

**BOARD OF  
BUILDING AND SAFETY  
COMMISSIONERS**

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**City of Los Angeles**  
CALIFORNIA



KAREN BASS  
MAYOR

**DEPARTMENT OF  
BUILDING AND SAFETY**  
201 North Figueroa Street  
Los Angeles, CA 90012

--

OSAMA YOUNAN, P.E.  
GENERAL MANAGER  
SUPERINTENDENT OF BUILDING

JOHN WEIGHT  
EXECUTIVE OFFICER

April 01, 2024

Property Concierge  
VIVIAN CHAING  
816 E 4th Pl  
LOS ANGELES CA, 90013

**RE: 215 E WINDWARD AVE, LOS ANGELES, CA 90291**

**APN: 4238-013-006**

Restoration of a legal, nonconforming building, nonconforming with respect to any current zoning code requirements such as use, parking and/or density, that is damaged to the extent of up to 100 percent under specified provisions, may be restored as per Los Angeles Municipal Code (L.A.M.C.) Section 12.23 A5, which states as follows:

**A. Buildings with Nonconforming Area, Height, Encroachment Plane, Yards or Lot Coverage Regulations. (Amended by Ord. No. 184,802, Eff. 3/17/17.)**

**5. Restoration of Damaged Nonconforming Buildings.**

- (a) *A nonconforming building or structure, which is damaged or partially destroyed by any fire, flood, wind, earthquake or other calamity or the public enemy, may be restored and the occupancy or use of the building, structure or part of the building or structure, which existed at the time of the damage or destruction, may be continued or resumed, provided that the total cost of restoration does not exceed 75 percent of the replacement value of the building or structure at the time of the damage or destruction. A permit for restoration shall be obtained within a period of two years from the date of the damage or destruction. Except as set forth in Paragraph (b) below, if the damage or destruction exceeds 75 percent of the replacement value of the nonconforming building or structure at the time of the damage or destruction, no repairs or restoration shall be made unless every portion of the building or structure is made to conform to all regulations for new buildings in the zone in which it is located, and other applicable current land use regulations.*
- (b) *If the damage or destruction of a nonconforming single-family or two-family dwelling, multiple dwelling or apartment house in the OS, A, R, P, PB, C, M, or PF Zones exceeds 75 percent of its replacement value at the time of the damage or destruction, the building or structure may be reconstructed provided:*
  - (i) *that each side yard is no less than one-half the required side yard for new buildings in the zone in which it is located, or in other applicable current land use regulations, but in no event less than three feet; and*
  - (ii) *that the front and rear yards are at least one-half the required front and rear yards for new buildings in the zone in which it is located, or in other applicable current land use*

regulations; and

- (iii) that neither the footing, nor the building or structure projects into any area planned for widening or extension of existing or future streets as determined by the Advisory Agency upon the recommendation of the City Engineer; and
- (iv) that the height shall not exceed the allowable height for new buildings or structures in the zone in which it is located, or in other applicable current land use regulations; and
- (v) that a building permit for the reconstruction be obtained within two years of the damage or destruction from fire, flood, wind, earthquake, or other calamity or the public enemy.

6. **Replacement of Earthquake Hazardous Buildings.** Notwithstanding any other provision of this article to the contrary, a building nonconforming as to height, number of stories, lot area, loading space or parking, which is demolished as a result of enforcement of the Earthquake Hazard Reduction Ordinance (Article 1, Chapter IX of this Code), may be reconstructed with the same nonconforming height, number of stories, lot area, loading space or parking as the original building, provided, however, that reconstruction shall be commenced within two years of obtaining a permit for demolition and completed within two years of obtaining a permit for reconstruction. Provided further, that neither the footing, nor any portion of the replacement building may encroach into any area planned for widening or extension of existing or future streets as determined by the Advisory Agency upon the recommendation of the City Engineer.

Additionally, a building nonconforming as to use or yards, which is demolished as a result of enforcement of the Earthquake Hazard Reduction Ordinance, may be reconstructed with the same nonconforming use or yards provided that the approval of a Zoning Administrator is obtained pursuant to Section 12.24 X.16. of this Code.

Furthermore, pursuant to Section 12.23 B.1&2 of the L.A.M.C., a nonconforming commercial or industrial use located in an A or R zones must be discontinued as follows:

**B. Nonconforming Use of Buildings. (Amended by Ord. No. 178,599, Eff. 5/26/07.)**

- 1. *Discontinuance of Manufacturing Use in A and R Zones.* In the A and R Zones, any nonconforming use of a building first permitted in the MR1 or less restrictive zone shall be discontinued within five years from June 1, 1946, or five years from the date the use becomes nonconforming, whichever date is later.
- 2. *Discontinuance of Commercial Use in A and R Zones.* In the A and R Zones, any nonconforming commercial use of a building shall be discontinued within five years from June 1, 1946, or five years from the date the use becomes nonconforming, whichever date is later. However, the Zoning Administrator may permit its continuation pursuant to the procedures set forth in Section 12.24 X.27. of this Code.

Secondly, pursuant to Section 12.23 B.9 of the L.A.M.C., as shown below, a nonconforming building, which remains vacant for a continuous period of one year, can not be occupied except by a use which conforms to the use regulations of the zone in which it is located.

**Section 12.23 B.9 of the Los Angeles Municipal Code:**

- 9. **Discontinuance of Use.** A building or structure or portion of a building or structure, which contains a nonconforming use which is discontinued for a continuous period of one year, shall only be occupied by a use that conforms to the current use regulations of the zone and other applicable current land use regulations.

Please note that the property owner or lessee has the responsibility of demonstrating that the property has been continuously occupied (with the nonconforming use) and has not become vacant or remained unoccupied for a continuous period of one year or longer.

Note also that for existing buildings, a valid certificate of occupancy certifies that the building described on it is the

legal use and that it conformed with the building and zoning code in effect at the time of its issuance. Furthermore, requirements of other applicable codes and regulations (e.g., Building Code, Title 24, etc.) are applicable and must be complied with.

Should you need further assistance pertaining to this matter regarding restoration of damaged buildings or other code related inquiries, please contact the Code Engineer at (213) 473-3231 or 3-1-1. If you wish to obtain copies of affidavits, certificates of occupancy, building permits, and/or outstanding code violations, filed with LADBS, visit our website at <https://ladbsdoc.lacity.org/> to view the video tutorial on how to obtain your records online. Records not available from the Search Online Building Records system may be requested by attaching a Records Research Request Form (available at LADBS.org and search "Records Research Request Form") and email it to [records.ladbs@lacity.org](mailto:records.ladbs@lacity.org). You may also make an appointment at LADBS.org for records not accessible online.

For your convenience, our website, <http://www.ladbs.org> provides a lot of other information including parcel related information pertaining to this property and can be accessed via the Parcel Profile Report. You can also obtain more detailed zoning information online from the ZIMAS System (<http://zimas.lacity.org/>) which is managed by the Department of City Planning and the Department of Public Works. Per the Parcel Profile Report, this parcel is zoned **C2-1-O**. This report is accessible by clicking on the "Online Services" tab and then selecting Parcel Profile Report from within the drop down menu.

Note that a Rebuild Letter is also available online and can be generated instantly from our website. You may request this letter by selecting the "Online Services" tab and then choosing the "Rebuild Letter" item from the drop down menu.

Information on any recent outstanding orders for violations is also available. This information may be obtained by selecting the "Online Services" tab and then choosing the "Permit & Inspection Report (<https://www.ladbsservices2.lacity.org/OnlineServices>)" item from the drop down menu.

This information is provided as of **April 01, 2024**, and the zone is as shown on the Zoning Map. Should you need any further assistance pertaining to this matter, please email the Zoning Letter section at [ladbs.zoning@lacity.org](mailto:ladbs.zoning@lacity.org).

DEPARTMENT OF BUILDING AND SAFETY

## City of Los Angeles REPORT OF RESIDENTIAL PROPERTY RECORDS

### I. MAIL-TO AND CONTACT INFORMATION

<b>Company</b>	CLOSING AGENTS ESCROW	<b>Phone</b>	(818) 972-9666
<b>Contact-Title</b>	ALEXIS PINCHEIRA	<b>E-mail</b>	MYESCROWTEAM@CLOSINGAGENTS.COM
<b>Address</b>	914 N. HOLLYWOOD WAY	<b>Escrow No.</b>	CA20-4919-S
<b>City, State, Zip</b>	BURBANK, CA 91505	<b>Return Method</b>	EMAIL
<b>Country</b>	US		

### II. ASSESSOR, ADDRESS, AND LEGAL DESCRIPTION OF PROPERTY TO BE SOLD

#### A. INFORMATION PROVIDED BY APPLICANT

ASSESSOR NUMBER	Book No.		Page No.	Parcel No.
	4238		013	006
ADDRESS(ES)	Building No.	Unit No.	Property Description	No. of Units
215 WINDWARD AVE			TWO FAMILY DWELLING	
<b>COMMUNITY NAME</b>				
<b>LEGAL DESCRIPTION OF PROPERTY TO BE SOLD</b>				
Tract	Block		Lot	Arb
VENICE OF AMERICA	8		7	

#### B. INFORMATION OBTAINED THROUGH RESEARCH CONDUCTED BY CITY STAFF

ASSESSOR NUMBER	Book No.		Page No.	Parcel No.
	4238		013	006
ADDRESS(ES)	Building No.	Unit No.	Property Description	No. of Units
215 - 215 1/2 E WINDWARD AVE			TWO FAMILY DWELLING	2
<b>COMMUNITY NAME</b>				
<b>LEGAL DESCRIPTION OF PROPERTY TO BE SOLD</b>				
Tract	Block		Lot	Arb
VENICE OF AMERICA	8		7	
<b>Year(s) Built</b>	1905-2			

**III. IMPORTANT NOTES**

- A. L.A.M.C Section 151.00 requires all owners whose rental units are subject to the Rent Stabilization Ordinance to register their rental units with the Rent Stabilization Division. No landlord shall demand or accept rent until such registration has been obtained. Contact the division at (866) 552-7368.
- B. L.A.M.C Section 96.300 requires owner or owner’s agent to deliver this report to the buyer prior to the close of escrow or prior to sale or exchange of property.
- C. The information provided in this report relates only to the specific items listed. It is only a search of those official records. No field inspection was performed.
- D. This report does not cover any other items regarding the property such as illegal additions, improper construction, illegal uses, other liens, or existing corrective orders against the property. A complete inspection and report by the Los Angeles Department of Building and Safety (LADBS) on the property can be obtained through LADBS’ “Building Inspection Service” which is available for a fee. For information call (213) 473-3231.
- E. Report is valid for six months from the date of issuance. However, the items reported on may change any time after the research or report search date.
- F. The City does not certify, guarantee, or warrant that the property in question necessarily satisfies all present or future requirements of the L.A.M.C. nor does the City assume any liability for errors or omissions in the furnishing of any information required to be provided in this report.

**\*\*\*\*\*PART 1 OF 2 PARTS - REPORT OF SUPERINTENDENT OF BUILDING\*\*\*\*\***

**IV. ZONING CLASSIFICATION AND AUTHORIZED OCCUPANCY AND USE**

**A. ZONING CLASSIFICATION AND PARCEL INFORMATION**      *For zoning information, call 213-482-6881*

<b>1. Classification for Parcel:</b>	C2-1-O
<b>2. Parcel Information:</b>	
<b>INFORMATION GROUPS</b>	<b>GEOGRAPHICAL INDICATOR OF DOCUMENT NUMBER</b>
Geographical Indicators	2 (FD);YES (LIQ)
Building & Safety	ORD-172019 (ORD);ORD-175693 (ORD);ORD-172897 (ORD);ORD-168999 (ORD);ORD-175694 (ORD);ORD-186104 (ORD);ORD-130336 (ORD);ZI-2452 TRANSIT PRIORITY AREA IN THE CITY OF LOS ANGELES (ZI);ZI-1874 SPECIFIC PLAN: LOS ANGELES COASTAL TRANSPORTATION CORRIDOR (ZI);ZI-2273 SPECIFIC PLAN: VENICE COASTAL ZONE (ZI);ZI-2453 SURVEYLA - LOST VENICE CANALS HISTORIC DISTRICT (ZI);ZI-2406 DIRECTOR'S INTERPRETATION OF THE VENICE SP FOR SMALL LOT SUBDIVISIONS (ZI)
City Planning	CPC-2000-4046-CA (CPC);CPC-2014-1456-SP (CPC);CPC-1984-226-SP (CPC);CPC-2005-8252-CA (CPC);CPC-1998-119 (CPC);CPC-2019-7393-CA (CPC);CPC-2018-7548-CPU (CPC);CPC-17630 (CPC);CPC-1987-648-ICO (CPC)
Redevelopment/Historical	
Miscellaneous	

**B. AUTHORIZED OCCUPANCY AND USE**

*For occupancy and use information, call 213-482-6777*

*Authorized Occupancy and Use are based on the Building Permits and Certificates of Occupancy (C/O) of Records in LADBS. Any difference between this authorized use and the current use may indicate illegal use or conversion. A zero in the "No. of Records Found" box indicates that search of Department files has failed to reveal building permits or Certificates of Occupancy pertaining to the authorized occupancy and use for the requested property being sold. Please contact the Department of Building and Safety if additional information is required.*

Struct. No.	Address	Building Description	Parking Structure	No. of Units	Records Found	C/O Attached
1	215 - 215 1/2 E WINDWARD AVE	TWO FAMILY DWELLING		2	1	3
<b>Additional Occupancy &amp; Use Information:</b>						

<b>Note</b>	<b>If applicable, the estimated amount of Pending Assessments shown on LADBS records, resulting from the Superintendent of Building awarding a contract to repair, demolish, or secure buildings or structures or to clean premises, is listed under Part2, V. "Liens and Assessment".</b>
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**Superintendent of Building's Report Authorized for Release By** Suneeta Atyam **Date Completed** 11/24/2020

**\*\*\*\*\*PART 2 OF 2 PARTS - REPORTS OF CITY ENGINEER\*\*\*\*\***

[This report does not include items collected on County Property Tax Bills]

**V. SEWER AND LIEN AND ASSESSMENT INFORMATION**

**A. SEWER INFORMATION**

*For sewer information, call (213) 482-7483 or (213) 482-7479.*

<b>Vacant Lot</b> NO	<b>Sewer Permit</b> PERMIT ISSUED
<b>Comments</b>	

**B. LIENS AND ASSESSMENT**

*For liens and assessment information, call (213) 482-7483 or (213) 482-7479.*

**DESCRIPTION OF CITY ENGINEER'S SPECIAL ASSESSMENT RECORDS REPORT**

In accordance with Sec. 96.304(b) of the Los Angeles Municipal Code, being Ordinance No 144942, the report of the City Engineer includes a search of the following

1. Pending Special Assessment Liens for Public Improvements under State Law or City Ordinances for which an Ordinance of Intention has been adopted.
2. Existing liens of Record or Special Assessment Liens for Public Improvements under State Law or City Ordinance as shown City Engineer Records.
3. Notices of Record issued by the Department of Public Works under Chapter 22, Part 3, Division 7, of the Streets and Highways Code.
4. Notices to complete adjacent public improvements issued by the Department of Public Works under Chapter 27, Part 3, Division 7, of the Streets and Highways Code.
5. Notices of Record received by the Department of Public Works from the Fire Department requesting Brush or Weed Abatement.
6. Pending assessments for Weed Abatement performed or proposed to be performed under City Ordinance.
7. Referrals received from Los Angeles County Health Department requesting weed or debris abatement.
8. Applications for Essential Public Utilities assessment pursuant to Chapter 8, Division 6, Los Angeles Administrative Code.
9. Contracts awarded by Department of Building and Safety, to repair, demolish, or secure buildings or structures or to clean premises.

