

COUNTY CLERK'S USE

CITY OF LOS ANGELES
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200 NORTH SPRING STREET, ROOM 395
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152(b) and CEQA Guidelines Section 15062. Pursuant to Public Resources Code Section 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS
DIR-2020-2067-TOC / Transit Oriented Communities

LEAD CITY AGENCY
City of Los Angeles (Department of City Planning)

CASE NUMBER
ENV-2020-2068-CE

PROJECT TITLE
1447 Hi Point Street

COUNCIL DISTRICT
10

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map)
1447 South Hi Point Street, Los Angeles, CA

Map attached.

PROJECT DESCRIPTION:
Construction of a new 20-unit multi-family structure, reserving two (2) units for Extremely Low Income Households, over five (5) stories and one (1) level of subterranean parking. The building will be approximately 57 feet in height and approximately 20,093 square feet in total building area. There are 11 non-protected trees on the site, which will be removed due to construction, and one (1) non-protected tree in the public right-of-way, which will remain. In order to provide the one (1) level of subterranean parking, more than 500 cubic yards of soil would be removed from the project site. Therefore, a haul route for the export of approximately 3,100 cubic yards of earth is required.

Additional page(s) attached.

NAME OF APPLICANT / OWNER:
Hi Point M, LLC

CONTACT PERSON (If different from Applicant/Owner above)
Tov Equities, LLC

(AREA CODE) TELEPHONE NUMBER | EXT.
(213) 228-4444

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)

STATE CEQA STATUTE & GUIDELINES

- STATUTORY EXEMPTION(S)
Public Resources Code Section(s) _____
- CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)
CEQA Guideline Section(s) / Class(es) 32
- OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

JUSTIFICATION FOR PROJECT EXEMPTION: Additional page(s) attached

In-fill development meeting the conditions described in this section. (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered, rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services.

- None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.
- The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.
If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE
Esther Ahn 

STAFF TITLE
City Planner

ENTITLEMENTS APPROVED
TOC / Transit Oriented Communities

FEE: \$5,774	RECEIPT NO. 0109172595	REC'D. BY (DCP DSC STAFF NAME) Maidel Luevano
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DISTRIBUTION: County Clerk, Agency Record

approximately 20,093 square feet in total building area, resulting in a Floor Area Ratio (FAR) of approximately 3.78:1. Of the 20 units proposed, two (2) will be one-bedroom units, 10 will be two-bedroom units, and eight (8) will be three-bedroom units. The project proposes to provide 24 automobile parking spaces in addition to 20 long-term bicycle parking spaces and two (2) short-term bicycle parking spaces. A total of 2,492 square feet of open space will be provided, divided among balconies, decks, and a fifth floor garden area. The project will maintain a 15-foot front yard and 20-foot rear yard, as required by the underlying [Q]R3-1-O Zone, but will provide reduced side yard setbacks of a minimum five (5) feet eight (8) inches, in lieu of the otherwise required eight (8) feet required, through utilization of a TOC incentive, as discussed below.

The project is requesting the following discretionary actions:

1. Pursuant to the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), the project is eligible for Base Incentives and up to three (3) additional incentives. As base incentives, the project is eligible to (1) increase the maximum allowable number of dwelling units permitted by 70 percent, (2) increase the maximum allowable FAR by 50 percent, and (3) provide automobile parking at a ratio of 0.5 spaces per unit. The project is seeking a 70 percent density increase from 12 units to 20 units and an increase in FAR to 3.78:1 and will provide at least the minimum number of parking spaces required. As Additional Incentives, the project is requesting (1) a maximum 22-foot increase in building height, (2) a maximum reduction of 30 percent in the required width of both side yard setbacks, and (3) a maximum reduction of 25 percent in the required amount of open space; and
2. Any additional actions as deemed necessary or desirable, including but not limited to demolition, grading, excavation (3,100 cubic yards of dirt will be exported), haul route, tree removal, and building permits.

The proposed project would not have a significant effect on the environment. A “significant effect on the environment” is defined as “a substantial, or potentially substantial, adverse change in the environment” (CEQA Guidelines, Public Resources Code Section 21068). The proposed project and potential impacts were analyzed in accordance with the California Environmental Quality Act (CEQA) Guidelines, which establish guidelines and thresholds of significant impact, and provide the methods for determining whether or not the impacts of a proposed project reach or exceed those thresholds. Analysis of the proposed project has been determined that it is Categorically Exempt from environmental review pursuant to Article 19, Section 15332 of the CEQA Guidelines (Class 32) and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies. On March 9, 2020, the subject project was issued a Notice of Exemption for a Class 32 Categorical Exemption.

CLASS 32 CATEGORICAL EXEMPTION

The proposed project qualifies for a Class 32 Categorical Exemption because it conforms to the definition of “In-fill Projects.” A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following five applicable conditions: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; (c) The project site has no value as habitat for endangered, rare or threatened species; (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and (e) The site can be adequately served by all required utilities and public services.

As stated above, the proposed project is for the construction of a new 20-unit multi-family structure, reserving two (2) units for Extremely Low Income Households, over five (5) stories and one (1) level of subterranean parking. The building will be approximately 57 feet in height and approximately 20,093 square feet in total building area. There are 11 non-protected trees on the site, which will be removed due to construction, and one (1) non-protected tree in the public right-of-way which is expected to remain. In conjunction, an application for a haul route for the export of approximately 3,100 cubic yards of earth will be initiated with the Department of Building and Safety, Grading Division. All haul routes applications require the submittal of a Geology and Soils Report to the Los Angeles Department of Building and Safety (LADBS). In addition, roof and site drainage as well as sewer availability must comply with Bureau of Engineering and Bureau of Sanitation standards; and hydrants, Fire Department Access, and Fire Safety must be reviewed and approved by the Los Angeles Fire Department before permits can be issued. Furthermore, the project must comply with all City Regulatory Compliance Measures (RCMs) that apply.

