



2436 N. Gates Street Project

First Addendum to ENV-2019-4984-ND

Case Number: DIR-2025-4-CLQ (CEQA Case No. ENV-2019-4984-ND-REC1)

Related Case Number: CPC-2019-4983-GPA-VZC

Project Location: 2417-2455 North Thomas Street & 2428-2436 North Gates Street
Los Angeles, CA 90031

Community Plan Area: Northeast Los Angeles

Council District: 14 – Jurado

Project Description: This document serves as the First Addendum to the Negative Declaration (ND) ENV-2019-4984-ND, dated December 2021, prepared for the Project located at 2417-2455 North Thomas Street and 2428-2436 North Gates Street (“2021 ND” for the “Original Project”). The ND was adopted on June 28, 2022, by the Los Angeles City Council, the City’s legislative body that determined the Original Project would not have a significant effect on the environment. The Initial Study that was undertaken analyzed impacts related to Aesthetics, Agriculture and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, Utilities and Service Systems, Wildfire, and Mandatory Findings of Significance. The project description for the Original Project was as follows:

The proposed project is a change of use from a school, daycare, convent, and chapel to office. There is no demolition, and no grading is proposed at this time. There are three (3) palm trees on-site and no trees within the public right-of-way that will be removed as part of the proposed scope. The existing structures, which are proposed to remain, measure approximately 17,318 square feet, with a maximum of 29.12 feet in height, and include approximately 36,395 square feet of open space and landscaping, 39 automobile parking spaces, and five (5) bicycle parking spaces (2 short-term and 3 long-term). Minor improvements to the existing structures that are proposed to remain may be necessary to comply with current codes as part of the change of use process. Any such improvements will be required to be in compliance with the applicable requirements of the HPOZ for those buildings within the HPOZ boundaries.

The applicant also requests up to 10,000 square feet of office use for a potential future development. The additional floor area will be in seven (7) one-and two-story buildings located in the northeast portion of the project site that is currently a landscaped garden area. If developed in the future, the open space would be reduced to approximately 29,745 square feet. The additional floor area will require the provision of 16 automobile parking spaces and three (3) bicycle parking spaces (1 short term and 2 long-term). The potential future development will be located on three (3) lots that are currently located outside the boundaries of the HPOZ.

Of the 11 total lots that comprise the project site, six (6) of them are within the Lincoln Heights HPOZ. The campus in its entirety was identified as a Contributing Element to the Lincoln Heights HPOZ. These structures on the campus are proposed to be preserved and maintained to allow for their adaptive reuse as office space. The existing and contributing structures will not be altered so that they continue to contribute to the historic character of the surrounding community and the HPOZ.

The requested entitlements include a General Plan Amendment from Low Residential to Neighborhood Commercial; and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to [Q]C2-1D-HPOZ.

The original determination for Case No. CPC-2019-4983-GPA-VZC, issued March 29, 2022, approved a change of use from a school, daycare, convent, dormitories, playground, and chapel to storage, office, and motion picture/television uses. The approval includes a General Plan Amendment from Low Residential to Neighborhood Commercial land use designation and a Vesting Zone Change from [Q]R1-1D and [Q]R1-1D-HPOZ to (T)(Q)C4-1D and (T)(Q)C4-1D-HPOZ. The Vesting Zone Change was approved under Ordinance No. 187,557, effective August 7, 2022. The approval also includes development of up to 10,000 additional square feet of office and motion picture/television uses on portions of the Project Site that are outside the Lincoln Heights Historic Preservation Overlay Zone (the “HPOZ”) boundaries.

Subsequent to the adoption of the 2021 ND and the approval of the original case (CPC-2019-4983-GPA-VZC), in 2022 it was discovered by Los Angeles Department of Building and Safety (“LADBS”) staff during the permit plan check process for the Original Project that the Floor Area of the existing buildings to remain was miscalculated and reflected incorrectly in the Original Project plans approved with Ordinance No. 187,557. Including the areas that were erroneously left out of the Floor Area calculation, the total existing building Floor Area to remain is approximately 18,864 square feet, corrected from 17,318 square feet.

