



## 2143 Violet Street Project

Case Number: ENV-2017-438-EIR  
State Clearinghouse No. 2018051050

---

**Project Location:** 2117–2147 E. Violet Street; 2118–2142 E. 7th Place, Los Angeles, CA 90021

**Community Plan Area:** Central City North

**Council District:** 14—De León

**Project Description:** The Project proposes a new mixed-use development on a 96,523-square-foot Project Site located in the Central City North Community Plan area of the City of Los Angeles. The Project would include up to 347 new live-work units, of which 5 percent of the total proposed units (18 units) would be set aside for Extremely Low-Income Households and 11 percent of the total proposed units (39 units) would be set aside for Very Low-Income Households; approximately 187,374 square feet of new office space; 21,858 square feet of new commercial floor area; and a 926-square-foot community room.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Eyestone Environmental, LLC

**APPLICANT:**

ONNI Capital, LLC

**August 2021**

# TABLE OF CONTENTS

---

	<u>Page</u>
<b>1 Introduction .....</b>	<b>1</b>
1.1 Background .....	1
1.2 CEQA Authority for an Addendum .....	1
<b>2 Project Description.....</b>	<b>3</b>
2.1 Project Summary .....	3
2.2 Environmental Setting .....	3
2.3 Requested Permits and Approvals .....	4
2.4 Responsible Public Agencies.....	5
<b>3 Environmental Impact Analysis .....</b>	<b>6</b>
3.1 Aesthetics .....	8
3.2 Land Use and Planning .....	13
<b>4 Addendum Conclusion .....</b>	<b>15</b>

## Appendices

Appendix A	Revisions and Corrections to the Certified EIR
------------	--

# 1 INTRODUCTION

---

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the 2143 Violet Street Project (Case No. ENV-2017-438-EIR, State Clearinghouse No. 2018051050), which was certified by the City of Los Angeles (City) on May 14, 2021 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (the Modified Project) to the 2143 Violet Street Project approved in 2021 (the Approved Project) and demonstrates that the Modified Project does not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code (PRC), Section 21166 or CEQA Guidelines Section 15162 and 15163.

## 1.1 BACKGROUND

The City prepared an EIR pursuant to the CEQA for the 2143 Violet Street Project (Project) to assess potential environmental impacts of the Project, as described below. The EIR concluded that, with mitigation, all of the Project's environmental impacts would be less than significant, with the exception of significant and unavoidable project-related environmental impacts associated with on-site construction noise, on-site construction vibration, and vehicle miles traveled, as well as cumulative impacts associated with on-site construction noise and off-site operational noise.

On May 14, 2021, the City certified the EIR and approved the Project. Subsequent to approval of the Project, ONNI Capital, LLC (Applicant) has revised the Project (Modified Project). The Modified Project includes reducing the height of the residential tower from 425 feet to 399 feet, with the number of floors reduced from 36 to 30, and increasing the height of the office tower from 131 feet to 157 feet, with the number of floors increasing from eight to nine. These proposed changes in height would result in a 30-degree angle from the Los Angeles River to the top of the residential tower.

Both the Approved Project (as analyzed in the Certified EIR) and the Modified Project (analyzed in this Addendum) are discussed further below.

## 1.2 CEQA AUTHORITY FOR AN ADDENDUM

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, CEQA Guidelines Section 15164(a) states that:

*The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

CEQA Guidelines Section 15162 requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project 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
  - (D) 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.

Likewise, California PRC Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the Modified Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Modified Project do not meet the criteria for a Supplemental or Subsequent EIR pursuant to PRC Section 21166 and CEQA Guidelines Section 15162 and 15163.

## 2 PROJECT DESCRIPTION

---

### 2.1 PROJECT SUMMARY

#### 2.1.1 Overview of Approved Project

The Approved Project proposed a new mixed-use development on a 96,523-square-foot Project Site located in the Central City North Community Plan area of the City. The Approved Project included up to 347 new live-work units, of which 5 percent of the total proposed units (18 units) were to be set aside for Extremely Low Income Households, and 11 percent of the total proposed units (39 units) were to be set aside for Very Low Income Households, and approximately 187,374 square feet of new office space, 21,858 square feet of new commercial floor area, and a 926 square-foot community room that residents could use for art creation. These new uses were to be located in two new buildings: a 36-story residential tower with a maximum height of 425 feet and an eight-story office building comprised of seven levels of office space and a partial eighth level with indoor and exterior amenity spaces with a maximum height of 131 feet. In addition, five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet were to be retained with office, retail, restaurant, warehouse, and six live-work units. Two existing buildings that contain four live-work units and two existing open sheds were to be removed. Upon completion, up to 569,448 square feet of floor area was to be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 6.0:1. The Approved Project also proposed to provide approximately 828 vehicular parking spaces and 257 bicycle parking spaces within six subterranean parking levels.