As a residential building developed on an infill site, this Project qualifies for the Categorical Exemption. The project can be characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting the five conditions listed below.

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The proposed project is consistent with applicable general plan designation, applicable policies, and applicable zoning designations. The subject property is located within the Wilshire Community Plan Area, which is one of the 35 Community Plans that make up the Land Use Element of the General Plan. The Community Plan designates the subject property with a land use designation of Medium Residential, corresponding to the R3 Zone. The subject property is zoned [Q]R3-1-O and is thus consistent with the existing land use designation. The "Q" Qualified Condition, established pursuant to Ordinance Number 168,193, limits the building height to 35 feet, requires articulation at every 30 feet for building facades exceeding 40 feet (minimum depth of façade modulation is five feet), and prohibits balconies above the first floor which have a line of sight to adjacent existing single-family uses. The "O" Oil Drilling District, established pursuant to Ordinance Number 112,901, pertains to oil drilling activities and operations, which are not a part of the project. The subject property is also within a Transit Priority Area in the City of Los Angeles (ZA-2452). The site is not located within the boundaries, or subject to, any additional specific plan, community design overlay, or interim control ordinance.

Consistent with the Wilshire Community Plan, the proposed 20-unit apartment development would add new and desirable multi-family housing and contribute to the City's affordable housing stock. The proposed project meets the intent of the following Goals, Objectives, and Policies of the Wilshire Community Plan:

Goal 1: Provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Wilshire Community.

Policy 1-1.3: Provide for adequate multi-family residential development.

Objective 1-2: Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.

- Policy 1-2.1:* Encourage higher density residential uses near major public transportation centers.
- Objective 1-4:* Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.
- Policy 1.4-1:* Promote greater individual choice in type, quality, price and location of housing.

The project will result in a net increase of 19 units at the site, locating new, higher density residential near transit lines and neighborhood services. The resulting development will thus be located in a manner that has the potential to reduce vehicular trips. The project will also provide a mix of market rate and affordable units, thereby promoting the provision of adequate housing for all persons relative to income, including students, senior citizens, and persons with disabilities as all new development would require compliance with the Americans with Disabilities Act. The project meets all applicable design guidelines and standards, and is a multi-family development with an appropriate, context-sensitive scale. The project has been conditioned and designed to contribute towards a pedestrian-friendly environment that is safe for all modes of transportation. Furthermore, the project features an attractive and high-quality architectural design and is located within close proximity to the intersection of two local bus lines. The provision of well-designed multi-family housing, which includes restricted affordable units, ensures a project that will complement the existing neighborhood while also providing valuable housing stock to current and future residents. Therefore, the proposed project is consistent with the General Plan policies and zoning regulations within the City of Los Angeles.

(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The subject property is located wholly within the Wilshire Community Plan Area within the City of Los Angeles. The subject site consists of a single lot that total approximately 8,838 square feet, or approximately 0.20 acres, in size. The project site is substantially surrounded by urban uses and is not located near any areas designated for farmland or agricultural uses. The neighborhood is fully built-out with a variety of multi-family and commercial uses that are consistent with their General Plan land use designations and zoning. Pico Boulevard, which is half a block away from the project site, is also a heavily trafficked, major corridor that is well-served by public transit and various commercial uses and amenities.

(c) The project site has no value as habitat for endangered, rare or threatened species:

The existing site consists of one lot improved with one (1) single-family residential structure, which will be demolished as part of the project. The project site is located in a well-established urban area which is fully developed with residential and commercial uses. The project site has no value as habitat for endangered species, rare, or threatened species. A tree report, prepared by Harmony Gardens on March 17, 2020, states that there are 11 non-protected trees existing on the subject property and one (1) tree in the public right-of-way, which is expected to remain. While the remaining trees are subject to removal and replacement per the Los Angeles Municipal Code, none of these trees are protected or habitat for endangered, rare, or threatened species.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality:

Traffic

The proposed project involves the construction, use, and maintenance of a new five-story, 20-unit residential apartment building with one (1) level of subterranean parking. Based upon the existing mobility and circulation networks near the proposed project, the creation of 19 net new units will not result in significant traffic impacts in the community. Per the Los Angeles Department of Transportation (LADOT) determination dated March 4, 2020 and attached to the subject case file, the proposed project is not required to conduct a vehicle miles traveled (VMT) analysis as the project is beneath LADOT thresholds of significance. The determination also states that there is no VMT analysis required and thus, the project does not need to be referred further to LADOT. Therefore, the project is not expected to result in any significant impact relating to traffic.

Noise

A Noise Technical Report was prepared by ZMassociates Environmental Corporation on March of 2020 for the subject property. Given that the project would be required to comply with all existing and applicable noise regulations, the study concluded that the project would not result in any significant impacts and that no mitigation measure are necessary. Although noise and vibration arising from construction is unavoidable, these impacts would be temporary and limited to the duration of the construction in any one location. The level of construction noise for the proposed project would be managed within the City of Los Angeles day and time ordinance. The report also states that due to the small project size, the limited number of construction vehicles, limited number of construction equipment, and small size of construction equipment compared to much larger projects, the proposed project will not result in exceedance of the City of Los Angeles noise ordinances. The report states that standard, industry-wide best practices for construction in urban or otherwise noise-sensitive areas would ensure that construction noise does not exceed the noise limit imposed by LAMC Section 112.05. These could include erecting temporary noise barriers around the project's perimeter, using mufflers to dampen noise from internal combustion engines, and warming-up or staging equipment away from sensitive receptors. Complete elimination of construction activity noise is technically infeasible; however, incorporation of the best available noise reduction methods will minimize impacts on the residential uses bordering the project site. Compliance with the various local regulatory measure will further minimize any adverse construction noise impact potential.