Additionally, the approved Original Project reflected a conceptual plan which has since evolved. Specifically, the approved Original Project includes 10,000 square feet of additional/new Floor Area for office use proposed within seven (7) new buildings (Building 1-7). Under the Modified Project proposed in the Clarification of Q Conditions and D Limitations entitlement, Case No. DIR-2025-4-CLQ, the 10,000 square feet of office use will be spread across four (4) new buildings (Buildings 1-4) and allocated as modifications to existing buildings (Buildings B, C, D and F). Specifically, a total of approximately 8,514 square feet of floor area would be allocated to new Buildings 1-4 and a total of approximately 1,486 square feet of additional/net new floor area would be added to Buildings B, C, D and F.

The site plan for the Original Project indicated that the seven new buildings would be one- to two-stories, ranging from 15 feet to 30 feet in height. The revised site plan for the Modified Project

indicates building heights between 10 feet to 28 feet for the new one- to two-story buildings. As approved, the new buildings of the Original Project would range from approximately 450 square feet to 3,800 square feet. The revised site plan for the Modified Project indicates building square footages ranging from 344 square feet to 4,700 square feet for the four buildings. The proposed changes, described in further detail below, are limited to a corrected calculation of existing Floor Area, site development changes with the approved increase of 10,000 square feet of Floor Area as described above, and updated vehicular and bicycle parking requirements pursuant to California Government Code Section 65863.2 (AB 2097) and Los Angeles Municipal (LAMC) requirements, and are not considered substantial changes compared to what was approved for the Original Project.

In addition, whereas the approved Original Project did not involve changes to the existing buildings, the Modified Project includes upgrades, modifications, and improvements to existing Buildings B, C, D, and F. Buildings B, C, and D are located within the Lincoln Heights HPOZ and Building F is located outside of the HPOZ boundaries.

Within Building B, mechanical and storage space within the basement level will be converted to usable floor area, creating 300 square feet of floor area.

Within Building C, the existing full-height crawl space within the basement level will be converted to usable space, creating 400 square feet of floor area. In addition, 16 square feet of floor area will be demolished at the northwest corner of Building C to provide ADA-compliant accessibility into the building and to improve pedestrian and vehicular visibility from the two adjoining on-site driveways that are steep and intersect just to the northwest of Building C.

With the creation of usable floor area within the basements of Buildings B and C (totaling 700 square feet) and the demolition of 16 square feet at the northwest corner of Building C, a net total addition of 684 square feet of floor area will be added to Buildings B and C.

Changes to Building D include demolition of a previously existing shade structure/canopy with approximately 283 square feet of floor area. This structure was added to Building D in the 1980s or 1990s, according to approved plans for Case No. ADM-2022-6475-CWC. The Conforming Work on a Contributing Structure (CWC) case was approved by the Office of Historic Resources staff in 2022. In addition, a roof overhang/extension (or eave) will be added on level two of the building to create a covered outdoor entrance for weather protection, creating approximately 180 square feet of additional floor area. While the existing building footprint of Building D would not change, demolition of the shade structure and addition of the new roof overhang would result in a net reduction of approximately 103 square feet in Building D.

Approximately 905 square feet of office floor area will be added to Building F, which is not located in the HPOZ, which will add a second level to the existing storage building. The height of Building F with the addition would be approximately 25 feet, which is below the 30-foot building height limit imposed on the project.

See **Table 1** for a summary of the changes proposed by the Modified Project, as compared to the Original Project.