**THIS PROPERTY IS CLEARED OF ALL ITEMS LISTED ABOVE IN "DESCRIPTION OF CITY ENGINEER'S SPECIAL ASSESSMENT RECORDS REPORT".**

**RESIDENTIAL PROPERTY REPORT VIA THE INTERNET!**

Please visit our website at  
<https://www.ladbsservices2.lacity.org/OnlineServices/> to:

- >Submit applications for Residential Property Reports
- >Check the status of a Report in progress
- >Obtain a copy of a completed Report
- >Research parcel information
- >Obtain refund information and forms



City of Los Angeles - Department of Building and Safety
REPORT OF RESIDENTIAL PROPERTY RECORDS DECLARATIONS ATTACHMENT

(Per Sec. 22.12, 22.13 L.A.M.C., refunds are not granted for a report where ANY work has been done on the report.)

Table with 2 columns: PROJECT ADDRESS (215 215 1/2 E WINDWARD AVE) and ASSESSOR'S ID (4238-013-006)

Description of property being sold: [ ] 1-Family Dwelling [ ] 2-Family Dwelling [ ] Apartment [ ] Condo [ ] Vacant Lot [ ] Other

The Owner must complete item B in Section I for all reports. If the owner cannot complete all declarations under item A of Section I, the Buyer must complete Section "II. Buyer's Declaration". Check only one box under each number.

I. OWNER'S DECLARATION:

I, as owner, declare under penalty of perjury that the following statements are true and correct for the residential building for which this report is sought.

A. The following device(s) and/or material have been or will be installed as indicated below.

1) Water conservation devices

- a) [x] Have been installed.
b) [ ] Will be installed in compliance with Section 122.03 Los Angeles Municipal Code (L.A.M.C.).
c) [ ] DWP Waiver.

\*\*\*Water Conservation Certificate of Compliance, as specified in L.A.M.C. Section 122.03, must be filed prior to the close of escrow with the Department of Water and Power (LADWP). A Certificate of Compliance form may be obtained by calling LADWP at (800) 544-4498.\*\*\*

2) Security Lighting and Locks

- a) [x] Have been installed.
b) [ ] Will be installed in compliance with Section 91.8607 L.A.M.C.
c) [ ] The Security Lights and Locks Ordinance does not apply since no apartment building (3 or more units) is currently present on the property for which this report is being sought.

3) Seismic Gas Shut-Off Valves (SGSOV) or Excess Flow Shut-Off Valve (EFSOV)

- a) [x] Have been installed.
b) [ ] Will be installed in compliance with Section 94.1217 L.A.M.C.
c) [ ] The Gas Shut-off Valves Ordinance does not apply since no gas fuel lines are provided for any building on the property for which this report is being sought.

4) Metal bars, grills, grates, security roll-down shutters, and similar devices installed over emergency escape windows in sleeping rooms.

- a) [ ] Have been installed.
b) [ ] Will be installed in accordance with Section 91.1029 L.A.M.C.
c) [x] Are not installed.

5) Smoke and Carbon Monoxide Detectors

- a) [x] Have been installed.
b) [ ] Will be installed in compliance with Section 91.8603 L.A.M.C.; Section 91.420.6.2.3 L.A.M.C.

6) Impact Glazing/Approved Film for sliding glass panels of sliding-type doors

- a) [ ] Have been installed.
b) [ ] Will be installed in compliance with Section 91.6101; Section 96.302 L.A.M.C.
c) [x] The Impact Hazard Glazing Ordinance does not apply.

Further, I (owner) certify that smoke detectors in compliance with Section 91.8603 L.A.M.C. and carbon monoxide detectors in compliance with Section 91.420.6.2.3 L.A.M.C. and impact glazing/approved film for sliding glass panels of sliding-type doors in compliance with Section 91.6101; Section 96.302 L.A.M.C. will be installed prior to entering into an agreement of sale or contracting for an exchange of said residential property, or, where an escrow agreement has been executed in connection therewith, prior to close of escrow, and that within 10 days after installation, I will so advise the Department of Building and Safety in writing to Residential Property Records, c/o Cashier, 201 N. Figueroa St., 4th Floor, Los Angeles, CA 90012-4869.

- B. 1) [x] The property for which this report is being sought is one acre or less in size.
2) [ ] The property for which this report is being sought exceeds one acre in size and I have inspected the property for the existence of protected trees. (For the purpose of this declaration the definition of "protected trees" set forth in L.A.M.C. Section 46.01 shall apply.) The number of protected trees identified as located on this property is \_\_\_\_\_ (If none, write "0").

I authorize the Department of Building and Safety to verify this information by entry upon the subject property. I understand that a fee, as specified in L.A.M.C Section 98.0412(a), shall be collected by the Department of Building and Safety for any inspection required to verify this declaration.

Signature of Owner \_\_\_\_\_ Print Name WALTER SCOTT GRIEGER, TRUSTEE OF THE SCOTT GRIEGER & ALEXIS SMITH TRUST Date 11/17/2020





**City of Los Angeles - Department of Building and Safety**  
**REPORT OF RESIDENTIAL PROPERTY RECORDS DECLARATIONS ATTACHMENT**

(Per Sec. 22.12, 22.13 L.A.M.C., refunds are not granted for a report where ANY work has been done on the report.)

PROJECT ADDRESS 215 215 1/2 E WINDWARD AVE	ASSESSOR'S ID 4238-013-006
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**II. BUYER'S DECLARATION:**

I, as buyer, declare under penalty of perjury that the following statements are true and correct for the residential building for which this report is sought.

A. The following device(s) and/or material have been or will be installed as indicated below.

**1) Water conservation devices**

a)  Have been installed in compliance with Section 122.03 Los Angeles Municipal Code (L.A.M.C.).

**2) Security Lighting and Locks**

a)  Have been installed in compliance with Section 91.8607 L.A.M.C.

b)  The Security Lights and Locks Ordinance does not apply since no apartment building (3 or more units) is currently present on the property for which this report is being sought.

**3) Seismic Gas Shut-Off Valves (SGSOV) or Excess Flow Shut-Off Valve (EFSOV)**

a)  Have been installed in compliance with Section 94.1217 L.A.M.C.

b)  Will be installed in compliance with Section 94.1217 L.A.M.C., prior to entering into an agreement of sale or prior to the close of escrow when an escrow agreement has been executed in connection with the sale; and that within 10 days after installation, Buyer will so advise the Department of Building and Safety in writing to Residential Property Records, c/o Cashier, 201 N. Figueroa St., 4th Floor, Los Angeles, CA 90012-4869. Failure to comply with this requirement shall subject the buyer to the payment of a noncompliance fee in addition to the other penalties provided by law.

c)  The Gas Shut-off Valves Ordinance does not apply since no gas fuel line is provided for any building on the property for which this report is being sought.

**4) Metal bars, grills, grates, security roll-down shutters, and similar devices installed over emergency escape windows in sleeping rooms**

a)  Have been installed in accordance with Section 91.1029 L.A.M.C. for the property for which this report is being sought.

b)  Are not installed.

**5) Smoke and Carbon Monoxide Detectors**

a)  Will be installed in compliance with Section 91.8603 L.A.M.C.; Section 91.420.6.2.3 L.A.M.C.

**6) Impact Glazing/Approved Film for sliding glass panels of sliding-type doors**

a)  Will be installed in compliance with Section 91.6101; Section 96.302 L.A.M.C.

b)  Impact Hazard Glazing Ordinance does not apply.

Further, smoke detectors in compliance with Section 91.8603 L.A.M.C. and carbon monoxide detectors in compliance with Section 91.420.6.2.3 L.A.M.C. and impact glazing/approved film for sliding glass panels of sliding-type doors in compliance with Section 91.6101; Section 96.302 L.A.M.C. will be installed by Buyer within 30 days after entering into an agreement of sale or contracting for an exchange of said residential property, or, where an escrow agreement has been executed in connection therewith, within 30 days after the close of escrow, and that within 10 days after installation, will so advise the Department of Building and Safety in writing to Residential Property Records, c/o Cashier, 201 N. Figueroa St., 4th Floor, Los Angeles, CA 90012-4869.

Signature of Buyer \_\_\_\_\_ Print Name \_\_\_\_\_ Date \_\_\_\_\_

Section 96.300 L.A.M.C. requires that the seller of Residential Property within the City of Los Angeles shall apply to the City for a report of Residential Property Records and Pending Special Assessment Liens (aka Form 9) and deliver such report to the buyer prior to entering into an agreement of sale or exchange of the Residential Property or prior to close of escrow in connection therewith. Refer to the [Forms](#) section at this website for submitting a paper application or our Online service [Residential Property Report System](#) for submitting a request for RPR using the internet.

For more information regarding the Los Angeles Municipal Code and Ordinance requirements when selling residential and commercial property for existing single or two family dwellings, condominiums and apartments, please refer to the Los Angeles Department of Building and Safety website at: <http://ladbs.org/LADBSWeb/requirements-selling-property.jsf>

Address of Building ..... 215 Windward Avenue

Permit No. and Year ..... V 3012 1948

Certificate Issued ..... Jan. 24, 1949

CITY OF LOS ANGELES  
DEPARTMENT OF BUILDING AND SAFETY

**CERTIFICATE OF OCCUPANCY**

**NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.**

This certifies that, so far as ascertained by or made known to the undersigned, the building at above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses; Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Act,—for following occupancies:

1 Story Type V Garage R Occupancy

Owner ..... J. Gordon  
Owner's Address ..... 1208 Cabrillo Street  
Venice, California

Form B-95a-20M-12-48 G. E. MORRIS, Superintendent of Building By

J. Scharf



CITY OF LOS ANGELES  
DEPARTMENT OF BUILDING AND SAFETY

CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

Address of Building ..... 215 Windward Avenue  
Permit No. and Year ..... V 40 - 1950  
Certificate Issued ..... February 15, ..... 19... 50

This certifies that, so far as ascertained by or made known to the undersigned, the building at above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses; Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Act,—for following occupancies:

1 story, Type V, 37' x 37' Single Family Dwelling converted to Duplex Dwelling (Kitchen made into Bedroom; Bathroom added)

H Occupancy

Owner Joe Gordon  
Owner's Address 1208 Cabrillo Blvd.  
Venice, California



Address of Building 215-15 1/2 Windward Ave.

Permit No. and Year 73786W-68

Certificate Issued 10-8-68

CITY OF LOS ANGELES  
DEPARTMENT OF BUILDING AND SAFETY

**REHABILITATION  
CERTIFICATE OF OCCUPANCY**

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the deficiencies in this building have been corrected and the building complies with the applicable requirements of Division 49, Article 1, Chapter 9 of the Municipal Code for the following occupancies:

**One-Story, Type V, 37'6" x 45' Two-Family Dwelling.**

**R-Occupancy**

Owner Ms. Maybel Machrea  
Owner's Address 336 Hudson Avenue  
Los Angeles, California 90005

Form B100-20M-13-59

G. B. [Signature] Superintendent of Building By R. V. SIDY:bls



# 3 APPLICATION TO ALTER-REPAIR-DEMOLISH AND FOR CERTIFICATE OF OCCUPANCY

CITY OF LOS ANGELES  
DEPT. OF BUILDING AND SAFETY

INSTRUCTIONS: 1. Application to Complete Numbered Items Only  
2. Plot Plan Required on Back of Original.