As the project is a residential development, the project is not expected to generate significant permanent operational noise impacts. Noise generated through human conversation and activities (particularly in outdoor recreational spaces, such as balconies and patios), landscape maintenance, or trash collection would not exceed the recommended noise compatibility guidelines. Any new stationary sources of noise, such mechanical HVAC equipment, installed on the proposed development will be required to comply with LAMC Sections 112.02 and 112.05 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level at neighboring occupied properties by more than five dBA. In addition, the project is not expected to generate a substantial number of vehicle trips which could in turn generate additional noise. The proposed project is expected to generate a negligible increase in ambient noise from operation.

Through compliance with all existing regulations governing both construction and operational noise, any noise impacts resulting from the project will be less than significant.

Air Quality

The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2012 Air Quality Management Plan (AQMP) to meet federal and state ambient air quality standards. A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. As the project will result in the net increase of 19 residential units, it is not expected to conflict with, or obstruct, the implementation of the AQMP and SCAQMD rules. The project is consistent with current zoning regulations and policies within the City of Los Angeles, allowing for the proposed development on the subject site. The project would also comply with the 2017 Los Angeles Green Building Code (LAGBC), which builds upon and sets higher standards than those in the 2016 California Green Building Standards Code. Additionally, the project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, thus reducing the vehicle miles traveled for employees, residents, and visitors. Therefore, project impacts related to air quality will be less than significant.

During construction, appropriate dust control measures would be implemented as part of the proposed project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specifically, Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas.

Best Management Practices (BMP) will be implemented that would include (but not be limited to) the following:

- Unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce emissions and meets SCAQMD Rule 403;
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust;
- General contractors shall maintain and operate construction equipment to minimize exhaust emissions; and
- Trucks shall not idle but be turned off.

By implementing BMPs, all construction-related impacts will be less than significant and temporary in nature. No permanent significant impacts are anticipated to occur from construction.

Furthermore, an Air Quality Technical Report was prepared by ZMassociates Environmental Corporation on March of 2020, which is included in the subject case file. The study quantifies the estimated daily construction and operational emissions for various pollutants from the project site using CalEEMod simulations. Based on the simulation results, none of the construction and operational emissions are expected to exceed the South Coast Air Quality Management District (SCAQMD) air quality significance thresholds. Furthermore, the report finds that the project is consistent with all applicable aspects of the City's General Plan Air Quality Element. The study does not recommend any mitigation measures as all construction and operational emissions are expected to be far below the thresholds considered by SCAQMD to be significant under

CEQA guidelines. Potential impacts related to air quality from the project will therefore be less than significant.

Water Quality

With regard to water quality, a significant impact would occur if the project would: 1) exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB); 2) increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded; or 3) increase surface water runoff, resulting in the need for expanded off-site storm water drainage facilities. All wastewater from the project would be treated according to requirements of the National Pollutant Discharge Elimination System (NPDES) permit authorized by the LARWQCB. Therefore, the proposed project would result in a less than significant impact related to wastewater treatment requirements.

Additionally, prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the proposed project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as part of the project. Therefore, the proposed project would not result in a significant impact related to water or wastewater infrastructure.

Lastly, development of the proposed project would maintain existing drainage patterns; site generated surface water runoff would continue to flow to the City's storm drain system. The proposed project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Therefore, the proposed project would not result in a significant impact related to existing storm drain capacities.

(e) The site can be adequately served by all required utilities and public services:

The site is currently and adequately served by the City's Department of Water and Power, the City's Bureau of Sanitation, the Southern California (SoCal) Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, Los Angeles Unified School District, Los Angeles Public Library, and other public services. In addition, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. As a result of these new building codes, which are required of all projects, it can be anticipated that the proposed project will not create any impact on existing utilities and public services through the net addition of 19 new dwelling units.

EXCEPTIONS TO CATEGORICAL EXEMPTIONS

The City has further considered whether the proposed project is subject to any of the six exceptions set forth in State CEQA Guidelines Section 15300.2 that would prohibit the use of any categorical exemption. Planning staff has determined that none of the exceptions apply to the proposed project, as described below.

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where**

designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

As the proposed project is not defined as a Class 3, 4, 5, 6 or 11 project, this exception is non-applicable. The project site is in an urbanized area in the City of Los Angeles. The project site is not located in a particularly sensitive environment and is not located on a site containing wetlands, endangered species, or wildlife habitats; therefore, this exception is not applicable.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The development of the project site with 20 dwelling units is consistent with the zone and land use designation of the site, as designated by the Wilshire Community Plan, and as permitted by the City's TOC Affordable Housing Incentive Program pursuant to LAMC 12.22-A.31. A successive project of the same type and nature would reflect a development that is consistent with the underlying land use designation and the Los Angeles Municipal Code, and thus would be subject to the same regulations and requirements, including development standards and environmental impacts. The impacts of each subsequent project will be mitigated if necessary, and thus will not result in a cumulative impact.

The project would not result in a cumulatively considerable contribution to any impact. The threshold of significance for a cumulatively considerable contribution to a traffic impact is the same as the threshold of significance for a project impact. Therefore, since the project would not exceed that threshold it would have neither a project-specific significant impact nor the potential to result in a cumulatively considerable contribution to a significant traffic impact. The same is true for air quality thresholds of significance; the project does not have the potential to result in a project-specific significant air quality impact, and therefore, does not have the potential to result in a cumulatively considerable contribution to a significant air quality impact. Upon review of similar development projects within 500 feet of the project site, there are two planned projects at 1444 Hi Point Street and 1437 Hi Point Street which are both expected to be completed by August or September 2020, well before this project is set to commence. Both are small and well below impact thresholds evaluated above. Even if both projects were to take place at the same timeframe, cumulative effects would still be well below all significant thresholds.