#### 2.1.2 Modifications to Approved Project

The proposed Modified Project would alter the proposed building heights and relocate some of the residential amenities. Specifically, the height of the residential tower has been reduced from 425 feet to 399 feet, with the number of floors reduced from 36 to 30. The proposed office tower would increase in height from 131 feet to 157 feet, with the number of floors increasing from eight to nine. These proposed changes in height would result in a 30-degree angle from the Los Angeles River to the top of the residential tower. The residential amenities within the residential tower would also be relocated from Level 9 to Level 12. No reduction in the number of residential units is proposed, the amount of open space would remain the same, and the Project's floor area ratio would remain the same. No other changes from the Approved Project are proposed.

### 2.2 ENVIRONMENTAL SETTING

#### 2.2.1 Project Location

The Project Site is located in the Arts District area of the City of Los Angeles (City), approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street. The 96,523-square-foot (approximately 2.2-acre) Project Site is specifically bounded by East 7th Place to the north, East Violet Street to the south, an alley to the west, and properties to the east used primarily for parking. Further to the east are railroad tracks and the Los Angeles River.

## **2.2.2 Existing Conditions**

The northern portion of the Project Site is currently developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories and used for 6,983 square feet of office, 25,739 square feet of retail, 2,109 square of warehouse, and 10 live-work units comprised of 28,699 square feet. The Project Site also includes two sheds and surface parking areas generally located on the southern half of the Project Site. Vehicular access to the site access is currently available at driveways along Violet Street, East 7th Place, and a public alley that abuts the Project Site to the west. The Project Site is relatively flat with limited ornamental landscaping.

## **2.2.3 Surrounding Land Uses**

The Project Site is located at the southern edge of the Arts District which is developed with a mix of light industrial, commercial, and residential uses. Nearby uses include retail, restaurant, and office uses, as well as a recycling center and distribution facility. Other uses in the Project vicinity include creative loft spaces located north of the Project Site along Mateo Street, and the Ford Factory building across South Santa Fe Avenue.

## **2.3 REQUESTED PERMITS AND APPROVALS**

The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.6, General Plan Amendment to the Central City North Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial;
- Pursuant to LAMC Section 12.32 Q, a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO;
- Pursuant to LAMC Section 12.24 T and 12.24 W.19, a Vesting Conditional Use Permit to permit floor area averaging and residential density transfer within a unified development;
- Pursuant to LAMC Section 12.24 W,1, a Master Conditional Use Permit for the on-site sale of a full-line of alcoholic beverages within 10 of the Project's commercial areas;
- Pursuant to LAMC Section 11.5.11 E (Measure JJJ) and Government Code Section 65915(k), an affordable housing development incentive to permit a zero-foot side yard in lieu of the 16 feet otherwise required for the residential levels along the eastern property line;
- Pursuant to LAMC Section 16.05, Site Plan Review for a maximum of 347 net new live-work units and a maximum of 210,158 square feet of net new non-residential floor area;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site into three (3) lots and for 353 residential and 8 commercial condominiums and including Haul Route approval for 239,500 cubic yards of export;
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

## 2.4 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- None

### 3 ENVIRONMENTAL IMPACT ANALYSIS

---

This section provides an impact assessment of the Modified Project. The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously adopted EIR for the Approved Project and the most current Appendix G of the CEQA Guidelines. The conclusions of the previously adopted EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR.

This Addendum focuses on changes from the Approved Project to the Modified Project that would affect the following impact areas: aesthetics and land use.

As noted above, the Modified Project includes changes only to the building heights and location of residential amenities. No changes to the mix of uses, square footages, residential unit mix, open space program, or FAR are proposed. Therefore, the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts for the following categories: agricultural and forestry resources; air quality; biological resources; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; mineral resources; noise; population and housing; public services (fire, police, schools, parks, and libraries); recreation; transportation; tribal cultural resources; utilities and service systems (water, wastewater, solid waste, storm water drainage, and utility and wireless communication infrastructure); and wildfire.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in CEQA Guidelines Section 15162 and PRC Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered.