1. LEGAL DESC.	LOT <b>7</b>	BLK. <b>8</b>	TRACT <b>Venice of America</b>	CENSUS TRACT <b>2735</b>
2. PRESENT USE OF BUILDING <b>(02 two family dwlg</b>	NEW USE OF BUILDING <b>( ) same</b>			DIST. MAP <b>7187</b>
3. JOB ADDRESS <b>215-15 1/2 Windward Avenue</b>				ZONE <b>C2-1</b>
4. BETWEEN CROSS STREETS <b>Main Street</b>	<b>AND Riviera Avenue</b>			FIRE DIST. <b>#2</b>
5. OWNER'S NAME <b>Maybel Machres</b>	PHONE			INSIDE COR. LOT <b>70'</b>
6. OWNER'S ADDRESS <b>336 Hudson Avenue</b>	P.O. BOX <b>L.A. 90005</b>	ZIP <b>90005</b>	KEY REV. COR. LOT SIZE <b>37. x 82.5</b> <b>17. 108.53</b>	
7. ARCHITECT OR DESIGNER	STATE LICENSE NO. PHONE			REAR ALLEY <b>15'</b>
8. ENGINEER	STATE LICENSE NO. PHONE			SIDE ALLEY BLDG. LINE
9. CONTRACTOR <b>Crest Construction Company</b>	STATE LICENSE NO. PHONE			AFFIDAVITS
10. SIZE OF EXISTING BLDG. <b>37'6" x 45'</b>	STORIES <b>1</b>	HEIGHT <b>15</b>	NO. OF EXISTING BUILDINGS ON LOT AND USE <b>1 dwelling &amp; 1 garage</b>	
11. MATERIAL OF CONSTRUCTION	EXT. WALLS <b>wood</b>	ROOF <b>compo</b>	FLOOR <b>wood</b>	
12. JOB ADDRESS <b>215-15 1/2 Windward Avenue</b>				DISTRICT OFFICE <b>WLA</b>
13. VALUATION TO INCLUDE ALL FIXED EQUIPMENT REQUIRED TO OPERATE AND USE PROPOSED BUILDING <b>\$1000.00</b>				GRADING
14. NEW WORK (Describe) <b>To comply with the Venice Rehabilitation</b>				CRIT. SOIL
<b>File No. X79817</b>				HIGHWAY DED.

NEW USE OF BUILDING	SIZE OF ADDITION	STORIES	HEIGHT	FLOOD
TYPE	GROUP	SPRINKLERS REQ'D SPECIFIED	VALUATION APPROVED	CONS.
BLDG. AREA	MAX OCC.	TOTAL	PLANS CHECKED	yes
DWELL. UNITS	GUEST ROOMS	SPACES PARKING REQ'D PROVIDED	PLANS APPROVED	ZONED
P.C. No.	CONT. INSP.		APPLICATION APPROVED	FILE WITH <b>VENICE</b>
P.C.	S.P.C.	G.P.I.	\$6.00	INSPECTOR <b>Johnson</b>
			I.F.	O.S.
			C/O	TYPIST

Plan check expires six months after fee is paid. Permit expires one year after fee is paid or six month after fee is paid if construction is not commenced.

**Aug 21 68 73786W**

CASHIER'S USE ONLY

**AUG-21-68 18787 A - 1 CK 6.00**

### STATEMENT OF RESPONSIBILITY

I certify that in doing the work authorized hereby I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance

"This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed." (See Sec. 91 0202 L A M C.)

Signed <i>Maybel Machres</i> (Owner or Agent)	Name	Date
Bureau of Engineering	ADDRESS APPROVED	
	SEWERS AVAILABLE	
	NOT AVAILABLE	
	DRIVEWAY APPROVED	
	HIGHWAY DEDICATION REQUIRED COMPLETED	
Conservation	FLOOD CLEARANCE APPROVED	
	APPROVED FOR ISSUE	
Plumbing	FILE # <b>X79817</b>	
	PRIVATE SEWAGE DISPOSAL SYSTEM APPROVED	
Planning	APPROVED UNDER CASE #	
Fire	APPROVED (TITLE 19) (L.A.M.C.-S700)	
Traffic	APPROVED FOR	





## SEC. 12.14. "C2" COMMERCIAL ZONE.

The following regulations shall apply in the "C2" Commercial Zone:

**A. Use** – No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for the following uses, and when a "**Supplemental Use District**" is created by the provisions of Article 3 of this chapter, for such uses as may be permitted therein:

1. The following stores, shops or businesses when conducted in accordance with the limitations hereafter specified:

(a) **Types of uses:**

(1) Any use permitted in the C1.5 Limited Commercial Zone by Section 12.13.5 A.2. of this Code or in the C1 Limited Commercial Zone by Section 12.13 A.2. of this Code. **(Added by Ord. No. 156,924, Eff. 8/23/82.)**

(2) Art or antique shop.

(3) Bird store or taxidermist, or a pet shop for the keeping or sale of domestic or wild animals, other than those wild animals specified in the definition of "**Accessory Use**" as set forth in Section 12.03 of this Code, under an appropriate permit issued by the Department of Animal Services as provided in Section 53.38 of this Code. **(Amended by Ord. No. 174,735, Eff. 9/13/02.)**

(4) Carpenter, plumbing or sheet metal shop.

(5) Catering shop.

(6) Feed and fuel store.

(7) Interior decorating or upholstering shop.

(8) Sign painting shop.

(9) Tire shop, provided the tire shop is in compliance with all of the development standards and operating conditions set forth in Section 12.22 A.28. of this Code. **(Amended by Ord. No. 178,382, Eff. 3/24/07.)**

(10) Restaurant, tea room or cafe (including entertainment other than dancing) or a ground floor restaurant with an outdoor eating area. An outdoor eating area for ground floor restaurants may be located anywhere between the building and any required side or rear yard. **(Amended by Ord. No. 165,403, Eff. 2/17/90.)**

(b) **Limitations:**

(1) Any of the stores, shops or business listed in Paragraph (a) may be operated as a retail business, i.e., where the majority of the merchandise sold during each calendar month is sold at retail.

As an integral part of any such retail business, there may be manufacturing of products, or assembling, compounding, processing or treating of materials; providing that the majority of such products and materials sold during each

calendar month are also sold at retail; that not more than five persons are engaged in such manufacturing of products and assembling, compounding, processing or treating of materials, and that such products, materials and all activities in connection therewith, are not objectionable due to odor, dust, smoke, noise, vibration or other causes.

(2) Any of the stores, shops or businesses listed in Paragraph (a) may be operated as a wholesale business, i.e., where the majority of the merchandise sold during each calendar month is sold at wholesale. The total area of all space used for storage on the premises in connection with any one such business shall not exceed 4,500 square feet. Such limitation shall include all storage space within a building, and all open storage space as provided for in subdivision 42 of this section. No manufacturing of products nor assembly, compounding, processing or treating of materials shall be conducted in connection therewith.

(3) In connection with the stores, shops or businesses listed in Paragraph (a) all activities, other than incidental storage and outdoor eating areas for ground floor restaurants, shall be conducted wholly within a completely enclosed building. **(Amended by Ord. No. 165,403, Eff. 2/17/90.)**

(4) Any Pet Shop where four or more dogs that are each at least four months of age are kept or maintained shall comply with the following: **(Added by Ord. No. 186,372, Eff. 12/10/19.)**

**(i) Development Standards:**

a. The total number of adult dogs and/or cats in a Pet Shop shall not exceed one for every 45 square feet of floor area of the facility, rounded up to the nearest whole number, up to a maximum of 40 adult dogs and/or cats.

b. Animal boarding areas shall not occupy the first 25 percent of the depth of the portion of the building used as a Pet Shop, or the first 25 feet, whichever is less, as measured from the front of the shop; and animal boarding areas shall be separated from retail, grooming, or food storage areas. This limitation shall not apply to animal display areas.

c. Onsite activities related to keeping or maintaining animals, including, but not limited to, grooming or feeding, shall be conducted wholly within an enclosed building.

d. Outdoor dog runs and training activities are not permitted.

**(ii) Operation Standards:**

a. Animals shall not be left outside at any time. This shall not preclude dogs being brought in and out for walks.

b. Where a Pet Shop has an entrance on any side that abuts, has a common corner with, or is across a public right-of-way from any residentially zoned land, pets can only be brought through that entrance between 7am to 9pm daily.

c. The operator shall submit the proposed dog walking route(s) to the Department of Animal Services for review and approval.

d. The maximum number of dogs to be walked by one caretaker at the same time shall be limited to the number that can be safely controlled by the caretaker, not to exceed three dogs at one time. Any dog defecation generated during dog walking shall be removed immediately and disposed of properly.

e. No unreasonable noise or odor shall be detectible beyond the property line. Sound proofing material and/ or air filtration systems shall be used when such measures are deemed necessary by the Department of Animal Services.

2. Advertising signs or structures and billboards.

3. **(Amended by Ord. No. 168,516, Eff. 2/14/93.)** Amusement enterprises, including a billiard or pool hall use, whether primary or ancillary to the subject business, bowling alley, games of skill and science, penny arcades (except those containing more than four coin or slug-operated or electrically, electronically or mechanically controlled game machines), shooting gallery, skating rink and the like, if all activities other than incidental storage are conducted wholly within a completely enclosed building, provided that:

(a) Billiard or pool hall use, whether primary or ancillary to the subject business, other than those located in a mini-shopping center and subject to conditional use approval pursuant to Section 12.24 W.27., shall also be subject to the following conditions: **(Amended by Ord. No. 173,492, Eff. 10/10/00.)**

(1) The billiard or pool hall use shall be located at least 500 feet from an A or R zone; and

(2) The billiard or pool hall use shall not be open for business or operate between the hours of 2:00 a.m. and 6:00 a.m.

4. Any use permitted in the C1.5 Limited Commercial Zone provided that all regulations and limitations of the C1.5 Limited Commercial Zone are complied with except as provided in this section. **(Amended by Ord. No. 156,994, Eff. 9/25/82.)**

5. Auditoriums having a seating capacity for not more than three thousand (3,000) people.

6. **(Amended by Ord. No. 169,584, Eff. 4/23/94.)** Automotive fueling and service station, provided that:

(a) **(Amended by Ord. No. 172,468, Eff. 4/1/99.)** All tire and tube repairing, battery servicing, automotive lubrication, mechanical adjustments and other vehicle maintenance activities shall be conducted wholly within a building, except for:

(1) Those servicing operations which are normally made in the area immediately adjacent to the pump island; and

(2) The following services when conducted within the first 18 feet in depth measured perpendicular to the entire length of the building wall containing a garage bay door, provided said area shall not displace any required parking:

(i) electrical diagnostics;

(ii) battery charging and changing; and

(iii) tire removal and replacement, if the vehicle is elevated no more than 12 inches off the ground measured to the bottom of the tire. A portable hoist may be used for this function.

Except as provided in (2)(iii) above, automotive hoists of any type or size shall be located or operated only inside a building.

(b) A six-foot high concrete or masonry wall, for the entire length of the property line, shall be constructed on any lot line which abuts an "A" or "R" Zone, or is separated therefrom only by an alley provided, however, that for a distance of 15 feet from the intersection of the lot line with the street, said wall shall be only 3 feet 6 inches high, and provided further, that where a lot line abuts an alley and the alley is used for ingress and egress the wall may be omitted for a distance not to exceed 25 feet from the intersection of said lot line with the street. Such walls shall be without openings and shall be of solid masonry or concrete with a minimum nominal thickness of 6 inches. Such walls shall be protected from damage or destruction by automobiles by the erection or installation of wheel blocks, guard rails or other appropriate devices on the property.

(c) No driveway approach shall be located within five feet of any property line abutting in an "A" or "R" Zone, said distance to be measured from the intersection of the lot line with the street to the far side of the nearest side slope of the driveway.

(d) No part of any pump island shall be located within 12 feet of any street.

(e) Display and/or storage of merchandise for sale, must be confined to the rear half of the lot measured from all street frontages, except that display of automotive merchandise for sale shall be permitted in enclosed buildings, on the pump islands, in the open within three feet of the exterior walls of the main building, and is not more than two portable or semi-portable cabinets, provided each of said cabinets shall not exceed 6 feet in height, nor exceed 40 square feet in base area, and provided further that said cabinets are located not less than 50 feet from all street lines. The display, rental and/or storage of household moving rental trucks and/or utility rental trailers as defined in Section 12.03 of this Code shall also be permitted in connection with an automobile service station, which is currently active in dispensing gasoline and oil to the general public, and pursuant to the following restrictions:

(1) If the adjoining property, on any two of the three sides of the involved parcel not abutting the main street is in the C1.5, C2, C4 or C5 zone, then up to 10% of the lot area may be used for the display, rental, and/or storage of household moving rental trucks or utility rental trailers.

(2) If the adjoining property, on any two of the three sides of the involved parcel not abutting the main street is in the CM or a less restrictive zone, then up to 25% of the lot area may be used for the display, rental, and/or storage of household moving rental trucks or utility rental trailers.

No storage, display or rental of household moving rental trucks or utility rental trailers permitted by Subparagraphs 1 and 2 above shall take place within 25 feet of a residential zone.

Except for the storage, display or rental of household moving rental trucks and utility rental trailers permitted herein, there shall be no rental, storage or storage for rental purposes of equipment commonly used by contractors or commercial vehicles which exceed a registered net weight of 5600 pounds.

(f) Except as permitted in Subsection (e) hereof, open-air storage of merchandise or materials, including rubbish containers, used tires, used batteries and items of a similar nature must be confined to a storage area completely enclosed by a solid, non-combustible wall or fence (with necessary self-closing gates) six feet in height. Said storage area must be at least 150 square feet in area. No merchandise or material shall be stored higher than said wall or fence.

(g) Lights used to illuminate the service station site shall be arranged so as to reflect the light away from the adjacent premises in an "A" or "R" Zone and the light standard for such lights shall not exceed 20 feet in height.

(h) **(Repealed by Ord. No. 169,130, Eff. 12/16/93.)**

(i) **(Repealed by Ord. No. 169,130, Eff. 12/16/93.)**

(j) Notwithstanding Section 12.24 W.27. of this Code, the automotive fueling station use shall be in compliance with all of the development standards and operating conditions set forth in Section 12.22 A.28. of this Code. **(Added by Ord. No. 178,382, Eff. 3/24/07.)**

7. **(Amended by Ord. No. 178,382, Eff. 3/24/07.)** Used automobile and trailer sales area, provided the used automobile and trailer sales area is in compliance with all of the development standards and operating conditions set forth in Section 12.22 A.28. of this Code.