Regulatory Compliance Measures (RCMs) in the City of Los Angeles regulate impacts related to Air Quality, Construction Noise/Vibrations, Operational Noise/Vibrations, and Transportation/traffic. Numerous Los Angeles Municipal Code Sections provide requirements for construction activities and ensure impacts from construction related noise, traffic, and parking are less than significant. The Noise Regulation Ordinance, No. 144,331, provides regulatory compliance measures related to construction noise and maximum noise levels for all activities. LAMC Section 62 provides specific regulatory compliance measures related to construction traffic and parking. LAMC Section 41 requires construction site postings listing representative contact information and permitted construction/demolition hours as established by the Department of Building and Safety. Additionally, there is insufficient evidence to conclude that significant impacts will occur based on past project approvals or in progress entitlement applications and that the proposed project will have adverse impacts on the cumulative impacts of construction noise and transportation/traffic in this area. Further, there is insufficient evidence to conclude that the proposed project will be under construction at the same time as projects within the vicinity. Thus, this exception does not apply.

- (c) **Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.**

The project proposes to construct a 20-unit multi-family residential development with two levels of subterranean parking. The project site is comprised of approximately 8,838 square feet of lot area located in an urbanized area within the City of Los Angeles. The project consists of residential uses and operations that are compatible with the surrounding urban development and consistent with the underlying zoning. The project site is a long-established neighborhood and is surrounded by various residential, commercial, and civic uses. The site does not demonstrate any unusual circumstances, and the project will not generate any significant impacts regarding traffic, noise, air quality, or water quality. There are no special districts or other known circumstances that indicate a sensitive surrounding environment. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

- (d) **Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.**

Based on a review of the California Scenic Highway Mapping System, the subject site is not located along a California State Scenic Highway and will not impact any identified scenic resources, including trees, historic buildings, rock outcroppings, or other similar resources, within a highway officially designated as a State Scenic Highway. Furthermore, the street is not designated as a scenic highway in the General Plan, Wilshire Community Plan, or City of Los Angeles Zone Information & Map Access System (ZIMAS). Therefore, this exception does not apply.

- (e) **Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.**

Based on a review of the California Department of Toxic Substances Control "Envirostor Database," no known hazardous waste sites are located on the project site. There are also no listed sites within the immediate vicinity of the project site. The subject property has been previously developed with residential uses which are not expected to utilize hazardous waste or materials that pose significant constraint on the site.

- (f) **Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.**

The project site has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or the Los Angeles Historic-Cultural Monuments Register. While the existing structure was built in 1946, the project site is not identified as a historic resource subject to historic preservation review, nor is it located within a Historic Preservation Overlay Zone. Additionally, the project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. For these reasons, construction of the proposed project would not constitute a substantial adverse change in

the significance of a historic resource as defined by CEQA, and this exception does not apply to the proposed project.

CONCLUSION

The proposed project involves the construction of a new five-story, 57-foot high, 20-unit apartment building across a single lot that encompasses approximately 8,838 square feet of lot area. The project is consistent with the surrounding developments (which consists of established residential, commercial, and public uses), is permitted by the TOC Guidelines, and is entirely consistent with the existing General Plan designation, zoning, and requirements of the LAMC. The project will not generate a significant number of vehicle trips and will not result in any significant impacts to land use planning, environmental habitat, noise, air quality, or water quality. The project is located in an urbanized and long-developed area, and thus will be adequately served by all required public utilities and services.

In addition, as the project is in an urbanized area, it is not in a particularly sensitive environment, and will not impact an environmental resource of hazardous or critical concern that is designated, precisely mapped, or officially adopted by any federal, state, or local agency. The project will not result in any significant impacts and, therefore, will not make a cumulatively considerable contribution to any significant impacts that are not already accounted for by the General Plan and future environmental clearances. The project is consistent with the surrounding developments, including established residential and commercial uses, does not present any unusual circumstances that would result in a significant impact on the environment, and would not constitute a substantial adverse change in the significance of a historic resource as defined by CEQA. Therefore, none of the possible exceptions to Categorical Exemptions, found in Section 15300.2 Exceptions, apply to this project, and as such, the project qualifies for a Class 32 Categorical Exemption.



ASSOCIATES
*Environmental & Management
Consultants*

DIR-2020-2067

March 2020

Class 32 Categorical Exemption 1447 Hi Point St., Los Angeles, CA 90035



Submitted by,
Hi Point M, LLC.
550 South Hill Street, Suite 1420
Los Angeles, CA 90013

Prepared by,
ZMassociates Environmental Corp.
19800 MacArthur Blvd., Suite 300
Irvine, CA 92612



Class 32 Categorical Exemption Report **1447 Hi Point St.– Proposed Project**

Project Description

The project site is located at 1447 Hi Point St., Los Angeles, CA 90035 and is comprised of one parcel with an approximate lot area of 8,838.5 square feet. The site is located along the western side of Hi Point Street, just south of Pico Blvd. The site has approximately 52 feet of frontage along Hi Point Street. The proposed project includes the demolition of an existing single family home and new construction of a residential development containing 20 units of multi-family housing.

The City of Los Angeles General Plan land use designation for the site is Medium Residential. The city's zoning for the site is [Q]R3-1-O, which corresponds to Medium Residential land use designation. The applicant is proposing to demolish the existing single family home at the site and develop the site with a new five-story multi-family building providing 20 residential units. Two (2) of the units would be set aside as extremely low-income units in compliance with the city's TOC density bonus requirements and as mandated by Senate Bill 330 (SB 330). The building would be approximately 57 feet in height, which includes 22 additional feet allowed per the city's density bonus requirements as an on-menu, developer incentive request. The residential building is proposed to provide a total area of 20,093 square feet total residential space. Vehicular access to the subterranean parking structure would be provided from the driveway. The complex would provide 25 parking spaces, which is more than the required 10 spots necessary for the project using the TOC Density Bonus. A total of 20 long-term bicycle parking spaces and 2 short term bicycle parking spaces would be provided for residents.