The checklist and evaluation below provides the following information for each of these environmental impact categories:

#### 1 IMPACT DETERMINATION IN THE CERTIFIED EIR

This section lists the impact determination made in the Certified EIR for each impact category.

#### 2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to CEQA Guidelines Section 15162(a)(1) , this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.



### **3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?**

Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

### **4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?**

Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D), this section indicates whether 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 environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

- (A) The project will have one or more significant effects not discussed in the prior environmental documents;
- (B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents;
- (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
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative;

then the question would be answered "Yes", requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered "No" and no Supplemental or Subsequent EIR is required. New studies completed as part of this environmental review are attached to this Addendum, or are on file with the Department of City Planning.

### **5 MITIGATION MEASURES ADDRESSING IMPACTS**

Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. If so, a "Yes" response will be provided. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the Modified Project, or a

significant impact was not identified and mitigation was not required. In either instance, a “No” response will be indicated.

## 6 CONCLUSION

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

### 3.1 AESTHETICS

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>AESTHETICS:</b> Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less Than Significant	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less Than Significant	No	No	No	No
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant	No	No	No	No

#### 3.1.1 Impact Determination in the EIR

Aesthetic impacts are discussed in Section VI, Other CEQA Considerations, of the Certified EIR. The Approved Project is a mixed use project located within a transit priority area (TPA) as defined in PRC Section 21099 and confirmed by the City of Los Angeles Zone Information Map Access System (ZIMAS).<sup>1</sup> As such, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099 and the discussion provided was for informational purposes only. A summary of the analysis from the Certified EIR is provided below.

<sup>1</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, <http://zimas.lacity.org/>, accessed August 10, 2021. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place.

## **Scenic Vistas**

In the vicinity of the Project Site, panoramic views of nearby scenic vistas, including the Downtown skyline, San Gabriel Mountains, and the Los Angeles River, are limited, partial, distant, and/or non-existent due to the predominantly flat terrain of the vicinity and the intervening developments that block long-range, expansive views. In addition, although the Los Angeles River is located adjacent to the Project Site, this portion of the river is channelized and does not possess natural or scenic value. Furthermore, due to flat terrain, the location of the rail lines, and existing development, panoramic views of the Los Angeles River along with the Project Site are generally not available in the Project vicinity. Therefore, the Approved Project would not have a substantial adverse effect on a scenic vista.

## **Scenic Resources Within a State Scenic Highway**

The Project Site is not located along a scenic highway as designated by the State. Therefore, the Approved Project would not substantially damage scenic resources, including trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a scenic highway.

## **Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality**

With approval of the requested discretionary actions, including the proposed General Plan Amendment to change the land use designation from Heavy Industrial to Regional Center Commercial and Vesting Zone and Height District Change from M3-1-IO to C2-2-RIO, the Project would not conflict with applicable zoning for the Project Site. The Project would also not conflict with other regulations governing scenic quality including the River Improvement Overlay (RIO) District, the Citywide Design Guidelines, and the Walkability Checklist, each of which are discussed further below.

### **River Improvement Overlay District**

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establishes best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies specifically address river-adjacent development. Although the Approved Project is located within the boundaries of the RIO District, the Project Site is separated from the Los Angeles River by existing rail lines and is not immediately adjacent to the River. Nevertheless, the Approved Project would further the relevant objectives, including employing high quality, attractive and distinguishable architecture (Objective 2) and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view (Objective 4). Therefore, the Approved Project would not conflict with the RIO District.

## **Citywide Design Guidelines<sup>2</sup>**

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case.<sup>3</sup> As a mixed-use project that would create a more pedestrian-friendly environment and encourage pedestrian activity, include a design that would reflect the industrial character of the surrounding area, provide an internal paseo, locate parking within a subterranean structure, provide 71,719 square feet of open space, and provide signage and low-level exterior lights in conformance to applicable LAMC standards, the Approved Project would be consistent with the six objectives of the Citywide Design Guidelines for residential projects.

### **Light and Glare**

New sources of light that would be introduced by the Approved Project would include low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes; low-level lighting to accent signage, architectural features, and landscaping elements; outdoor decorative string lights; and interior lighting visible through the windows of the proposed uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. The Approved Project would not include signs with flashing, mechanical, or strobe lights. The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site. The Approved Project's lighting would also comply with regulatory requirements, including the requirements that are set forth in the LAMC, the California Energy Code, and the CALGreen Code.