New automobile sales area and a secondary used automobile sales area, provided that all of the following conditions are met:

(a) The lot containing the automobile sales areas is located and developed in compliance with the provisions set forth in Section 12.21 A.6. of this Code.

(b) Any incidental repair of automobiles shall be done within a building.

8. Baseball or football stadiums or boxing arenas, having a seating capacity for not more than three thousand (3,000) people.

9. Automotive laundry or wash rack, provided the automotive laundry or wash rack is in compliance with all of the development standards and operating conditions set forth in Section 12.22 A.28. of this Code. **(Amended by Ord. No. 178,382, Eff. 3/24/07.)**

10. Church. **(Added by Ord. No. 145,250, Eff. 12/24/73.)**

11. **(Deleted by Ord. No. 171,687, Eff. 8/19/97.)**

12. Film and tape editing and motion picture reconstruction, provided that only safety film is used; and projection and screening rooms associated with such uses shall seat no more than 100 persons. **(Added by Ord. No. 162,514, Eff. 7/31/87.)**

13. Circus or amusement enterprise of a similar type, transient in character.

14. **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** Drive-in businesses, including theaters, refreshment stands, restaurants, food stores, and the like when not subject to the conditional use requirements of Section 12.24W.
15. Ferris wheels, carousels, merry-go-rounds, and the like.
16. Film exchange.
17. Hospitals, sanitariums or clinics, except animal hospitals, when located as required by Section 12.21D.
18. Ice storage house, not more than five (5) tons capacity.
19. Medical or dental clinics and laboratories.
20. Music conservatory or music instruction.
21. Newsstand.
22. Nursery, flower or plant, provided that all incidental equipment and supplies, including fertilizer and empty cans, are kept within a building.
23. Parcel delivery service, branch, if all activities including storage and loading and unloading, are conducted within a completely enclosed building.
24. Parking buildings and all buildings containing automobile parking as primary or accessory uses. All buildings containing automobile parking shall be subject to the requirements of Sections 12.21A5 and 12.12.1.5A of this Code. **(Amended by Ord. No. 160,273, Eff. 9/16/85.)**
25. Pony riding ring, without stables.
26. Printing, publishing or lithographing establishments.
27. Automotive repair, provided the automotive repair is in compliance with all of the development standards and operating conditions set forth in Section 12.22 A.28. of this Code. **(Amended by Ord. No. 178,382, Eff. 3/24/07.)**
28. **(None)**
29. Public services, including electric distributing substation, fire or police station, telephone exchange, and the like.
30. Second-hand store, except pawnshops, if all activities other than incidental storage are conducted wholly within a completely enclosed building. **(Amended by Ord. No. 171,257, Eff. 10/4/96.)**
31. **(Repealed by Ord. No. 173,979, Eff. 6/29/01.)**
32. Studios (except motion picture).
33. School (elementary or high), educational institution, or private school. **(Added by Ord. No. 145,250, Eff. 12/24/73.)**

34. **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** Indoor swap meets when authorized pursuant to the provisions of Section 12.24 W.42.

35. Trade school, if not objectionable due to noise, odor, vibration, or other similar causes.

36. Wedding chapel, rescue mission or temporary revival church.

37. Massage parlor, where massage, alcohol rub, formentation, electric or magnetic treatment, or similar treatment or manipulation of the human body is administered by a medical practitioner, chiropractor, acupuncturist, physical therapist or similar professional person licensed by the State of California, and including an athletic club, health club, school, gymnasium, state licensed cosmetology or barber establishment, reducing salon, spa or similar establishment where massage or similar manipulation of the human body is offered as an incidental or accessory service. **(Added by Ord. No. 155,718, Eff. 8/6/81.)**

38. Laundries or cleaning establishment, provided that:

(a) All activities other than incidental storage are conducted wholly within a completely enclosed building;

(b) Not more than five persons are engaged in operating any laundry or cleaning establishment, excluding personnel engaged wholly in pressing, office and delivery work;

(c) The majority of the articles washed or cleaned during each calendar month period are handled at retail;

(d) The operations are not objectionable due to odor, dust, smoke, noise, vibration or other causes;

(e) Not more than two clothes cleaning units shall be used in any clothes cleaning establishment, neither of which shall have a rated load capacity of more than 40 pounds, or in lieu of the aforesaid two clothes cleaning units there may be used one unit with a rated load capacity of more than 40 pounds but it shall in no event exceed a rated load capacity of 80 pounds, and no cleaning fluid shall be used which is explosive or flammable at temperatures below 138.5 degrees Fahrenheit. **(Amended by Ord. No. 143,291, Eff. 6/20/72.)**

39. Miniature or pitch and putt golf courses, golf driving tees or ranges, and similar commercial golf uses. **(Amended by Ord. No. 144,365, Eff. 4/5/73, Oper. 9/1/73.)**

40. Other uses similar to the above, as provided for in Sec. 12.21 A.2.

41. Conditional uses enumerated in Sec. 12.24 when the location is approved pursuant to the provisions of said section. **(Amended by Ord. No. 117,450, Eff. 12/18/60.)**

42. **(Amended by Ord. No. 162,336, Eff. 6/6/87.)** Uses customarily incident to any of the above uses, and accessory buildings, when located on the same lot. Open storage of materials and equipment, including used materials and equipment, shall be permitted only when incidental to the use of an office, store or other commercial building located on the front portion of the same lot, and provided that:

(a) Such storage is located on the rear one-half of the lot and is confined to an area of not to exceed three thousand (3,000) square feet;



- (b) No power driven excavating or road building equipment is stored on the premises;
- (c) The storage area is completely enclosed by a solid wall or fence not less than six (6) feet in height with necessary solid gates of the same height;
- (d) No material or equipment is stored to a height greater than that of the wall or fence enclosing the storage area; and
- (e) There shall be no rental, storage or storage for rental purposes of a commercial vehicle which exceeds a registered net weight of 5,600 pounds.

The phrase “used materials and equipment” includes vehicles, boats, or airplanes which are inoperable, wrecked, damaged or unlicensed, i.e. not currently licensed by the Department of Motor Vehicles.

43. Automobile parking space required for dwellings and for buildings other than dwellings, as provided for in Sec. 12.21 A.4.

44. Shelter for the homeless (as defined in Section 12.03 of this Code) containing not more than 30 beds and designed to serve not more than 30 persons. Except within the Central City Community Plan area, any shelter for the homeless established pursuant to this subdivision shall be located at least 600 feet from another such shelter. The residential yard requirements of this section shall not apply to a shelter in an existing non-residential building. The minimum number of off-street parking spaces provided in conjunction with such use shall comply with the requirements of Section 12.21 A.4.(w) of this Code. **(Added by Ord. No. 161,427, Eff. 8/2/86.)**

45. Motion picture, television, video and other media production, no outdoor sets. **(Added by Ord. No. 172,106, Eff. 8/14/98.)**

**B. Restriction. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)** For any lot designated as Public, Quasi-Public, Public/Quasi-Public Use, Other Public, or Open Space on the land use map of the applicable community or district plan; any lot shown on the map as having existing lakes, waterways, reservoirs, debris basins, or similar facilities; any lot shown on the map as the location of a freeway right-of-way; and any property annexed to the City of Los Angeles where a plan amendment was not adopted as part of the annexation proceedings:

Any of the uses permitted by Subsection A. of this section shall require prior approval in accordance with the provisions of Section 12.24.1 of this Code.

**C. Area. (Amended by Ord. No. 144,365, Eff. 4/5/73, Oper. 9/1/73.)** No building or structure nor the enlargement of any building or structure shall be hereafter erected or maintained unless the following yards, lot areas and loading spaces are provided and maintained in connection with such building, structure or enlargement:

1. **Front Yard** – Not required.

2. **Side and Rear Yards** – Not required for buildings erected and used exclusively for commercial purposes.

For all portions of buildings erected and used for residential purposes, side and rear yard conforming to the requirements of the R4 Zone (Section 12.11 C.2. and 3.) shall be provided and maintained at the floor level of the first story used in whole or in part for residential purposes.

3. **Lot Area** – The lot area requirements of the R4 Zone (Section 12.11 C.4.) shall apply to all portions of buildings used for residential purposes.

4. **Loading Space** – As required by Section 12.21 C.6., Exceptions to area regulations are provided for in Section 12.22 C.

**SEC. 12.13.5. “C1.5” LIMITED COMMERCIAL ZONE**  
**(Added by Ord. No. 144,365, Eff. 4/5/73, Oper. 9/1/73.)**

The following regulations shall apply to the C1.5 Limited Commercial Zone:

**A. Use** – No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for the following uses, and when a “**Supplemental Use District**” is created by the provisions of Article 3 of this chapter, for such uses as may be permitted therein.

1. Any use permitted in the C1 Limited Commercial Zone, provided that all regulations and limitations of said C1 zone are complied with except as provided in this section. Any single-family dwelling, two-family dwelling or apartment house use permitted in the R4 Multiple Dwelling Zone provided that all regulations of said R4 zone are complied with except as provided in this section. **(Amended by Ord. No. 156,994, Eff. 9/25/82.)**

2. The following stores, shops, services or facilities when conducted in accordance with the limitations hereafter specified:

**(a) Types of Uses:**

- (1) Addressograph service.
- (2) Air conditioning equipment service.
- (3) Appliance repair, household.
- (4) Aquarium.
- (5) Auditorium having a seating capacity for not more than 3,000 people.
- (6) **(None)**
- (7) Baths, Turkish and the like.
- (8) Blueprinting and photostating.
- (9) Bootblack stand.
- (10) Broadcasting studio, without transmitting towers.
- (11) Building materials, retail.
- (12) Burglar alarm business.
- (13) Collection agency office.
- (14) Department store.
- (15) Employment agency or bureau.
- (16) Exhibits, commercial or cultural.

- (17) Export import business, with not more than 3,000 square feet of storage area.
- (18) Frozen food store.
- (19) Interior decorating store.
- (20) Locksmith shop.
- (21) Mimeographing service.
- (22) Museum (for profit).
- (23) Newsstand.
- (24) Physical culture institution, reducing salon.
- (25) Rubber or metal stamp store.
- (26) Sound score production.
- (27) Studio, except drama, dancing, music, and motion picture.
- (28) Swimming pool, commercial.
- (29) Telephone exchange.
- (30) Theater, and showcase theater. **(Amended by Ord. No. 148,910, Eff. 11/17/76.)**
- (31) Trading stamp business.
- (32) Typewriter or adding machine repair.

**(b) Limitations. (Amended by Ord. No. 156,924, Eff. 8/23/82.)**

- (1) All merchandise shall be sold at retail only;
  - (2) **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** All merchandise sold shall be new, except merchandise which is sold incidental to the operation of a permitted repair shop; or unless the sale of used merchandise is authorized in an indoor swap meet pursuant to the provisions of Section 12.24 W.42.
  - (3) All activities, including storage, shall be conducted wholly within an enclosed building;
  - (4) All products produced, whether primary or incidental, shall be sold on the premises, and not more than five persons may be engaged in such production or in servicing of materials at the same time.
3. Golf course or club; not including miniature or pitch and putt courses, golf driving tees or ranges, and similar commercial golf uses.

4. Park, playground or recreational or community center, privately operated. **(Amended by Ord. No. 145,250, Eff. 12/24/73.)**

5. Parking buildings and all buildings containing automobile parking as primary or accessory uses. For the purposes of this section, all references to the “PB” Zone in Section 12.12.1.5 shall be deemed to mean the “C1.5” Zone and the requirements and restrictions applicable to the erection, alteration and maintenance of parking buildings and all buildings containing automobile parking as primary or accessory uses therein shall apply in the “C1.5” Zone. **(Amended by Ord. No. 160,273, Eff. 9/16/85.)**

6. Signs as permitted in the C1 Zone - Section 12.13 A.2.(b)(4).

7. Other uses similar to the above, as provided for in Section 12.21 A.2.

8. Uses (not involving open storage) customarily incident to any of the above uses, and accessory buildings, when located on the same lot.

9. Automobile parking space as required in Section 12.21 A.4., or as provided in connection with all uses permitted in this zone.

10. The conducting of any game of bingo pursuant to the provisions of Article 4.5 of Chapter IV of this Code. **(Added by Ord. No. 153,620, Eff. 5/18/80.)**

11. Hotels (including motels), apartment hotels or hostels when no portion of a structure proposed to be used as a hotel (including a motel), apartment hotel or hostel is located within 500 feet from any A or R zone. **(Amended by Ord. No. 185,931, Eff. 7/1/19.)**

12. **(Deleted by Ord. No. 171,687, Eff. 8/19/97.)**

13. **(Deleted by Ord. No. 171,687, Eff. 8/19/97.)**

**B. Area** – No building or structure nor the enlargement of any building or structure shall be erected or maintained unless the following yards, lot areas and loading spaces are provided and maintained in connection with such building, structure or enlargement.

1. **Front Yard.** There shall be a front yard of not less than 10 feet in depth.

2. **Side and Rear Yards.** Same as required in the C1 Zone. (Section 12.13 C.2. and 3.)

3. **Lot Area.** The lot areas requirements of the R4 Zone (Section 12.11 C.4.) shall apply to all portions of buildings erected and used for residential purposes.

4. **Loading Space.** As required by Section 12.21 C.6. Exceptions to area regulations are provided for in Section 12.22 C.

**C. Restriction. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)** For any lot designated as Public, Quasi-Public, Public/Quasi-Public Use, other Public, or Open Space on the land use map of the applicable community or district plan; any lot shown on the map as having existing lakes, waterways, reservoirs, debris basins, or similar facilities; any lot shown on the map as the location of a freeway right-of-way; and any property annexed to the City of Los Angeles where a plan amendment was not adopted as part of the annexation proceedings:

Any of the uses permitted by Subsection A. of this section shall require prior approval in accordance with the provisions of Section 12.24.1 of this Code.