INTRODUCTION

The project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Section 21084 of the California Public Resources Code, and Article 19, Section 15332 (Class 32) of the CEQA Guidelines.

The proposed incentives will not have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22. A.25(b)). The proposed Project and potential impacts were analyzed in accordance with the City's Environmental Quality Act (CEQA) Guidelines and the City's L.A. CEQA Thresholds Guide. These two documents establish guidelines and thresholds of significant impact and provide the data for determining whether the impacts of a proposed Project reach or exceed those thresholds. Analysis of the proposed Project determined that it is Categorical Exempt from environmental review pursuant to Article 19, Section 15332 (Class 32) of the CEQA Guidelines. The Class 32 exemption is intended to promote infill development within urbanized areas. The project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Section 21084 of the California Public Resources Code, and Article 19, Section 15332 (Class 32) of the CEQA Guidelines.

This report serves as the environmental analysis to confirm the eligibility of the 1447 S. Hi Point St. project to qualify for a Class 32 Categorical Exemption (CE) under the California



Environmental Quality Act (CEQA). Section 15332 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), which addresses the category of in-fill development projects that have been determined not to have a significant effect on the environment and which are exempt from the provisions of CEQA. A Class 32 exemption consists of projects characterized as in-fill development meeting the criteria described below:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

This report evaluates the consistency of the proposed project with each of the above criteria.

CLASS 32 CATEGORICAL EXEMPTION ANALYSIS

The proposed project qualifies for a Categorical Exemption as it conforms to the definition of "In-fill Projects" as follows:

(a): The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

As discussed previously, the City of Los Angeles General Plan land use designation for the site is Medium Residential and the city's zoning designation for the site is [Q]R3-1-O. A by-right density of 11 residential units and a building height of 35 feet are permitted on the site. However, pursuant to the Transit Oriented Communities ("TOC") density bonus provisions for a project located in a Tier 3 area, as implemented by the city and mandated by law, a building with 20 residential units of which 2 will be set aside for Extremely Low Income ("ELI") residents and 57 feet in height is allowed.

Therefore, the proposed project is consistent with the existing land use and zoning designations for the site.

(b): The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The proposed project site is located within the Wilshire Community Plan area of the City of Los Angeles and totals 0.203 acres (8,838.5 square feet) in area, which is well below the 5-acre threshold. The site is located within a highly urbanized area and is bordered by existing multi-family. The subject property is located within 1,500 feet of the intersection of Pico Blvd. and Fairfax Ave. As confirmed by the Los Angeles Department of City Planning, the subject property is therefore located in Tier 3 of the Transit Oriented Communities Affordable Housing Incentive Program. As the redevelopment of an underutilized property within the City of Los Angeles, the project is characterized as in-fill development. Therefore, the proposed project meets this criterion

because it would occur within city limits on a project site of no more than five acres substantially surrounded by urban uses.

(c): The project site has no value as habitat for endangered, rare or threatened species.

The project site is located within a highly urbanized area that lacks habitat that is suitable for sensitive plant and animal species. The site is developed with an existing single family home. The immediate vicinity is highly urbanized and is comprised of multi-family residential. Navigate LA and the Los Angeles City Planning Department's Environmental and Public Facilities map for Significant Ecological Areas show that the subject site is not located in any of these areas. The project site is located within an urbanized area and is not located within a Biological Resource Area. Therefore, the proposed project meets this criterion because there is no habitat for endangered, rare, or threatened species.

(d): Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic:

The project would not result in any significant effects related to traffic. Due to the small size of the project, LADOT determined that no traffic referral study would be necessary. The proposed project does not exceed traffic threshold criteria established by LADOT for preparing a traffic study. The traffic impacts will be below the LADOT threshold for significance. Parking will be provided to tenants of the project complex, mitigating any street parking issues. The proposed project will create no significant impact on traffic or the environment.

Trees:

The project will not result in the removal of any protected trees. The Subject Property has a slope of less than ten (10) percent and is not in a waterway, wetland, officially designated scenic area, or within an official Seismic Hazard Zone.

Noise:

The level of construction noise, for the proposed project, would be managed within the City of Los Angeles day and time ordinance. Due to the small project size, the limited number of construction vehicles, limited number of construction equipment, and small size of construction equipment compared to much larger projects, the proposed project will not result in exceedance of City of Los Angeles noise ordinances. The Los Angeles' Noise Ordinance has been utilized to determine the significance of noise impacts for this type of project. The Noise Ordinance, which is found within the Los Angeles Municipal Code (Municipal Code), presents noise standards applicable to construction and demolition operations occurring within Los Angeles. Specifically, Section 41.40 of the Municipal Code prohibits construction activities that entail the use of any machine, tool, device or equipment between the hours of 9:00 PM – 7:00 AM that could disturb sleeping persons in any dwelling, apartment or other place of residence. Additionally, Section 112.05 of the Municipal Code prohibits the operation of any power equipment/tool that produces a maximum noise level that exceeds the applicable noise limit from the following list at-a-distance of 50-feet between the hours of 7:00 AM – 10:00 PM:

- 75 dB(A) for construction machinery (e.g., tractors, dozers, drills, loaders, shovels/cranes, etc.);



- 75 dB(A) for powered equipment 20 HP or less intended for infrequent use; and
- 65 dB(A) for powered equipment intended for repetitive use in residential areas (e.g., mowers, blowers, riding tractors, etc.).

Per the Municipal Code, these noise limitations shall not apply where compliance is technically infeasible. Technically infeasible means that these noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices/techniques during the operation of the equipment.

Construction activities that generate noise will be confined to daytime hours only, as defined by the City of Los Angeles *Construction Noise Ordinance* (7:00 AM-9:00 PM, Monday through Friday, 8:00 AM-6:00 PM Saturdays). Please note all construction activities that generate noise are prohibited on Sundays and all federal holidays.