Development of the Approved Project could affect daytime glare conditions with the introduction of new buildings and signage at the Project Site. The Approved Project would utilize glass, concrete, and metal on the building exteriors. However, exterior windows and glass used on building surfaces will be non-reflective or treated with an anti-reflective coating to minimize glare. Therefore, these materials would not have the potential to produce a substantial degree of glare. Nighttime glare could result from illuminated signage and from vehicle headlights entering and leaving the driveway (no headlights would be visible from the subterranean parking levels). However, illuminated signs would not exceed the prescribed lighting requirements of the LAMC, the Energy Code, and the CALGreen Code. In addition, while headlights from vehicles entering and leaving the driveway on Violet Street would be visible during the evening hours, such lighting sources would be typical for the area and would not be anticipated to result in a substantial adverse impact. Therefore, the Approved Project would not create a new source of light or glare which would adversely affect day or nighttime views in the area.

### **3.1.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Threshold (a):** As discussed in the Certified EIR, in the vicinity of the Project Site, panoramic views of nearby scenic vistas, including the Downtown skyline, San Gabriel Mountains, and the Los Angeles River, are limited, partial, distant, and/or non-existent due to the predominantly flat terrain of the Project vicinity

---

<sup>2</sup> Section VI, Other CEQA Considerations, of the Certified EIR included an analysis of the City's Walkability Checklist. However, the Walkability Checklist is now part of the Citywide Design Guidelines.

<sup>3</sup> City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5; and Residential Citywide Design Guidelines, Multi-Family Residential & Commercial Mixed-Use Projects, May 2011, p. 5.

and the intervening developments that block long-range, expansive views. In addition, although the Los Angeles River is located adjacent to the Project Site, this portion of the river is channelized and does not possess natural or scenic value. Furthermore, due to flat terrain, the location of the rail lines, and existing development, panoramic views of the Los Angeles River along with the Project Site are generally not available in the Project vicinity. Set against this backdrop, the Modified Project, like the Approved Project, would not have a substantial adverse effect on a scenic vista. Furthermore, as noted above, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Impacts would continue to be less than significant, and such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

**Threshold (b):** The Project Site is not located along a scenic highway as designated by the State. Therefore, the Modified Project, like the Approved Project, would not substantially damage scenic resources, including trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a scenic highway. Furthermore, as noted above, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Impacts would continue to be less than significant, and such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

**Threshold (c):** Like the Approved Project, with approval of the requested discretionary actions, including the proposed General Plan Amendment to change the land use designation from Heavy Industrial to Regional Center Commercial and Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO, the Project would not conflict with applicable zoning for the Project Site. The Modified Project would also not conflict with other regulations governing scenic quality including the RIO District and the Citywide Design Guidelines, both of which are discussed further below. Lastly, as noted above, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Impacts would continue to be less than significant, and such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

### **River Improvement Overlay District**

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establishes best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies specifically address river-adjacent development. Although the Modified Project is located within the boundaries of the RIO District, the Project Site is separated from the Los Angeles River by existing rail lines and is not immediately adjacent to the River. Nevertheless, the Modified Project would further the relevant objectives, including employing high quality, attractive and distinguishable architecture (Objective 2) and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view (Objective 4). Additionally, because the RIO District does not include height regulations, the change in height would not affect the significance conclusion. Therefore, the Project would not conflict with the RIO District.

### **Citywide Design Guidelines**

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a

project, not all will be appropriate in every case.<sup>4</sup> Because the Citywide Design Guidelines do not include guidelines related to height or the location of open space, the Modified Project, like the Approved Project, is concluded to be consistent with the six objectives of the Citywide Design Guidelines for residential projects: 1) Consider Neighborhood Context and Linkages in Building and Site Design; 2) Employ High Quality Architecture to Define the Character of Commercial Districts/Employ Distinguishable and Attractive Building Design; 3) Augment the Streetscape Environment with Pedestrian Amenities/ Provide Pedestrian Connections Within and Around the Project; 4) Minimize the Appearance of Driveways and Parking Areas; 5) Include Open Space to Create Opportunities for Public Gathering/ Utilize Open Areas and Landscape Opportunities to their Full Potential; and 6) Improve the Streetscape Experience by Reducing Visual Clutter.