**Table 1
Original and Modified Project Comparison Table**

	Original Project ¹		Modified Project ²	
FLOOR AREA & HEIGHT				
	Existing Floor Area (To Remain)	Additional/ New Floor Area Provided	Existing Floor Area (To Remain)	Additional/ Net New Floor Area Proposed
Existing Buildings				
Building A	8,928 SF	-	9,461 SF	0
Building B	1,422 SF	-	2,516 SF	684 SF
Building C	678 SF	-		
Building D	2,970 SF	-	4,134 SF	- 103 SF
Building E	1,794 SF	-	1,825 SF	0
Building F	1,154 SF	-	700 SF	905 SF
Building G	372 SF	-	228 SF	0
Total	17,318 SF	-	18,864 SF	1,486 SF*
New Buildings				
Building 1	-	3,800 SF	-	4,700 SF
Building 2	-	1,700 SF	-	2,850 SF
Building 3	-	700 SF	-	620 SF
Building 4	-	900 SF	-	344 SF
Building 5	-	650 SF	-	No longer proposed
Building 6	-	450 SF	-	No longer proposed
Building 7	-	1,800 SF	-	No longer proposed
Total	-	10,000 SF	-	8,514 SF*
Total Floor Area / FAR (Existing & New Based on 93,340 SF Lot Area)	17,318 SF Existing To Remain + 10,000 SF New = 27,318 SF / 0.29:1		18,864 SF Existing To Remain + 10,000 SF New = 28,864 SF / 0.31:1	
Maximum Height	30' / 2 stories		30' / 2 stories (No Change)	
PARKING				
Automobile Parking (Based on Existing & New Buildings/Square Footage)	Required: 55 spaces (2 spaces/1,000 SF for Office) reduced to 44 spaces with 20% bike parking reduction Provided: 45 spaces (including 18 existing spaces to remain)		Required: 0 spaces (0 spaces required per AB 2097) Provided: 18 non-required spaces	
Bicycle Parking (Based on New Buildings/ Square Footage Only)	Required: 9 spaces (short-term + long-term) + 44 spaces for 20% auto parking reduction Provided: 53 spaces		Required: 4 spaces (2 short-term + 2 long-term) (Short-Term: 1 per 10,000 SF or Minimum 2; Long-Term: 1 per 5,000 SF or Minimum 2) Provided: 4 spaces	
HARDSCAPE & LANDSCAPE AREAS				
	Total Area	Percentage of Lot Area	Total Area	Percentage of Lot Area

	Original Project ¹		Modified Project ²	
Hardscape Area	43,174 SF	46.2%	33,791 SF	36.2%
Landscape Area	29,745 SF	31.9%	32,231 SF	34.5%
<p>1 As approved per Case No. CPC-2019-4983-GPA-VZC and Ordinance No. 187,557. 2 Per the subject application for Clarification of Q Conditions and D Limitations, DIR-2025-4-CLQ. * For the Modified Project, the total proposed additional/net new floor area will not exceed 10,000 square feet, consistent with the 10,000 square feet of additional new floor area approved under Case No. CPC-2019-4983-GPA-VZC and Ordinance No. 187,557 (the approved Original Project). However, the 10,000 square feet of additional/net new floor area will include approximately 1,486 net square feet to be added to the existing buildings to remain (Buildings B, C, D, and F) and approximately 8,514 square feet in the proposed new buildings (Buildings 1-4) rather than provided entirely in the new buildings.</p>				

The Project Applicant is also seeking to clarify the current automobile and bicycle parking requirements that the Project is subject to. In particular, the Project is eligible for California Government Code Section 65863.2 (AB 2097) which prohibits a public agency from imposing minimum automobile parking requirements on a residential, commercial, or other development project that is within a one-half mile of a major transit stop. The Project will utilize California Government Code Section 65863.2 (AB 2097) and has modified the Project plans to maintain the existing parking (18 spaces) in lieu of providing additional automobile parking pursuant to Section 12.21 A.4 of Chapter 1 of the LAMC. In addition, because automobile parking is not required, the Applicant no longer needs to utilize the bicycle parking reduction permitted per Section 12.21 A.4 of Chapter 1 of the LAMC; the Original Project utilized a 20 percent automobile parking space reduction with bicycle parking space replacement. Instead, bicycle parking will be provided per Code for the building additions (10,000 square feet of additional/new Floor Area), pursuant to Section 12.21 A.16(a)(2) of Chapter 1 of the LAMC, which requires one short-term space per 10,000 square feet of Floor Area (or a minimum of two spaces) and one long-term space per 5,000 square feet of Floor Area (or a minimum of two spaces) for a total of four bicycle parking spaces required.