## SEC. 12.13. "C1" LIMITED COMMERCIAL ZONE.

The following regulations shall apply to the "C1" Limited Commercial Zone:

**A. Use** – No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for the following uses, and when a "**Supplemental Use District**" is created by the provisions of Article 3 of this chapter, for such uses as may be permitted therein:

1. Any use permitted in the CR Limited Commercial Zone but not including a church, educational institution, museum or school (elementary or high), provided that all the regulations of said CR zone are complied with except as provided in this section. Any residential use permitted in the R3 Multiple Residential Zone provided that all the regulations of said R3 zone are complied with except as provided in this section. **(Amended by Ord. No. 157,994, Eff. 9/25/82.)**

1.5. Hotels (including motels), apartment hotels or hostels when no portion of a structure proposed to be used as a hotel (including a motel), apartment hotel or hostel is located within 500 feet from any A or R zone. **(Amended by Ord. No. 185,931, Eff. 7/1/19.)**

2. **(Amended by Ord. No. 140,726, Eff. 9/3/70.)** The following retail stores, shops or businesses when conducted in accordance with the limitations hereafter specified:

(a) **Types of Uses:**

- (1) Bakery goods shop;
- (2) **(None)**
- (3) Barber shop or beauty parlor;
- (4) Book or stationery store;
- (5) Clothes cleaning agency or pressing establishment;
- (6) Clubs or lodges, bridge clubs, fraternal or religious associations; **(Amended by Ord. No. 144,365, Eff. 4/5/73, Oper. 9/1/73.)**
- (7) Confectionery store;
- (8) Custom dressmaking or millinery store;
- (9) Drugstore;
- (10) Dry goods or notions store;
- (11) Florist or gift shop;
- (12) Grocery, fruit or vegetable store;
- (13) Hospital, sanitarium or clinics (except animal hospitals). **(Amended by Ord. No. 177,325, Eff. 3/18/06.)**
- (14) Hardware or electric appliance store;

- (15) Jewelry store;
- (16) Laundry agency;
- (17) Meat market or delicatessen store;
- (18) Office, business or professional;
- (19) Photographer;

(20) Restaurant, tea room or cafe (excluding dancing or entertainment). Restaurants with drive-through service that adjoin or are across the street from or separated only by an alley from any portion of a lot in a residential zone or use or in an RA Zone, shall be subject to the conditional use requirements of Section 12.24 W.17. **(Amended by Ord. No. 173,492, Eff. 10/10/00.)**

- (21) Shoe store or shoe repair store;
- (22) Tailor, clothing or wearing apparel shop;

(23) Laundries or cleaning establishments of a self-service type using only automatic machines with non-flammable cleaning fluid; **(Added by Ord. No. 140,726, Eff. 9/4/70.)**

(24) Other uses similar to the above list when determined as provided for in Section 12.21 A.2.; **(Added by Ord. No. 140,726, Eff. 9/4/70.)**

(25) Uses (not involving storage) customarily incident to any of the above-named uses and accessory buildings (including storage garages) when located on the same lot. Automobile parking space required in connection with permitted uses as provided for in Section 12.21 A.4.

(26) **(Amended by Ord. No. 173,754, Eff. 3/5/01.)** Indoor swap meets when authorized pursuant to the provisions of Section 12.24 W.42.

(27) Joint living and work quarters for the following occupations: accountants; architects; artists and artisans; attorneys; computer software and multimedia related professionals; consultants; engineers; fashion, graphic, interior and other designers; insurance, real estate and travel agents; photographers and other similar occupations as determined by the Zoning Administrator, provided that the commercial uses are permitted by the underlying zone. **(First Sentence Amended by Ord. No. 172,572, Eff. 6/3/99.)** For all existing buildings, the yards required shall be the same as the yards observed by the existing structures on the site. For an existing building, for which a building permit was issued before April 1, 1994, and which contains no more than eight living and work quarters, the number of parking spaces required shall be the same as the number of spaces existing on the site. All other buildings used for this purpose must meet the parking and yard requirements for residential buildings. **(Added by Ord. No. 169,670, Eff. 5/13/94.)**

(28) Facilities for the development of software (including the reproduction of software and data) and other computer and media-related products and services, not including hardware. **(Added by Ord. No. 172,106, Eff. 8/14/98.)**



(29) Skilled Nursing Care Housing. **(Added by Ord. No. 178,063, Eff. 12/30/06.)**

(30) Alzheimer's/Dementia Care Housing. **(Added by Ord. No. 178,063, Eff. 12/30/06.)**

(31) Eldercare Facility. **(Added by Ord. No. 178,063, Eff. 12/30/06.)**

**(b) Limitations:**

(1) **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** All merchandise shall be new and shall be sold at retail only, unless the sale of the merchandise is authorized in an indoor swap meet pursuant to the provisions of Section 12.24 W.42.

(2) All activities are conducted wholly within an enclosed building, except that ground floor restaurants may have outdoor eating areas. An outdoor eating area for a ground floor restaurants may be located anywhere between the building and its required front yard, or between the building and any required side or rear yard which side or rear yard abuts a public street. **(Amended by Ord. No. 165,403, Eff. 2/17/90.)**

(3) All products produced, whether primary or incidental, are sold on the premises, and not more than five persons are engaged in such production or in servicing of materials. **(Amended by Ord. No. 144,365, Eff. 4/5/73, Oper. 9/1/73.)**

(4) Any exterior sign is attached to a building, does not extend more than two feet beyond the wall of the building, and does not project above the roof ridge or parapet wall (whichever is higher) of the building.

(5) **(Added by Ord. No. 174,097, Eff. 8/26/01.)** All retail stores, shops or businesses shall be limited to less than 100,000 square feet of floor area. This limitation shall apply to the cumulative sum of related or successive permits that are a part of a larger project, such as piecemeal additions to a building, or multiple buildings on a lot or adjacent lots, as determined by the Director of Planning.

**B. Restriction. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)** For any lot designated as Public, Quasi-Public, Public/Quasi-Public Use, Other Public, or Open Space on the land use map of the applicable community or district plan; any lot shown on the map as having existing lakes, waterways, reservoirs, debris basins, or similar facilities; any lot shown on the map as the location of a freeway right-of-way; and any property annexed to the City of Los Angeles where a plan amendment was not adopted as part of the annexation proceedings:

Any of the uses permitted by Subsection A of this section shall require prior approval in accordance with the provisions of Section 12.24.1 of this Code.

**C. Area. (Amended by Ord. No. 144,365, Eff. 4/5/73, Oper. 9/1/73.)** No building or structure nor the enlargement of any building or structure, shall be erected and maintained unless the following yards, lot areas and loading spaces are provided and maintained in connection with such building, structure or enlargement.

In applying the provisions of this section, the front lot line of a corner lot shall be the line separating the lot from the principal street upon which it abuts. Where said lot abuts upon a major or secondary highway such highway shall be construed as being the principal street. Where a lot abuts upon two or more highways, and in all other cases, a Zoning Administrator shall determine which street is the principal street.

1. **Front Yard.** There shall be a front yard of not less than 10 feet in depth.
2. **Side Yards.** Side yards shall be required only in the following instances:
  - (a) Along the side street lot line of every corner lot in the C1 Zone.
  - (b) Where the side lot line of the lot in the C1 Zone abuts upon the side of a lot in an A or R Zone.
  - (c) For all portions of buildings erected and used for residential purposes.

The width of such required side yard shall not be less than 10 percent of the lot width, but need not exceed five feet and shall not be less than three feet in width. Provided, however, that one foot shall be added to the width of the required side yard for each additional story above the second story, but such side yard need not exceed 16 feet in width.

In all other cases, a side yard for a commercial building shall not be required, but if provided, it shall not be less than three feet in width.

3. **Rear Yard.** A rear yard shall be provided only in the following instances:
  - (a) Where the rear of the lot in the C1 Zone abuts upon a lot in an A or R Zone.
  - (b) For all portions of buildings erected and used for residential purposes. Such yard shall be provided and maintained at and above the floor level of the lowest story designed or used for residential purposes, and the full height of the building shall be used in computing the required depth of rear yard.

The depth of such required rear yard shall be not less than 15 feet. One foot shall be added to the depth of such rear yard for each additional story above the third story, but such rear yard need not exceed 20 feet in depth.

4. **Lot Area.** The lot area requirements of the R3 Zone (Section 12.10 C.4.) shall apply to all portions of buildings erected and used for residential purposes. Provided, however, that where the lot is in the "H" Hillside or Mountainous Area, there shall be not more than one dwelling unit for each 5,000 square feet of lot area.

5. **Loading Space.** As required by Section 12.21 C.1. Exceptions to Area regulations are provided for in Section 12.22 C.

# **EXHIBIT F.3:**

## **Summary of Survey of Live-Work Ordinances**

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### **Downtown Community Plan**

CF 22-0617; CPC-2017-432-CPU; CPC-2014-1582-CA; ENV-2017-433-EIR

Recommended by the City Planning Commission on September 23, 2021

September 2022



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## MEMORANDUM

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To: Craig Weber & Brittany Arceneaux, Los Angeles Department of City Planning

From: HR&A Advisors, Inc.

Date: July 26, 2022

Re: Summary of Survey of Live-Work Ordinances

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HR&A Advisors, Inc. (HR&A) has prepared the following memorandum to assist the Los Angeles Department of City Planning (LADCP) in: 1) identifying best practices for ensuring that “Live-Work” units are used for their intended purposes; (2) evaluating indicators of demand for these units; and (3) exploring how to increase affordability of these units. Generally, the term “Live-Work” is applied to dwelling units that include both commercial and residential components within the same space, and often applied to structures in districts otherwise zoned for commercial or industrial uses. LADCP is currently in the final stages of adopting an update to the Downtown Los Angeles Community Plan (DTLA 2040) and implementing associated changes to the City’s Zoning Code, which will codify regulations related to Live-Work development projects. The proposed regulations are intended to promote expanded housing opportunities within the Downtown’s Arts District in particular, while simultaneously seeking to preserve its existing industrial character and maintaining affordability for current and future businesses and residents.

The proposed Zoning Code is composed of fifteen articles, but there are two articles that include provisions affecting the development of Live-Work units: Article 3 details aesthetic requirements through the frontage requirements, while Article 5 regulates use. Our analysis focuses on the IX-4 (Industrial Mixed Use) use provisions, which, as currently proposed, apply to the Arts District. This memorandum also includes key considerations for LADCP staff and decision makers for potentially modifying these Zoning Code components to support the objectives noted above.

## **Arts District and Live-Work Overview**

The City of Los Angeles has a long history of industrial development, although over time these uses have shrunk from housing one of the City's core employment sectors to comprising only nine percent of the City's 469 square mile land area.

Beginning in the 1970's, artists who were being priced out of other neighborhoods saw vacant industrial buildings in eastern Downtown as an opportunity for both affordable housing and workspaces. Underutilized warehouses that were once home to various industries represented a tremendous opportunity to create spaces where artists could both live and practice their craft. Responding to artists who were illegally occupying these spaces, the City passed the Joint Living and Work or Artist in Residence (AIR) Ordinance in 1981, to regulate safe building conversions. This action permitted the conversion of industrial buildings to accommodate artist living quarters and workspaces. As a result of this action and the re-location of the Southern California Institute of Architecture to the emerging Arts District, eating and drinking establishments as well as other commercial uses soon followed to capitalize on this new infusion of artistic population.

Over time, the Arts District attracted galleries, retail businesses, resident amenities, and a resurgence of larger employment-focused uses such as media production and technology, the culmination of which has stimulated broad-based demand for housing in the Arts District. The City then faced a dilemma about how to address demand for the construction of new housing in the area, as the AIR ordinance permitted only the conversion of existing buildings, but not new construction. To address this, in 2015, the City introduced a "Hybrid-Industrial" zoning district that would not only enable the continued conversion of industrial spaces to residential uses, but also would permit construction of new Live-Work housing that met certain design criteria.

In 2016, the Los Angeles City Council adopted the Hybrid-Industrial ordinance, but it was quickly subjected to legal challenge, because the ordinance also exempted such projects from the California Environmental Quality Act (CEQA) review process. Ultimately, the courts agreed with the plaintiffs and ordered the City to repeal the Hybrid-Industrial ordinance. Some new construction projects have, nevertheless, proceeded to use many of the Hybrid-Industrial zoning standards by utilizing zone changes and complying with CEQA, as required for such discretionary approvals.

The draft DTLA 2040 Community Plan and Zoning Code updates include new standards that would permit new construction of Live-Work housing in the newly proposed Industrial Mixed-use Zoning Districts (IX-3 and IX-4). During public review of the draft DTLA 2040, questions were raised about the relative demand for Live-Work, opportunities to support affordability, and the relative alignment of proposed policies with City and stakeholder goals.

## **Live-Work Regulations in Other U.S. Cities**

HR&A surveyed Live-Work ordinances in a selection of other cities to provide comparisons with the draft DTLA 2040. For the purpose of this analysis, we examined the following Live-Work ordinances in: Denver, Colorado; Oakland, California; Boston, Massachusetts; Seattle, Washington; and Santa Rosa, California.

As in the Arts District, Live-Work uses are generally encouraged in certain parts of each city reviewed through their respective zoning ordinances. In most cases, Live-Work is defined as an "as-of-right" permitted use. Typically, Live-Work uses are classified as a non-residential use and therefore are allowed in commercial and/or industrial zone districts, but not residential districts. Finally, most of the cities we reviewed

have business license requirements for Live-Work units.

For each city, the following provisions were analyzed and compared to those proposed by LADCP:

- Average unit sizes;
- Unit mix between standard residential and Live-Work units;
- Location of workspace within units and buildings;
- Conditions affecting natural or deed-restricted affordability;
- License and permitting requirements; and
- Mandatory or voluntary targeting of artists.