**Threshold (d):** With regard to light and glare, the change in building height and relocation of the residential amenities would not result in new sources of light or glare. Lighting sources and potential sources of glare would continue to be similar to what was analyzed in the Certified EIR. Therefore, the Modified Project would not create a new source of light or glare, which would adversely affect day or nighttime views in the area. Furthermore, as noted above, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Impacts would continue to be less than significant, and such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

### **3.1.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

### **3.1.4 Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance that has become available relative to visual resources. No substantial changes in the environment affecting this analysis have occurred since certification of the Certified EIR. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to aesthetic resources, and a review of feasible mitigation measures is not required.

### **3.1.5 EIR's Mitigation Measures Addressing Impact**

None.

### **3.1.6 Conclusion**

Therefore, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

---

<sup>4</sup> City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5; and Residential Citywide Design Guidelines, Multi-Family Residential & Commercial Mixed-Use Projects, May 2011, p. 5.

## 3.2 LAND USE AND PLANNING

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>LAND USE AND PLANNING:</b> Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

### 3.2.1 Impact Determination in the EIR

Impacts regarding land use and planning were provided in Section IV.F, Land Use, of the Certified EIR. A summary of the analysis from the Certified EIR is provided below.

#### Division of an Established Community

The Project Site is located at the southern edge of the Arts District, a highly urbanized area that has experienced substantial residential and commercial growth over the past decade. This area is currently characterized by a mixture of low- and mid-rise industrial and warehouse buildings that have been restored and converted to commercial uses and live/work units. The Approved Project did not propose a freeway or other large infrastructure that would divide a community. All proposed development would occur within the boundaries of the Project Site, a private plot of land which does not intersect the public right of way, as it currently exists. Therefore, the Approved Project would not physically divide an established community. As such, the Approved Project would not physically divide, disrupt, or isolate an established community and impacts were determined to be less than significant.

#### Plan Consistency

As analyzed in the Certified EIR, with implementation of the requested approvals, the Approved Project would be consistent with the goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Housing Element, and Conservation Element; the Central City North Community Plan (Community Plan); the LAMC; the Redevelopment Plan; the RIO District; and the Citywide Design Guidelines<sup>5</sup> that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. The Approved Project would also be consistent with SCAG's RTP/SCS. The Certified EIR also included, for informational purposes, a discussion of the Project's consistency with certain goals, objectives, and policies of the General Plan Framework Element and Community Plan pertaining to industrial preservation and conversion and was determined to be consistent with these goals,

<sup>5</sup> Section VI, Other CEQA Considerations, of the Certified EIR included an analysis of the City's Walkability Checklist. However, the Walkability Checklist is now part of the Citywide Design Guidelines.

objectives, and policies. Therefore, impacts associated with plan consistency were determined to be less than significant.

### **3.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Threshold (a):** As previously described, the Modified Project includes changes only to the proposed building heights and location of residential amenities. The Modified Project does not propose a freeway or other large infrastructure that would divide a community. All proposed development would continue to occur within the boundaries of the Project Site, a private plot of land which does not intersect the public right of way, as it currently exists. Therefore, the Modified Project would not physically divide an established community. Impacts would continue to be less than significant, and such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

**Threshold (b):** As previously discussed, the Modified Project would reduce the height of the residential building from 425 feet to 399 feet, with the number of floors reduced from 36 to 30, and increase the height of the office tower from 131 feet to 157 feet, with the number of floors increasing from eight to nine. The residential amenities within the residential tower would also be relocated from Level 9 to Level 12. No reduction in the number of residential units is proposed, the amount of open space would remain the same, and the Project's floor area ratio would remain the same. No other changes from the Approved Project are proposed. Accordingly, like the Approved Project, the Modified Project would be consistent with the goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Housing Element, and Conservation Element; the Community Plan; the LAMC; the Redevelopment Plan; the RIO District; and the Citywide Design Guidelines that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. The Modified Project would also be consistent with SCAG's RTP/SCS. Additionally, for informational purposes, the Modified Project would be consistent with the goals, objectives, and policies of the General Plan Framework Element and Community Plan pertaining to industrial preservation and conversion for the same reasons that the Approved Project would be. Impacts would continue to be less than significant, and such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

### **3.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

Based on the above analysis, the Modified Project is consistent with existing land use plans and regulations and would not physically divide an established community. There are no new circumstances involving new significant impacts or substantially more severe land use impacts than what was analyzed in the Certified EIR.

### **3.2.4 Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance that has become available relative to land use and planning. No substantial changes in the environment related to land use and planning beyond the construction of anticipated development have occurred since publication of the Certified EIR. Finally, as the Modified Project would not result in any new or substantially more severe land use impacts, a review of new or additional feasible mitigation measures is not required.