As a result of the modified plans for the new buildings, the Applicant proposes other minor changes to the Project plans, including a slight reduction in the proposed amount of hardscape area and an increase in landscaped area. The Applicant proposes to provide approximately 32,231 square feet of landscaped areas (increased from 29,745 square feet for the Original Project) and approximately 33,791 square feet of hardscape areas (reduced from approximately 43,174 square feet for the Original Project). The existing landscaping for the Project Site includes both native and adaptive native plant materials.

CEQA Authority for Addendum

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

An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

Section 15162 of the CEQA Guidelines requires a Subsequent MND/ND when an MND/ND has already 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
 - 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 Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- 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
- 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.

All of the impacts associated with the Modified Project are within the envelope of impacts addressed in the adopted ND and do not constitute a new or substantially increased significant impact. The scope of the proposed modification is limited to a corrected calculation of existing Floor Area, site development changes with the approved increase of 10,000 square feet of Floor Area as described above, and updated vehicular and bicycle parking requirements pursuant to California Government Code Section 65863.2 (AB 2097) and LAMC requirements.

As discussed above, the Modified Project includes physical changes including upgrades, modifications, and improvements to existing Buildings B, C, and D, which are located within the Lincoln Heights HPOZ. The changes would be minimally visible from public locations (such as the street) within the HPOZ. The conversion of existing basement space to Floor Area in Buildings

B and C will not be visible from the exterior of the buildings. The east elevation of Building D is visible from Thomas Street, but removal of the shade structure and the replacement of the existing roof with a new roof and eave for Building D were included in the scope of work reviewed and approved by the Office of Historic Resources staff, under Case Nos. ADM-2022-6475-CWC and ADM-2023-7373-CWC. The Lincoln Heights Preservation Plan for the HPOZ serves as an implementation tool of the Northeast Community Plan (part of the Land Use Element of the City's General Plan). It outlines design guidelines for the maintenance, repair, rehabilitation, restoration, addition to, and construction of single and multiple-family residential structures, commercial structures, and the public realm, based upon the Secretary of the Interior's Standards for the Treatment of Historic Properties. Review of all work within the HPOZ is subject to review by the HPOZ Board, Cultural Heritage Commission, and/or Director of Planning, depending on the type of work proposed. HPOZ conformance review for changes proposed to Buildings B and C would also be required by staff in the Office of Historic Resources. Such review will ensure that the Modified Project will not result in a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5. The proposed changes to the building heights and square footages of the four new buildings and Building F will not result in a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5 as the new buildings and Building F are outside of the boundaries of the HPOZ. Thus, the Modified Project would not have a significant effect on the environment under CEQA.

Therefore, the Modified Project would not result in any significant impacts related to Aesthetics, Agriculture and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, Wildfire, or Mandatory Findings of Significance. Based on this determination, the Modified Project does not meet the requirements for preparation of a Subsequent ND pursuant to Section 15162 of the CEQA Guidelines.

Conclusion

Based on the above, the Department of City Planning has determined that the previously issued Negative Declaration (ENV-2019-4984-ND) serves to address the potential environmental impacts of the Modified Project. The present request does not represent a "substantial revision" to the Original Project, as defined by Section 15073.5 of the California Environmental Quality Act (CEQA Guidelines). No new mitigation measures or project revisions must be added to reduce any impacts to less than significant levels. Therefore, pursuant to Section 15073.5 of the CEQA Guidelines, a public circulation period is not required.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

EcoTierra Consulting, Inc.

APPLICANT:

NR8R Holdings, LLC