### Average Unit Sizes

Of the various cities surveyed, only Oakland and Santa Clara stipulate minimum unit sizes for Live-Work units, which are 660 SF and 1,000 SF, respectively. Typically, rather than unit size, cities regulate the allocation of space within a unit that can be occupied by residential and/or commercial uses. Seattle, for example, stipulates that the residential portion of Live-Work units may not exceed one-third of the total building area while Denver places the residential limit at 50 Percent.

The benefits of using percentages by building occupancy as opposed to minimum unit sizes is that there is greater flexibility in the floor plans for different types of work and living places. Furthermore, such regulations permit flexibility between units to align with constraints that arise when converting a building that was originally constructed for nonresidential purposes to a Live-Work space. Accordingly, the City allows for non-residential to residential conversion to meet any type of dwelling conversion without having to meet the Live-Work unit requirements.

As currently proposed, the City's zoning ordinance contemplates a minimum average unit size of 1,000 SF, putting its requirements at the upper end of the spectrum of cities that were analyzed<sup>1</sup>. It should be noted that while larger unit sizes may allow and encourage a larger range of productive activities, it will also likely come at the expensive of affordability. Given these tradeoffs, this requirement should be considered in a broader context of policy goals.

The overall intent of the Hybrid Industrial district is to encourage production and job-producing activities. In an August 21, 2021 LADCP staff report, it was noted that in conversations with stakeholders, two overarching outcomes that were desired were: to reinforce the neighborhood's industrial character; and sustain the district's legacy as a center for manufacturing, fabrication, creative and artistic pursuits. To balance these goals, the City's development of the Hybrid Industrial district allowed for the transition of previously-heavy industrial uses to a mixed-use office, production, and makers district, complemented by newly converted office space, and other commercial amenities. The provision of Live-Work units helps achieve this goal by allowing not only for adequate space for job-producing activities but also for artisans and others to reside within the district. Therefore, while affordability is a consideration on the development of zoning standards

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<sup>1</sup> For purposes of our analysis, we reviewed the Live-Work ordinances of the following cities: Boston, MA; Denver, CO; Oakland, CA; Santa Rosa, CA; and Seattle, WA. In Denver and Seattle, there was no minimum unit size. Rather, those cities limit the allocation of space to residential/non-residential activities within the building. In cities with minimum unit size requirements, Oakland requires 660 SF while Santa Rosa requires 1,000 SF, respectively.

for the Arts District, there are also other factors and larger policy goals which must be considered.

#### Unit Mix Between Standard Residential and Live-Work Units

When it comes to allowing conventional residential development alongside Live-Work units, Boston's ordinance is the only example we found in our survey that allows these two groups of uses to coincide in the same building. As noted above, it is more typical elsewhere to classify Live-Work units as a non-residential use. As such, Live-Work units are generally located only within commercial, mixed use and industrial districts.

In some instances, the distinction between standard residential and Live-Work units is driven by the fact that Live-Work units are permitted only as a conversion of existing industrial or commercial properties. This is the case in both Oakland and Santa Rosa where construction of new Live-Work units is prohibited. In Oakland, the city's zoning code states that Live-Work units are "only permitted in buildings originally designed, constructed and completed for commercial or industrial purposes."

As currently proposed, the City's zoning ordinance contemplates that all units within the IX4 Use District are Live-Work units, and standard residential units are not permitted. In addition to the average unit size requirements discussed above, and the workspace location requirements discussed below, the City's proposed zoning ordinance stipulates that Live-Work units must be built to a commercial occupancy standard (to accommodate up to five employees) and must have open floor plans. However, 100 percent affordable housing projects are permitted by right and are not required to comply with Live-Work development standards within the Arts District.

#### Location of Workspace Within Units and Buildings

Because Live-Work units can have a storefront presence and serve to activate the streetscape, some cities have requirements which regulate the location of workspaces within the units and buildings. Cities such as Seattle and Oakland accomplish this with requirements dictating that "work" portions of Live-Work units must be on the street-facing side and on the ground floor of the respective building. Such approaches are more stringent than those proposed for DTLA 2040.

On the other hand, because Live-Work units are inherently flexible spaces, other cities seek to promote flexibility of use over time in their regulations. Santa Rosa, for example, requires that living and working spaces may not be separated within the unit and discourages the use of partition walls. Boston takes this approach one step further by allowing for the consolidation of the workspaces within Live-Work units to a single floor, corridor, or portion of the building rather than requiring the spaces to be distributed within Live-Work units. Such examples demonstrate that locational requirements of workspaces can be used to either limit or promote flexibility within projects.

As currently proposed, the City's zoning ordinance contemplates that the workspace associated with a Live-Work unit would be between 48% and 50% of the unit's floor area, which is consistent with Building Code requirements related to commercial occupancy within such units.

#### Conditions Affecting Natural or Deed-Restricted Affordability

The combination of zoning and building requirements directly has an impact on affordability. In general, imposing minimum average unit sizes, in-unit workspace requirements, occupancy standards practicalities relating to construction types most suitable for the type of mixed-use buildings required in certain Industrial

Mixed-Use districts can impact the market's ability to deliver units at affordable prices.

Requiring larger unit sizes translates into greater construction costs on a per unit basis which dictates the price at which a unit is rented or sold. Furthermore, minimum unit sizes at a given floor area ratios (FAR) set by zoning requirements or other practical (i.e. height) limitations, act to limit the number of units that can be built, and limit the ability of developers to spread fixed costs (e.g., land and design costs) over more units, increasing per-unit costs.

From a practical perspective, developers in IX-4 Use District are required to both meet commercial occupancy standards for Live-Work units, and to provide at least 1.5 FAR of productive (i.e., creative office or production) uses. While this mix of uses may be possible to provide in podium buildings, they are most frequently delivered in mixed-use concrete or steel-frame buildings. Building materials have a direct impact on affordability, particularly at a time that construction cost escalation has adversely impacted feasibility for multifamily projects. In general, less durable wood frame construction has lower overall construction cost per square foot than concrete, steel or to a lesser extent, heavy timber construction.

#### License and Permitting Requirements

The surveyed cities had mixed requirements regarding whether business licenses are required to occupy a Live-Work unit. All cities reviewed require business licenses for commercial activity to ensure business owners pay business license or sales taxes for products sold or created at the location. In places such as Oakland and Seattle, Live-Work units must produce a tax certificate to lease a Live-Work unit.

Some cities also require additional licensing for both the residential as well as nonresidential portion of the building. Denver has a specific permit that is issued exclusively for Live-Work units while Boston has an artist certification process that Live-Work units must go through before they can be occupied. The purpose of the license requirement in Boston is to ensure that residents are in fact artists—the targeted industry for Boston's ordinance. As part of this process, prospective tenants are required to submit documentation to the City of Boston's Artist Resource Manager demonstrating their body of work for consideration of an Artist Certificate. It is this certification that enables individuals with this documentation to occupy Live-Work units.

As currently proposed, the City's zoning ordinance does not contemplate a stipulation that inhabitants of Live-Work units have established business licenses, nor would it stipulate that specified work, production, or artistic activities ensue within the units. Rather, it seeks to ensure that the capacity for such activities is accommodated.

#### Mandatory or Voluntary Targeting of Artists

Of the cities surveyed, only Boston explicitly and specifically targets its Live-Work program to artists. Boston's Live-Work program is open only to artists who are certified through an application process with the city. This process is to ensure the continued presence and viability of the artist community in Boston, which the city has identified as a priority policy goal.

More common is the incidental targeting of artists by permitting artist galleries and art-related uses as a permitted Live-Work commercial activity. For example, in Denver the city permits an "artist studio" as a permitted commercial use; in industrial districts only art studios are permitted as the "work" function in Live-



Work units. In this way, cities implicitly promote the use of Live-Work units for artists by permitting arts-related uses as permitted “work” functions within Live-Work units.

As currently proposed, the City’s zoning ordinance allows for a broad range of artistic, production, and work activities within Live-Work units.

### **Market Feedback**

To ground our analysis of issues related to Live-Work Spaces within the Arts District, we supplemented HR&A’s experience and ongoing conversations with market experts about development in Downtown Los Angeles in the Arts District, with a formal interview with Linear City, a company with extensive and long-standing experience delivering Live-Work housing product<sup>2</sup>. In our discussion, some of the key considerations that were identified were:

- Flexibility of Live-Work space for differing types of uses over time; and
- Desire to temper market trends that could make certain development less feasible.

#### Flexibility of Live-Work Space

Preservation of loose requirements related to work uses in Live-Work units and flexibility in the allocation of space within the units were top issues. We heard concerns about regulating the share of space that should be allocated to work and living functions. Comments reflected a desire to set a minimum size standard to ensure Live-Work spaces can be used for work, without a definition of the Live-Work space allocation, which is currently set at range of 48-50 percent of the total unit size. It was observed that use evolves over time, both between tenants and as tenants’ businesses potentially grow or shrink over time; definitions such as the Live-Work space allocation or permitted “work” uses were found to be overly prescriptive and limiting to a narrow scope of professions. However, minimum Live-Work unit sizes were seen as an opportunity to support a range of different businesses of different types and stages over time. The minimum unit size is perhaps even more relevant for consideration in the wake of the COVID-19 pandemic, which has made Live-Work ubiquitous in every residential setting, as workers and businesses increasingly seek work space in proximity to their own homes.

#### Market Trends, Land Values & Development Feasibility

We heard a strong desire for the City to maintain minimum standards for unit size and occupancy standards as proposed. In addition to the reasons for setting minimum unit sizes listed above, interviewees sought greater uniformity in the types and sizes of units that were delivered to the market as well as their quality of construction. The variation in product type was observed to allow some developers to produce an inferior product marketed as Live-Work but not usable as such. The addition of this housing product to the market increased land values due to strong demand for housing in the Arts District, challenging the feasibility of other product types (including Live-Work/adaptive reuse).

### **Demand Drivers**

To examine the drivers of demand for Live-Work units, HR&A sampled existing Live-Work buildings located within the Arts District that have similarly large unit sizes as contemplated by the proposed code; these

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<sup>2</sup> On March 15, 2022, HR&A interviewed Yuval Bar-Zemer

buildings are largely for-sale condominiums. While there are many newer Type III-B (“podium”) in the Arts District, these buildings (which are generally rental apartments) have smaller average unit sizes and are less reflective of the code’s intent. As such, we focused on sale trends for existing condominium buildings for the purpose of this analysis. For each property, we evaluated sales transactions from the last five years as well as business license data. Combined, these datasets allowed us to examine the following questions:

- What is the relative demand for Live-Work units in the Arts District? Do the trends indicate increasing or decreasing demand?
- Are business starts in Live-Work units increasing or decreasing?
- Are units being utilized as workspaces and if so, what types of businesses occupy them?
- Do homebuyers prefer units smaller or larger than the proposed minimum unit size?

**Figure 1: Locations of Live-Work Units Analyzed within the Arts District**

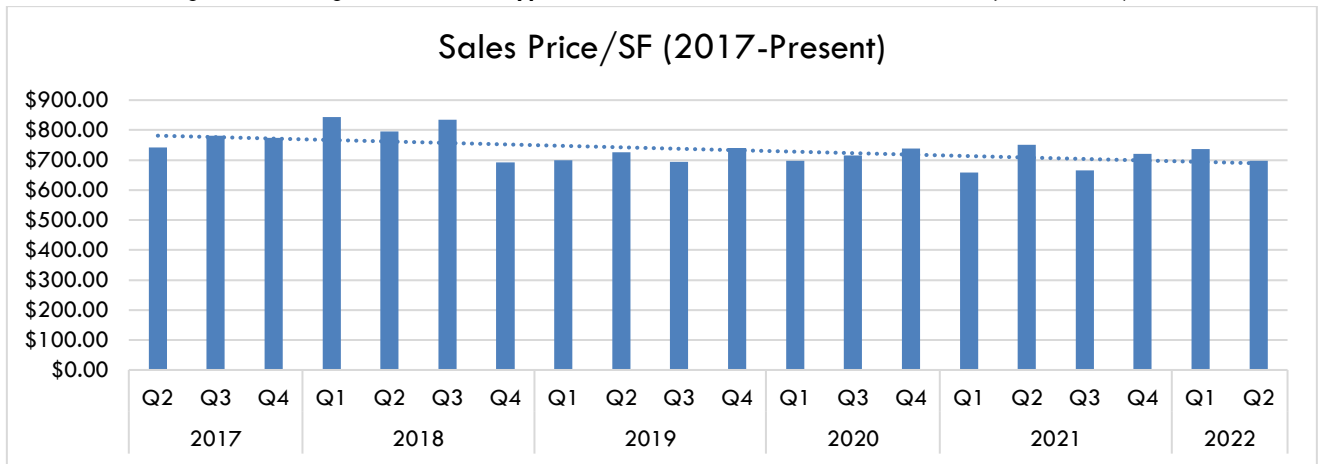


Source: Redfin

### Live-Work Demand

To determine the demand for Live-Work units, we examined the 5-year historical sales price per square foot as well as the number of units sold as a percentage of the total sample size inventory within the Arts District. Although there are some Live-Work units for rent in smaller buildings, historical data is inconsistent. There are also newer, larger rental buildings in the Arts District, but these properties do not reflect the minimum unit size requirements and construction type requirements included in the draft DTLA 2040. As such, we focus our analysis primarily on for-sale units.

**Figure 2: Average Sales Price of Type I and II Live-Work Units in the Arts District (2017-2022)**

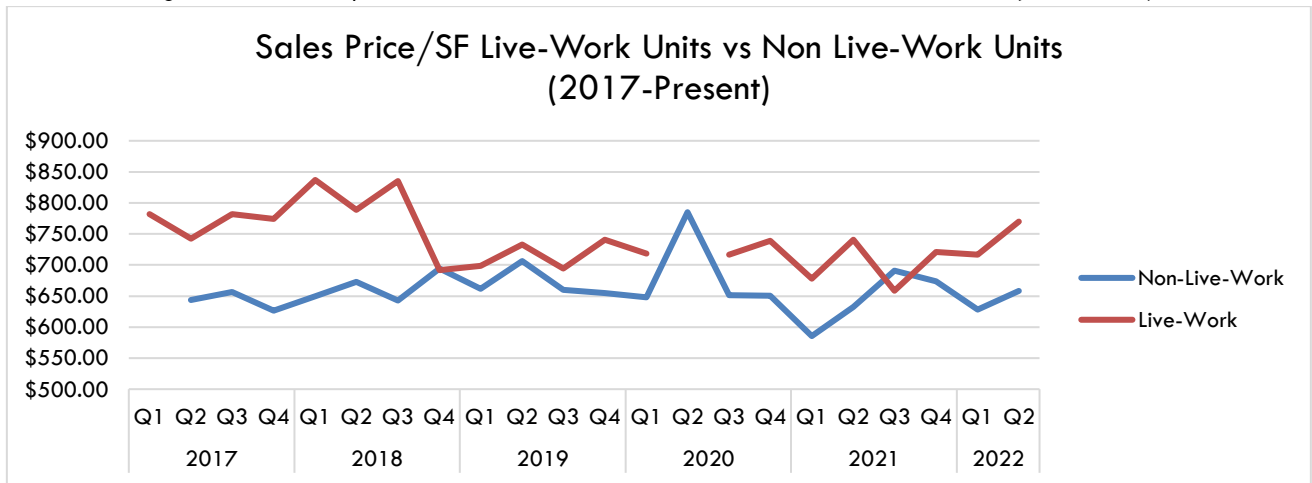


Source: Redfin

Overall, the average price of Live-Work units has slightly declined over the last five years, in contrast to average condominium sale prices across the City, which increased by 43 percent (to \$617/SF from \$430/SF) over the same period. As shown in Figure 2, from 2017 to 2022, the average sales price decreased approximately five percent (to \$732/SF from \$772/SF). This trend may reflect the fact that Arts District units are larger and more expensive, and limited inventory of more-affordable units has driven up prices for value-oriented buyers. However, it also indicates that the Arts District and Type I and II Live-Work units are not as desirable as other typologies in different markets.

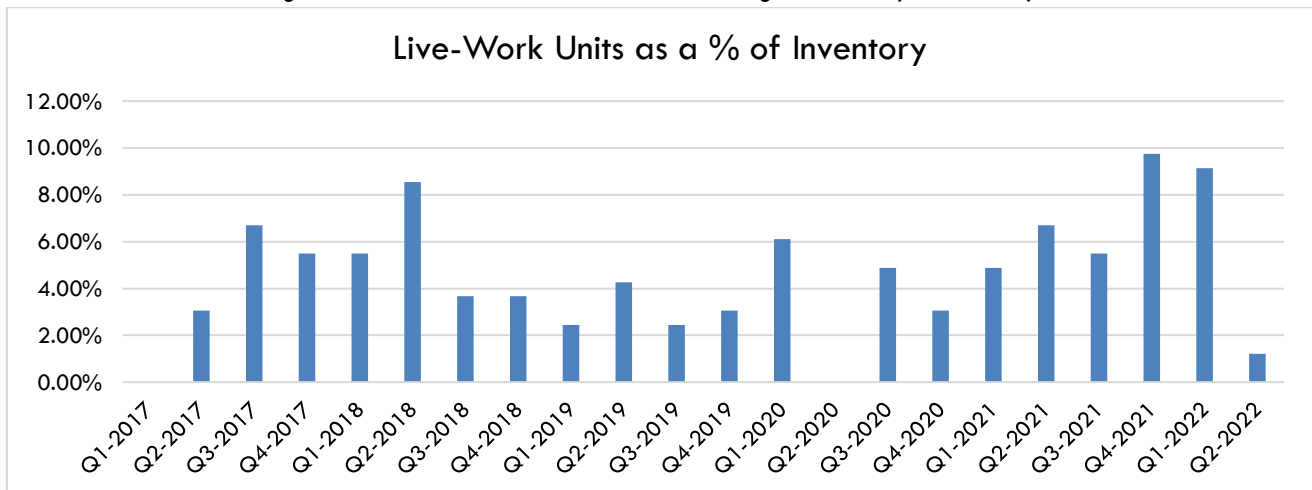
As shown in Figure 3, compared to all units sold within the Arts District over the same period, the sales price per square foot for Live-Work units is greater than non Live-Work units in every quarter except Q4 2018 and Q3 2021, reflective in part of the higher-quality (largely through adaptive re-use) construction.

**Figure 3: Sales Price/SF of Live-Work Units vs Non Live-Work Units in the Arts District (2017-2022)**



Source: Redfin

**Figure 4: Turnover of Units in Arts District Buildings Evaluated (2017-2022)**



Source: Redfin

There was a considerable uptick in turnover for Live-Work units beginning in Q1 2021 continuing through Q1 2022 when compared to historical rates, reflecting in part a frozen real estate market during the initial months of the COVID-19 pandemic in 2020.

Although transactions have increased, stagnant sale prices suggest that there may be limited demand for Live-Work units in comparison to smaller, more affordable units, which are increasing rapidly in value citywide.

### How the “Work” Function of Live-Work Units is Utilized

We further examined historic business license data for the same units we performed our sales analysis to understand business (vs. exclusively resident) demand for Live-Work units. It is worth noting the limitations of this dataset, as it indicates only new business starts and not closures. Therefore, it is not possible to know



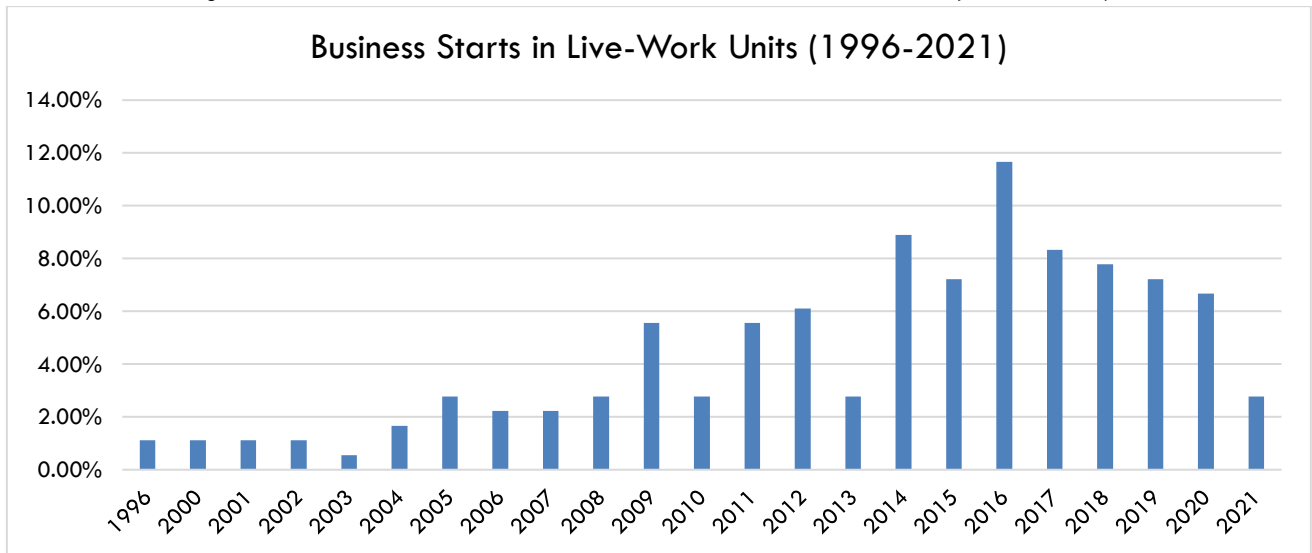
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whether the number of new businesses is cumulative or is replacing other businesses. Nonetheless, it is still a relevant proxy for utilization of Live-Work units as a workspace.

We first considered the number of business starts registered to addresses of the selected units between 1996 and 2021. Overall, there is an upward trend when considering the relatively few business licenses issued prior to 2013. The number of business licenses peaked in 2016 but held steady between 2017-2020, with a noticeable dip in 2021. Combining the relatively few business starts in 2021 with the comparatively higher number of sales transactions depicted in figure 5, it is likely that the increased number of transactions in 2021 was driven by buyers intending to use their units primarily for living, not work.

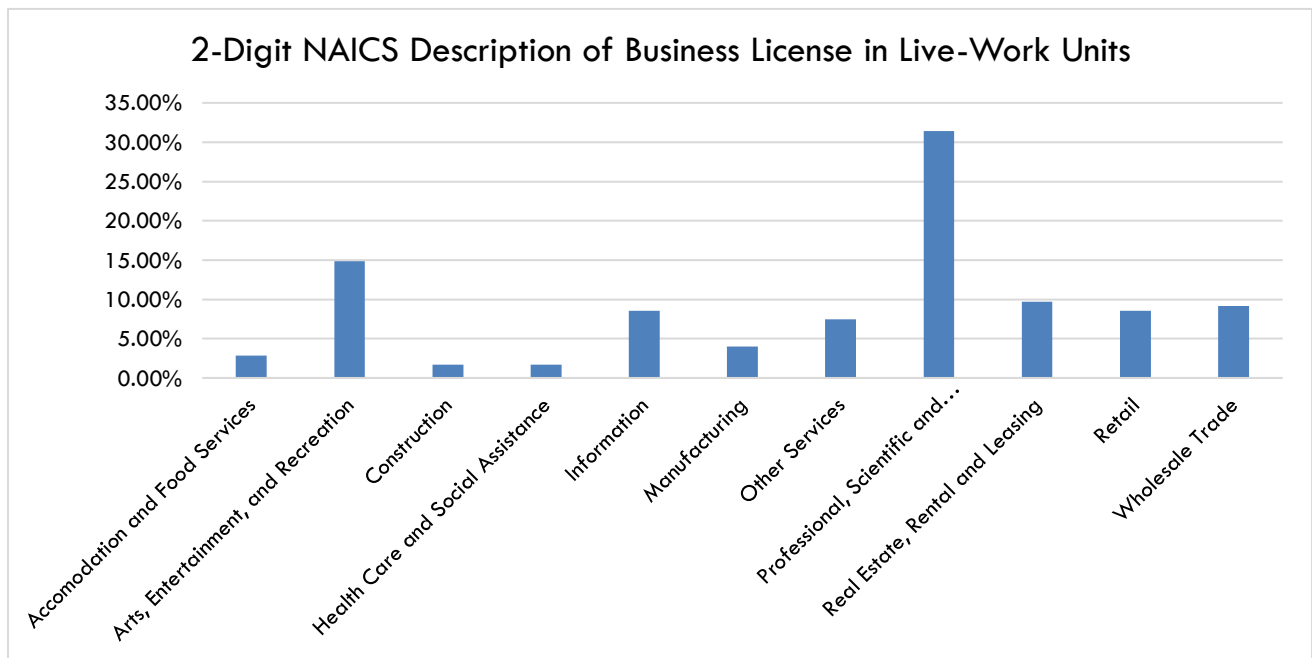
**Figure 5. Business Starts Within Selected Live-Work Units in the Arts District (1996-Present)**



Source: City of Los Angeles

We also reviewed the types of businesses that have been established within Live-Work units. Using business license data from the City, the following table summarizes the businesses based in live-work units by 2-digit North American Industry Classification System (NAICS) designation.

**Figure 6. Business Licenses of Selected Live-Work Units, Top 10 Industries (1996-Present)**



Source: City of Los Angeles

The most popular use of Live-Work units was for professional, scientific and technical services businesses (31%) followed by art, entertainment, and recreation (14%) and real estate, rental and leasing (9%) businesses. Information, retail and wholesale trade accounted for significant numbers of business licenses. The use of Live-Work units for these purposes aligns with the overall trend as a result of the pandemic's work-from-home trends associated with desk-focused businesses.

### **Key Considerations for Optimizing City Objectives for Live-Work Provisions**

Based on HR&A's experience and previous analysis of Live-Work programs, we recommend greater consideration should be given to unit size requirements, as well as the location of work spaces relative to the residential units. While such provisions may achieve certain policy goals to maintain a land use focus on employment activities in the Arts District, taken together, the provisions run counter to the City's objectives for producing housing that is affordable to households at different income levels. Greater flexibility of these provisions (outlined below) could help the City achieve its dual goals of appropriately scaled Live-Work units and housing affordability.

#### Location of Workspace Within Units and Buildings

As proposed in the current ordinance, the average Live-Work unit must be no smaller than 1,000 SF, and each unit must have a ratio of 48-50% workspace. As was noted in the survey of other cities' Live-Work ordinances, this places Los Angeles' minimum unit size at the top end of the range. While minimum unit size requirements can help to ensure that Live-Work units are large enough to function for both living and working, other approaches identified can help maintain this balance while also helping the space to remain affordable.

Examples of alternative approaches include Boston's flexibility in allowing the consolidation of workspaces in a portion of the building while remaining separate from the living space. According to Boston's ordinance regulating Live-Work spaces, workspaces may be integrated within the living quarters, a portion of a floor's corridor, or a separate floor altogether. This flexible approach of decoupling the Live-Work function requirement from the unit itself to the entire structure could allow for more efficient use of space within existing buildings and allow for property owners to yield additional units, both of which can reduce rents and sales prices of units by removing artificial cost minimums on a per-unit basis associated with the additional floor area.

HR&A recommends exploring the addition of an exemption to the Live/Work standards of the IX4 use district that would allow for the decoupling of workspace from residential units, such that when the space is decoupled there is no longer an average unit size minimum for residential units. There should be minimum size workspaces (potentially 300 square feet), and further requirements that workspaces be equipped with necessary infrastructure for the type of productive uses desired by LADCP (i.e., water/sinks, appropriate ventilation, electrical capacity, etc.). Furthermore, these spaces should be designed to accommodate an equivalent number of smaller businesses/sole proprietors as would be accommodated in Live-Work units. Such an exemption could be allowed for all projects, or can be qualified to apply only when a requisite number of conventional Live/ have been provided (e.g., 25 Live-Work units). The City may also wish to consider whether the floor area dedicated to decoupled workspace pursuant to Live-Work obligations can also be credited toward the 1.5:1 FAR obligation for larger-scale employment space that is also required in the IX4 use district.



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### Permitted Uses

As currently permitted in the zoning ordinance, only the following uses are permitted to be in the workspaces of Live-Work units: office, personal services, light manufacturing, and artistic and artisanal light manufacturing uses. HR&A recommends that permitted workspace uses should be expanded to also include limited retail uses.

*Conclusion: Live-Work provisions in zoning ordinances can be a valuable tool for promoting work-from-home and small-business growth in a post-COVID world. However, to achieve affordability goals, LADCP should consider reducing minimum unit sizes or permitting workspaces to be decoupled from Live-Work units under certain conditions.*



**Z.I. NO. 2406**  
**SMALL LOT SUBDIVISION**  
**REVISED DIRECTOR'S INTERPRETATION**

**COUNCIL DISTRICT: 11**

**GENERAL REQUIREMENTS AND PRINCIPLES:**

On October 23, 2014, case number DIR-2014-2824-DI-1A was approved by the City Planning Commission. The Director's Interpretation clarifies the Venice Coastal Specific Plan (Ordinance No. 175,693), as it relates to Section 12.22 C. 27 of the Los Angeles Municipal Code, established by the Small Lot Subdivision Ordinance (No. 176,354). The Director's Interpretation applies to all Small Lot Subdivision cases within the boundary of the Venice Coastal Zone Specific Plan.

The subject Director's Interpretation determines how the Small Lot Subdivision provisions shall be applied within the Venice Coastal Zone Specific Plan.

The Director's Interpretation shall be effective on or after October 23, 2014. Any project application deemed complete after this date, shall be subject to the Director's Interpretation contained herein. This Director's Interpretation supersedes the previous interpretation issued by the City Planning Commission on February 12, 2010 (Case No. DIR-2008-4703-DI-1A).

**Instructions:**

Refer all applicants who wish to submit an application for a Small Lot Subdivision (SL) within the boundary of the Venice Coastal Zone Specific Plan to the Department of City Planning Plan Implementation Division and Subdivisions staff.

The Director's Interpretation language is attached, covering the general requirements and principles.

The Director's Interpretation is as follows:

1. Where provisions in the Venice Coastal Zone Specific Plan differ from provisions contained in Chapter 1 of the Los Angeles Municipal Code (LAMC), the Venice Coastal Zone Specific Plan shall supersede those other regulations. Where provisions are silent in the Venice Coastal Zone Specific Plan, regulations of the Los Angeles Municipal Code (LAMC) apply, including Section 12.22 C.27.
2. APPLICABILITY OF SMALL LOT ORDINANCE IN THE VENICE COASTAL ZONE SPECIFIC PLAN: Notwithstanding LAMC Section 12.22.C.27 (Small Lot Ordinance), small lot projects within the Venice Coastal Zone Specific Plan shall adhere to multi-family development procedures and standards established within the Specific Plan. Additionally, any standards which further restrict lot area, density, setbacks, stepbacks, lot coverage, open space, driveway access and/or parking shall apply to the entire subdivided area, including individual resulting small lots.

Applications for small lot developments within the Venice Coastal Zone Specific Plan shall be subject to Director of Planning review pursuant to Section 8 of the Specific Plan, either "Director of Planning Sign-Off" or "Project Permit Compliance Review", depending on the location of the project and number of dwelling units proposed. Project Permit Compliance review shall be completed concurrent with any application for a subdivision.

3. PARKING: Required parking for subdivision projects shall be based on the parking requirements for multiple dwelling uses, based on the width of the pre-subdivided lot, pursuant to Section 13.D of the Venice Coastal Zone Specific Plan. Beach Impact Zone Parking, if applicable, shall be provided pursuant to Section 13.E of the Specific Plan, consistent with multi-family parking requirements.
4. DRIVEWAYS: Pursuant to the Venice Coastal Zone Specific Plan, all driveways and vehicular access shall be from alleys, when present. When projects abut an alley, each newly resulting subdivided lot shall be accessible from the alley and not the street. Exceptions may be made for existing structures where alley access is infeasible.
5. SETBACKS: Front, rear, and side yard setbacks and lot coverage and open space requirements within each lot resulting from a small lot subdivision shall be consistent with the Specific Plan, where it sets limitations, if applicable. In the Ballona Lagoon West Bank and Ballona Lagoon (Grand Canal) East Bank Subareas, side yard setbacks on all lots within a small lot project must be 3.5 feet in width, consistent with Sections 10.A.2.b(4) and 10.B.2.b.3(d) of the Specific Plan. This requirement is in addition to the 5-foot setback where the lot abuts another lot not created pursuant to the small lot subdivision ordinance, pursuant to LAMC Section 12.22.C.27(e).
6. MULTIPLE LOTS: Existing lots may be subdivided into multiple small lots so long as the averaged newly resulting lot size is equivalent to the minimum requirement for "lot area per dwelling unit" established for each residential zone in the LAMC, except where minimum lot sizes per dwelling unit are further restricted in the Specific Plan, such as in the Marina Peninsula (D), North Venice (F), and Oakwood, Millwood, Southeast Venice (G) Subareas. For example, a 4500 square foot parcel in the RD1.5 zone may be subdivided into a maximum of 3 small lots with one measuring 1000 square feet, one measuring 1800 square feet and one measuring 1700 square feet, given that the

average lot size is 1500 square feet. However, if the same 4500 square foot parcel in the RD1.5 zone is located in the North Venice (F) or Oakwood, Millwood, Southeast Venice (G) Subareas, each lot must not be less than 1,500 square feet per dwelling unit.

7. DENSITY: The density of combined newly created lots shall not exceed the density permitted by zoning of the original, pre-subdivided lot, which is the "lot area per dwelling unit" restriction for each subarea and each zone, as determined by the Venice Coastal Zone Specific Plan. Where the Specific Plan is silent with respect to density, the density shall be based on the underlying zone in the Los Angeles Municipal Code.

CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING  
ZONING INFORMATION FILE

**Z.I. NO. 2406**  
**SMALL LOT SUBDIVISION**  
**DIRECTOR'S INTERPRETATION**

**Applies to projects deemed complete prior to Oct 23, 2014.**

**COUNCIL DISTRICT: 11**

**COMMENTS:**

On June 11, 2009, case number DIR-2008-4703-DI-1A was approved by the City Planning Commission. The Director's Interpretation clarifies the Venice Coastal Specific Plan (Ordinance No. 175,693), as it relates to Section 12.22 C. 27 of the Los Angeles Municipal Code, established by the Small Lot Subdivision Ordinance (No. 176,354). The Director's Interpretation applies to all Small Lot Subdivision cases within the boundary of the Venice Coastal Specific Plan.

**INSTRUCTIONS:**

Refer all applicants who wish to submit an application for a Small Lot Subdivision (SL) within the boundary of the Venice Coastal Specific Plan to require a Planning clearance to the Department of City Planning Community Planning Bureau, West Coastal Unit and the Subdivisions Counter.

A portion of the Director's Interpretation language is attached, covering the general requirements and principals.

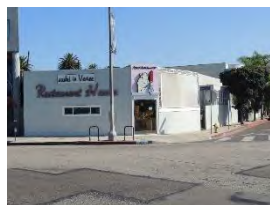
## GENERAL REQUIREMENTS AND PRINCIPLES

A summary of the Interpretation is as follows, comprised of language that applies generally to Venice Coastal Specific Plan.

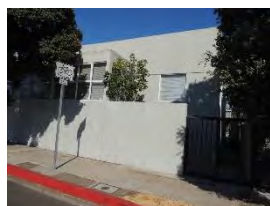
1. Where provisions are silent in the Venice Coastal Specific Plan, regulations of the Los Angeles Municipal Code (LAMC) apply, including Section 12.22 C.27.
2. **PARKING:** Required parking for subdivision projects shall be based on the parking requirements pursuant to the Venice Coastal Specific Plan, 2 or 3 spaces (depending on subarea). Each new lot resulting from a small lot subdivision that contains one unit will fall under the “single family dwelling” category in the Specific Plan. For the purposes of parking calculations, small lot subdivisions shall be considered “less than 40 feet in width, or less than 35 feet in width if adjacent to an alley.” Where new lots resulting from a small lot subdivision include multiple units on a lot, they shall provide two and a quarter parking spaces for each dwelling unit, and shall provide Beach Impact Zone Parking, if applicable, pursuant to Section 13 E of the Specific Plan, consistent with multi-family parking requirements.
3. **DRIVEWAYS:** Pursuant to the Venice Coastal Specific Plan, all driveways and vehicular access shall be from alleys, when present. When projects abut an alley, each newly resulting subdivided lot shall be accessible from the alley and not the street. Exceptions may be made for existing structures where alley access is infeasible.
4. **SETBACKS:** Front, rear, and side yard setbacks abutting an area outside of the subdivision shall be consistent with the Specific Plan, where it sets limitations. This includes locations where new lots abut a lot that is not created pursuant to the Small Lot Subdivision Ordinance and not part of the project, or where the lots abut a waterway or street.
5. **MULTIPLE LOTS:** Existing lots may be subdivided into multiple small lots so long as the averaged newly resulting lot size is equivalent to the minimum requirement for “lot area per dwelling unit” established for each residential zone in the LAMC, pursuant to the Small Lot Subdivision Ordinance. For example, a 4500 square foot parcel in the RD1.5 zone may be subdivided into a maximum of 3 small lots with one measuring 1000 square feet, one measuring 1800 square feet and one measuring 1700 square feet, given that the average lot size is 1500 square feet.
6. **MULTIPLE UNITS:** Lots subdivided pursuant to the Small Lot Subdivision Ordinance shall be limited to one unit per resultant lot, unless the lot size is large enough to permit additional units based on the “lot area per dwelling unit” calculation established for each residential zone. In no case may a newly resulting lot contain more than three units. Generally, the combined density of the newly resulting lots shall not exceed the permitted density of the original lot, pre-subdivision. For Subareas that restrict density by limiting the number of units on a lot by a defined number, the resulting density from multiple lots may increase the originally permitted density on one original lot. Unit restrictions prescribed for Subareas shall still apply to individual resulting lots, but not over the entire pre-subdivided area; for instance subarea “(C) Silver Strand,” limits density to one unit per lot in the RD1.5 zones, and subarea “(D) Marina Peninsula” limits R3 lots to two dwelling units per lot.) As a general example, for Subareas in

which numbers of units per lot are not defined and restricted, a 4,500 square foot parcel in the RD1.5 zone may be subdivided into two small lots with one comprised of a single-family home and the other comprised of two residential units. This is possible since each unit averages 1,500 square feet of lot area. Resulting small lots cannot be further subdivided in the future, and cannot add future additional units.

7. AFFORDABLE REPLACEMENT UNITS: Projects in subarea “(F) North Venice,” and subarea “(G) Oakwood, Milwood, Southeast Venice,” that include demolition of Affordable Units (as determined by Los Angeles Housing Department—LAHD) are required to provide “Replacement Affordable Unit(s)” as defined in Section 5(T) of the Specific Plan when there are any units in excess of two units on newly resulting single lots. Lots subdivided pursuant to the Small Lot Subdivision Ordinance shall be permitted a density based on the “lot area per dwelling unit” calculation established for each residential zone. Affordable replacement unit requirements apply to multiple units on a single lot, and are not required if the density is spread over newly resulting lots so that no lot has an excess of two units. The requirement to replace an affordable unit will increase the number of units that would otherwise be permitted under the Small Lot Subdivision Ordinance only when the development includes three units on a lot. Mello Act requirements to replace affordable units still apply in all circumstances, and consistent with the Specific Plan, any affordable replacement units shall be replaced on the small lot subdivision project site.
  
8. DENSITY: Density shall not exceed the density permitted by zoning of the original lot, which is the “lot area per dwelling unit” restriction for each zone as determined by the Venice Coastal Specific Plan, or when not explicit in the Specific Plan, the Los Angeles Municipal Code.



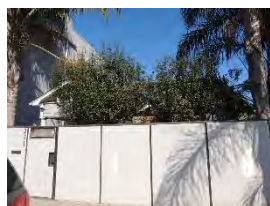
Primary Address: 213 E WINDWARD AVE  
 Type: Non-Contributor  
 Year built: 1963  
 Property type/sub type: Commercial-Food Service; Restaurant/Tavern  
 Architectural style: Commercial, Vernacular



Primary Address: 215 E WINDWARD AVE  
 Type: Non-Contributor  
 Year built: 2000  
 Property type/sub type: Residential-Multi Family; Duplex  
 Architectural style: Other



Primary Address: 217 E WINDWARD AVE  
 Type: Non-Contributor  
 Year built: 1984  
 Property type/sub type: Residential-Multi Family; Apartment House  
 Architectural style: Other



Primary Address: 221 E WINDWARD AVE  
 Type: Non-Contributor  
 Year built: 1920  
 Property type/sub type: Residential-Single Family; House  
 Architectural style: Craftsman



Primary Address: 225 E WINDWARD AVE  
 Type: Not sure  
 Year built: 1921  
 Property type/sub type: Residential-Single Family; House  
 Architectural style: Craftsman



Primary Address: 227 E WINDWARD AVE  
 Type: Non-Contributor  
 Year built: 1920  
 Property type/sub type: Residential-Single Family; House  
 Architectural style: Craftsman