### **3.2.5 EIR's Mitigation Measures Addressing Impact**

None.

### **3.2.6 Conclusion**

Therefore, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## **4.0 ADDENDUM CONCLUSION**

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project. As all of the impacts of the Modified Project would be within the envelope of impacts analyzed in the Certified EIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or Project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

## Appendix A

---

# Revisions and Corrections to the Certified 2143 Violet Street Project Environmental Impact Report

As discussed in Section 4.0 of the Addendum to the 2143 Violet Street EIR, the Modified Project would alter the proposed building heights and relocate some of the residential amenities. Specifically, the height of the residential tower has been reduced from 425 feet to 399 feet, with the number of floors reduced from 36 to 30. The proposed office tower would increase in height from 131 feet to 157 feet, with the number of floors increasing from eight to nine. These proposed changes in height would result in a 30-degree angle from the Los Angeles River to the top of the residential tower. The residential amenities within the residential tower would also be relocated from Level 9 to Level 12. No reduction in the number of residential units is proposed, the amount of open space would remain the same, and the Project's floor area ratio would remain the same.

Because the maximum height of the Project would be reduced, impacts would be less than those evaluated in the Certified EIR. Furthermore, because the Project is a mixed-use project within a designated transit priority area, Public Resources Code Section 21099 applies to the Project and the aesthetic impacts of the Project shall not be considered a significant impact on the environment. For informational purposes, the following provides minor revisions to the Certified 2143 Violet Street Project EIR. Revisions to the EIR are presented below with deletions presented as ~~striketrough~~ and additional language presented in underline.

### **a. Revisions to the Certified EIR**

Section I, Executive Summary, page I-9, amend the first full sentence as follows:

These new uses would be located in two new buildings: a ~~36~~ 30-story residential tower with a maximum height of ~~425~~ 399 feet located on the western portion of the Project Site, and ~~an eight-story~~ a nine-story office building with a maximum height of ~~131~~ 157 feet located on the eastern portion of the Project Site.

Section I, Executive Summary, page I-9, amend the third through fifth sentences of the first full paragraph as follows:

Residential units, which range from one-bedroom units with approximately 598 square feet to three-bedroom units with approximately 1,045 square feet, would be located on Levels 2 through ~~36~~ 30. Approximately 2,008 square feet of residential amenities would be located on Level ~~9~~ 12 of the residential tower. Level ~~9~~ 12 would also feature a pedestrian bridge that would connect the residential tower to Level ~~8~~ 9 of the proposed office building and lead to additional residential amenities.

Section I, Executive Summary, page I-9, amend the second sentence of the last paragraph as follows:

Levels 2 through ~~6~~ 7 of the office building would contain approximately ~~150,000~~ 176,000 square feet of office space.

Section I, Executive Summary, page I-10, amend the first two sentences as follows:

Level ~~7~~ 8 would contain approximately ~~25,111~~ 8,179 square feet of office space and mechanical equipment. Level ~~8~~ 9 would contain 7,593 square feet of indoor residential amenities that would be accessible via the pedestrian bridge from the residential tower, a pool, and approximately 28,063 square feet of outdoor residential and office amenity space.

Section I, Executive Summary, page I-11, amend the first sentence of the first full paragraph as follows:

The Project would incorporate open space and recreational amenities, particularly within the ground level, on Level ~~9~~ 12 of the residential tower, and on Levels 4 and ~~8~~ 9 of the office building.

Section I, Executive Summary, page I-11, amend the first and second sentences of the second full paragraph as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level ~~9~~ 12 of the residential tower and on Level ~~8~~ 9 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and ~~8~~ 9 of the office building. Outdoor amenities are located on Levels 4 and ~~8~~ 9 of the office building, these include a variety of amenities, a pool, and landscaped and programmed open space.

Section I, Executive Summary, page I-37, amend the first sentence of the last paragraph as follows:

The Project would construct a ~~36~~ 30-story residential tower and an eight-story office building on the Project Site.

Section I, Executive Summary, page I-71, amend the third sentence of the third full paragraph as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level ~~9~~ 12 of the residential tower and on Level ~~8-9~~ of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and ~~8-9~~ of the office building.

Section I, Executive Summary, page I-74, amend the second sentence of the last paragraph as follows:

These new uses would be located in a ~~36~~ 30-story residential tower with a maximum height of ~~425-399~~ feet and an eight-story office building with a maximum height of ~~131-157~~ feet.