The development of the project would not result in any significant effects relating to noise, since the project must comply with the City of Los Angeles Noise Ordinance No. 161,574 and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels. Furthermore, the project is below the 75 dwelling units and 1,000 average daily vehicle trips CEQA threshold. Construction activities, on the site, will comply with the Los Angeles Noise Ordinance.

Vibration:

The Project’s construction vibration impacts would be considered less than significant. The FTA has established vibration impact criteria as it relates to potential building and structural damages, as these are the foremost concern when evaluating the impacts of construction-related vibrations. Table-1 summarizes the FTA’s vibration guidelines for building and structural damage.

Table 1 FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Construction of the Project would require heavy-duty earthmoving equipment that would be capable of generating vibration levels of 0.064 inches per second PPV at a reference distance of 25 feet. Other construction vehicles, equipment, and practices would have lesser impacts. Table-2 shows the Project’s projected construction vibration impacts at the nearest off-site structures. No receptor would experience potentially damaging levels of ground-borne vibration from the Project’s construction activities. More distant structures would experience lesser impacts. As a result, the Project’s construction vibration impacts would be considered less than significant.



Table 2 Building Damage Vibration Levels At Off-Site Structure

Off-Site Structures	Distance to Project Site (ft.)	Condition	Significant Criteria (in/sec)	Impact (in/sec)	Significant?
Hi Point St. Structures	25	III.Non-engineered Timber and masonry	0.2	.0017	No
Point View St. Structures	15	III.Non-engineered Timber and masonry	0.2	0.003	No

The Project Site is currently developed with a residential structure that contains no significant sources of ground borne vibration, such as heavy equipment or industrial operations. Vehicles traveling to and from the site generate minimal levels of ground borne vibration that are generally below levels of human perception.

During Project operations, there would also be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Minimal levels of operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways, but most vibrations from road vehicles are imperceptible.

As a result, the Project's long-term vibration impacts would be considered less than significant.

Air Quality:

The proposed project will produce criteria air emissions during the construction phases of the proposed project.

This air quality impact analysis was performed for Local area significance, using the SCAQMD "Final Localized Significance Threshold Methodology", July 2008. SCAQMD CEQA Handbook (SCAQMD, 1993), construction projects, SCAQMD AQ-17 Air Quality Significance Mass Daily Thresholds, and SCAQMD Significance Threshold Methodology were utilized to identify the appropriate and applicable air pollutant significance thresholds appropriate for the project 0.203-acre project site.

Local Construction Significance Thresholds

The proposed project is in the Wilshire Community Plan area of Central Los Angeles area for use in applying the applicable SCAQMD analysis methodology.

The SCAQMD "Final Localized Significance Threshold Methodology", July 2008 was used assuming a 1-acre site (the smallest project size table, since the project size is 0.203 acre), focusing on non-attainment pollutants.

Table 1 presents SCAQMD current non-attainment status for the following California and National ambient air pollutant standards¹:

¹ <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf>



Table 1 SCAQMD Ambient Air Standards for Non-Attainment Pollutants

Pollutant	Averaging Time	California Standards	National Standards
Ozone	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m ³)	0.12 ppm
Particulate Matter (PM10)	Annual Arithmetic Mean	20 µg/m ³	
	24 Hour	50 µg/m ³	150 µg/m ³
Particulate Matter (PM2.5)	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³
	24 Hour		35 µg/m ³

On page I-5 of the “Final Localized Significance Threshold Methodology” cited above, it recommends using the Mass look-up tables for construction projects. The mass rate look-up tables are organized by Sources Receptor Area (by County and Sub-County), project acreage size, receptor distance (meters) from the project site boundary, and by pollutant applicable to the attainment status of the receptor area. The most stringent ambient air pollutant allowable concentration increase for non-attainment pollutants was selected. For example, we utilized the table with a significance threshold of 2.5 mg/m³ for PM10 and PM2.5. This level of stringency was utilized to demonstrate that the proposed project construction emissions would not exceed ozone, PM10, and PM2.5 ambient air standards within the project localized area.

Table 2 lists the Local Construction Significance Threshold values for construction of a 1-acre project size, located in the Central Los Angeles area, with a receptor distance of 25 meters (most stringent criteria), and for each of the pollutants listed (SCAQMD Non-Attainment Pollutants):

Table 2 Local Construction Significance Thresholds (1-Acre Site)²

Pollutant Parameter	CO	NOx	PM ₁₀ (Assume 2.5 mg/m ³ increase limit)	PM _{2.5} (Assume 2.5 mg/m ³ increase limit)
Look-up Table No.	Table C-2	Table C-1	Table C-3	Table C-5
Receptor Distance (meters)	25	25	25	25
Construction Thresholds (lbs/Day)	680	74	2.0	2.0

lbs/day = pounds per day

MT/yr CO₂eq = metric tons per year of CO₂ equivalent

≥ = greater than or equal to

CO = carbon monoxide

NOx = oxides of nitrogen

PM10 = particulate matter equal to or less than 10 microns in diameter

PM2.5 = particulate matter equal to or less than 2.5 microns in diameter

ROG = reactive organic gases, also referred to as VOC or volatile organic gases

SOx = oxides of sulfur

² South Coast Air Quality Management District Construction Project Local Impact Mass Lookup Tables, October 21, 2009

CO₂e = carbon dioxide equivalents

Table 3 provides a comparison of the proposed project construction emissions, as calculated using CalEEMod, and Table 2 Local Construction Significance Thresholds. A full copy of the model run report for CalEEMod, used to analyze project construction and operation emissions, is attached to this report.

Table 3 Proposed Project Construction Emissions (Derived from CalEEMod modeling)

Pollutant Parameter	CO (lbs/day)	NOx (lbs/day)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Local Construction Thresholds (Table 2)	680.0	74.0	2.0	2.0
Project Emissions (CalEEMod, estimate)	0.0851	0.0876	0.00672	0.00496
Threshold Exceedance?	No	No	No	No

lbs/day = pounds per day

MT/yr CO₂eq = metric tons per year of CO₂ equivalent

≥ = greater than or equal to

CO = carbon monoxide

NOx = oxides of nitrogen

PM₁₀ = particulate matter equal to or less than 10 microns in diameter

PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter

ROG = reactive organic gases, also referred to as VOC or volatile organic gases

SOx = oxides of sulfur

CO₂e = carbon dioxide equivalents

Based upon the above analysis, the proposed 1447 S. Hi Point St. construction project will not exceed Local Area Construction Air Emission Significance Thresholds, and therefore will not have a local air quality impact.

Regional Construction Significance Thresholds

The SCAQMD provides guidance for regional analysis of project construction emissions within the South Coast Air Quality Management District.³

Table 4 provides the most current SCAQMD Air Quality Regional Significance Thresholds, daily mass project emission limits, applicable to the proposed construction project.

Table 4 Regional Construction Pollutant Significance Thresholds (SCAQMD)

Pollutant Parameter	CO (lbs/day)	NOx (lbs/day)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)	ROG (lbs/day)	SOx (lbs/day)
Construction Thresholds	550.0	100.0	150.0	55.0	75.0	150.0

lbs/day = pounds per day

MT/yr CO₂eq = metric tons per year of CO₂ equivalent

≥ = greater than or equal to

CO = carbon monoxide

NOx = oxides of nitrogen

PM₁₀ = particulate matter equal to or less than 10 microns in diameter

³ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

PM2.5 = particulate matter equal to or less than 2.5 microns in diameter
 ROG = reactive organic gases, also referred to as VOC or volatile organic gases
 SOx = oxides of sulfur
 CO₂e = carbon dioxide equivalents

Table 5 provides a comparison of Regional Construction Threshold to the proposed project construction emission calculated using CalEEMod.

Table 5 Proposed Project Construction Emission Comparison to Regional Thresholds

Pollutant Parameter	CO (lbs/day)	NOx (lbs/day)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)	ROG (lbs/day)	SOx (lbs/day)	CO ₂ e (MT/year)
Regional Construction Thresholds	550.0	100.0	150.0	55.0	75.0	150.0	3,000
Project Estimated Emissions	0.08512	0.08758	0.006716	0.004964	0.02060	0.000146	70.69
Threshold Exceedance?	No	No	No	No	No	No	No

lbs/day = pounds per day
 MT/yr CO₂e = metric tons per year of CO₂ equivalent
 ≥ = greater than or equal to
 CO = carbon monoxide
 NOx = oxides of nitrogen
 PM₁₀ = particulate matter equal to or less than 10 microns in diameter
 PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
 ROG = reactive organic gases, also referred to as VOC or volatile organic gases
 SOx = oxides of sulfur
 CO₂e = carbon dioxide equivalents

These are mass daily thresholds derived by SCAQMD rules and the SCAQMD CEQA Handbook (1993). Based upon the above analysis, the proposed 1447 S. Hi Point St. construction project will not exceed Regional Area Construction Air Emission Significance Thresholds, and therefore will not have a Regional air quality impact.

Greenhouse Gas (GHG) Significance Thresholds

The SCAQMD provides guidance for regional analysis of project construction emissions within the South Coast Air Quality Management area and basin. Currently SCAQMD has not yet set a greenhouse gas (GHG), significance threshold. SCAQMD has released guidance for construction projects, within the SCAQMD air district, recommending a GHG project emission threshold limit of 3,000 MT CO₂e/year.

Table 6 Proposed Project Construction GHG Emission Comparison to Regional Thresholds

Pollutant Parameter	CO ₂ e (MT/year)
Regional Construction Thresholds	3,000
Project Estimated Emissions	70.69
Threshold Exceedance?	No

CO₂e = carbon dioxide equivalents

Based upon the above analysis, the proposed 1447 S. Hi Point St. construction project will not exceed greenhouse gas Construction Air Emission Significance Thresholds, and therefore will not have a greenhouse gas air quality impact.

Volatile Organic Compounds Significance Thresholds

The SCAQMD provides significance threshold levels for volatile organic compounds (also referred to as reactive organic gases or ROG), for regional construction projects.

SCAQMD manage ROG air emissions as precursor compounds to formation of atmospheric, ground-level ozone concentrations. Ozone is a non-attainment pollutant in the local and regional air districts, where the proposed project resides.

Table 7 presents a comparison of proposed project ROG construction emission levels to the SCAQMD Regional Significance Thresholds.

Table 7 Project Construction Emission Comparison of ROG to Regional Thresholds

Pollutant Parameter	ROG (lbs/day)
Regional Construction Thresholds	75.0
Project Estimated Emissions	0.0206
Threshold Exceedance?	No

lbs/day = pounds per day

ROG = reactive organic gases, also referred to as VOC or volatile organic gases

The proposed project ROG construction emissions do not exceed Regional Significance levels, as established by SCAQMD. (See reference cited in above regional pollutant analysis).

Architectural drawing data, and default CalEEMod settings, were used setting up and running CalEEMod. A copy of the CalEEMod report is attached to this report.

The proposed project is designed to utilize low-VOC and low-odor architectural materials, as required of the industry and best management practices. Odors from the project, will be minimal and expected to be managed within the project site boundary.

Summary of Air Quality Impact Analysis

The above analysis for local, regional, greenhouse gas, reactive organic gases (ROGs), and odor demonstrate that the proposed project air emissions do not exceed Local and Regional air emission thresholds as compared to the applicable local, regional and national standards and analysis guidelines. Therefore, the proposed project will pose no significant impact to local and regional air quality.

This conclusion is based upon performance of City of Los Angeles required air quality analysis, CEQA guidance for categorical exemption air quality impact analysis, performance of all analysis following local and regional air quality impact analysis guidance for development construction projects less than 1 acre in size.

