would include 10 buildings.			
² This project would include five buildings.			

Design features that have been incorporated to break up the bulk and mass of the new office building include a partially open mezzanine level and lightwells; the step-back above Level 5 of the proposed office building, reducing the perceived massing of the Project from Violet Street; and the use of open space within the office building, including the proposed ground floor paseo between the new office building and the existing Warner Music Group and the repurposing of 7th Place. Additionally, balcony cutouts are located on the south elevation of the building and help to break up an otherwise flat elevation. The roof above Levels 3 and 12 is designed with an irregular sawtooth shape when viewed from the east and west elevations, which helps to distinguish the building from surrounding structures, which are predominantly rectilinear in form. The design of terraces and roof decks within the office building structure not only provide a unique design element but also soften the building with landscaping and help break up the mass and bulk of the structure.

Finally, the design of the parking podium has been conditioned to screen the visibility of parked cars and mirror the surrounding neighborhood's traditional warehouse massing. The three above-grade parking levels would be clad in concrete, while upper office levels would be clad in aluminum and non-reflective glass and screened with GFRC and vertical metal panels that are spaced to create tall, narrow openings.

In sum, the proposed height, bulk, and mass of the Project would be consistent with the scale of existing and future proposed developments within the surrounding neighborhood.

Setbacks

Pursuant to LAMC Section 12.14, setbacks are not required in the C2 Zone for commercial uses. This would be consistent with other properties in the area, as well as industrially zoned properties which also do not have setback requirements.

Off-Street Parking and Loading Area

Vehicular access to the Site would be provided from two driveways on 7th Place, including an ingress/egress to the subterranean parking garage and another ingress/egress to the upper levels of the garage. As 7th Place terminates within the Project Site, access would be

restricted to in from the west and out towards the west. An at-grade loading dock would be accessible from 7th Place. All driveways and access would be designed in accordance with the City of Los Angeles Department of Transportation (LADOT) standards.

While parking is not required pursuant to Government Code Section 65863.2 (AB 2097), the Applicant has chosen to voluntarily provide 1,276 parking spaces, of which 30 percent of the proposed parking spaces will be electric-vehicle (EV) ready and 10 percent would provide EV chargers installed.

New parking would be provided within four subterranean levels and three above-grade parking levels contained within a parking podium of the new office building. The existing five-story parking structure with 604 vehicle parking spaces on Lot 2 would remain. Both parking structures would be accessible via the repurposed 7th Place accessway, resulting in an efficient and centralized access design. Parking levels in the new building visible from 7th Street and westerly public alley façades would be designed with non-operable, industrial steel frame opaque windows set in exposed concrete walls. The three above-grade parking levels would be partially wrapped in office and retail/restaurant uses on the southern façade along Violet Street and along the westerly public alley screened with landscaping and/or industrial style window openings. Additionally, the above -grade parking is limited to half of the building footprint of the new office building to allow active ground use throughout the site by placing office, retail, and restaurant use combined with the ground floor paseo along 7th Place and the easterly public alley.

The Project would also provide bicycle parking spaces in accordance with LAMC requirements. Short-term bicycle parking would be located at the ground floor of the site adjacent to the proposed new office building, while long-term bicycle parking spaces along with a bicycle repair station would be located adjacent to restrooms on the ground floor inside the new office building, accessible from the Violet Street or 7th Place entrances. These locations maximize convenience and accessibility to entrances.

Landscaping

As the Project does not include residential uses, open space per LAMC Section 12.21 G is not required; however, the Project proposes 74,999 square feet of outdoor areas and landscaping through the introduction of a publicly accessible 43,938-square-foot ground floor paseo and a total of 31,062 square feet of additional open space within the new office building, comprised of 15,962 square feet of balconies located on Levels 1 through 4, and 8 and 10, along with 15,100 square feet of roof decks located on Levels 1.5, 4, and 12, all of which would be designed with a combination of landscape, hardscape, seating areas, and pavers and would unify the site by encouraging an active ground floor and providing a cohesive plant palette. Trees of various species would be planted throughout the Project Site, including street trees that would be provided along adjacent streets.

Trash Collection

As conditioned, all trash and recycling areas would be enclosed and screened from public view, accessed via the loading corridor on 7th Place, at the rear of the proposed office building. Enclosing trash collection with the building envelope will prevent any negative impacts on surrounding properties.

Lighting & Building Signage

The Project would add new commercial and office uses that, as conditioned, would include accent and security lighting in compliance with LAMC requirements, and similar to that provided for existing adjacent commercial and industrial uses to protect nearby uses from

potential lighting-related impacts. No signage is proposed at this time; however, any proposed signage shall 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 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.

- 17. 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 does not contain any residential units; therefore, this finding does not apply.

Housing Element (SB 166)

- 18. The remaining sites identified in the Housing Element are adequate to meet the requirements of Section 65583.2 and to accommodate the jurisdiction's share of the regional housing need pursuant to Section 65584. The finding shall include a quantification of the remaining unmet need for the jurisdiction's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.**

The Project is located on a parcel identified in the Inventory of Sites prepared for the Housing Element and was anticipated to accommodate 34.09 Very Low Income Units, 34.9 Low Income Units, and 646.9 Above-Moderate Income Units. As the Project does not propose a residential component, the Project would not develop any affordable housing units on the Project Site and would not meet the allocated number of affordable units as identified in the Housing Element.

Pursuant to Government Code Section 65863(b)(2), the City finds that while the Project would result in fewer units by income category on the Project Site than those identified in the Inventory of Sites prepared for the Housing Element, the remaining sites identified in the Housing Element are adequate to meet the requirements of Government Code Section 65583.2 and to accommodate the City's share of the regional housing need pursuant to Government Code Section 65584. As of April 1, 2023, the City's remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low Income Units, 67,086 Low Income Units, 74,964 Moderate Income Units, and 168,892 Above-Moderate Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low Income Units, 332,096 Low Income Units, 63,107 Moderate Income Units, and 907,466 Above-Moderate Income Units. The excess Above-Moderate Income Unit capacity may accommodate both Moderate and Above-Moderate Unit RHNA Allocations. Thus, the City's RHNA allocation for the 2021-2029 Planning period for Very Low, Low, Moderate, and Above-Moderate Income Units makes up 34 percent, 20.2 percent, 7.7 percent, and 18.6 percent of the City's remaining housing capacity, respectively. Therefore, the City finds that there are adequate remaining sites identified in the Housing Element and located throughout the City to accommodate the remaining RHNA Allocation for the Planning Period.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

Introduction

The City of Los Angeles (the “City”), as Lead Agency, has evaluated the environmental impacts of the Violet Street Creative Office Campus Project by preparing an environmental impact report (EIR) ENV-2021-2232-EIR (SCH No. 2021110015). 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 Violet Street Creative Office Campus Project EIR, consisting of the Draft EIR, Final EIR and Erratum, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and impacts of the Violet Street Creative Office Campus Project (Project), located at 2030-2060 East 7th Street; 715-829 East Santa Fe Avenue; 2016-2040 and 2023-2043 East 7th Place; and 2017-2051 Violet Street (Project Site). The Project, as analyzed in the EIR, proposes the redevelopment and expansion of an existing office campus on an approximately six-acre site. New construction includes a 13-story, 450,599-square-foot building comprised of 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and four subterranean and three above-grade levels of parking, which would require the demolition of warehouse and office uses and associated surface parking, all located on the southwest portion of the Project Site. In addition, a Future Campus Expansion Phase could allow for up to 211,201 square feet of additional office and restaurant uses, which would require the demolition of an existing office building, located at the corner of Violet Street and Santa Fe Avenue. The existing 222,915 square-foot Warner Music Group building (originally the Ford Factory building, a designated historic resource) and a five-story parking garage would be retained as part of the Project.

The Draft EIR was circulated for a 45-day public comment period beginning on June 29, 2023 and ending on August 14, 2023. A Notice of Completion and Availability (NOC/A) was distributed on June 29, 2023 to all property owners and occupants 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 Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and the following local libraries: Los Angeles Central Library, Benjamin Franklin Branch Library, R. L. Stevenson Branch Library, and Little Tokyo Branch Library. A copy of the document was also posted online at <https://planning.lacity.org>. A Notice of Completion was sent with the Draft EIR to the Governor’s Office of Planning and Research State Clearinghouse for distribution to State Agencies on June 26, 2023, and notice was provided in newspapers of general and/or regional circulation.

The Final EIR was distributed for the Project on May 31, 2024; and an Erratum was posted on the Department of City Planning website in August 2024, to replace Final EIR Appendix FEIR-2 with correct supporting calculations to the voluntary Health Risk Assessment. The Deputy Advisory Agency certified the EIR on August 29, 2024 (“Certified EIR”) in conjunction with the approval of the Project’s VTTM (Case No. VTT-83382). In connection with the certification of the EIR, the Deputy Advisory Agency adopted CEQA findings and a mitigation monitoring program. The Advisory Agency adopted the mitigation monitoring program in the EIR as a condition of approval. This decision was appealed in a timely manner on September 6, 2024 by the Adams Broadwell Joseph and Cardozo law firm on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA) and the City Planning Commission denied the appeal and certified the EIR at its November 14, 2024 meeting. All mitigation measures in the Mitigation Monitoring Program are also imposed on the Project through Conditions of Approval of both the VTTM and CPC-2021-2231-GPA-VZC-HD-VCU-ZV-SPR, to mitigate or avoid significant

effects of the Project on the environment and to ensure compliance during implementation of the Project.

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 has arisen since the approval of the Project. 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, Final EIR, and Erratum, 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).