Section I, Executive Summary, page I-79, amend the second and third sentences of the first full paragraph as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level ~~9~~ 12 of the residential tower and on Level ~~8-9~~ of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and ~~8-9~~ of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level ~~8-9~~ of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces.

Section I, Executive Summary, page I-104, amend the first sentence as follows:

The Project would provide 2,008 square feet of indoor residential amenities on Level ~~9~~ 12 of the residential tower, 926-square-foot community room on the ground level of the office building, and additional indoor amenities on Level ~~8-9~~ of the office building.

Section I, Executive Summary, page I-107, amend the first through third sentences as follows:

In the office building, Level 4 would include 3,499 square feet of outdoor amenities for office employees, while Level ~~8-9~~ would include 28,063

square feet of additional outdoor amenities for residents. Level ~~8-9~~ of the office building would also provide 7,593 square feet of indoor amenities. In the residential tower, Level ~~9-12~~ would also include 2,008 square feet of indoor residential amenities.

Section I, Executive Summary, page I-153, amend the fourth sentence of the first full paragraph as follows:

The proposed uses would be located in a six-story, 99-foot-tall building, as compared to a ~~36~~ 30-story residential tower with a maximum height of ~~425~~ 399 feet and an eight-story, ~~134~~ 157-foot-tall office building with the Project.

Section I, Executive Summary, page I-154, amend the fifth sentence of the second paragraph as follows:

These buildings would be shorter than the ~~425~~ 399-foot residential tower and 8-story office building proposed by the Project.

Section II, Project Description, page II-1, amend the third sentence as follows:

These new uses would be located in two new buildings: a ~~36~~ 30-story residential tower with a maximum height of ~~425~~ 399 feet, and ~~an eight-story~~ a nine-story office building comprised of ~~seven-eight~~ levels of office space and a ~~eighth-ninth~~ level with indoor and exterior amenity spaces with a maximum height of ~~134~~ 157 feet.

Section II, Project Description, page II-6, amend the third sentence as follows:

These new uses would be located in two new buildings: a ~~36~~ 30-story residential tower with a maximum height of ~~425~~ 399 feet located on the western portion of the Project Site, and ~~an eight-story~~ a nine story office building with a maximum height of ~~134~~ 157 feet located on the eastern portion of the Project Site.

Section II, Project Description, page II-6, amend the last full sentence as follows:

Residential units, which range from one-bedroom units with approximately 598 square feet to three-bedroom units with approximately 1,045 square feet, would be located on Levels 2 through ~~36~~ 30.

Section II, Project Description, page II-6 to II-7, amend the last sentence starting on page II-6 as follows:

Approximately ~~2,008~~1,935 square feet of residential amenities would be located on Level ~~9~~12 of the residential tower.

Section II, Project Description, page II-7, amend the first full sentence as follows:

Level ~~9~~12 would also feature a pedestrian bridge that would connect the residential tower to Level ~~8~~9 of the proposed office building and lead to additional residential amenities.

Section II, Project Description, page II-7, amend the last paragraph as follows:

Figure II-3 on page II-8 also shows the ground level of the proposed office building, which includes retail/restaurant space oriented along Violet Street with a ground floor lobby entrance on East 7th Place, office space, and a 926-square-foot community room that residents could use for art creation. Levels 2 through ~~6~~8 of the office building would contain approximately ~~150,000~~176,000 square feet of office space. At Level 4, the height of the office building along the East 7th Place frontage is stepped back to create approximately 3,499 square feet of outdoor residential and office amenity space. Level ~~7~~8 would contain approximately ~~25,111~~8,179 square feet of office space and mechanical equipment. Level ~~8~~9 would contain 7,593 square feet of indoor residential amenities that would be accessible via the pedestrian bridge from the residential tower, a pool, and approximately 28,063 square feet of outdoor residential and office amenity space.

Section II, Project Description, page II-10, amend the first sentence as follows:

The Project would incorporate open space and recreational amenities, particularly within the ground level, on Level ~~9~~12 of the residential tower, and on Levels 4 and ~~8~~9 of the office building.

Section II, Project Description, page II-10, amend the first two sentences of the second paragraph as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level ~~9~~12 of the residential tower and on Level ~~8~~9 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and ~~8~~9 of the office building. As shown in Figure II-5 on page II-12, outdoor amenities are located on Levels 4 and ~~8~~9 of the office building, these include a variety of amenities, a pool, and landscaped and programmed open space.