Water Quality:

The development of the project would not result in any significant effects relating to water quality. There will be no water or wastewater issues with the proposed project, as all construction water will be managed on site, and wastewater for the completed project will be managed the same as currently available on site, using public utilities. The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, storm water mitigations; and Best Management Practices for stormwater runoff. These RCMs will ensure the project will not have significant



impacts on noise and water. Therefore, construction of the project will not create any impact on water quality. Furthermore, the project will comply with the City's storm water management provisions per LAMC 64.70.

(e): The site can be adequately served by all required utilities and public services.

The site is currently and adequately served by the City's Department of Water and Power, the City's Bureau of Sanitation, the Southern California (SoCal) Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, Los Angeles Unified School District, Los Angeles Public Library, and other public services. These utilities and public services have continuously served the neighborhood for many years. In addition, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. As a result of these new building codes, which are required of all projects, it can be anticipated that the proposed Project will not create any impact on existing utilities and public services.

The Project can be characterized as in-fill development within urban areas, for the purpose of qualifying for Class 32 Categorical Exemption, as a result of meeting the five conditions listed above.

Exceptions Narrative for Class 32 Categorical Exemption

There are five (5) Exceptions which must be considered to find a project exempt under Class 32: (a) Cumulative Impacts; (b) Significant Effect; (c) Scenic Highways; (d) Hazardous Waste Sites; and (e) Historical Resources.

Criterion (a): Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

This exception does not apply to the proposed project. The project involves the construction of new residential units at a site currently developed with, and surrounded by, residential uses. The project would not generate a significant number of vehicle trips and would not result in any significant impacts to land use planning, sensitive habitat, traffic, noise, air quality, or water quality. Any contribution of the proposed project to an otherwise significant cumulative impact would not be cumulatively considerable under CEQA. Upon review of available Los Angeles City records, there are two planned development projects within 500 feet of the subject project. 1444 Hi Point is under construction but is expected to be completed by August 2020, well before this project is set to commence. Additionally, 1437 Hi Point St., a 6-unit project, is currently under construction and should be completed by September 2020, well before this project is set to commence. Both are small and well below impact thresholds evaluated above. Even if both projects were to take place at the same timeframe, cumulative effects would be well below all thresholds.

Criterion (b): Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

As discussed previously in this report, the project would not result in any significant impacts to land use planning, sensitive habitat, traffic, noise, air quality, or water quality. The proposed project is consistent with the existing land use and zoning designations for the project site. The



project involves the construction of new residential units at a site developed with, and surrounded by, residential uses and there are no unusual aspects to the project site. Therefore, there is no reasonable possibility that the project could create a significant effect on the environment due to any unusual circumstances.

Criterion (c): Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The project site is on Hi Point St. which is designated by the City of Los Angeles as a local street. The street is not designated as a scenic highway in the City of Los Angeles General Plan, the Wilshire Community Plan, or the City of Los Angeles Zone Information & Map Access System (ZIMAS). Therefore, no impact would occur.

Criterion (d): Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The project involves the construction of new residential units at a site currently developed with, and surrounded by, residential uses. The project site is not included on any list of hazardous waste sites compiled pursuant to Section 65962.5 of the Government Code. No impact would occur. Also, according to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site in the vicinity, is as a hazardous waste site.

Criterion (e): Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. The proposed project will replace the existing single family home at the project site with a newly constructed apartment building. According to ZIMAS, the structure was built in 1946. The structure is not designated as historic on any local, state, or national database. The structure has not been identified or surveyed as part of the City's Survey LA program or on the HistoricPlacesLA website; nor is the structure located within an existing or proposed HPOZ or historic district. No historic cultural monuments are located adjacent to the project site. Therefore, no known historical resources would be adversely damaged by implementation of the proposed project.

CONCLUSION

Based on the analysis presented in this report, the proposed 1447 S. Hi Point St. project meets all criteria for a Class 32 Categorical Exemption pursuant to Section 15332 of the CEQA Guidelines. None of the exclusions identified under Section 15300.2 of the CEQA Guidelines would preclude the project from qualifying for a Class 32 Categorical Exemption.

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Miller".

Thomas Miller, Sr. Environmental Scientist
ZMassociates Environmental Corporation
19800 MacArthur Blvd., Suite 300
Irvine, CA 92612
(949) 608-9890



DIR-2020-2067

Gabriel Rabbanian <gabrielrabbanian@gmail.com>

LADOT Referral Form 1447 Hi Point

2 messages

Gabriel Rabbanian <gabrielrabbanian@gmail.com>

Wed, Mar 4, 2020 at 4:08 PM

To: Wes Pringle <wes.pringle@lacity.org>, Jacob Rabbanian <jacob.rabbanian@gmail.com>, Jonathan Rabbanian <jonathanrabbanian@gmail.com>

Hi Wes,
Thank you for your time again over the phone today.

Attached is the Department of Transportation Referral Form- Traffic Study Assessment filed out for 1447 S Hi Point .

As we spoke the project is for 20 units (residential only), and per our conversation a traffic study will not be required.

If you can confirm attached document I would really appreciate it.

Thank you in advance,
Gabriel Rabbanian
Cell: 213-949-1627

 **ladot referal form.pdf**
580K

Wes Pringle <wes.pringle@lacity.org>

Wed, Mar 4, 2020 at 4:24 PM

To: Gabriel Rabbanian <gabrielrabbanian@gmail.com>

Cc: Jacob Rabbanian <jacob.rabbanian@gmail.com>, Jonathan Rabbanian <jonathanrabbanian@gmail.com>

Hi Gabriel,

A 20 unit multi-family development would not meet the threshold to require a traffic study. The referral form is not necessary.

Wes
[Quoted text hidden]

Wes Pringle, P.E.

Transportation Engineer
Metro Development Review
100 S. Main St, 9th Floor
Los Angeles, CA 90012

Los Angeles Department of Transportation

213.972.8482   



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