Section II, Project Description, page II-10, amend the first sentence of the third paragraph as follows:

As illustrated in Figure II-4 and II-5, landscaped planters containing trees and drought-tolerant plants would be installed throughout the ground-level pedestrian paseo system and within the outdoors spaces on Levels 4 and ~~8-9~~12 of the office building.

Section IV.B, Cultural Resources, page IV.B-29, amend the first sentence of the last paragraph as follows:

The Project would construct a ~~36~~30-story residential tower and an eight-story office building on the Project Site.

Section IV.F, Land Use, page IV.F-22, amend the third sentence of the first full paragraph as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level ~~9~~12 of the residential tower and on Level ~~8-9~~ of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and ~~8-9~~ of the office building.

Section IV.F, Land Use, page IV.F-25, amend the second sentence of the second full paragraph as follows:

These new uses would be located in a ~~36~~30-story residential tower with a maximum height of ~~425-399~~ feet and an eight-story office building with a maximum height of ~~131-157~~ feet.

Section IV.F, Land Use, page IV.F-29 through IV.F-30, amend the second and third sentences of the last paragraph starting on page IV.F-29 as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level ~~9~~12 of the residential tower and on Level ~~8-9~~ of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and ~~8-9~~ of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level ~~8-9~~ of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces.

Section IV.H.4, Public Services—Parks and Recreation, page IV.H.4-20, revise Table IV.H.4-2 as follows:

**Table IV.H.4-2**  
**LAMC Section 12.21-G—Open Space Required and Provided by the Project**

Open Space Requirement	Quantity	Requirement per Unit	Total Required
1-Bedroom Units (with less than 3 habitable rooms)	144 du	100 sf per du	14,400 sf
1-Bedroom Units with Den; 2-Bedroom (with 3 habitable rooms)	143 du	125 sf per du	17,875 sf
2-Bedroom Units with Den; 3-Bedroom (with more than 3 habitable rooms)	60 du	175 sf per du	10,500 sf
Total Open Space Required			42,775 sf
Minimum Common Open Space Required (50% of Total Open Space)			21,388 sf
Open Space Proposed	Total Provided		
Indoor Common			
Level 9-12 (Residential Tower) Indoor Amenity Rooms	2,008 sf		
Level 1 (Office Building) Community Room	926 sf		
Level 8-9 (Office Building) Indoor Amenity Rooms	7,593 sf		
Subtotal	10,527 sf (0.24 acre)		
Outdoor Common			
Ground Level Paseo	12,280 sf		
Level 4 (Office Building) Outdoor Residential/ Office Amenity Area	3,499 sf		
Level 8-9 (Office Building) Outdoor Residential/ Office Amenity Area	28,063 sf		
Subtotal	43,842 sf (1.02 acres)		
Private			
Residential Tower Private Patio/Balconies	17,350 sf		
Subtotal	17,350 sf (0.40 acre)		
Total Provided	71,719 sf (1.66 acres)		
du = dwelling units sf = square feet Source: ONNI, Enns Gauthier Landscape Architects, 2018 2021.			

Section IV.H.4, Public Services—Parks and Recreation, page IV.H.4-24, amend the first three sentences as follows:



In the office building, Level 4 would include 3,499 square feet of outdoor amenities for office employees, while Level 8-9 would include 28,063 square feet of additional outdoor amenities for residents. Level 8-9 of the office building would also provide 7,593 square feet of indoor amenities. In the residential tower, Level 9-12 would also include 2,008 square feet of indoor residential amenities.

Section V, Alternatives, page V-22, amend the fourth sentence as follows:

The proposed uses would be located in a six-story, 99-foot-tall building, as compared to a ~~36~~ 30-story residential tower with a maximum height of ~~425~~ 399 feet and an eight-story, ~~134~~ 157-foot-tall office building with the Project.

Section V, Alternatives, page V-43, amend the fifth sentence as follows:

These buildings would be shorter than the ~~425~~ 399-foot residential tower and 8-story office building proposed by the Project.

Appendix G, Land Use Tables, pages 4 through 5, amend the third and fourth sentences of the consistency analysis for Policy 6.4.8 as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9-12 of the residential tower and on Level 8-9 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8-9 of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level 8-9 of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces.

Appendix G, Land Use Tables, page 19, amend the third and fourth sentences of the consistency analysis for Policy 16 as follows:

Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9-12 of the residential tower and on Level 8-9 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8-9 of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level 8-9 of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces.